

AVMA



American Veterinary Medical Association

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Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: Docket No. 2005N-0272 – Irradiation in the Production, Processing and Handling of Food

Dear Madam/Sir:

I am writing on behalf of the American Veterinary Medical Association (AVMA), established in 1863, and the largest veterinary medical association in the world. As a not-for-profit association established to advance the science and art of veterinary medicine, AVMA is the recognized national voice for the veterinary profession. The association's more than 75,000 members represent approximately 86% of U.S. veterinarians, all of whom are involved in a myriad of areas of veterinary medical practice including private, corporate, academic, industrial, governmental, military, and public health services.

The Food and Drug Administration (FDA) published a proposed rule that would modify labeling requirements for foods treated with irradiation. Currently, all irradiated foods must be labeled as such and must bear the radura logo. The proposed rule would require that irradiated foods be labeled as such, only if the irradiation caused a material change (ie., nutritional, organoleptic, or functional properties) in the food that the consumer could not identify at the point of purchase. In addition, the proposed rule would allow marketers to use the term "pasteurized" in lieu of "irradiated," when the marketer has shown the FDA that the criteria have been met for pasteurization as defined in the Federal Food, Drugs and Cosmetic Act, and if the FDA does not object.

The AVMA supports irradiation of food to improve food safety and food quality. The AVMA supports the FDA proposed rule that would revise labeling regulations applicable to irradiated foods. Furthermore, the AVMA agrees with FDA's second proposal to allow food labels to state "pasteurized" in lieu of "irradiated," provided that the marketer gains approval to do so from the FDA.

We commend the FDA for the scientific basis development of food irradiation labeling requirements. We believe the FDA provides excellence in its safeguarding of the public's food and drugs, including animal feeds and drugs. We believe the FDA's scientists provide a superior level of expertise, and we

applaud the FDA for its science-based policies.

We look forward to future opportunities to provide our recommendations to the FDA regarding public health- and animal health-related policies.

Please feel free to contact Dr. Lynne A. White (800-248-2862 ext. 6784 or lwhite@avma.org), should you need any additional information or explanation of AVMA's comments.

Respectfully,

A handwritten signature in black ink that reads "Bruce W. Little". The signature is written in a cursive style with a large initial "B".

Bruce W. Little, DVM
Executive Vice President

BWL/LAW