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December 12, 2002

TO:
Livestock and Seed Programs, Agricultural Marketing Service, USDA

Dear Livestock and Seed Programs:

I am writing in response to your request on 11/22/02 for comments entitled 'USDA requests input regarding Farm Bill requirement on approved food safety technologies for use in commodity purchase programs.' I strongly urge you NOT to permit irradiated food to be served in the National School Lunch Program.

I base my opposition on the following reasons:

- The most recent Farm Bill allows American children to be 'guinea pigs' for irradiated food. Irradiated food has not been proven safe to eat. It not only degrades the nutritional content of food, but research has revealed a wide range of health problems in laboratory animals that ate irradiated food including premature death, fatal internal bleeding, a rare form of cancer, stillbirths and other reproductive problems, genetic damage, and organ malfunctions and nutritional deficiencies. In addition, the FDA did not follow its own testing protocols when legalizing irradiated food.

- There is even less research into the long-term health effects experienced by children who are exposed to toxic chemicals in foods. Dr. William Au, a toxicologist at the Department of Preventive Medicine and Community Health, University of Texas Medical Branch in Galveston, has argued that the lack of understanding regarding the ill effects suffered by children who consume toxic chemicals in foods extends to 'the toxicological risk with respect to eating irradiated food.'

- Irradiation merely masks the problems of meat processing that result in contaminated meat. It is a mistake to accept food irradiation as the true solution to our food contamination problem.

- There are proposed regulations that would strengthen inspection and testing in the meat industry that have been languishing for months in the USDA. However, the agency has opposed legislation that would strengthen the current inspection program.

- Furthermore, current regulations do not require children, teachers, or parents to be informed that the school meals have been prepared with irradiated foods. We deserve the right-to-know what is being served in the nutrition programs offered in school. Using children as unwitting experimental subjects or to create a market for a technology that consumers don't want is reprehensible.

I strongly urge you to stop the process of implementing this change in USDA policy. There is good reason why irradiated food has been kept out of the nutritional programs that the USDA administers. Your hasty approval of this new policy could lead to more problems than it is designed to correct.

Sincerely,

Garth Payne