



NFPA

The Food Safety People

NATIONAL

FOOD

PROCESSORS

ASSOCIATION

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-8
Regina Hildwine; Lloyd Hontz

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FSIS DOCKET R 01
02 JAN - 3 PM 4:39

RE: Docket No. 01-018P; Definitions and Standards of Identity or Composition: Elimination of the Pizza Standard 66 Federal Register 55601; November 2, 2001

Dear Sir or Madam:

The National Food Processors Association (NFPA) submits the following comments on the docket referenced above.

The National Food Processors Association (NFPA) is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, nutrition, technical and regulatory matters and consumer affairs. NFPA's three scientific centers, its scientists and professional staff represent food industry interests on government and regulatory affairs and provide research, technical services, education, communications and crisis management support for the association's U.S. and international members. NFPA members produce processed and packaged fruit, vegetable, and grain products, meat, poultry, and seafood products, snacks, drinks and juices, or provide supplies and services to food manufacturers.

NFPA takes no position with respect to the FSIS proposal to remove the standards of identity for meat pizza and sausage pizza.

NFPA members have carefully considered the proposal put forward by FSIS regarding meat pizza and sausage pizza, and have engaged in extensive debate on the subjects addressed in the proposed rule. Some NFPA members favor removal of the meat pizza standards of identity, while other members prefer that the standards of identity be retained. Despite considerable deliberation and

1350 I Street, NW
Suite 300
Washington, DC 20005
202-639-5900

WASHINGTON, DC
DUBLIN, CA
SEATTLE, WA

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discussion, NFPA is unable to achieve consensus among members on the proposed action to remove the standards of identity for meat pizza, and thus refrains **from** comment on this subject. While NFPA must remain silent with respect to the proposed elimination of the FSIS standards of identity for meat pizza and sausage pizza, we are advancing to the Agency our perspectives on percentage meat component labeling, on which FSIS solicited views.

NFPA opposes mandatory percentage meat ingredient declaration.

If FSIS were to eliminate the standards of identity for meat pizza and for sausage pizza, NFPA believes that product composition of pizzas containing meat or poultry components would be sufficiently declared through full ingredient labeling in order of predominance by weight. As a result, NFPA believes that mandatory percentage meat component labeling is not necessary if the standards of identity for pizza are removed. Mandatory percentage meat component labeling for meat and poultry pizzas would require the disclosure of proprietary information, including the disclosure of recipes, and would distract from required label information related to product safety and nutrient content.

Furthermore, NFPA believes that percentage meat component labeling on meat and poultry pizzas has the potential to mislead consumers. The percentage of these components would be based on weight of ingredients in the formulation. Moisture content of an ingredient is a significant factor in its weight. Various meat toppings will have naturally variable amounts of inherent moisture. This inherent moisture variability may create a false appearance to the consumer when utilizing different types of meat. For example, since ham is likely to be naturally higher in moisture than pepperoni, a pizza with ham may appear to have a lower proportion of meat compared to a pepperoni pizza that may have the same percentage of meat content declared on the label.

Mandatory percentage meat component labeling likely will impede value comparisons between varieties of meat pizza, and would make it especially difficult for consumers to compare pizzas that use a combination of meat ingredients. For example, on combination sausage-pepperoni pizzas, varying amounts of each component could result in different meat percentage declarations, but little or no difference in the appearance, taste, or acceptability of the finished products. In addition, the meat toppings and other pizza ingredients may gain or lose moisture during processing and distribution, thereby potentially altering the percentage by weight of the meat component relative to the finished pizza product. This characteristic would necessitate FSIS providing for a moisture variability allowance in any percentage meat component labeling requirement for pre-packaged pizza, comparable to the consideration presently extended in net

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contents declaration requirements, to ensure that any required percentage meat component labeling is truthful and non-misleading.

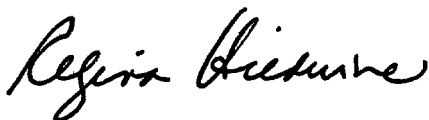
Additional related technical difficulties argue against mandatory percentage meat component labeling:

- To ensure consistent finished products, in-going weights of meat ingredients with variable natural moisture content may have to be adjusted to produce the same outcome.
- Any requirement for meeting a specific percentage on the labeling of the finished pizza will remove all flexibility for a food processor to substitute one variety of meat ingredient for another of the same kind to achieve the same finished product, even when taking moisture-protein ratio requirements into consideration. Supply constraints frequently would require the manufacturer to replace a portion of one ingredient with a nutritionally equivalent, more readily available ingredient with a different grade or moisture content.
- A production line cannot weigh each piece of meat when producing an individual pizza. It would mislead a consumer to see a label declaration of 10% meat if the pizza actually contains 9% meat by weight. In fact, because of the difficulties in meeting precise targets in commercial production conditions, mandatory percentage meat ingredient labeling would ensure that meat ingredients would have to be added to meat pizzas at levels higher than declared. This in turn would raise questions regarding the accuracy of nutrition labels.

NFPA would support voluntary percentage meat component labeling. Such a declaration may be considered by pizza processors that claim they are formulating with more meat than a previous formulation.

Thank you for the opportunity to comment on this important issue.

Sincerely,



Regina Hildwine
Senior Director, Food Labeling & Standards



Lloyd Hontz
Senior Director, Food Inspection Issues