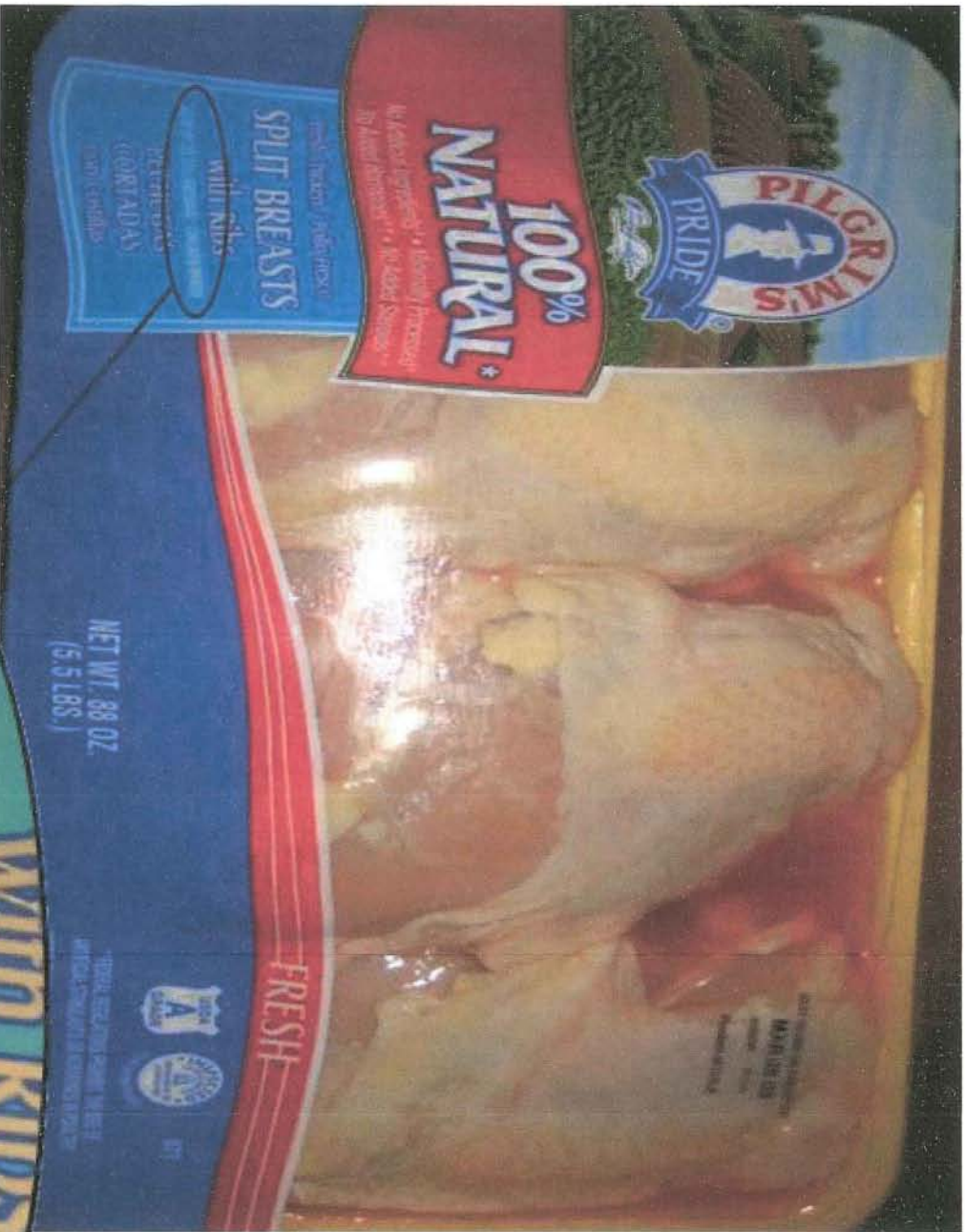


Some things just  
aren't **natural.**



 **TLC**  
Feeding. Learning. Growing.  
Rising. Soaring. Making. Healthy. Change.



WITH UP TO 12% NATURAL \* CHICKEN BROTH  
**NO MSG**  
**NO GLUTEN**

### Nutrition Facts

Serving Size 4 oz (112g)  
 Servings Per Container ABOUT 3

Amount Per Serving	Calories from Fat 130	% Daily Value*
Calories 200		
Total Fat 15g	23%	
Saturated Fat 4g	20%	
Cholesterol 70mg	24%	
Sodium 440mg	18%	
Total Carbohydrate 0g	0%	
Protein 17g		
Vitamin A 2%		Iron 4%

\*Percent Daily Values are based on a diet of 2,000 calories.

Natural\* Chicken Broth Ingredients:  
 Chicken Broth, Salt, Carrageenan.  
**GLUTEN FREE**





BEST TO USE OR FREEZE BY

**NOV 15 10**

030020 P-177

Product of U.S.A

**100% Natural**

Protein	22g	Fat	3g	Reduced Sodium
---------	-----	-----	----	----------------

**Fresh Chicken Boneless • Skinless**  
**BREAST with RIB MEAT**

enhanced with up to 15% chicken broth, salt and carrageenan

KEEP REFRIGERATED • PRODUCT OF USA

NET WT. 26.4 OZ. (1.65 LBS.)



FEDERAL REGULATIONS PROHIBIT THE USE OF ARTIFICIAL FLAVORS OR ARTIFICIAL COLORS



**Total Fat 3g**

**Saturated Fat 0g**

**Trans Fat 0g**

**Cholesterol 55mg**

**Sodium 180mg**

**Total Carbohydrate 0g**

**Dietary Fiber 0g**

**Sugars 0g**

**Protein 22g**

**Vitamin A 0%**

**Calcium 0%**

\* Percent Daily Values are based on  
calories from fat.

Always Read the Fine Print on Labels

**Natural<sup>®</sup> Chicken Broth**  
**Chicken Broth, Salt, Carrageenan**  
**GLUTEN FREE**



# SANDERSON FARMS (non-"enhanced")



*With Rib Meat*  
CONTAINS UP TO ONE PERCENT RETAINED WATER

Nutrition Facts	
Serving Size 4 oz (114g) raw	
Servings Per Container Varied	
Amount Per Serving	
Calories 130 Calories from Fat 20	
	% Daily Value*
Total Fat 2g	3%
Saturated Fat 0.5g	3%
Trans Fat 0g	
Cholesterol 65mg	22%
Sodium 75mg	3%
Total Carbohydrate 0g	0%
Dietary Fiber 0g	0%
Protein 26g	52%
Vitamin C 2%	Iron 4%
*Not a significant source of Sugars, Vitamin A and Calcium	
Percent Daily Values are based on a diet of 2,000 calories per day.	

