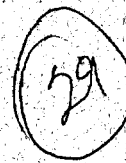


**National
Seasoning
Manufacturers
Association, Inc.**

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Room 102, Cotton Annex
300 C Street, SW
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01-018P
01-018P-29
Richard H. Alsmeyer

February 19, 2002

Docket # 01-018P

President
Tom Haney
Flavorite Div.
Newly Weds Foods

Dear Madam:

Vice President
Peter Shah
Spice Tec USA

Although the comment period for this docket has closed, this Association of seasoning blenders and ingredient or service providers to the meat and poultry industry would like to comment.

Secretary
Lynn Theiss
Newly Weds Foods

We are pleased that the National Frozen Pizza Institute [NFPI] wants to provide the public with pizza that is more consistent with nutritional guidelines e.g. lower fat or lower saturated fat. The nutrition facts panel will convey this information adequately.

Treasurer/Executive Director
Dick Alsmeyer, PhD

Under Section 7 of the Federal Meat Inspection Act as amended, standards of identity or composition are intended to protect consumers from economic deception including substitution of ingredients of lesser value for those of greater value e.g. meat, poultry or cheese. It is this possible economic deception that is of particular concern to the Association. Consumer confidence in products and product names is important to maintain. This proposal, if published in final form as proposed, would reduce the meat or poultry requirement to twenty percent or less of the current standards. Protection of the consumer and the identity of the product would suffer irreparable damage. Reductions in standards, if needed, should be done in smaller increments than an eighty-percent-or-more reduction.

Directors
Paul Hargarten
Central Soya
Paul Kurpe
Elite Spice
Jerry Hall
Excalibur Seas.
John Randall
Griffith Labs.
Tom Haney
Newly Weds Foods
Simon Statter
Presco Food Prod.
Barry Eddy
Spice Tec USA

The Agency asked for comment on whether the product name should be required to include the percentage of meat or poultry in the product. The Association believes this would be necessary to properly inform consumers of the amount of these valuable constituents [e.g. sausage, dry sausage, meat pizza topping, poultry or poultry pizza topping] that are present in the pizza offered for sale to consumers. This would be the only equitable way that the standards can be replaced and consumers adequately informed and protected.

Without standards, quality of product can deteriorate rapidly; the integrity of the name "pizza" would be in jeopardy, and consumer confidence in the USDA Secretary's ability to comply with the will of the Congress in passage of the Acts could be lost or severely damaged.

Thanks for the opportunity to comment.

Sincerely,

Richard H. Alsmeyer Ph D
Executive Director