

11 March 2003

### **To National Delegates to the 35<sup>th</sup> CCFAC, March 2003**

The under-signed organizations, support your efforts at the 35<sup>th</sup> meeting of the Codex Committee on Food Additives and Contaminants (CCFAC) in Tanzania on 17-21 March.

#### **Subsections 2.2 and 5.3**

We have long held the view that irradiation of foods is neither necessary nor desirable. As such it would be preferable not to permit general use of food irradiation, thereby removing the need for a Codex standard to govern this. The European Parliament has also recognized the lack of need or desirability of food irradiation, by voting in December 2003 against expanding the list of foods permitted for irradiation within the European Union.

If, however, the use of food irradiation is permitted, as is currently the case, and a standard therefore must exist to control its use, then that standard on food irradiation should only permit the lowest irradiation dose possible. In a statement issued by the European Commission Scientific Committee for Food (SCF) last week (Thursday 6 March 2003), the SCF explained that they cannot endorse moves to allow the irradiation of all foods above the current maximum irradiation dose limit of 10kGy, because not enough research has been done to assess the safety of eating foods irradiated at doses above this level. In addition the recent EU-funded studies of cyclobutanones, chemicals produced in irradiated fat-containing foods indicated serious health problems in animals that were fed these chemicals, and clearly demonstrated the need for further research to assess the potential impacts on human health<sup>i</sup>. The studies also indicated a positive correlation between the level of irradiation dose used and the levels of cyclobutanones produced in the foods.

The assurances of the World Health Organisation (WHO), that irradiation of any food at any dose is completely safe, are clearly questionable. The WHO on 34 occasions dismissed or ignored studies that used radiation doses above 10 kGy and which resulted in serious and varied health problems in lab animals that ate irradiated foods.<sup>ii,iii,iv</sup> Furthermore the WHO has dismissed over 50 years' worth of research documenting a wide range of serious health problems in lab animals that ate irradiated foods, including premature death, mutations, reproductive problems and nutritional deficiencies.

The Codex standard must not only be accurate and rigorous in its wording and specifications, but its manner of application must also be transparent and reliable. Any wording in the standard that permits derogation can only be accepted if the conditions for any derogation are clearly stated and put into operation. The US proposed additions to subsection 2.2 and 5.3 would permit derogation from the standard, by allowing the 10kGy dose limit to be exceeded for potentially any food. In addition, it is not yet possible to detect the dose levels of irradiation to which foods have been subjected, opening the way further for abuse of the system, for misleading consumers and for potentially putting their health at risk. We therefore urge you to maintain your support for the 10 kGy dose limit, and to firmly oppose the additional sentence proposed by the US that this dose limit should apply '*except when necessary to achieve a legitimate technological purpose*'.

The United States is also attempting to include cesium-137 in the Codex General Standard for Irradiated Foods, a by-product of nuclear weapons production, as a source of ionizing radiation for food, regardless of historical environmental impacts of the water-soluble substance.

In 1983, the United States Department of Energy (DOE) explained that utilisation of radioactive materials in a civilian capacity would reduce the DOE's waste handling problem.<sup>v</sup> Five years later, cesium-137 was employed at a medical irradiation facility near Atlanta, Georgia, USA. One capsule of the water-soluble cesium-137 sprung a leak and radioactivity was spread throughout the community. It cost the US government \$30 million to clean up the accident. Since then, cesium-137 has never been known to be used at any irradiation facility anywhere in the world, and there is no reason to endanger the public and the environment by allowing its use now. We urge you to oppose this unnecessary addition to the Proposed Draft Revised Codex General Standard for Irradiated Foods.

We commend your steadfast commitment to protecting the health of consumers worldwide.

Yours sincerely,

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Merav Shub, Food Irradiation Campaign, Europe, The Food Commission, UK

Klaus Melvin Jensen, Active Consumers Denmark

Bengt Ingerstam, Swedish Consumer Coalition

Giulio Labbro Francia, Movimento dei Consumatori, Italy

François Veillerette, Mouvement pour les Droits et le Respect des Générations Futures (MDRGF), France

Andrianna Natsoulas, Public Citizen, USA

Gérard Choplin, European Farmers Coordination (CPE), Europe

Peter Jenkins, Center for Food Safety, USA

Anna Barnes, Stop Food Irradiation Alliance, Australia

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<sup>i</sup> Comment on a statement of the SCF on a report on 2-alkylcyclobutanones. D. Burnouf, H. Delincée, A. Hartwig, E. Marchioni, M. Miesch, F. Raul, D. Werner, 2002.

<sup>ii</sup> *Safety and Nutritional Adequacy of Irradiated Food*. Geneva: World Health Organization, 1994.

<sup>iii</sup> *Review of Data on High Dose (10-70 kGy) Irradiation of Food*. Report of a Consultation, Karlsruhe, Germany, 29 August - 2 September 1994. Geneva: World Health Organization, 1995.

<sup>iv</sup> *High-Dose Irradiation: Wholesomeness of Food Irradiated with Doses Above 10 kGy*. Report of a Joint FAO/IAEA/WHO Study Group, Geneva, 15-20 September 1997. Geneva: World Health Organization, 1999.

<sup>v</sup> "Hearings on H.R. 2496, Department of Energy National Security and Military Applications of Nuclear Energy Authorization Act of 1984." Before the Procurement and Military Nuclear Systems Subcommittee of the Committee on Armed Services, House of Representatives, Congress of the United States. March 1-2, 1983. Washington, D.C.