



January 9, 2007

TO: FSIS Docket Room
Docket Clerk
USDA, FSIS
300 12th Street, SW
Room 102, Cotton Annex
Washington, DC 20250

FROM: Ecolab Inc.
370 N. Wabasha Street
St. Paul, MN 55102-1390

**RE: Submission of Comments in response to Federal Register Notice (December 5, 2006)
Docket No. 2006-0040 regarding Definition for the Voluntary Claim "Natural".**

Dear Sir or Madam:

In the *Federal Register* of December 5, 2006, USDA FSIS issued a Notice for submission of comments in response to Hormel Food's filing of a 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. This petition requests that FSIS begin rulemaking procedures to clarify the circumstances in which the claim may be used on the labeling of meat and poultry products.

Ecolab Inc. (Ecolab) is a global manufacturer of industrial and institutional hard surface antimicrobials and antimicrobial processing aids for treatment of meat and poultry products. Ecolab has reviewed the above mentioned petition and is providing the following comments.

The Federal, Food, Drug and Cosmetic Act defines a food contact substance as "...any substance intended for use as a component of materials used in manufacturing, packing, packaging, transporting, or holding food if such use is not intended to have any technical effect in the food. 21 CFR 101.100(a)(3) defines incidental additives as materials that are present in a food at insignificant levels and which do not have any technical or functional effect in food. This regulatory definition also includes processing aids used in the manufacturing, packing, packaging, transporting or holding of food and which do not have any technical or functional effect in food. This is consistent with FDA's definition of a "food contact substance" as these are additives which do not have an ongoing intended technical effect in food.

Incidental food additives and processing aids (as defined in 21 CFR 101.100(a)(3)) and additives which meet FDA's food contact substance definition should be categorically exempt from the

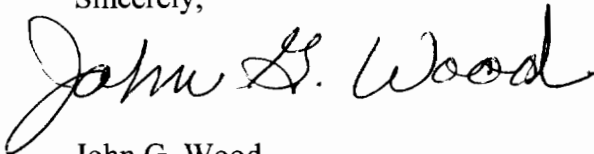
requirements determined to qualify a meat and poultry product as “natural”. Food contact substances, incidental additives, and processing aids, designated as such by the FDA and USDA/FSIS, are substances that are added to foods for their technical effect (e.g., microbial reduction) in processing, are present in the finished food at insignificant levels and do not have any technical or functional effect in that food. Antimicrobial processing aids provide food processors with interventions which are critical to the safety of the nation’s food supply, needed to help ensure public health, and to meet the microbial standards established by regulatory agencies such as FDA, USDA and EPA.

FDA’s and USDA/FSIS’ clearances of antimicrobial incidental additive/processing aids/food contact substances require that the quantity of a substance added to meat and poultry products does not exceed the amount reasonably required to accomplish the intended technical effect. Antimicrobial processing aids provide only a momentary technical effect rather than an ongoing effect in meat and poultry products. The use of antimicrobials which meet the definition of a processing aid or food contact substance coupled with this requirement would render use of the additive as consistent with the Agency’s current position of “minimally processed”. Furthermore, FSIS has not required incidental additive labeling of these aforementioned substances on the processors’ product

Therefore, a “natural” claim should not be invalidated by use of otherwise natural ingredients which contain processing aids which may not themselves be considered as natural.

Ecolab thanks the Agency for its attention to these comments. Any questions should be directed to the following email address john.wood@ecolab.com.

Sincerely,

A handwritten signature in black ink that reads "John G. Wood". The signature is written in a cursive, flowing style.

John G. Wood

Director, Product Registration & Compliance

Regulatory Affairs

Ecolab Inc.