# PERDUE (non-"enhanced")

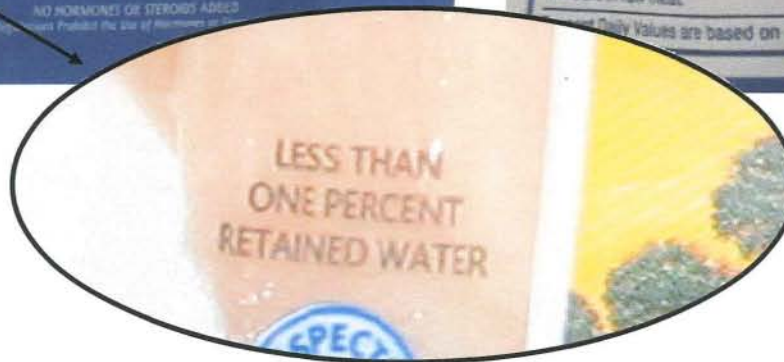


Nutrition Facts		
Serving Size 4 oz (112g) Raw Boneless Breast		
3 oz (84g) Roasted Boneless Breast		
Servings Per Container Varied		
Amount Per Serving	Raw	Cooked
<b>Calories</b>	110	110
Calories from Fat	10	10
	% Daily Value*	
<b>Total Fat</b> 1g**, 1g	2%	2%
<b>Cholesterol</b> 75mg, 70mg	25%	23%
<b>Sodium</b> 45mg, 30mg	2%	1%
<b>Total Carbohydrate</b> 0g, 0g	0%	0%
<b>Protein</b> 26g, 25g	52%	50%
Iron	6%	4%

Not a significant source of Saturated Fat, Dietary Fiber, Sugars, Vitamin A, Vitamin C and Calcium.

\*\*Amount in raw meat.

\*Percent Daily Values are based on a 2,000 calorie diet.





# STORE BRAND ("enhanced")



<b>Nutrition Facts</b>	
Serving Size 4 oz (112g)	
Servings Per Container Varied	
Amount Per Serving	
<b>Calories</b> 110	Calories from Fat 10
% Daily Value*	
<b>Total Fat</b> 1 g	2 %
<b>Cholesterol</b> 55 mg	19 %
<b>Sodium</b> 370 mg	15 %
<b>Total Carbohydrate</b> 0 g	0 %
<b>Protein</b> 23 g	
Iron 4 %	Vitamin C 2 %
Calcium 2%	
Not a significant source of saturated fat, dietary fiber, sugars, and vitamin A.	
*Percent Daily Values are based on a 2,000 calorie diet.	

# PILGRIM'S PRIDE ("enhanced")



with Rib Meat  
WITH UP TO 15% NATURAL\* CHICKEN BROTH  
PECHUGAS

**Nutrition Facts**  
Serving Size 4 oz. (112g)  
Servings Per Container about 6

Amount Per Serving	
Calories 120	Calories from Fat 25
% Daily Value*	
Total Fat 3g	5%
Cholesterol 55mg	10%
Sodium 330mg	14%
Total Carbohydrate 0g	0%
Protein 22g	
Iron 4%	

Not a significant source of saturated fat, trans fat, dietary fiber, sugars, vitamin A, vitamin C, and calcium.  
\*Percent Daily Values are based on a 2,000 calorie diet.

**Natural\* Chicken Broth Ingredients:**  
Chicken Broth, Salt, Carrageenan.  
**GLUTEN FREE**

**DISTRIBUTED BY:**  
**PILGRIM'S PRIDE CORPORATION**  
PO BOX 93  
PITTSBURG, TX 75686



# TYSON ("enhanced")



**CHICKEN BREASTS**  
 WITH 100% NATURAL CHICKEN BROTH  
 WITH UP TO 10% FAT  
 NO ARTIFICIAL INGREDIENTS, NO MSG

PRICE 3.99  
 UNIT PRICE 1.86  
 TOTAL 7.42  
 P-6551

**Nutrition Facts**

Serving Size 4 oz (112g)  
 Servings Per Container: Varies

Amount Per Serving	Calories from Fat 20	% Daily Value*
<b>Calories 110</b>		
<b>Total Fat 2.5g</b>		4%
<b>Saturated Fat 0.5g</b>		3%
<b>Trans Fat 0g</b>		
<b>Polyunsaturated Fat 0g</b>		
<b>Monounsaturated Fat 1g</b>		
<b>Cholesterol 65mg</b>		22%
<b>Sodium 190mg</b>		8%
<b>Total Carbohydrate 0g</b>		0%
<b>Dietary Fiber 0g</b>		0%
<b>Sugars 0g</b>		
<b>Protein 23g</b>		46%
Vitamin A 0%	Vitamin C 0%	
Calcium 0%	Iron 0%	

\*Percent Daily Values are based on a diet of 2,000 calories a day.

DISTRIBUTED BY TYSON FOODS, INC.  
 P.O. BOX 2020, SPRINGDALE, AR 72765-2020 U.S.A.  
 ALL NATURAL CHICKEN BROTH INGREDIENTS: Chicken  
 broth, sea salt, natural flavoring.

# TYSON ("enhanced")



- > CHICKEN RAISED WITHOUT ANTIBIOTICS
- > NO HORMONES ADMINISTERED\*\*
- > NO ARTIFICIAL INGREDIENTS\*

 **American Heart Association**  
 Meets American Heart Association food criteria for saturated fat and cholesterol for healthy people over age 2.  
While many factors affect heart disease, diet is a significant one and cholesterol may reduce the risk of the disease. See Nutrition Facts panel for information on cholesterol and other nutrients.

KEEP REFRIGERATED  
 \*NO ARTIFICIAL INGREDIENTS, MINIMALLY PROCESSED  
 \*\*FEDERAL REGULATIONS PROHIBIT THE USE OF HORMONES IN CHICKEN



**CONTAINS UP TO 15% NATURAL\* CHICKEN BROTH TENDERNESS & JUICINESS GUARANTEED™**

## Nutrition Facts

Serving Size 4 oz. (112g)  
 Servings Per Container: Varied

Amount Per Serving

**Calories 110**    **Calories from Fat 20**

% Daily Value\*

**Total Fat 2.5g**    **4%**

**Saturated Fat 0.5g**    **3%**

**Trans Fat 0g**

**Polyunsaturated Fat 0g**

**Monounsaturated Fat 1g**

**Cholesterol 65mg**    **22%**

**Sodium 180mg**    **8%**

**Total Carbohydrate 0g**    **0%**

**Dietary Fiber 0g**    **0%**

**Sugars 0g**

**Protein 23g**    **46%**

Vitamin A 0%    Vitamin C 0%

Calcium 0%    Iron 0%

\*Percent Daily Values are based on a 2,000 calorie diet.

