

Monday, November 28, 2011

Docket No. APHIS-2009-0100
Regulatory Analysis and Development, PPD
APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Subject: No New Irradiation Facilities -- Irradiation Treatment; Location of Facilities in the Southern United States (Document ID APHIS-2009-0100-0001)

Dear Secretary Vilsack,

I urge you to reject the proposed amendment to phytosanitary treatment regulations that would allow the construction of new irradiation facilities anywhere in fifteen southern states (Docket # APHIS-2009-0100.) These facilities are intended to be used on imported fruits and vegetables in order to kill pests such as fruit flies that would otherwise prevent these products from entering the United States.

"It is horrifying that we have to fight our own government to save the environment."
-- Ansel Adams

Right now, the U.S. Department of Agriculture's policy is to allow irradiation facilities for imported fruits and vegetables to be built in specific locations in Mississippi, North Carolina, and Georgia. I oppose this current approval for the construction of irradiation facilities, and absolutely oppose any attempt to expand the list of locations where irradiation facilities for imported food can be constructed.

In addition to my concerns about the safety of irradiated food—which can deplete vitamins and create new chemical byproducts in treated foods—I also believe it is inappropriate for U.S. Department of Agriculture (USDA) to facilitate more produce imports into the United States. The purpose of these facilities is to help exporting countries deal with pest infestations that currently serve as a barrier to sending their produce to the United States.

The USDA should not put U.S. farmers at a disadvantage by encouraging more imports of fruits and vegetables from countries with pest problems, or by putting domestic producers at risk if the irradiation treatment is ineffective or pests escape. And the USDA should not be encouraging more imports from countries with weak labor, environmental, and other standards that can undercut U.S. farmers.

"Do not suffer your good nature, when application is made, to say 'Yes' when you should say 'No'. Remember, it is a public not a private cause that is to be injured or benefited by your choice."
-- George Washington

Expanding the use of irradiation is an inappropriate way to deal with the risk of pests carried by imported food. The USDA should not put consumers, U.S. farmers, and communities in these fifteen states at risk by expanding the use of irradiation.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
Olema, CA