

January 2, 2003

Livestock and Seed Programs
Agricultural Marketing Service
U.S. Department of Agriculture Stop 0249, Room 2092-S
Washington, DC 20250-0249
Fax: 202/720-3499

Dear Sir or Madam:

I would like to comment on some of the recent news accounts regarding Public Citizen's efforts to inform the public about the implementation of Section 4201 (b) (3) of the Farm Security and Rural Investment Act of 2002 (the Farm Bill) – "Use of Approved Food Safety Technologies."

From November 22, 2002 – when USDA issued its press release announcing the solicitation of comments on this issue – to present, there has been confusion over the length of the comment period. During the week of November 25, 2002, Monique Mikhail from Public Citizen contacted Matt Lloyd, one of the contacts listed on the press release to ascertain information about the comment period. It was Mr. Lloyd who informed Ms. Mikhail that there would only be a 30-day comment period on this issue. This seemed to comport with press accounts on this matter which indicated that USDA intended to implement a policy change by the end of 2002.¹

We learned that there was not a time limit regarding the submission of comments through a December 19, 2002 press account.² Public Citizen received a response to a December 5, 2002 letter to Secretary Veneman³ on this issue during the week of December 23, 2002 confirming that there was no deadline for comments.⁴ It seems that the USDA press office needs to get its story straight.

¹ http://www.enn.com/news/wire-stories/2002/12/12132002/reu_49173.asp

² <http://www1.umn.edu/cidrap/content/fs/irradiation/news/irradcomm.html>

³ http://www.citizen.org/cmep/foodsafety/food_irrad/articles.cfm?ID=8684

⁴ Letter from Barry L. Carpenter, Deputy Administrator, Livestock and Feed Program, Agricultural Marketing Service, United States Department of Agriculture to Wenonah Hauter, December 20, 2002.

Public Citizen has never hidden its efforts to inform the public and to urge interested citizens to become engaged in this comment period. We have serious concerns about the possible health impacts from consuming irradiated foods. We do not believe that there has been enough research conducted to evaluate those impacts. We have urged citizens, and particularly parents, to voice their concerns as well.

Unlike many of the pro-irradiation comments that you have received, Public Citizen has no vested economic interest in the outcome of the policy change you are contemplating. Specifically, I call your attention to the following e-mail that was sent to investors of SureBeam Corporation, a major irradiation firm based in San Diego, California.

Gentlemen, please feel free to send this to other friends and supporters of SureBeam. I have attached a "form" type letter as well but you may want to put your letter in your own words. Thank you for your support!!!

YOUR HELP IS NEEDED!

The USDA has issued a request for comments on their proposal to buy irradiated food for their commodity purchase programs, which includes the National School Lunch Program. Congress has encouraged USDA to include irradiated food in the national school lunch program, however they have asked the public to comment first. Special interest groups have inundated USDA with the usual anti-irradiation rhetoric. **YOUR HELP IS NEEDED, NOW! EVERY COMMENT IS IMPORTANT!** Comment deadline is December 20!

Write a letter today expressing your support for irradiation as an option that will help increase the safety of our school lunches and provide consumers with another choice.

****TALKING POINTS****

Food irradiation is endorsed by all leading health organizations including the World Health Organization, the American Medical Association, the American Dietetic Association, the American Council on Science & Health and dozens more.

No food preservation technology has been studied more extensively than irradiation. In fact, according to Dr. Michael Osterholm, Director, University of Minnesota Center for Infectious Disease Research & Policy, more research has been done on irradiation than any other food processing technology including canning and freezing combined!

Our goal is to stop the spread of disease in foods (such as fresh fruit, raw vegetables, poultry and ground beef) just like we stopped the spread of disease in milk with pasteurization. Irradiation will do for ground beef and other foods what pasteurization has done for the dairy industry.

Irradiation doesn't substitute for good manufacturing practices, and will not replace inspection or sanitation procedures already in place. Intervention strategies such as steam pasteurization, organic rinses and others have significantly reduced the incidence of bacterial contamination in beef. Irradiation is an additional step to make our food safer and not a replacement for food safety practices already in place.

There have been more than 500 scientific papers published on the safety and effectiveness of irradiation during the past 50 years. Our astronauts have consumed irradiated food since 1972.

The National School Lunch Program is meant to provide children with a healthy well-balanced meal. The nutritional content of irradiated foods is very similar to those of non-irradiated foods, in fact nutritional losses are small and often substantially less than those that result from canning, drying and heat pasteurization.

There is strong consumer acceptance of irradiated ground beef in the marketplace. Currently over 4000 supermarkets are offering irradiated ground beef. Irradiated ground

beef is also available at several hundred restaurants and nationwide by mail order and home delivery.

Fax the USDA and enter your additional comments. Write, or e-mail the USDA with your comments. Write to:
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Agriculture Marketing Service
U.S. Department of Agriculture
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Washington, DC 20250-0249

FAX 202.720.3499

E-mail: foodsafetytechnology@usda.gov

Krista Mallory
Director of Investor Relations

A number of investors have taken up SureBeam's "call to arms."⁵ In addition, you have received comments from SureBeam company officials.⁶

When evaluating comments on this issue, AMS staff should take into consideration the motivation of those commenting. Public Citizen attempted to inform the public of this impending policy change so that they could express their opinions on the public health issues that it raises; others who have taken part in this debate have a direct financial stake in its outcome. And, if there has been confusion over the length of the comment period, USDA can only blame itself for issuing conflicting accounts on this matter.

Should you have any questions regarding our views, please feel free to contact me.

Sincerely,

Wenonah Hauter
Director
Public Citizen's Critical Mass Energy and Environment Program

⁵[http://messages.yahoo.com/bbs?.mm=FN&action=m&board=1603257715&tid=sure&sid=1603257715&mid=35823;](http://messages.yahoo.com/bbs?.mm=FN&action=m&board=1603257715&tid=sure&sid=1603257715&mid=35823)
[http://messages.yahoo.com/bbs?.mm=FN&action=m&board=1603257715&tid=sure&sid=1603257715&mid=35728;](http://messages.yahoo.com/bbs?.mm=FN&action=m&board=1603257715&tid=sure&sid=1603257715&mid=35728)
[http://messages.yahoo.com/bbs?.mm=FN&action=m&board=1603257715&tid=sure&sid=1603257715&mid=35702;](http://messages.yahoo.com/bbs?.mm=FN&action=m&board=1603257715&tid=sure&sid=1603257715&mid=35702)
<http://www.ams.usda.gov/fst/comments/fst342.htm>

⁶ <http://www.ams.usda.gov/fst/comments/fst330.txt>