DISTRIBUTED BY: TYSON FOODS, INC.  
 P.O. BOX 2020, SPRINGDALE, AR 72765-2020 U.S.A.  
 ALL NATURAL\* CHICKEN BROTH INGREDIENTS: Chicken broth, sea salt, natural flavorings.



## What People Are Saying About “Pumped-Up” Poultry:

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"We want consumers to know what they're getting, said [California Poultry Federation President Bill Mattos](#). We think it's kind of a fraud to sell something in the refrigerated (not frozen) case that looks fresh and feels fresh but contains up to 15 percent water and salt."

*The Seattle Times*  
September 15, 2004

"Some poultry producers are adding a solution of sodium and water to raw poultry products in order to enhance flavor or increase moisture content. USDA policies require producers to disclose this process on the label; however, this is usually done with euphemisms such as “Enhanced with up to X percent chicken broth” and written in a small font size. USDA also allows these products to be labeled as “natural.” USDA should change its policies to provide consumers with sufficient information about these products so that they can make informed decisions when they are purchasing poultry products.”

[Chris Waldrop](#), [Consumer Federation of America](#)  
May 22, 2007

“People shouldn’t be paying chicken prices for saltwater. But some unscrupulous poultry producers add as much as 15 percent saltwater — and then have the gall to label such pumped-up poultry products “natural.” Some in the industry euphemistically call chicken soaked or injected with salt water “enhanced chicken.” Of course this isn’t really about enhancing chicken, it’s about enhancing profits. Someone’s clucking all the way to the bank.

Adding injury to insult is the fact that these “enhanced” products are much less healthy for you than the natural, unenhanced versions, because they contain up to five times as much sodium. Sodium, of course, tends to increase blood pressure and the risk of heart attacks and strokes. Americans consume way too much sodium as it is, and the last thing we need is more sodium tucked surreptitiously into otherwise low-sodium foods.”

[Michael F. Jacobson](#), [Center for Science in Public Interest](#)  
May 22, 2007

[Dr. Stephen Havas](#), [vice president of the American Medical Association](#), is concerned the added sodium "has potential health implications" because most consumers aren't reading labels on "natural" chicken because they expect it to be free from any additives.

*The Wall Street Journal*  
May 17, 2007

“For consumers who think they are purchasing poultry that is natural, they may be in for a rude awakening — particularly for those who have heart disease or hypertension, who are watching their sodium or who have other health concerns. Not to mention the economic impact of unknowingly buying chicken that contains up to 20 percent foreign ingredients by weight. Producers that improperly use “100% All Natural” claims are selling saltwater at chicken prices, hurting consumers at a time of ever-increasing food costs.”

[Amanda Loudon](#), [National Association of Nutrition Professionals](#)  
September 14, 2008



**FOR IMMEDIATE RELEASE:**  
Wednesday, February 24, 2009

**FOR MORE INFORMATION:**  
Jeff Cronin: 202-777-8370  
Stacey Greene: 202-777-8316

## **Salt-Water-Soaked Chicken Not at all Natural, Says CSPI**

*Statement of CSPI Executive Director Michael F. Jacobson*

On behalf of the 850,000 members of the Center for Science in the Public Interest (including almost 100,000 in California), I am honored to be here today with Senator Barbara Boxer. I'm delighted that she is standing up for both consumers and honest poultry producers.

Chicken, salt, and water all are natural, but when you combine the three what you get is adulterated chicken that is anything but "all natural."

When Americans take their hard-earned dollars to the supermarket, they want to know that they're getting the most value for their money. And when they see words on food labels like "100 percent natural," they assume that the foods really are. Unfortunately, too many unscrupulous poultry producers, with the regrettable acquiescence of the U.S. Department of Agriculture, are draining the meaning from such words.

The practice of pumping up poultry with salt water is basically a hidden tax of up to 15 percent that extracts on the order of \$2 billion from American consumers each year. This isn't about "enhancing" chicken, it's about enhancing profits.

Think of it this way. This looks like a 7-and-a-half-pound chicken. But it's really about five-sixths chicken and one-sixth water. You think you're buying 7.5 pounds of chicken, but you're really getting less than six and a half pounds of chicken and 18 ounces of water. This bag of chicken has two small drumsticks and a boneless thigh—that's a little more than a pound of chicken, and that represents what consumers are getting cheated out of.

Consumer fraud would be bad enough, but adulterated chicken is also bad for our health.

Sodium chloride, or salt, is probably the most harmful ingredient in the food supply. It's a major promoter of high blood pressure, stroke, heart disease, kidney disease, and other ailments. Most adults should not consume more than about 1,500 milligrams of sodium per day, yet the average adult is consuming closer to 4,000 milligrams a day. And one of the things that has made our food supply so salty is the adulteration of chicken with a salty solution. The last thing we need is a stealth salt assault on an otherwise healthy food.





## Consumer Federation of America

May 22, 2007

Contact: Chris Waldrop

202-797-8551

### **Consumer Federation of America Expresses Concerns Regarding USDA Policies on Enhanced Poultry**

Consumer Federation of America is concerned with the U.S. Department of Agriculture's policies regarding "enhanced" poultry products. Some poultry producers are adding a solution of sodium and water to raw poultry products in order to enhance flavor or increase moisture content. USDA policies require producers to disclose this process on the label; however, this is usually done with euphemisms such as "Enhanced with up to X percent chicken broth" and written in a small font size. USDA also allows these products to be labeled as "natural."

Consumers, however, are not typically aware of this process and often do not recognize the disclosure statement on the label because of its small font size. Consumers do not expect products labeled as "natural" to contain added ingredients. In addition, this process means that consumers are paying chicken prices for salt water. Finally, at a time when consumers are being told to reduce the amount of sodium in their diets, these "enhanced" poultry products are dramatically increasing consumers' sodium intake.

USDA should change its policies to provide consumers with sufficient information about these products so that they can make informed decisions when they are purchasing poultry products.

