

June 12, 2003

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00-046P
00-046P-4
David Meeker

FSIS Docket Clerk
Cotton Annex Bldg
300 12 St., S.W., Room 102
Washington, DC 20250-3700

RE: Docket No: 00-046P, Nutrition Labeling: Nutrient Content Claims on Multi-Serve Meal-Type Meat and Poultry Products

The National Turkey Federation (NTF) is the only national trade association representing the turkey industry exclusively. NTF represents nearly 100 percent of the United States turkey industry, including processors, growers, breeders, hatchery owners, and allied industry

NTF agrees with the FSIS proposal which will allow similar nutrient content claim criteria for both single serve and multiple serving meals, and we applaud the agency's proposal to amend the meal definition in 9 CFR 317.309 and 9 CFR 381.409 to match FDA's meal and main dish definitions. NTF strongly believes that the uniformity in the nutritional claim criteria, as outlined in this proposal, between FSIS and FDA will benefit consumers by providing additional tools and simplistic guidance to adhering to healthier diet, as well as, give families a nutritious low fat and healthier multiple serving meal options at a favorable price.

NTF supports the proposed modifications and respectfully submits the following comments:

Regulatory Consistency

By adopting the main dish and meal product definitions as prescribed by FDA, consumers will be presented with consistent product package information on similar products regulated by either FSIS or FDA. Consumers are unaware that the two Agencies have different nutrient content claim criteria for multiple serving meal products, and so mistakenly believe that a healthier option simply does not exist for meat based multiple serving products. The proposed modifications will greatly assist in the elimination of any consumer confusion that exists due to the current claim criteria.

Nutritional Consistency

The expansion of the per 100g claim criteria to multiple serving meals is logical. These



products and their single serve counterparts, are more complex and play a more overall vital role in the diet than individual foods. By allowing multiple serving meal product nutrient content claims to be based on a per 100g basis, FSIS positions its meat and poultry meals as being equally as nutritious as similar products regulated by FDA. The nutrient content claims criteria for a 10 oz. meal serving, whether from a single serve or multiple serving container, should be identical but not the same as claim criteria for lunchmeat.

It is extremely confusing to the consumer to have nutrient content claim qualification based on the packaging format instead of the product formulation. The current FSIS regulations, which do not have consistent nutrient content claim for single serve and multiple serving meals, strongly promote the concept of “good versus bad food.” Consumers are very accustomed to seeing numerous nutrient content claims on meals packed in single serve packages, however these same claims are virtually non-existent on identical products sold in multiple serving containers. Consumers can only assume that the multi-serve products are nutritionally inferior due to the lack of claims.

Consumer Benefits

The modifications presented in this proposal will allow food manufacturers to significantly expand the healthful multiple serving meal opportunities provided to consumers. Specifically, the proposal serves the consumer’s best interest in two ways.

First, the proposal offers an economic benefit to consumers and as an incentive to food manufacturers to provide healthy meal options. Multiple serving meal products are a less expensive choice for consumers compared to the price of purchasing multiple single serve meals. A low fat or healthy multi-serve meal can be provided for \$7 vs. the comparative cost of at least \$11 for purchasing four individual low fat meals. This is more economically feasible for families, and would contribute to the adoption of healthier diets.

The proposed changes would also be an incentive to food manufacturers to provide more multiple serving meals that would be positioned as being low fat or healthy. There currently exist numerous nutritionally positioned single serve meals that are purchased in significant quantities by consumers because they taste good. Manufacturers will now be able to present consumers with these same products in a multi-serve format containing the same nutritional claims as their single serve counterparts. This proposal will greatly diminish label confusion and can only result in the consumer having more choices and help to achieve a more healthful dietary plan.

Second, the proposal would provide for healthier meal choices for families. The current FSIS nutrient content regulations make it virtually impossible for food manufacturers to develop multi-serve products that comply with low fat or healthy criteria and taste acceptable to consumers. The current regulations have established different nutrient content claim criteria for single serve and multiple serving meals. The current criteria determining claim eligibility is based on packaging format, where single serve meal

criteria is 100 grams of product basis (formula) while that for multiple serving meals is based on the standard serving size (RACC). The FDA regulations allow for both single serve and multiple serving meals to use the per 100 gram basis to determine claim eligibility. By adopting the FDA's definition for "main dish" and "meal product", manufacturers will be able to provide families with many more low fat and healthful meal options. The change will also enable consumers, who are concerned with obesity or other health related issues, to more readily identify nutritious meals and make better choices, which they can incorporate into a healthier family diet plan.

Since March 2002, consumer demands for healthy multi-serve meals has greatly increased. The premium multi-serve entrees in the lean family serve segment have increased by 51.9%, which is more than ten times that of the non-calorie controlled multi-serve meals (which declined at a rate of -3.2%).

In summary, the National Turkey Federation fully supports the changes proposed in this rulemaking. The proposal promotes regulatory uniformity between the FDA and USDA, which will allow manufacturers to provide multiple serving meal products with comparable nutrient content claims as its single serve counterpart, which is acceptable to the consumer and less confusing. We strongly believe that these modifications will be beneficial to families and will help consumers make healthier meal choices. NTF appreciates the opportunity to comment on this and future FSIS proposals.

Respectfully submitted,



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