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FOOD INDUSTRY CONSULTANTS SINCE 1971

Docket Clerk, USDA, FSIS
300 12TH Street S.W. Room 102
Cotton Annex
Washington, D.C. 20250

Dear Docket Clerk

Re: FSKS Docket 2006-0040
Product Labeling:
Definition of the term NATURAL

This letter addresses the request for comment requested in the Notice of Federal Register Vol 71, No. 233/December 5, 2006, page 70503-70505.

Washington Liaison Services® has been a food industry labeling consultant for more than thirty years.

The requirements for "minimal processing" and "no preservatives" are of most concern to our clients.

The USDA and FDA must consider the health risks that may arise if the standard for "natural" prohibits the use of spices or herbs that have been either irradiated, steam sterilized or treated with ethylene oxide to control pathogenic and spoilage microorganisms.

With concern for food safety, FSIS recently permitted the use of antimicrobial agents in foods labeled "natural". We support the use of ingredients that increase food safety and consumer protection and should be provided for in your rulemaking.

When no organic substitute was available, the National Organic Program, administered by USDA (AMS) was faced with having to accept non-organically derived ingredients. We support a provision for use up to five (5%) percent collectively of ingredients that are either "more than minimally processed" or function as antimicrobials. Such meat and poultry products could be labeled "natural," but not "all natural."

Sincerely,

Ernie Jenkinson

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