#####

**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515

October 11, 2007

The Honorable Chuck Conner  
Acting Secretary  
United States Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, DC 20250

Dear Mr. Secretary:

We are writing to express our concern over USDA's continued allowance of misleading labels on poultry products.

As you know, current USDA labeling guidelines allow for poultry injected with saltwater or seaweed solutions to be prominently labeled as "*100% All Natural*." However, these same guidelines allow the warning alerting consumers to these added ingredients, most often with the phrase "*Enhanced with up to Fifteen Percent Chicken Broth*", to be only 1/4 the size of the product name. This misguided policy has enabled some processors to lead consumers into believing they are purchasing unaltered, natural poultry products. While we agree that seaweed and sea salt may occur naturally in seawater, these ingredients certainly do not occur naturally in poultry.

We believe this labeling practice is deceptive and is misleading consumers into believing they are purchasing all natural chicken when, in fact, they are paying billions more for added saltwater weight and drastically increasing their sodium intake. A recent nationwide survey revealed that over 70% of consumers were unaware that some poultry companies routinely add sodium and other additives to their fresh chicken. Furthermore, nearly 3 out of 4 consumers failed to notice the statements warning of additional ingredients because the writing is significantly smaller in comparison to the entire package design.

The health implications of this practice are serious and deserve prompt attention. A natural serving of chicken, without saltwater and seaweed extract contains 70 mg of sodium but enhanced chicken can contain up to 370 mg of sodium per serving. This is roughly equivalent to the sodium levels in a bag of regular potato chips.

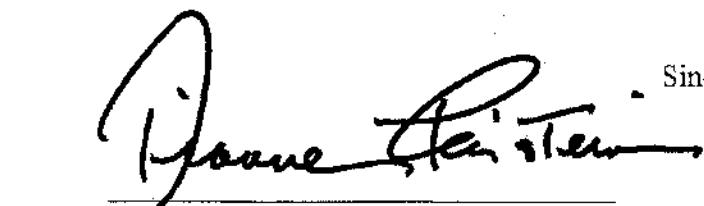
We firmly believe USDA should immediately tighten its policies on fresh poultry labeling to ensure American consumers are able to make informed choices about their food. Without change, individuals across the country will continue to be charged additional costs for enhanced



products while adding potentially dangerous amounts of sodium to their diets.


Thank you for your attention to this important matter. We look forward to working with you to quickly resolve this issue.

Sincerely,



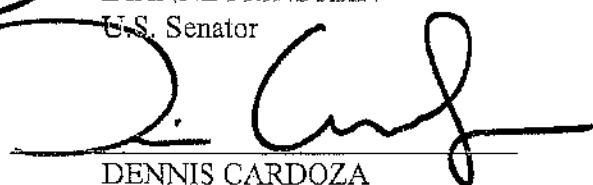
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DIANNE FEINSTEIN  
U.S. Senator




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BARBARA BOXER  
U.S. Senator



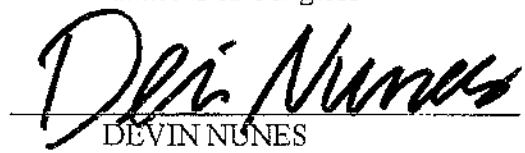
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DENNIS CARDOZA  
Member of Congress




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CHIP PICKERING  
Member of Congress




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DEVIN NUNES  
Member of Congress



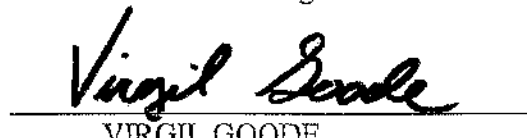
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PETER DEFAZIO  
Member of Congress



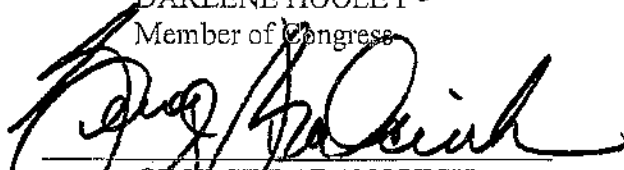
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DARLENE HOOLEY  
Member of Congress



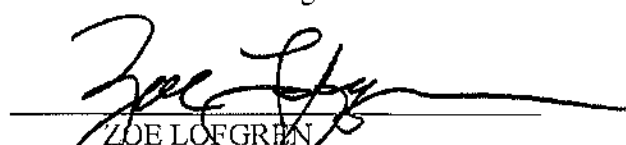
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VIRGIL GOODE  
Member of Congress




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GEORGE RADANOVICH  
Member of Congress




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ZOE LOFGREN  
Member of Congress



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GENE TAYLOR  
Member of Congress



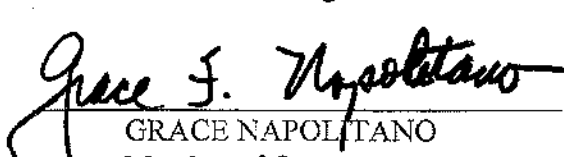
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ELLEN O. TAUSCHER  
Member of Congress



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LORETTA SANCHEZ  
Member of Congress



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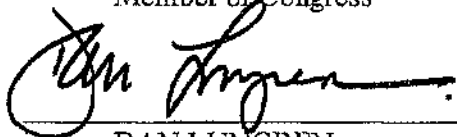
GRACE NAPOLITANO  
Member of Congress

  
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TAMMY BALDWIN  
Member of Congress

  
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LOIS CAPPS  
Member of Congress

  
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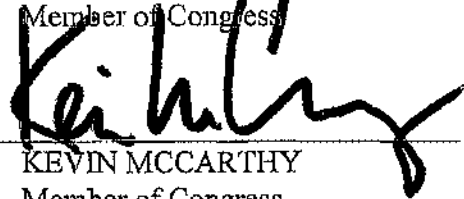
DAN LUNGREN  
Member of Congress

  
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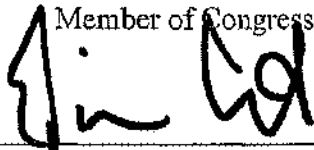
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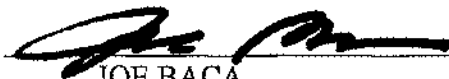
SAM FARR  
Member of Congress

