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January 4, 2002



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

01-018P
01-018P-27
Forrest D. Dryden

*Re: Definitions and Standards of Identity
or Composition: Elimination of the Pizza Standard
66 Federal Register 55601; November 2, 2001*

Dear Sir or Madam:

Hormel is a multinational manufacturer and marketer of consumer branded meat and food products, including meat toppings used on pizza and meat used in canned stews, hash, and luncheon meat. All such products are subject to standards, each of which specifies minimum levels of meat. Accordingly, adoption of this standard will directly impact Hormel Foods and could presage further reductions in meat levels in existing standards for Hormel Foods' other meat items above.

In anticipation of FSIS denying our Company's request to extend the comment period on the docket referred above, the Company submits these comments in opposition to the elimination of the Pizza Standard and its requirement that meat comprise at least 12 percent of the pizza's cooked weight or 15 percent of the pizza's raw weight.

In our request for extension of December 19, 2001, the Company reported a consumer survey it was conducting on the proposed change in the standard. Because of the intervention of the holidays and your department's anticipated denial of our extension request, our survey was limited but no less instructive. Specifically, the Company contacted over 1,000 consumers at random by telephone employing recognized market survey techniques to ensure accuracy and fairness.

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The consumers' response was overwhelmingly against the proposed change in the standard: only 14 percent favored the proposal, while over 50 percent opposed the proposal. The questions and categories of responses are attached.

Typically, meat is the most expensive ingredient in any food product. This point certainly is true with frozen pizza. In the absence of the current standard, manufacturers would be permitted to reduce the meat content of this pizza significantly without the consumers' knowledge.

Thus, consumers run the very real risk of being misled that pizzas containing as little as 2 percent meat of the cooked weight or 3 percent of the raw weight contain as much as 12 percent cooked weight or 15 percent raw weight, the current standard requirement. The consumer survey results reported above reinforces this point. It is one thing to mislead the public about the presence of inexpensive ingredients such as **flour** in pizza; it is quite another matter to mislead consumers about meat, the most expensive component of pizza.

In sum, Hormel Foods opposes this change in the standard as contrary to the best interest of consumers and the underlying intent of the US Meat and Poultry Inspection Acts.

Respectfully submitted.

Sincerely,

A handwritten signature in black ink, appearing to read "Forrest D. Dryden". The signature is fluid and cursive, with a large initial "F" and "D".

Forrest D. Dryden, Ph.D.

jrs
enc.

Hormel Foods Corporation conducted a national random sample of 1,000 consumers by telephone and asked this question:

Currently the **U.S.**Government regulates the minimum amount of meat that frozen pizzas identified as “Meat Pizza” must contain. The minimum amount of meat currently required is **12** percent of the pizza’s cooked weight or 15 percent of the pizza’s raw weight.

The **U.S.**Government is proposing to change the minimum amount of meat for frozen meat pizza to **2** percent of the cooked weight or **3** percent of the raw weight.

Which of the following statements best describes how you feel about this federally proposed change?

Answers:

Very Positive	6.1%
Somewhat Positive	7.4%
Neutral	29.0%
Somewhat Negative	13.9%
Very Negative	39.1%
Don’t Know	3.9%