

AEC

Association of European Consumers
socially and environmentally aware
Association Européenne des consommateurs
socialement et environnementalement responsables



Mr Georg Schreiber
European Commission
DG Health and Consumer Protection
Unit D3 - Chemical and physical risks; surveillance
B 232 - 4 / 49
Rue de la Loi 200
Brussels B-1049

Co-signatories:

Association of European Consumers (AEC)
The Food Commission, UK
Active Consumers Denmark
Swedish Consumer Coalition
Movimento dei Consumatori, Italy
Mouvement pour les Droits et le Respect des
Générationes Futures (MDRGF), France
Public Citizen, USA

24 February 2003

Dear Mr Schreiber / EC delegation to CCFAC,

The Association of European Consumers, The Food Commission (UK) and the under-signed organisations support your efforts at the 35th meeting of the Codex Committee on Food Additives and Contaminants (CCFAC) meeting in Tanzania on 17-21 March.

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. The assurances of the World Health Organisation (WHO), that irradiation of any food at any dose is completely safe, are 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.^{i,ii,iii} 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 recent EU-funded studies of cyclobutanones, chemicals produced in irradiated fat-containing foods, also 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^{iv}.

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.^v 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 throughout the world.

Yours sincerely,

Bengt Ingerstram
Association of European Consumers (AEC)

and

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

Co-signatories:

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

ⁱ *Safety and Nutritional Adequacy of Irradiated Food*. Geneva: World Health Organization, 1994.

ⁱⁱ *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.

ⁱⁱⁱ *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.

^{iv} 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.

^v "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.