  
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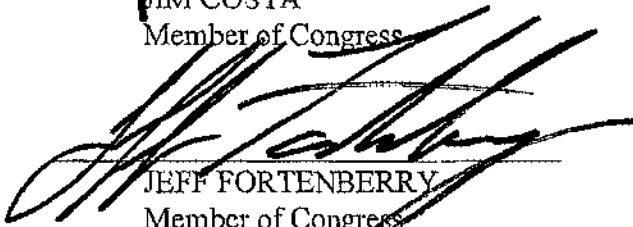
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Member of Congress

  
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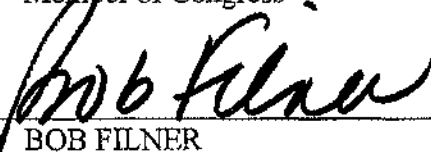
JIM COSTA  
Member of Congress

  
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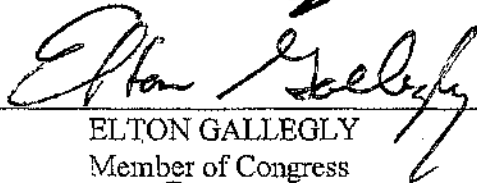
JOE BACA  
Member of Congress

  
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JEFF FORTENBERRY  
Member of Congress

  
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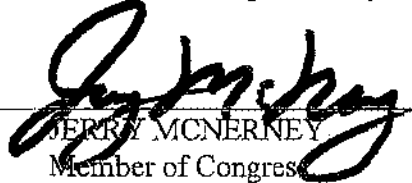
BOB FILNER  
Member of Congress

  
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ELTON GALLEGLY  
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G.K. BUTTERFIELD  
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# Cooking Light

JANITZER 2011

## CHICKEN MAKEOVER!

25 QUICK & EASY  
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& DESSERTS P.122

## SUPERFAST ITALIAN

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BREAKFAST  
PORTION SECRETS P.50

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PLAN FOR  
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HEALTHY  
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## NUTRITION MADE EASY

Hot Topic



### THE FINE PRINT ON PLUMPED POULTRY

#### NATURAL, NONENHANCED POULTRY (per 4 ounces raw)

Sodium: 45 to 70mg

**Fine print says:** "Contains 1 to 5% retained water." (This is water that may be absorbed during the chilling process; it's not injected, and no salt is added.)

#### ENHANCED POULTRY (per 4 ounces raw)

Sodium: 330 to 440mg

**Fine print says:** "Enhanced with up to 15% chicken broth, salt, and carrageenan."

Worse, it's 500% more sodium than is found naturally in untreated chicken. Yet the word "natural" can be used on the labels of these injected birds. USDA labeling policies give poultry companies a green light to label their enhanced products "100% natural" or "all natural," even though they've been injected with ingredients in concentrations that do not naturally occur in a chicken. (Like many foods, chicken contains trace amounts of sodium and other minerals.)

With injections totaling 15% or more of the meat's weight, a 7-pound enhanced chicken might net only 6 pounds of meat. Do the math: At \$2.99 per pound, you've paid a premium of up to \$0.45 per pound for added salt and water. Each year, this costs Americans about \$2 billion,

according to the Truthful Labeling Coalition, a trade group started by poultry producers who want to put an end to misleading labels on enhanced products.

At a time when sodium consumption has risen to the top of public health issues—and when at press time we expected to hear soon about a government move to lower sodium recommendations—here's an example of salt being needlessly added to fresh, whole foods.

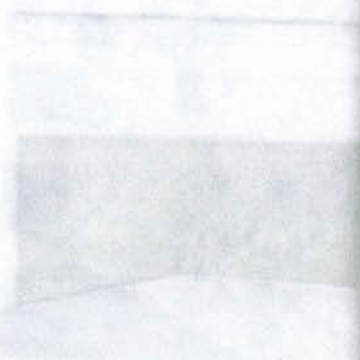
Processors are required to disclose the injections, but the lettering on the packaging can be small and inconspicuous. To know if you're picking up an enhanced product, squint at the fine print, which will list something like, "contains up to 15% chicken broth." You can also check the ingredient list, and, of course, look for the sodium content on the Nutrition Facts label. If the chicken is truly natural, the sodium content won't stray higher than 70mg per serving.

What you do with your chicken or turkey once you get it home is another story. However, at that point you are consciously choosing to add sodium, and you can control the amount you use. Seasoning a chicken breast with  $\frac{1}{2}$  teaspoon salt will add 250mg sodium—a healthier choice that you'll be much happier making if that same chicken breast doesn't come preloaded with 440mg of the salty stuff.

### NEED NUTRITION HELP?

Send your questions to [nutritioneditor@CookingLight.com](mailto:nutritioneditor@CookingLight.com) or to *Cooking Light*, P.O. Box 1748, Birmingham, AL 35209. Readers are cautioned that the advice here is not meant to substitute for a regular, professional health-care consultation.

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- Quarterly newsletters filled with bone-strengthening exercises and simple, delicious recipes.



\*You must be 18 years of age or older to join MyBONIVA. The free trial offer is limited to one per person. MyBONIVA is a registered trademark of Boehringer Ingelheim.

## LABELING & REGULATIONS

# Deciphering the 'natural poultry' debate

*Controversy continues within the poultry industry over what constitutes 'natural' poultry while the USDA reconsiders the definition.* BY TERRENCE O'KEEFE

Major broiler processors disagree on what the definition for "natural" fresh ready-to-cook (RTC) chicken products should be, and the USDA is now reviewing the regulations that define "natural" poultry. What is at stake for the U.S. poultry industry in this debate is the roughly \$2 billion per year that consumers are now paying at retail for the added weight of enhancing solutions used in some fresh chicken products.

Key points in the "natural" debate hinge on use of "natural" for single- versus multi-ingredient products and the size of the type face used on the label.

Current USDA FSIS policy states that products bearing "natural" claims must not contain any artificial or synthetic ingredients or chemical preservatives, and can be no more than "minimally processed."

### Enhanced products

In the last decade, a number of "Natural," "All-Natural" and "100% Natural" label claims have been approved for meat and poultry products which have been injected, vacuum tumbled or marinated with a variety of broth or brine solutions up to 15% of the weight of the meat. These fresh ready-to-cook (RTC) injected meat and poultry products are commonly referred to as "enhanced" products.

Market share in the fresh meat case for enhanced products has grown rapidly. Industry estimates put the 2008 market share for enhanced fresh pork, chicken and beef at 53%, 31% and 19%, respectively.

### Single- or multi-ingredient?

One point of contention in the natural poultry debate is whether the term "natural"

should be reserved just for chicken and turkey without any additives.

