

March 5, 2007

Docket Clerk, USDA, FSIS  
300 12<sup>th</sup> Street S.W.  
Room 102  
Cotton Annex  
Washington, DC 20250

**Re: Docket No. FSIS-2006-0040 Definition of Term "Natural"**

Dear Sir or Madam:

The following comments are submitted by World Technology Ingredients (WTI, Inc) in response to Hormel Foods petition dated October 9, 2006 for the issuance of a rule regarding the voluntary claim of "natural", and when or how the term should be used on meat and poultry product labels. World Technology Ingredients is a specialty ingredients manufacturer providing ingredients and technology to the meat and poultry industry with particular focus on food safety and marination technology. Many of our customers produce both fresh and ready-to-eat products which are marketed bearing "natural" claims.

WTI fundamentally agrees with the underlying premise of Hormel's petition to clarify the circumstances under which "natural" claims may be used on the label of meat or poultry products by eliminating inconsistencies in current FSIS policy. We also agree with Hormel's public comments on December 12, 2006; stating that they "do not object to dual-purpose natural ingredients that may also have preservative properties" and that natural substances such as flavorings, vinegar, spices and extracts with preservative or antioxidant properties "should not be excluded from the natural definition".

Recent USDA actions indicate a fundamental change in long standing policy whereby use of natural ingredients with multifunctional properties as food safety interventions negates the ability to make a "natural" finished product claim. However, use of chemical preservatives as process aids and physical processes which "prevent or retard deterioration thereof" may still be permitted for products bearing "natural" claims without disclosure.

From a consumer's perspective we believe label exempt treatments (ingredient/process) where finished product claims are made is equivalent to misbranding and inconsistent with the USDA's long standing objective to ensure truth in labeling via accurate, honest label statements. As consumer demand for "clean-label" food products bearing "natural" claims has steadily increased, so too have the needs of processors to find effective microbial interventions which consumers do not perceive as chemical treatments. Many ingredients commonly found in the home environment such as natural flavorings, vinegar, salt, spices and extracts are multifunctional natural ingredients which provide processors effective tools to facilitate food safety while maintaining consumer friendly labels.

In December and again in January, the FISI requested data to “show, for each product bearing a natural claim” which contain lactates, that the lactate is being used only for a flavoring effect and not as a microbial intervention. We find such a request to demonstrate a lack of understanding of the underlying scientific principles regarding the antimicrobial effects of multifunctional natural ingredients. That is to say, by way of their own websites and other promotional materials, manufacturers of lactates have validated the antimicrobial effects of their products at usage levels greater than 0.5%. Computer modeling programs, long recognized and accepted by USDA, clearly demonstrate that the antimicrobial effects of lactates are concentration dependent. Long-term marketing initiatives by lactate manufacturers have been focused on the reduction of “off-flavors” imparted in finished products by use of their products. Based upon these facts, USDA’s request for the provision of data is inconsistent with the accepted historical use of lactates for shelf life extension and as HACCP CCPs.

The USDA lactate letters and recent communications to our company have raised serious concerns regarding the scientific validity of USDA policy which assumes that effective antimicrobial interventions (ingredient/process) to control Listeria do not affect shelf life. Simply stated, this is untrue and scientifically invalid. By recent label application denials, it appears that the USDA is attempting to exclude the use of any ingredient that ensures food safety by the provision of an “antimicrobial effect” from use in conjunction with “natural” claims. In doing so, processors are forced to pursue process options, such as post-package pasteurization or high-pressure pasteurization. In turn, small and mid-sized manufacturers are being placed at a severe competitive disadvantage as most of these processes require large inputs of capital to initiate, and add significant cost to the finished food products. We assert that processes should not be given preferential treatment to ingredients, as they too will serve to “prevent or retard deterioration” in these foods.

WTI strongly suggests that the USDA consider the fact that finished product “natural” claims are independent of “natural ingredient” claims. Finished product “natural” claims are a sum total of parts, whereby each part must meet all regulatory definitions for “natural”. However, “natural ingredient” claims would only suggest that no artificial or synthetic ingredients exist.

We sincerely appreciate this opportunity to provide public comment on Hormel’s petition.

Thank you for your time.

Respectfully,

Rick Hull  
Vice President  
Technical Services & Business Development  
World Technology Ingredients