



National Cattlemen's Beef Association

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February 8, 2006

Vincent de Jesus
Center for Food Safety and Applied Nutrition (HFS-830)
Food and Drug Administration
5100 Paint Branch Pkwy
College Park, MD 20740

**Response to FR Docket No. 2004P-0183 Food Labeling: Nutrient Content Claims,
Expansion of the Nutrient Content Claim "Lean"**

Dear Mr. de Jesus:

The National Cattlemen's Beef Association (NCBA) would like to thank the Food and Drug Administration (FDA) for seeking comments about a proposed expansion of the nutrient content claim, "lean". Producer-directed and consumer-focused, NCBA is the trade association of America's cattle farmers and ranchers, and the marketing organization for the largest segment of the nation's food and fiber industry.

NCBA commends the agency for its efforts to understand whether expanding the use of the nutrient content claim "lean" for use on food products categorized as "mixed dishes not measurable with a cup" that are regulated by FDA would benefit consumers and help them choose foods consistent with the *2005 Dietary Guidelines for Americans*. NCBA agrees it is important to help consumers identify foods within product categories that help them achieve *Dietary Guidelines* recommendations to "Get the most nutrition from calories", to keep total fat intake between 20 to 35 percent of calories, consume less than 10 percent of calories from saturated fatty acids and less than 300 mg/day of cholesterol, and to "Go lean with protein"^{1,2}. Given the importance of the *Dietary Guidelines* "Go lean with protein" message, **we believe it is vital to ensure that in your consideration of expanding the "lean" nutrient content claim, there are no unintended consequences causing consumer confusion or devaluation undermining the current meaning of "lean"**.

We are pleased to submit the attached comments regarding the proposed expansion of the nutrient content claim, "lean". Thank you for your time and consideration.

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National Cattlemen's Beef Association

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Cc. Dr. Robert Post, Director, Labeling and Consumer Protection Division
United States Department of Agriculture

2004P-0183

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Comments in Response to FR Docket No. 2004P-0183 Food Labeling: Nutrient Content Claims, Expansion of the Nutrient Content Claim "Lean"

The beef industry has always supported information in the meat case and throughout all grocery aisles that tells a complete nutrition story and helps consumers make educated purchasing decisions. We support the proposition of developing an educational system that is unified and based on the 2005 *Dietary Guidelines for Americans* and *MyPyramid*, and includes tools at point of purchase – such as the nutrient content claim, “lean” on food labels – to help consumers make the best food choices possible. Consistent with this, we believe:

- **It is important to ensure that understanding of the nutrient content claim “lean” enables consumers to choose foods for improved health, consistent with public health objectives in the 2005 *Dietary Guidelines for Americans* and the Institute of Medicine *Dietary Reference Intakes for Energy, Carbohydrate, Fiber, Fat, Fatty Acids, Cholesterol, Protein, and Amino Acids* (2002);**
- **Consumers need to be fully informed about the amount of fat, calories, and important vitamins and minerals each food group provides and food labels must provide complete information to help educate consumers on *getting the most nutrition from their calories*².**

On behalf of the Beef Checkoff Program, NCBA has conducted research on consumer understanding and perceptions of the term “lean”³ and also on how consumers use the food label for choosing foods based on nutrient content⁴. We have found in our research that consumers do look to food labels to help them identify and choose foods to help them consume more healthful diets.

Understanding the nutrient content claim “lean” enables consumers to choose foods for improved health, consistent with public health objectives.

Checkoff-funded research shows that consumer understanding and perception of “lean” is tied closely to their perceptions of fat content, whether it’s the presence of, relative amount of, or absence of fat. The types of foods most often considered lean by consumers are chicken, turkey, fish, pork, and lean beef. Consumers also say that lean food is almost always healthy. With regard to beef, consumers understand that the level of leanness depends on the cut and correctly identify cuts such as tenderloin and sirloin as lean. They also understand the importance of the style of preparation in order to maintain a beef cut’s leanness. Consumers also say they are familiar with the lean information provided on ground beef packages in the meat case³. This research shows that the efforts for informing consumers about lean choices in the meat case have been effective and an important educational tool for helping consumers choose foods consistent with the *Dietary Guidelines*.

The 2005 *Dietary Guidelines for Americans* message to “Go lean with protein” partnered with supporting messages to “Choose low-fat or lean meats and poultry”; “Bake it, broil it or grill it” is a powerful message and one that consumers understand. Consumer testing conducted by the US Department of Agriculture (USDA) in collaboration with the US Department of Health and Human Services (HHS) shows that 95 percent of consumers

think this message is easy to understand, with more than half (56 percent) saying it would help them "a lot" to make better decisions about eating a healthier diet⁵.

Food labels must provide complete information to help educate consumers about fat content, calories and important vitamins and minerals each food group provides. In addition to helping consumers make more healthful choices within a food category, public health objectives as outlined in the *Dietary Guidelines* also include the recommendation that consumers *get the most nutrition from their calories*². Research shows that more education is needed to help consumers understand that when choosing foods based on a "lean" claim, attention should also be given to the complete nutrient package provided by the food, and not just the fat or calorie content⁷.

