



North American Natural Casing Association
494 Eighth Ave. Suite 805, New York, NY 20000
Phone: 212/695-4980 ♦ Fax 212/695-7153
Email: nanca18hq@yahoo.com ♦ Web: www.nanca.org

March 5, 2007

US Department of Agriculture
Food Safety and Inspection Service

Docket No. FSIS-2006-0040: Product Labeling: Definition of the term “Natural”

Comments of the North American Natural Casing Association (NANCA)

NANCA is an association of natural casing producers and brokers, as well as supplier companies, in North America. The association represents almost all natural casing producers. Natural casings are derived from hog, lamb, or beef intestines, and constitute a significant industry in the US and worldwide.

Natural casing production consists of cleaning, and sizing intestines, removing the mucosa and any tears or imperfections, storing the cleaned and “selected” product in salt for shipping to the sausage maker as a shelf stable and safe product. This industry is hundreds of years old, and involves perhaps the very first method of storing a meat product to insure safety for consumers. Once received by the sausage maker, the casing is soaked in warm water to remove the salt before stuffing. It is both minimally processed and contains NO artificial or synthetic additives or preservatives.

We have reviewed with interest the various submissions made in connection with the issue of providing requirements for the classification of products as “natural”, and we believe that several considerations are important to preserving this important concept for US consumers:

1. The requirements must be consistent from agency to agency
 2. The requirements must not add to consumer confusion
 3. The requirements must not provide a way for products neither logically nor heretofore considered “natural” to bootstrap themselves into this category.
-
1. There is a growing confusion between FDA and USDA on a host of issues and it is important for consumers to know that there is one standard for the important concept of “Natural”. We believe, therefore that a consistent and uniform rule should be developed and adopted by both agencies.
 2. We agree that the 2005 USDA policy allowing exemptions for certain artificial and synthetic ingredients and preservatives makes the overall policy confusing and undercuts the concept of “natural” as understood by consumers. Our own experience over decades of marketing a natural product is that the term “natural” does mean something to consumers and its meaning is not as complicated as some

submissions would suggest. Further, in this past decade consumers have been increasingly concerned about chemical and synthetic additives to food products. Label confusion is high and adding to that with increased "exemptions" on claims simply adds to that confusion.

3. Because there is increasing evidence that the "natural" label is being diluted, we agree with the Hormel petition that a chemical preservative such as sodium lactate is not "natural" in the centuries old definition, and while it may be useful in some circumstances, it should not be allowed to wear the "natural" label. There are a myriad of natural products available that achieve the same level of safety while maintaining consumer credibility for the "natural" label. To allow one by one "exceptions" for additives and preservatives based on company innovation into more and more questionable additives and highly processed foods will not only dilute the standard but also may lead to loss of confidence of consumers in legitimate "natural" products.

An example of the issues surrounding processing and additives can be seen in our own industry. Twenty years ago, it was thought that natural casings from intestines would cease to be an important part of the industry, as alternatives were developed that were easier to use and standard in size and shape. However, as consumer preference became evident, natural casings have increased and continue to increase in market share after losing market growth in the 1980's. This is due to a new emphasis on "natural" by consumers, clear superiority of taste and new innovations in the 1990's in machinery that standardizes the natural product for the sausage maker. Artificial casings, however, still command a major share of the commodity (mass produced) hot dog and sausage markets. These products should not be considered "natural". The three types of casings used today are:

1. Plastic casings (peel able Cellulose) which are inedible, and thus clearly not "natural", nor claiming to be anything but a container.
2. Edible Collagen casings, which are derived from either the inside protein fleshing of the hides of beef and to a lesser extent hogs. (In some instances stomachs can be re-constituted into a collagen mass) The collagen product is highly processed, and reconstituted into casing either with a defined casing shape or as an extruded product for use by the sausage maker. In the course of its processing, a number of artificial and synthetic preservatives, colorants and other additives are used.* We have had to take legal action in some cases where shaped collagen was advertised as "natural". Rules should clearly exclude this type of product from being considered "natural". Current policies give some hope to producers of those clearly "artificial" products to use the natural label if they are from an animal part and appear on the surface to be the same as the legitimate natural product.
3. Natural Casings derived from animal intestines, minimally processed, as described above.

* Both extruded and shaped collagen casings contain, among others, polyoxyethylene sorbitan ester from polyoxyethylene sorbitan monostereate and polyoxyethylene sorbitan monoleate, non collagenous cellulose fiber and are processed into a collagen mass prior to the addition of the additives and then reconstituted either into an extrudable mass or into a formed casing.

Finally, we believe that there are and should be clear distinctions between “natural” and “organic” and that consumer confusion needs to be cleared up through the rule making process. In September of 2006, NANCA jointly filed a petition with Applegate Farms and Organic Valley-Organic Prairie Coop to include natural casings on the NOP list as a “Non-organic agricultural substance allowed in processing”. Natural casings have been used on organic sausages for many years, predating the NOP, and have never been prohibited in organic productions as an agricultural ingredient not commercially available in organic form. The petitioner sausage makers contended that natural casings are the preferred choice compared to synthetic alternatives including collagen, as their presence in final formulation is low (0.01-0.02%), there is no GMO or irradiation concerns. The organic industry considers collagen, for example, to be artificial. Peel able plastic casings are on the list as an accepted substance only because they are not consumed but removed prior to the sausage being eaten. The organic label is concerned importantly with the process by which the animal is grown and processed, and the expectation is that as more organic animals are produced, there may be a commercial market for organic casings derived from those animals. In the meantime, however, the distinction is clear. We note that the NANCA petition has been recommended without restriction by the Committee evaluating the petition and is on the agenda for the late March meeting for approval.

We recommend that this subject be thoroughly evaluated to ensure that consumers have high confidence in the “natural” categorization of products and that the standard be narrowly construed to minimally processed products with no synthetic or artificial or chemical additives not naturally used. Such natural products as salts, vinegars and natural flavorings and spices are clearly within the consumer understanding of natural. Complicated and new innovations not meeting those parameters should not be able to wear the “natural” label.

If we can provide further information about the casing industry, please contact us directly.

Sincerely

A handwritten signature in black ink that reads "Barbara K. Negrón". The signature is written in a cursive style with a large, prominent initial "B".

Barbara K. Negrón
President