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**NFPA**  
*The Food Safety People*

June 16, 2003

00-046P  
00-046P-1  
Regina Hildwine

FSIS Docket Clerk  
Room 102  
Cotton Annex  
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Washington, DC 20250-3700

**NATIONAL  
FOOD  
PROCESSORS  
ASSOCIATION**

[Docket No. 00-046P] Nutrition Labeling: Nutrient Content Claims on Multi-Serve, Meal-Type Meat and Poultry Products  
68 Federal Register 18560, April 16, 2003

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 supports the FSIS proposed rule to accommodate multi-serving meal-type meat and poultry products under nutrient content claim regulations. The FSIS proposal, if made final as proposed, would increase the consistency between FSIS and FDA with respect to nutrient content claim regulations. It would also allow multi-serving meal-type meat and poultry products to make claims that may have not been available to them for the better part of the past decade. NFPA generally supports efforts by FSIS to achieve greater consistency with FDA nutrition labeling rules and policies, including consistency in food fortification policy.

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NFPA observed that FSIS referenced, but apparently did not propose, regulatory language for 9 CFR 317.313(m), an omission that we believe was inadvertent. NFPA surmises that this text would be identical to that in proposed 9 CFR 381.413(m), as follows:

(m) For purposes of making a claim, a “main-dish” product will be defined as a food that:

(1) Makes a major contribution to a meal by:

(i) Weighing at least 6 ounces per labeled serving, and

(ii) Containing not less than 40 grams of food, or combinations of foods, from two or more of the following four food groups, except as noted in paragraph (m)(1)(ii)(E) of this section.

(A) Bread, cereal, rice, and pasta;

(B) Fruits and vegetables;

(C) Milk, yogurt, and cheese;

(D) Meat, poultry, fish, dry beans, eggs, and nuts; except that:

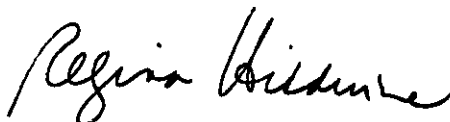
(E) These foods will not be sauces (except for foods in the four food groups in paragraph (m)(1)(ii)(A) through (D) of this section that are in the sauces), gravies, condiments, relishes, pickles, olives, jams, jellies, syrups, breadings, or garnishes; and

(2) Is represented as, or is in a form commonly understood to be, a main dish (e.g., not a beverage or a dessert). Such representations may be made either by statements, photographs, or vignettes.

NFPA urges that FSIS incorporate the missing regulatory text into the final rule.

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

Sincerely,



Regina Hildwine  
Senior Director, Food Labeling and Standards  
National Food Processors Association