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NATIONAL CONSUMERS LEAGUE

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FSIS Docket Clerk
Docket #01-018P
Room 102, Cotton Annex
300 C Street, S.W.
Washington, D.C. 20250-3700

01-018P
01-018P-20
Linda F. Golodner

Dear Sir/Madam:

The National Consumers League is pleased to have the opportunity to express its support for the U.S. Department of Agriculture, Food Safety and Inspection Service's proposed rule to eliminate the standards of identity for "pizza with meat" and "pizza with sausage." NCL is a private, nonprofit membership organization representing consumers in the marketplace and the workplace. Founded in 1899, for more than 100 years NCL has worked to improve diets and nutrition information provided to consumers.

NCL agrees with FSIS that the standards of identity for meat and sausage pizza, 9 C.F.R. § 319.600, have become obsolete and believes strongly in the continuing need for standards of identity to protect consumers from substandard products. However, certain standards, especially those that prevent the introduction of nutritionally improved foods, should be revised or eliminated. The standards of identity for meat and sausage pizza are perfect examples of standards that have outlived their usefulness and should be rescinded.

The meat and sausage pizza standards prevent the sale of nutritionally improved products. One of the principal ways in which manufacturers have improved the nutritional value of foods in recent years is by reducing their meat component in order to lower fat, saturated fat, and cholesterol content. The standard for "pizza with meat" has a **minimum** meat requirement of 15 percent raw meat, and the standard for "pizza with sausage" requires at least 12 percent cooked sausage or 10 percent pepperoni. By eliminating these standards, USDA would allow manufacturers to offer meat and sausage pizzas with hopefully a product of higher quality with lower fat meat. Elimination of the standards would also allow pizzas with reduced-fat cheese or no cheese. This would likewise assist consumers **who** wish to reduce their intake of **fat**, saturated fat, **and** cholesterol.

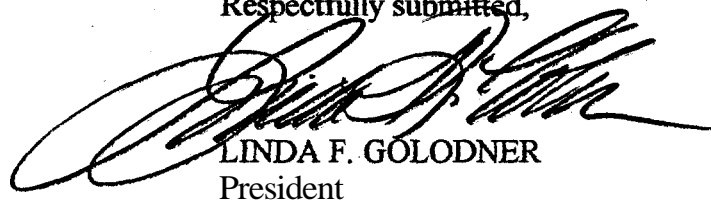
Eliminating these standards would pose no risk of consumer deception because nonstandard products would be required to use product names that distinguish them from **traditional** meat and sausage pizzas. **As** USDA recognizes,

consumer perceptions of pizza have changed to embrace a wide variety of non-standard products. These nonstandard pizzas generally have names such as “Mexican pizza”, and “Hawaiian pizza” that distinguish them from traditional pizza. When consumers buy these pizzas, they understand that they are purchasing a product that does not meet the **traditional** formula for pizza. Under the proposed rule, such products would be required to use product names that **are** appropriately descriptive. A descriptive product name, together with the nutrition label and ingredient statement (which **lists** all ingredients in descending order of predominance **by** weight), will provide consumers with the information they need to make **an** informed purchase.

The existing standards of identity for meat and sausage pizza no longer serve their original purpose. They no longer protect consumers from substandard products because pizzas that do not conform **to** the **standards** are no longer viewed by consumers as substandard. Consumers **today** understand **that** a pizza does not necessarily contain **all** of the traditional components **and** may contain less or more meat **than** prescribed by the standards. The **standards** of identity also no longer help **maintain** a “level playing field” for pizza manufacturers. Because restaurant pizzas are not subject to the USDA standards, the **standards** put manufacturers of frozen and refrigerated pizzas sold in supermarkets **at** a competitive disadvantage by preventing them **from** marketing the nonstandard pizzas popular **with** restaurant-goers.

While NCL believes **that** reform of **standards** of identity should be selective and cautious, **standards** that block nutritionally improved products should be revised or rescinded. **Because** the **standards** for meat and sausage pizza are **an** obstacle to products lower in fat, saturated fat, **and** cholesterol, they should be revoked

Respectfully submitted,



LINDA F. GOLODNER
President