In comments provided to the FDA on June 20, 2005, in response to Docket No. 2004N-0463 Food Labeling: Prominence of Calories, we outlined results from quantitative consumer research to determine preferences for enhanced information about calories and nutrients on food labels. This research strongly suggested that consumers prefer and are more likely to use labels that provide information about both calories and food group-specific vitamins and minerals to make food choices. In addition, the research revealed that focusing on just calories leads to unintended consequences of encouraging consumers to choose lower calorie, but less nutrient-rich foods⁴. This research showed that the impact of putting greater emphasis on just one component of food (e.g., calories or fat) without regard to the essential nutrients that are provided by each food may lead to increased consumption of lower-calorie (or fat) but nutrient-poor foods. The impact of putting emphasis on one component of food alone could mirror the unintended consequences which resulted from the 'lowfat' era in which focus on fat grams or calories from fat alone led consumers to choose food based solely on fat content without regard to total calories per serving.

The beef industry has a long-standing commitment to respond to consumer needs and the government guidelines for leaner protein options and for educating consumers about the Dietary Guidelines and MyPyramid.

America's beef producers have devoted considerable resources, including enhanced feeding, breeding and trimming practices, to offer people leaner beef, without sacrificing taste. According to the updated USDA National Nutrient Database for Standard Reference, Release 18, there are now 29 cuts of beef that meet government guidelines for lean. This represents a 53 percent increase in lean beef options during the past two years, which is the result of the beef industry's long-standing commitment to respond to consumer needs and the government guidelines for leaner protein options.

The 29 lean beef cuts include traditional favorites, such as flank steak, tenderloin, 93 percent lean ground beef and T-bone steak, as well as newer cuts of beef, such as the Western Griller steak and Ranch steak. With these 29 options, Americans can easily enjoy the beef they love while they "go lean with protein" as recommended within the 2005 *Dietary Guidelines for Americans* and USDA *MyPyramid*. In addition, NCBA is responsible for developing and disseminating a variety of resources to help educate the public on how to make nutrient-rich, lean choices within and among all five food groups and also help them enjoy the foods they love, like beef, as part of healthful lifestyles.

The recently published, *The Healthy Beef Cookbook: Steaks, Salads, Stir-fry and More ... Over 130 Luscious Lean Beef Recipes for Every Occasion*, which was created in partnership with the food and nutrition experts of the American Dietetic Association and the beef authorities at the National Cattlemen's Beef Association (NCBA), on behalf of the Cattlemen's Beef Board, features the 29 lean cuts of beef in more than 130 unique recipes and makes it easy for people to follow the 2005 *Dietary Guidelines for Americans* and *MyPyramid* and "get more nutrition from their calories." For example:

- The recipes are satisfying and delicious for people watching their weight – nearly 75 percent have less than 400 calories per serving.
- More than 50 percent of the recipes incorporate all food groups.
- 93 percent of the recipes are good or excellent sources of protein, iron, zinc, vitamins B₆ and B₁₂, and selenium.
- 66 percent are good or excellent sources of fiber.
- 76 percent are good or excellent sources of potassium.
- More than 55 percent are good or excellent sources of magnesium.
- 68 percent are good or excellent sources of vitamin A.
- 74 percent are good or excellent sources of vitamin C.

In addition, the Beef Checkoff Program has contributed significantly to the dissemination of the recommendations of the *Dietary Guidelines* and *MyPyramid*. Since the release of the new guidance, we have developed and distributed more than 75,000 "Naturally Nutrient-Rich Meals ... Putting More Power Foods on Our Plates" brochures providing "how to" education on implementing the *Dietary Guidelines*. In addition, more than 2 million *MyPyramid* posters and tear sheets have been distributed.

America's cattle producers believe it is important that consumers understand the term "lean", especially when "lean" is applied to protein products to help achieve public health objectives.

In conclusion, America's cattle producers believe it is important that consumers understand the nutrient content claim "lean" in order to make the most healthful choices within and among all food groups and categories of foods. In addition to being informed about the fat content of foods, consumers need to be fully informed about the amount of calories *and* important nutrients provided by a food group or product. Lean proteins contribute valuable nutrients to the diet, including protein, zinc, iron, vitamin B₁₂, selenium, phosphorus, niacin, vitamin B₆ and riboflavin and awareness of nutrient-rich choices such as lean beef will help Americans better meet the recommendations of the *Dietary Guidelines* and *MyPyramid* to "Go lean with protein" and "Get the most nutrition from calories."

¹ Dietary Guidelines for Americans 2005. US Department of Health and Human Services; US Department of Agriculture. www.healthierus.gov/dietaryguidelines. HHS Publication number: HHS-ODPHP-2005-01-DGA-A; USDA Publication number: Home and Garden Bulletin No. 232.

² 2005 *Finding your way to a healthier you: Based on the Dietary Guidelines for Americans* consumer brochure; Dietary Guidelines for Americans.

³ National Cattlemen's Beef Association on behalf of the Cattlemen's Beef Board. Lean Beef Focus Groups. The Praxi Group, Inc, Evergreen, CO. September 2005.

⁴ National Cattlemen's Beef Association on behalf of the Cattlemen's Beef Board. Enhanced Information about Calories and Nutrients on Food Labels. Shugoll Research, Bethesda, MD. June 2005.

⁵ United States Department of Agriculture Center for Nutrition Policy and Promotion. Research Summary Report for MyPyramid Food Guidance System Development. August 2005. <http://www.cnpp.usda.gov/pyramid-update/Research/index.html>.