Foster Farms, Sanderson Farms, Gold'n Plump and Fieldale Farms are members of the Truthful Labeling Coalition (TLC). Comments signed by executives of the four companies and submitted to FSIS, included this statement: "We believe it is wrong and deceitful to allow fresh chicken to be labeled '100% All Natural' when it contains additives such as seaweed and saltwater."

Many of the solutions used to enhance poultry contain carrageenan, a seaweed extract which binds water. Perdue is also

"Perdue products receive USDA Process Verified seal" is online at [www.wattagnet.com/13928.html](http://www.wattagnet.com/13928.html)

pushing for the USDA to reserve the term "natural" for single-ingredient fresh chicken and turkey products. "Under no circumstances do we believe it is acceptable to label fresh poultry that has been enhanced with water, broth or solutions as 100% Natural or All Natural," said Luis A. Luna, vice president, corporate communications, Perdue Inc.

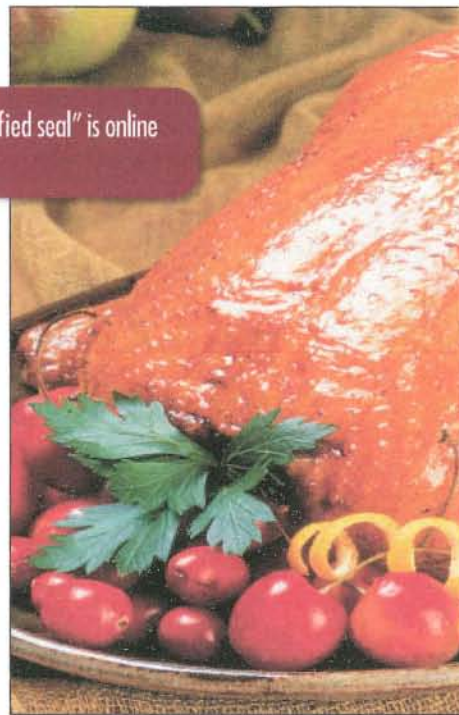
### Use of natural ingredients

Tyson and Pilgrim's Pride support the current USDA interpretation which allows for multi-ingredient fresh chicken and turkey products to be labeled as "natural."

Gary Rhodes, vice president, corporate communications and investor relations, Pilgrim's Pride Corp., said, "Pilgrim's supports the use of the 'natural' label as [currently] defined by USDA. We provide both marinated and non-marinated 'all natural' products. At this time USDA defines 'all

natural' as being a product that does not contain any artificial flavor, color, chemical preservatives or any artificial or synthetic ingredient, and is minimally processed."

Gary Mickelson, Tyson, Inc. spokesman, said, "Our 100% All Natural Marinated Fresh Chicken bears a USDA-approved label and includes no artificial ingredients. This product line includes chicken, chicken broth, sea salt and natural flavor. A Tyson-sponsored national study found that a majority of con-



One point of contention in the natural poultry debate is whether the term "natural" should be reserved just for chicken and turkey without any additives.



## ADVOCATES HELP WITH PATIENT CARE

In 2004, Edward Moskowitz was hospitalized near his home outside Miami with internal bleeding, but after a week he was worse, his daughter Sandy Tepper says. That's when he became a human pinball. Over the next seven weeks, he was sent to rehab, grew worse, was transferred by a new doctor to a different hospital, then was bounced for insurance reasons to a second rehab facility (at 2 a.m.), despite his daughter's attempts to intervene. Ordered to physical therapy a few days later, he struggled from his wheelchair and fell to the floor, dead of apparent heart failure. He was 84.

What if someone had been there to ask the right questions and ease the family's trauma? Enter the patient advocate, part of a growing field. Advocates, who are often former nurses or other health professionals, link patients and the health-care system. They can help get an elusive doctor's appointment, research treatments, file medical paperwork, or persuade an insurance company to cover a procedure. They might also stand in for far-away relatives by accompanying an ailing person to appointments or sitting at a hospital bedside. Some advocates work privately, on a case-by-case or hourly basis. Others work at no charge or are supplied by employers as part of benefits packages.

Unfortunately, finding good advocates

can be dicey. There's no licensing or credentialing process specific to health advocates, and no regulatory body oversees them, says Laura Weil, interim director of the master's program in health advocacy at Sarah Lawrence College in Bronxville, N.Y., the nation's only graduate program in health advocacy. But it makes sense to follow these guidelines:

**For someone who's employed:** See whether his or her benefits include patient advocacy. Many large employers contract with companies such as Health Advocate, the nation's biggest employee-based advocacy firm, staffed by registered nurses and benefits experts.

**For someone in a hospital or nursing home:** Ask whether there's an in-house patient advocate who mediates between families and staff members. (But be aware that such advocates are on the institution's payroll.)

**If a chronically ill person can't get care:** Contact the nonprofit Patient Advocate Foun-



**NEEDED: PATIENT ADVOCATE** Sandy Tepper's father, Edward Moskowitz, was shuttled from one facility to another, with little coordination of care.

ation (800-532-5274; [www.patientadvocate.org](http://www.patientadvocate.org)), which provides free mediation services on a case-by-case basis. The Web site includes resources to help navigate insurance issues as well as patient chats.

**To hire a private advocate:** Get a résumé, check references, and ask what experience the person has with similar cases. Obtain price estimates in writing.

PHOTOGRAPH BY BRIAN SWITH

## Buying this chicken? You could pay up to \$1.70 for broth



Perdue, Pilgrim's Pride, and some other poultry companies inject, immerse, or vacuum-tumble some of their products with broth or salty solutions to try to make them more tasty, juicy, and tender. But pumping up meats can also add water weight and sodium. The Department of Agriculture requires labels on what it terms "enhanced" poultry and meat, including beef and pork, to reveal the amount of solution but has set no maximum level. The practice has become so prevalent, some chicken producers say, that about 30 percent of chicken sold at market may be enhanced.

When our reporter visited eight supermarkets in the Washington, D.C., area he found chicken and turkey products ballooned with 10 to 30 percent of their weight as broth, flavoring solution, or water. Sodium levels ranged from 190 to 840 milligrams per serving, far higher than in poultry that isn't juiced up. That some of these enhanced products claim they're "natural" is ruffling feathers. Seventy percent of people surveyed by the Consumer Reports National Research Center last June said they think that the label "natural" should mean no salt water was added.

The USDA is under pressure from Congress and even some in the poultry industry to tighten the rules, and a USDA spokeswoman says the agency is determining its next steps. Meanwhile, to avoid paying chicken prices for salt water, you'll need to read labels.

