



Food Irradiation Processing Alliance

An Affiliate of the International Irradiation Association

**Food Technology Service, Inc.
GRAY*STAR, Inc.
Sterigenics
Securefoods, Inc.
MDS Nordion
Mitec Advanced Technologies
Reviss Services/Puridec
Sadex Corporation
STERIS Isomedix**

August 30, 2006

**Matthew Blevins
Mail Stop 7 J8
US Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738**

RE: Environmental Assessment for Pa'ina Hawaii, Honolulu, Hawaii

Dear Mr. Blevins:

The Food Irradiation Processing Alliance (FIPA) represents the irradiation service industry, manufacturers of food irradiators and suppliers of cobalt-60 sources. Its members have decades of experience in all aspects of commercial radiation processing.

It has come to our attention that the NRC is currently working on an Environmental Assessment (EA) of a commercial irradiator to be installed in Hawaii. We understand that part of the EA is involved with the economic and social importance of having a facility of this type in Hawaii.

As an industry, we are pleased to see Pa'ina Hawaii further commercialize this technology. However, we are very concerned about the regulatory difficulty that has been inflicted on them. To the best of our knowledge, they have followed all the rules and guidelines as specified by the NRC. Our industry relies on these rules and guidelines, for without them we face years of conflict and millions of dollars for each new food irradiator built. If the experience of Pa'ina Hawaii is representative of what awaits our industry, there might not be an industry...at least in the United States. Other countries will continue to advance this technology and position the United States at the bottom of the list. This is ironic because it was the United States that has historically pioneered food irradiation.

It is our collective opinion that food irradiation, and more specifically, the irradiation of specific fruits and vegetables in Hawaii, is of major benefit to the people of both Hawaii and the rest of the United States.

Millions of dollars and over four decades have been spent on research and development of this process specifically for Hawaii. The time has come for the R&D to mature commercially. Pa'ina Hawaii's private effort is a culmination of federal and state supported programs to bring this technology to Hawaii.

For the last few years, an irradiator using x-rays has been in operation on the island of Hawaii (the Big Island). This facility is not capable, by itself, of providing a constant

stream of products from Hawaii to the Mainland. Further, due to its location, it cannot help support the internal needs of Hawaiian agriculture. For agriculture to flourish in Hawaii, a reliable and safe irradiator needs to be installed on the island of Oahu where its international airport is located. The irradiator outlined in Pa'ina Hawaii's license application fits the bill.

Hawaii can provide the Mainland, as well as other countries, with high quality fruit that cannot be grown in the continental United States on a cost effective basis. Global agriculture is extremely competitive. The United States Department of Agriculture now permits fruits and vegetables from around the world to be imported into the United States using irradiation as a phytosanitary process. As with the rest of the world, Hawaii needs irradiation technology to allow their produce to enter the Mainland. If Hawaii is not able to utilize this technology, they will not be able to compete with foreign suppliers of the types of fruits grown in Hawaii. Hawaiian agriculture will suffer irreparable harm. Hawaiian farmers will no longer be able to sustain their livelihoods.

The Atomic Energy Act in 1954 contemplated and promoted the use of irradiation as an agricultural tool. In its wisdom, Congress insisted that this technology be made available to benefit the American people. It took the US Food and Drug Administration and the US Department of Agriculture many years to prove the safety and efficacy of irradiated foods. Both agencies, believe that irradiation is an important tool that saves lives and can provide a significant benefit to the people of the United States.

Irradiation is becoming an important tool to the food industry, as it has for the medical device industry. In many ways, the use of irradiation for Hawaiian fruits is an imperative step in the road to commercialization of this important process.

FIPA supports Pa'ina's efforts in Hawaii. Please contact me or any FIPA member if we can provide any information to facilitate the Environmental Analysis.

Sincerely,



Richard Hunter, Ph.D.
FIPA Chair