



RECEIVED
FSIS DOCKET ROOM
02 JAN -2 PM 4:38

(B)

January 2, 2002

FSIS Docket Clerk
Docket #01-018P
Room 102, Cotton Annex
300 C Street, SW
Washington, DC 20250-3700

01-018P
01-018P-15
Nancy Chapman

Board of Directors

Roger Kilburn, President
Devansoy Farms, Inc.

Tom Woodward, Vice President
Tetra Pak, Inc.

Paul Lang, Treasurer
Natural Products, Inc.

Yvonne Lo, Past President
Vitasoy USA, Inc.

Gerry Amantea
Yves Veggie Cuisine

Judy Baker
Indiana Soybean Board

Peter Golbitz
Soyatech, Inc.

Graham Keen
Archer Daniels Midland Co.

Paul Lang
Natural Products, Inc.

Ron McDermott
Worthington Foods/Kellogg

Tina Nelson
Galaxy Foods Co./Soyco

Allan Routh
SunRich, Inc.

Nancy Chapman
Executive Director

Docket #01-018P : Definitions and Standards of Identity or Composition:
Elimination of the Pizza Standard

Dear Sir or Madam:

The Soyfoods Association of North America (SANA) applauds USDA's efforts to encourage development and marketing of healthful frozen foods by eliminating the pizza standard. SANA is a trade association with **75** members including soy processors and soyfoods manufacturers, who are committed to producing high quality, good tasting soy products. SANA's members are appreciative of the proposed rule change to the pizza standards that encourages the production of lower fat products. We are pleased to provide the following comments about labeling and naming of these products.

Percent Labeling

SANA members appreciate USDA's efforts to accurately label pizza products. However, we believe the requirement to list the percentage of meat or poultry in the product name is unnecessary. Not only does this make the name cumbersome, but the existing requirements to list ingredients in order of their predominance by weight on the label will convey this type of information to the consumer. Requiring percent labeling in the product name could also result in a competition between companies to present the highest percent meat or poultry, thus running counter to USDA's goal of encouraging development of pizzas with lower saturated fat and cholesterol content.

Product Naming

SANA members agree that pizza products should be appropriately named, but we do not support the descriptive labeling system proposed by FSIS. Listing the names of the pizza ingredients in the product name as proposed would be awkward and cumbersome. **This** descriptive information is included not only in the ingredient list, but also through label pictures and statements. As stated in the proposed rule, if a product does not meet the consumer expectations, the product is likely to fail in the marketplace.

Soyfoods Association of North America
Page 2

Soyfoods Association of North America applauds USDA's efforts to provide healthful frozen foods by eliminating the pizza standard. Soyfoods manufacturers are committed to making high quality, good tasting, and healthy foods available to American consumers and we look forward to working with USDA to this end.

Sincerely,

A handwritten signature in black ink that reads "Nancy Chapman". The signature is written in a cursive style with a long, sweeping tail on the "n" and "a" at the end.

Nancy Chapman
Executive Director