**WATER WEIGHT** Perdue adds broth and salt to some poultry, boosting its weight and sodium content. This "enhanced" chicken cost \$9.48 at a Wal-Mart in Alexandria, Va.

## What's in your chicken?

Poultry gets plumped with water, salt and other additives

By Meredith Conn  
Sun reporter  
June 12, 2007

Those chicken breasts and thighs for sale in the grocery meat case might not be all bird, and consumer advocates say few shoppers know it.

Processors have been injecting some fresh poultry with up to 15 percent water, salt and elements of seaweed in recent years because, they say, it makes the meat taste better and government regulators allow it.

But critics say almost a third of the chicken Americans now buy has the additives, so it costs consumers more when it's sold by the pound and pumps more unhealthy sodium into their meals.

A coalition of consumer and health groups, lawmakers and some processors are pressing the U.S. Department of Agriculture, which is rewriting rules for food labeling, to stop companies from calling meat with additives "100 percent natural." And they want to force companies to enlarge the fine print on their packaging so consumers are more likely to notice what they are buying.

"I assumed it was all chicken," said Dave Alter of Baltimore, who picked up a package at a local Safeway recently that was injected with chicken broth and other additives. "I never noticed anything on the label. ... I certainly don't want more sodium."

For the most part, processors acknowledge that the labels are confusing and are not fighting changes. But they are split on whether it's OK to say chicken is natural when it's infused with salt water, or "chicken broth" as it's sometimes called.

The processors call chicken with additives "enhanced" and have been selling such products for about four

years. But some companies began labeling it natural in 2005. That's when USDA approved the companies' use of naturally derived elements for boosting flavor and moisture, said Julie Greenstein, deputy director of health promotion policy at the Center for Science in the Public Interest.

In Maryland, fresh poultry has become the biggest segment of the farm economy, worth a half-billion dollars in sales in 2005, or a third of farm sales. Growers dot the Eastern Shore, and Perdue Farms Inc., one of the nation's largest poultry companies, is based in Salisbury.

Chicken is the meat of choice in many U.S. households, and that makes the labeling issue especially pressing, Greenstein and others said. Americans ate an average of 88 pounds of chicken last year, compared with 39 pounds 30 years ago, according to industry data.

But the critics estimate that consumers are paying more than \$2 billion a year for such fresh chicken and getting salt water. The chicken also contains up to eight times the amount of salt per serving - about 370 milligrams of sodium versus 45 milligrams, in a four-ounce serving of skinless, boneless chicken breast.

Processors use USDA guidelines from 1982 that were tweaked in 2005. Those guidelines say natural food is minimally processed and contains nothing artificial or synthetic and no coloring or preservatives. Changes in food technology have muddied terms over time, and support for a modern, formal definition has picked up steam, even in the industry.

Hormel Foods Corp. petitioned USDA's

Food Safety and Inspection Service in October to rewrite the label rules for sliced deli meats made from poultry and other meat. Though other meats are injected with additives, poultry and pork are enhanced most often and labeled natural. Some Hormel competitors were using sodium lactate, a known preservative, but calling the product natural.

Federal officials expect to propose some rules and solicit comments in the fall, but an agency spokesman said they aren't prepared to say what the new guidelines will include.

A big critic of the natural labels has been one of the chicken industry's own, Laurel, Miss.-based processor Sanderson Farms Inc. Lampkin Butts, president and chief operating officer, said he's hoping the USDA acts fast to clear up the confusion. It's a competition issue. If shoppers know he doesn't enhance his chicken, he'll sell more than those who do.

But he said consumers can't easily tell the difference because injected chicken looks the same. Shoppers have to inspect the packaging for small type or check the back of the package for sodium content.

"We had complained in Washington to no avail," he said. "The Hormel petition opened the book for USDA to consider their policies on what is 'natural.' ... We're hoping they can sit down and write a reasonable policy with the consumer in mind and not drag this out two or three years."

Meanwhile, companies say they plan to continue enhancing meats they sell because consumers prefer it.



Gary Mickelson, a spokesman for Springdale, Ark.-based Tyson Foods, one of the nation's largest processors, said the company agrees that USDA needs to update the definition of natural so consumers understand what they are buying. But he said consumers will accept some naturally derived elements in their chicken for better taste, and the company should still be allowed to label it natural.

The company refers to its chicken with additives such as chicken broth, sea salt and natural flavor as marinated.

"Surveys show that consumers prefer marinated chicken over conventional chicken," he said "An increasing number tell us they want all natural chicken, yet prefer the taste and juiciness of marinated product. Marinated chicken is more forgiving for the home cook because it turns out tender and juicy."

Perdue says it also believes in allowing consumers to decide what to buy, so long as the label does not confuse them. The company has been enhancing some of its chicken since 2003, under the brand Tender & Tasty, but does not call it natural. Officials want the rules to ban others from calling similar products natural.

"We do not believe it is acceptable to label 'enhanced' fresh poultry as '100 percent natural' or 'all natural' under any circumstance," said Julie DeYoung, a Perdue spokeswoman.

Some lawmakers wrote to the USDA in May about changing the policy. Rep. Dennis Cardoza, a California Democrat who chairs the House Agriculture Committee's panel on horticulture and organic agriculture, and Rep. Charles W. "Chip" Pickering Jr., a Mississippi Republican, called on USDA to make swift changes to the natural label rules.

"Given the magnitude of this deception on consumers' food budgets and its health implications with regard to sodium, we expect USDA to use its

authority to quickly put an end to these misleading labels," the letter said.

And consumers, including William Rajaram of Baltimore, do say the labels are misleading. He recently picked up a package of chicken injected with "15 percent chicken broth" and didn't notice the added sodium because he only looked at the protein and fat content.

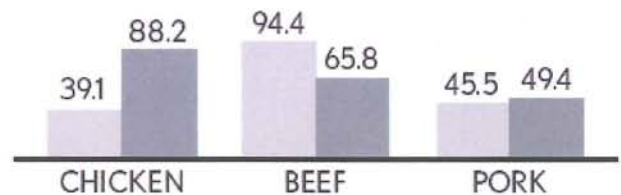
"That sodium makes me not want it," he said. "It's unhealthy for me, but it could be devastating to someone with high blood pressure. The wording should be bigger, definitely."

