

RECEIVED
DOCKET ROOM
JAN 2 2:34 PM '02

January 2, 2002

FSIS Docket Clerk
Docket#01-018P
Room 102
Cotton Annex
300 C Street, SW
Washington, DC 20250-3700



01-018P
01-018P-11
David A. Saunders

Re: Definitions and Standards of Identity or Composition: Elimination of the Pizza Standard of Identity 66 Federal Register 55601

Dear Sir or Madam:

The Soy Protein Council (the Council) appreciates the opportunity to provide the following comments on the proposal to eliminate Standards of Identity for Pizza. The Council represents three major U.S. manufacturers that process and sell soy proteins or food products containing soy proteins. These three manufacturers are Archer Daniels Midland Company, Cargill, Inc., and Central Soya Company, Inc.

The Council applauds the Agency's proposal to eliminate Standards of Identity for Pizza. We agree with the Agency that consumers have a conceptual understanding of pizza products and that labeling information can provide consumers with adequate information to make informed choices when purchasing frozen pizzas. The Council sincerely hopes that this is the first in a series of Agency proposals to simplify and eliminate cumbersome and restrictive standards of identity.

The Council, however, does not agree with the FSIS proposal to require percentage labeling of meat or poultry in the ingredient statement. No other product in the United States is required to carry such percentage labeling. The existing requirement to list ingredients in order of their predominance by weight on the label will convey this type of information to consumers. Mandatory percentage labeling for meat and poultry pizzas also would require manufacturers to disclose proprietary information, including trademarked recipes. Manufacturers who wished to provide this information voluntarily could do so, if they believed that communicating the percentage meat in the product provided them an advantage.

The Council also believes that the naming conventions proposed by **FSIS** are unwieldy, cumbersome and in direct contradiction to the goals of the proposal. Listing the names of the pizza ingredients in the name of the pizza as proposed by FSIS duplicates the information listed in the ingredient statement. The proposed names also are awkward, and would inhibit the development and marketing of pizzas that deviate from the


FSIS Docket Clerk
January 2, 2002
Page 2

Standard of Identity, running counter to **FSIS**' stated intentions. Effective marketing will ensure that consumers are aware, through pictures and label statements, of a pizza's components. Consumers are not confused by the naming conventions for pizza in restaurants—they should not be confused by names used by frozen pizza manufacturers.

Although the Agency does not address the Ratio Rule in its proposal, the Soy Protein Council urges the **FSIS** to suspend the application of the Ratio Rule to pizzas that no longer meet the Standard of Identity. The Ratio Rule was instituted for products with a standard of identity in order to protect consumers when textured vegetable protein was added to meat. When the agency no longer maintains a minimum meat requirement, as is being proposed here, then the application of the Ratio Rule becomes moot. The Soy Protein Council feels that the ingredient labeling, which lists ingredients by weight, will convey to consumers the composition of the product they are buying, just as for other pizza products that deviate from the Standard of Identity. The Soy Protein Council believes there should be no limit on the amount of textured vegetable protein allowed on a non-standardized pizza, as long as the pizza remains under **FSIS** inspection authority.

Thank you again for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Saunders". The signature is fluid and cursive, with a long horizontal stroke at the end.

David A. Saunders
Executive Vice President