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February 20, 2007

Dr. Robert C. Post
Director, Labeling and Consumer Protection
Food Safety and Inspection Service
United States Department of Agriculture
1400 Pennsylvania Avenue, S.W.
Room 602
Annex Building
Washington, D.C. 20250

Dear Dr. Post,

This letter is submitted in support of the Petition for the Issuance of a Rule Regarding Natural Label Claims submitted by Hormel Foods Corporation October 9, 2006. Specifically this letter supports codifying the definitions of "natural" and the circumstances under which the word "natural" may be used to label a meat or poultry product.

I support the use of "natural" to mean a meat or poultry product that (1) does not contain artificial flavorings, artificial coloring ingredients, other artificial or synthetic ingredients, or chemical preservatives, and (2) is not more than minimally processed. I ask that no exceptions be allowed as the consumer must have consistency in the meaning of words used in labeling a natural meat or poultry product. I support the meaning of "natural" to mean "chemical free". I support the meaning of "minimally processed" to indicate a process such as high pressure processing, a process that does not change the chemical composition of the product.

I am writing this support letter both as a food processing specialist with over 50 years of experience in the research, development, technology transfer, and manufacturing of processed foods. I am also writing this letter as a concerned consumer that enjoys "natural" meat and poultry.

I have lead research, development, and applications of ultra high pressure for the treatment of meat and poultry since 1984. This technology was developed specifically as a mechanical process for the processing of foods such as meat and poultry. The process was developed to provide processors with a true minimal process that allows a completely clean label by not introducing any chemical changes in the food treated. High pressure processing takes its place along side of other minimal processes identified in the Hormel Foods petition such as refrigeration, packaging, cooking, or drying.

My understanding of the use of the term "natural", thus "chemical free", as pertaining to meat and poultry products, is demonstrated in four examples. It is understood that high pressure treatment can be used for packaged products when appropriate without compromising the use of "natural" on their label.

Example I. Meat and poultry sold at retail, as an un-packaged product, displayed in a refrigerated display case, must be free of any additive. I would expect these meat and poultry products to spoil through microbial growth if held more than a few days under refrigeration. Additionally, I would expect to use prescribed handling and cooking procedures, associated with refrigerated meat and poultry, to insure that all pathogens associated with raw, natural, meat and poultry would be inactivated prior to consumption. Any point of sale signs used to identify the cut of meat or poultry could describe these products as "natural".

Example II. Meat or poultry sold in a unit package, and displayed in a refrigerated showcase, could carry a descriptive label stating "natural". The label could indicate a "use by date". No other listing of added ingredients would be allowed if the term "natural" was used. The processor may or may not choose to high pressure treat the retail package and still claim a "natural" product since the composition of the product is not changed. I would expect to handle and cook these products using prescribed procedures for raw meat or poultry to insure all pathogens are inactivated prior to serving.

Example III. Meat or poultry products may be partially or fully cooked, packaged, and displayed as ready to eat. Whole roasted chickens, for example, may be labeled "natural" and yet show a number of common flavoring ingredients on the label. No artificial flavors, colors or preservatives would be allowed. The cooking process, an example of a minimum process, would insure that the product as sold is safe to consume without further treatments.

Example IV. Meat or poultry products may be converted to value added products and labeled "natural" by separating meat from bone, cooking, seasoning, or processing by minimal processes such as, high pressure, or vacuum packaging. No artificial flavors, colors, or preservatives would be allowed. Specifically prohibited would be purified additives such as sodium lactate, citric acid, lactic acid, or other purified chemicals regardless of their GRAS or organic status. Sauces, marinades, or additional animal or vegetable ingredients must be free of all additives to allow the final product to be labeled as "natural". Post package treatment of the product using high pressure, mild heating, refrigeration, or vacuum packaging, would not affect the label term "natural"

Processors of "natural" meat and poultry products for retail distribution have choices among packages and processes. The meaning of "natural" should indicate "products of the highest quality" which contain no artificial ingredients or additives and are processed by minimal processes which do not change the chemical composition of the food.

Natural products can and do command premium prices due to the care used in their preparation. Processors wishing to use the term "natural" should be prepared to follow the good manufacturing practices requested in the petition submitted by Hormel Foods to earn the privilege of using the term "natural".

Respectively submitted,



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