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Docket Clerk  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
300 12<sup>th</sup> Street, SW  
Room 102 Cotton Annex  
Washington, DC 20250

**RE:    Docket No. FSIS 2006-0040**  
**Product Labeling: Definition of the Term "Natural"**

The American Association of Meat Processors (AAMP) is pleased to submit the following comments on Docket No. FSIS 2006-0040, "Product Labeling: Definition of the Term Natural." AAMP is an international organization whose members include meat and poultry processors, slaughterers, caterers, food service companies, wholesalers, retailers, suppliers, and consultants to the meat and poultry industry. There are 33 state, regional, and provincial associations of meat processors that are also affiliated with AAMP. Majority of our members are small and very small businesses, with most of them being them family-owned and operated.

AAMP believes that the meat and poultry processing industry, as well as the industry's suppliers need to have the opportunity to provide comments on the "natural" topic as the new definition may greatly affect the products they produce and the profitability of their companies. Therefore, AAMP respectfully requests that the Food Safety and Inspection Service (FSIS) extend the comment period for this issue. With the proximity to the holidays, and the fact that this is most processors busiest time of year, FSIS must consider the importance of an extension to accommodate all establishments wishing to submit comments on the "natural" labeling definition. An extension would also provide companies with additional time to conduct research and gather data on how consumer's preferences should influence the definition of "natural." This type of data will be important to FSIS when establishing an appropriate definition of the term "natural" as it applies to meat and poultry product labels.

Due to the hurried effort by FSIS to change the policy on "natural" labeling, many meat and poultry processing establishments and ingredient companies have struggled with changes that FSIS has imposed prior to formal rulemaking. Without the opportunity to comment on proposed changes, the industry has no influence on what may be practical or achievable in labeling products as "natural." Until FSIS goes through the proper rulemaking channels and collects information from industry and the public, the current labeling policies for the voluntary claim "natural" must remain in effect. This will avoid confusion as FSIS develops a more current definition of this term, which could take one or more years. Guidance must be issued by the Agency reaffirming and continuing the two-part "natural" definition that requires the absence of artificial flavors and colors, chemical preservatives, and other artificial or synthetic ingredients, in addition to requiring minimal processing. Without proper guidance from FSIS, manufacturers

of “natural” products and their ingredient suppliers will not be able to continue production on a level playing field due to inconsistencies in the messages from the Agency. It is imperative that FSIS maintain transparency throughout the rulemaking process as well.

FSIS should also foster relationships with other agencies within the U.S. Department of Agriculture (USDA), like the Agricultural Marketing Service (AMS), to develop a consistent policy on the term “natural” that can be accepted across the board. AAMP realizes that FSIS is not dealing with the definition of “natural” in exactly the same light as AMS, who is looking at development of a “naturally raised” claim, but the consideration for the consumer preferences and perceptions and inclusion of industry stakeholders in the development process should certainly be similar. If the agencies work together, the resulting definitions should be similar in their principles, making the terms more consumer-friendly. Additionally, FSIS should also be in contact with the Food and Drug Administration (FDA) to ensure that definitions developed and applied to other food products follow similar principles and can be easily understood by consumers.

AAMP agrees with the Hormel petition when it states, “responsible manufacturers would not sacrifice food safety in the interests of a marketing initiative.” Whatever determination FSIS makes for an updated definition of “natural,” the products will continue to be produced in a safe and wholesome fashion, regardless of the claim. If the Agency discourages the use of preservatives, artificial ingredients, antimicrobials, etc., with their updated definition of “natural,” then manufacturers will have to accommodate those changes in order to use the claim. Most safe handling procedures on the packages will clarify any questions a consumer has regarding the shelf-life and proper handling practices if they differ from other “traditional” products in the marketplace.

Industry must know how FSIS plans to address all previously approved labels that include the term “natural” once the new definition is established. If the Agency does not handle this situation properly, products may be misbranded and misleading to consumers. This is a very important consideration during the time following the revisions to the current definition of “natural.” A reasonable amount of time must also be allotted for establishments to change their formulations and labels to be eligible to use this labeling claim when it is redefined. It will be important to provide education where necessary to ensure that establishments are following the new guidelines and labeling products accordingly.

The bottom line is that FSIS must follow proper rulemaking procedures to revise the definition of “natural” as it relates to the labeling of meat and poultry products. In the meantime, the Agency needs to issue proper guidance material for processors and ingredient suppliers reaffirming the use of the original, two-part definition of “natural” that has been used for several years. Once the definition is revised, it is FSIS’ responsibility to provide adequate education on the new policies related to this issue.

AAMP encourages FSIS to maintain transparency throughout all rulemaking processes and appreciates this opportunity to comment on FSIS Docket No. 2006-0040.

Sincerely,



Andrea H. Brown  
Director of Legislative and Regulatory Affairs

cc: Jason Jennings, AAMP President