



June 20, 2007

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

RE: Docket No. 2005N-0272

Dear Sir or Madame:

On behalf of the family farmers and ranchers of National Farmers Union (NFU), I am writing in response to the Food and Drug Administration's (FDA) request for comments on a proposed rule change to allow some irradiated products to be labeled as 'pasteurized.' It is unfair to consumers who trust the FDA to provide them with accurate information about food processing and ingredients in the products they feed their families. I urge FDA to withdraw this proposal and continue to truthfully label irradiated foods.

The FDA argues that irradiated foods can be labeled as pasteurized if they are subjected to a treatment process that achieves the same results as pasteurization in terms of microbial destruction, contributions to public health and extension of shelf-life. While irradiation may meet these guidelines, it is deceptive to label irradiated products as pasteurized because they have not been pasteurized; irradiated products are exposed to radiant energy sources like x-rays, gamma rays and electron beams. Irradiation and pasteurization are not the same process and should not be labeled in the same manner.

The technique of pasteurization has been in use in the United States for more than a century and has earned the confidence of consumers. Americans understand pasteurization to be a specific process during which products are heated to kill microbes and extend shelf life. Today, a consumer who buys a gallon of milk labeled as pasteurized knows that he or she is purchasing a product which was subjected to this trusted process. If the proposed rule change is adopted, that same consumer is not guaranteed this right in the future. This is unfair to consumers and would be extremely damaging to dairy producers if Americans feel they can no longer trust pasteurized products.

NFU is a strong advocate of truthful labeling of food so consumers are able to make informed decisions when making purchases for themselves and their families. It is important for consumers to receive adequate and truthful information in order to make educated decisions. Labeling a product as pasteurized when it has been irradiated is misleading to consumers who believe they are buying a product which has been treated with heat and not radiant energy.

I urge you to uphold the American consumers' right to know and continue to honestly label irradiated food products.

Sincerely,

A handwritten signature in black ink that reads "Tom Buis". The signature is fluid and cursive, with a large, sweeping initial "T".

Tom Buis, President
National Farmers Union