

GENERAL MILLS • JAMES FORD BELL TECHNICAL CENTER

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-- SENT VIA FAX --

FSIS Docket Clerk  
FSIS, USDA  
Room 102-Cotton Annex  
300 12th Street, S.W.  
Washington, DC 20250

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01-018P

01-018P-16

Frederick A. Hegele

Re: Definitions and Standards of Identity or Composition: Elimination of the Pizza Standard (66 Fed. Reg. 55601, November 2, 2001), FSIS Docket No. 01-018P

To Sir or Madam:

General Mills, Inc., one of the nation's largest branded food companies and a leading manufacturer of frozen pizza products containing meat ingredients, appreciates the opportunity to comment on the above-captioned proposed rule.

General Mills, Inc. takes no position on the question of whether the existing frozen pizza standard should be retained or eliminated. If, however, after consideration of the comment record, FSIS chooses to eliminate or otherwise alter the existing standard, we would like to ensure that several important issues are clearly addressed by any such final rule or by any related policymaking activity regarding this class of products.

#### Cheese Content of Pizza Products

The pending proposal is not clear on how the elimination of the standard will affect existing labeling policies; primarily those contained in the Standards and Labeling Policy Book. The present standard stipulates that such products must contain cheese but is unclear on the question of how substitute cheese ingredients, if they are used, are to be regulated. For over twenty years the issue has been regulated in accordance with the specifications of FSIS Policy Memo 001, which states that standardized pizza products must contain cheese in a ratio of at least one part per nine parts cheese substitute. This policy, which was adopted in an effort to reflect practices as they existed at that time, has served to define both industry practice and consumer expectations over the past two decades. Under such circumstances, we see no reason for any alteration of the policy, particularly in view of today's mandatory nutrition labeling requirements.

## Meat Content of Pizza

As the proposal indicates, one of the principal impacts of any change in the existing standard would be to allow the marketing of product with lesser amounts of meat than that required by current standards. If these changes are to be made, we believe that FSIS should provide additional clarification of acceptable descriptive labeling policies.

First, under current FSIS Policy Memo 102, pizza products meeting the minimum meat content of the pizza standard with the addition of "textured vegetable protein" (TVP) need not declare TVP in the product name. This policy should continue to apply to pizza products, provided that they meet the minimum meat and poultry requirements for amendable product (i.e., greater than 3% raw, and 2% cooked),

Second, we request that FSIS further clarify its policies regarding the labeling of product which contain meat above the FSIS amenability level (3% raw or 2% cooked meat), but which contain meat at lower levels than those presently required by the standard. In this context, we are opposed to any suggestions that such labels should be required to specify the percentage of meat ingredients. Adoption of such a policy would single out pizza products for regulatory treatment which is distinct from many other products regulated by FSIS. In addition, as noted above, the presence of mandatory nutritional labeling, along with an accurate product ingredient statement, provides the consumer with detailed information regarding the specific nutritional characteristics of the product being purchased. Finally, any such increased regulation would be entirely at odds with one of the underlying purposes of the proposal – the elimination of regulatory inequities in the treatment of products regulated by FSIS versus those produced by restaurants and other non-inspected entities.

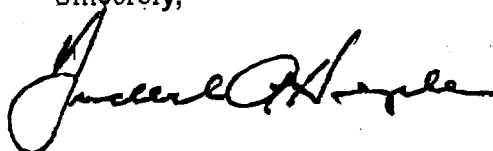
## Continuation of Generic Approvals of Labels

Since meat and sausage pizzas are presently standardized products, their labeling is presently considered to be generically approved, as specified in 9 C.F.R. 317. This means that prior label approval for such products need not be obtained. If the standard is eliminated, however, there is at least some potential that all pizza products would be removed from this generically approved category, and that all new pizza labels would be subjected to a new prior approval requirement. We believe that, regardless of the outcome of this proceeding, generic approval status for pizza product labels should be maintained.

Pizza product labels have been placed in this generically approved category for several years, and we are not aware of any problem which this has created, nor does FSIS cite any such problems in its proposal. A change in this regard could trigger a large volume of new labeling applications, placing unnecessary burdens upon FSIS' limited label review resources. Ensuring continuation of generic approval status for these products could be established by appropriate clarifying language in the final rule, references to pizza products in the FSIS Standards and Labeling Policy Book, or by some other appropriate mechanism.

General Mills, Inc. appreciates your consideration of its view and respectfully requests that all of the concerns expressed above be fully addressed and accommodated through the publication of any document completing this rulemaking process.

Sincerely,



Frederick A. Hegele