

March 6, 2009

Secretary Tom Vilsack
United States Department of Agriculture
Room 200-A Jamie L. Whitten Building
12th Street and Jefferson Drive, SW
Washington, DC 20250

Dear Secretary Vilsack:

We are writing about the possible nomination of Dr. Michael Osterholm for the position of USDA's Under Secretary for Food Safety. We have serious concerns about Dr. Osterholm's potential candidacy for this very important position.

Dr. Osterholm has enjoyed a distinguished career in the field of public health. As Minnesota's Chief Epidemiologist, he was responsible for streamlining a surveillance program for illness outbreaks in Minnesota. That program has received national recognition for its investigative work in identifying the sources of several recent major food borne illness outbreaks.

But Dr. Osterholm has also been a zealot in promoting food irradiation as the panacea to contaminated food. That technology is controversial and poses several potential risks to human health that have not been adequately studied. For instance, irradiation of meat generates novel chemicals called 2-alkylcyclobutanones (2-ACBs) that are found only in irradiated foods. Peer-reviewed research shows that low levels of 2-ACBs promote colon tumor formation in rats, and may cause genetic damage as well.¹ In addition, irradiation degrades the nutritional quality of foods by destroying certain radiation-sensitive vitamins (especially C, A and folate). These scientifically documented effects of food irradiation raise serious concerns about the long-term health impacts of consuming a diet of irradiated food.

As Director of the University of Minnesota's Center for Infectious Disease Research and Policy (CIDRAP), Dr. Osterholm has accepted contributions from the food irradiation industry to promote the technology, including from the now-defunct SureBeam Corporation, Ecolab, and Ion Beam Applications (IBA).

As you know, the Food Safety and Inspection Service (FSIS) is now considering a meat industry petition to allow low-dose irradiation of beef carcasses as a processing aid in

¹ For expert opinions and peer-reviewed studies to this effect, see two letters from Public Citizen and Center for Food Safety to: 1) Joseph Levitt, former CFSAN director, July 8, 2003, at: http://www.centerforfoodsafety.org/pubs/comm-FDA-Rao-andINVITE_7.8.03.pdf; and 2) Robert Brackett, former CFSAN director, Dec. 8, 2004, at: http://www.centerforfoodsafety.org/pubs/comm-FDA-revRaoandAu_12.8.04.pdf.

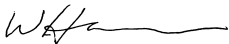
slaughter facilities (see Docket No. FSIS-0028). The agency let this industry petition lie dormant for over three years; it was resurrected only after the industry objected to the agency's attempt to regulate E. coli in intact cuts of meat at slaughterhouses (see Docket No. FSIS-0011). That proposal was discussed at a two-day public meeting in April 2008. Instead of holding processing plants responsible for all pathogenic contamination, it made sense to us that the slaughterhouses should finally be held accountable for supplying contaminated raw materials to processing plants. Two days of public discussion about this necessary reform to meat inspection regulations were wasted because the meatpackers successfully fought against further regulation of their operations, and the quick fix of irradiation was put forth as the alternative solution. The agency has received thousands of comments opposed to the industry's irradiation petition, but we are fearful that with the appointment of a food irradiation proponent as Under Secretary for Food Safety, those comments would be ignored.

We have already had a food irradiation advocate as Under Secretary for Food Safety. President George W. Bush appointed Dr. Elsa Murano to serve in that capacity from 2001 through 2004. Dr. Murano even worked to have her husband appointed as director of special nutrition programs at USDA's Food and Nutrition Service so that they could mandate the irradiation of meat products in the National School Lunch Program. Fortunately, they were unsuccessful in their efforts.

The appointment of Dr. Osterholm would also be contradictory to policies outlined by the Obama Administration to promote sustainable and organic agriculture. Food irradiation does not fit into that paradigm.

We strongly urge you to reconsider Dr. Osterholm's candidacy. We believe that there are better-qualified and less controversial people to serve as Under Secretary for Food Safety. Please contact Tony Corbo at Food & Water Watch at (202) 683-2449 if you have any questions or need more information.

Sincerely,



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