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November **12,2001**

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

01-018P  
**01-018P-26**  
Jerome R. Schindler

Re: Docket No. 01-018P - Elimination of the Pizza Standard

~~Dear~~ Sir:

Revocation of the existing USDA pizza standards is long overdue.

However, USDA should not replace this standard with an unofficial "policy" that requires a "pizza" to be made with tomato sauce and cheese. The evidence reportedly establishes that the term "pizza" has become broadly accepted by consumers as an open faced crust with toppings of almost any **sort**. A non-meat "pizza" regulated by FDA could be topped with almost anything, whereas USDA would apparently still require that a product labeled **as** a "pizza with meat" be topped with tomato sauce and cheese. This makes no sense whatsoever.

Actually, USDA regulation of most meat pizzas makes no sense whatsoever. Real regulatory reform in the best interests of the government, the industry and consumers, would have USDA declining jurisdiction over "pizzas" made with processed meat products such **as** cooked poultry, ham, sausage and pepperoni.

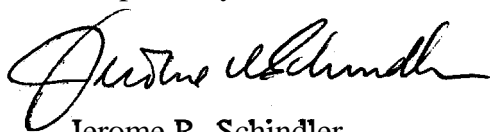
USDA directly oversees the slaughter of the animal. USDA again directly oversees the processing of that raw meat into processed meat products. Is it really necessary for the USDA to again oversee this same meat for the third time when it is merely incorporated into a "meat pizza"? As noted in the proposal, USDA has no such direct and continuous oversight when products such **as** cooked sausage, ham and pepperoni are used to make the vast majority of pizzas that **are** bought by consumers from national chains such as Pizza Hut and local pizza parlors - even many that are served as part of the school lunch program. I do not remember ever reading about any significant health problem linked to those pizzas. All of these pizzas, whether commercially prepared and frozen, or obtained from local foodservice pizza outlets, are thoroughly cooked shortly before consumption.

Taxpayers foot the bill for mandatory USDA inspection services. This is clearly a waste of resources that could be better directed to overseeing the slaughter of animals and preparation of raw meat products. Once the raw meat products have been processed into cooked sausage, ham, pepperoni etc., the USDA should pass the regulatory baton to FDA.<sup>1</sup> Just because it has been done this way for decades does not mean it should continue to be done that way.

Some in the industry may wish to retain USDA continuous inspection so they can display the USDA inspection shield on their label. Under a voluntary inspection program, those companies would then have to incur the cost of that inspection service rather than it being a burden on taxpayers in general.

As noted earlier, pizzas, whether commercially prepared and frozen, or obtained **from** local foodservice pizza outlets, are thoroughly cooked shortly before consumption. Therefore, the health risks **are** minimal to none. This would be a good starting point for USDA to experiment with relinquishing continuous inspection authority when a meat product is cooked and thereafter introduced as an ingredient another product. USDA's inspection and label approval burden would be drastically reduced with little if any reduction in the public safety. In fact, if these resources were redirected to better oversight of the slaughter of animals and preparation of raw meat products, public safety would be vastly improved.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jerome R. Schindler". The signature is fluid and cursive, with the first name "Jerome" being particularly prominent.

Jerome R. Schindler

<sup>1</sup> Legally USDA could just declare that food products containing less than **50%** cooked meat are not considered a "meat food product" and therefore not under USDA jurisdiction.