

Boar's Head Provisions Co., Inc.



Established 1905

February 26, 2007

FSIS Docket Room
Docket Clerk
USDA, FSIS
300 12th Street, SW
Room 102 Cotton Annex
Washington D.C. 20250-3700

RE: Docket No. FSIS 2006 - 0040

The Food Safety Inspection Service has requested comments on the petition to establish a definition for the voluntary claim 'natural' and to delineate the conditions under which the claim can be used on the labels of meat and poultry products. Boar's Head Provisions Company Inc., agrees that there is a definite need to provide clarity and certainty for voluntary use of a 'natural' claim.

Under Proposed Actions the petition requests the added limitation that: "Beyond the definition of 'chemical preservative' found in 21 CFR 101.22, it is intended that any substance, either natural or chemical, which serves to retard product deterioration as a result of microbial action would not be allowed in products which carry and all natural claim." This added limitation to use of the natural claim is overly restrictive and, as such, would not provide any benefit to consumers and would add unnecessary restrictions to food manufacturers.

The primary function or intended use of a flavor or flavoring should be the criteria for evaluating approval of natural claims for a product. Incidental microbial inhibitory effects of certain flavor ingredients and spice extractives should not be considered as a negative characteristic; and should not disqualify a product in any way from using a natural claim. Products whose main function is to extend shelf life, and are additionally manufactured through complex chemical processes should not be allowed in products with the 'natural' labeling claim.

Our Company has also experienced inconsistent decisions from the Labeling Branch regarding products with a 'natural' claim. In fairness to all meat and poultry processors, final decisions and definitions of the term "all natural" should be applied to all label approvals, both new and existing.

We would like to also comment that the term natural should be tied to animal raising practices and animal feed types. Use of antibiotics and hormones should be prohibited, and use of animal byproducts in feed should not be allowed.

Establishment of a clear definition of the all natural term must be based on providing consumers with full information on any ingredients of concern that is easy to read and understand. With that information consumers can make better decisions on purchasing meat and poultry products.

Sincerely,

Mike Luczynski
Boar's Head Provisions Co., Inc.