



June 18, 2007

Loretta A. Carey
Center for Food Safety and Applied Nutrition (HFS-820)
Food and Drug Administration
5100 Paint Branch Pkwy, College Park, MD

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

Dear Ms. Carey:

The American Spice Trade Association (ASTA) is pleased to provide comments on irradiation in the production, processing and handling of food.

ASTA was founded in 1907 and represents the interests of the spice industry around the world, specifically as it relates to trade in the United States. ASTA's membership is made up of approximately 175 companies that manufacture, import, export, distribute, purchase and supply services to the spice and seasoning industry. ASTA's members manufacture and market the vast majority of spices sold in the U.S. at retail, and to food processors.

Irradiation is an important tool used in the spice industry to ensure clean, safe spices. ASTA supports the FDA's proposal to revise its labeling regulations for irradiated foods to require that only those irradiated foods in which the irradiation causes a material change in the food or a change in the consequences that may result from use of the food, bear the radura logo and the term "irradiated," in conjunction with explicit language describing the change in the food or its conditions of use. ASTA also supports allowing a firm or company to petition FDA to use an alternate term to "irradiation."

Providing clean, safe spices is essential to our industry. Irradiation is one of the most effective microbial reduction processes available to the spice industry.

ASTA applauds the Agency's efforts at improving food safety and urges the Agency to move forward with this proposal.

If you would like more information about our industry or our position, please feel free to contact me at 202-367-1207.

Sincerely,

Cheryl Deem
Executive Director