###

## CHICKEN CONSUMPTION ON THE RISE

1976 2006

Per capita consumption, in pounds:



Source: National Chicken Council based on USDA data

[SUN NEWS GRAPHIC]

# Arkansas Democrat Gazette

NORTHWEST ARKANSAS EDITION

May 2, 2008

BALTIMORE — A federal appeals court refused to block an order barring Tyson Foods Inc. from advertising that its poultry products don't contain antibiotics thought to lead to drug resistance in humans.

The 4th U. S. Circuit Court of Appeals in Richmond, Va., denied a motion by Tyson on Wednesday to stay the order pending appeal. The Springdale, Ark., food giant had asked the court to stay a ruling by a Baltimore judge, who issued a preliminary injunction last week barring the advertisements while the case is pending.

Tyson issued a statement Thursday saying it is not currently running any advertisements and is working with stores to remove marketing materials by a May 15 deadline set by U. S. District Judge Richard Bennett in Baltimore. Tyson added that it is weighing its legal options and continues to believe it has acted responsibly.

The lower court ruling was a victory for rivals Perdue Farms Inc. and Sanderson Farms Inc., who are suing to stop the advertisements, which they claim are misleading because none of the companies uses those types of drugs and shoppers could be led to think other companies use the drugs.

Bennett said in his ruling that he was "satisfied that the consumer public is being misled" by the "Raised Without Antibiotics" advertising. The ruling affects all advertising and marketing, but not package labeling, which is regulated by the U. S. Department of Agriculture.

On April 25, Mariko Cohen, Monique Gilles, Kenneth Michael Freeman, Shannon Zimmerman and Elizabeth Guard filed suit against Tyson in U. S. District Court for the Eastern District of Arkansas, Western Division, in Little Rock. The plaintiffs are seeking class status.

In the complaint, the plaintiffs called Tyson's no-antibiotics marketing campaign a "calculated and cynical" scheme, and said the claim led them to buy more Tyson chicken at higher prices than was fair.

"We firmly believe we have acted responsibly in the way we have labeled and marketed our products and will vigorously defend ourselves against these unfounded claims," Tyson spokesman Gary Mickelson said in a statement about the Arkansas suit Wednesday.

Charles Hansen of the Truthful Labeling Coalition, whose members are Perdue, Sanderson and Livingston, Calif.-based Foster Farms, said his group had asked the USDA to rescind approval for labeling with the statement "Raised without antibiotics that impact antibiotic resistance in humans."

Tyson, Perdue and Sanderson say they all use feed containing ionophores, which are largely considered to be antibiotics. However, the substances are not used in humans and thus are not believed to raise human health concerns.

Last spring, the USDA said Tyson could label its foods as "raised without antibiotics," but the federal agency later reversed that decision after Tyson had spent money on advertising and packaging. Tyson was eventually allowed to use the claim "raised without antibiotics that impact antibiotic resistance in humans."

Sanderson, based in Laurel, Miss., has argued it lost a \$ 4 million account to Tyson because of the advertising campaign, and Salisbury, Md.-based Perdue claims it has lost about \$ 10 million in revenue since last year.

Bennett ruled that the qualifying language was not understood by a substantial portion of the consumer public and that the advertising "may even reinforce consumer misconception."





January 26, 2008

## **Tyson Adjusting Advertising After Complaints**

By LAUREN ETTER  
*January 26, 2008; Page A12*

**Tyson Foods Inc.** said in federal district court that it is revamping the advertising of its antibiotic-free chicken products, after competitors had alleged false and misleading advertising by the company.

In court filings, the company brushed off competitors' allegations and said it had already independently changed the advertising.

"No advertisement containing the 'Raised Without Antibiotics' claim was approved to run after January 20, 2008," according to a legal filing by Jenna Johnston, senior counsel for Tyson.

Competitors claimed they had witnessed the ads being aired and displayed since then.

The snag with the ads represents the latest setback for the Arkansas-based chicken producer, which has been touting its line of antibiotic-free chicken as part of a \$70 million advertising campaign.

Last month, Tyson agreed to stop using a version of its antibiotic-free labels on its chicken products after the U.S. Department of Agriculture concluded it had awarded the label mistakenly, because the company was still using medication that it characterized as antibiotics.

Despite the USDA decision, Tyson continued advertising the product as "antibiotic free" without further clarification on billboards and television, using similar language that was contained on the prohibited labels. Tyson said the USDA never outlined a time-frame for the phaseout of "nonlabel advertising such as television ads," according to a legal declaration by Nancy Bryson, an attorney representing Tyson. She also is the former general counsel of the USDA that oversaw the original approval of Tyson's label.

Four of Tyson's competitors -- Perdue Farms, Sanderson Farms Inc., Gold'n Plump Poultry Inc. and Foster Poultry Farms -- accused Tyson of displaying misleading advertising claims in violation of federal and state law and sent a letter to Tyson asking the company to pull its ads.

In a response letter dated Jan. 18, Tyson's attorneys neither admitted nor denied the claim, but said "making threats premised on baseless assertions only reinforces Tyson's view that it is your clients -- not Tyson -- who are engaging in unfair and anticompetitive conduct aimed at stifling, not promoting,

competition."

This past week, the four companies, who have formed a group they call the Truthful Labeling Coalition, asked the court to issue a temporary restraining order. A judge denied the competitors' request for a temporary restraining order Friday.

Tyson has been in a protracted regulatory battle with the USDA for months now. In May, the agency approved Tyson's antibiotic-free label. In June, the company announced that it was "the first major poultry company to offer fresh chicken raised without antibiotics on a large scale basis" and it rolled out the new ad campaign titled "Thank You," which was intended to "convey how Tyson products help make Mom a hero at mealtime." But in September the government agency said that it had mistakenly approved the label and demanded that Tyson remove the labels or clarify them.

At issue is Tyson's use of an animal medication called ionophores, commonly added to poultry feed to help prevent an intestinal parasite that can lead to lower body weight or death in poultry, causing economic loss to producers.

Ionophores aren't used in human medicine and therefore don't pose an immediate risk of causing antibiotic resistance in humans, something that is of growing concern to the medical and scientific communities.

Most large poultry producers use ionophores. Tyson disputes the USDA finding and says the department knew that it was using the medication when it was awarded. Still, Tyson changed its labels to read "Chicken Raised Without Antibiotics that impact antibiotic resistance in humans."

**Write to** Lauren Etter at [lauren.etter@wsj.com](mailto:lauren.etter@wsj.com)<sup>1</sup>



# The Modesto Bee

modbee.com

Posted on Tue, Jan. 15, 2008

Your 'natural' chicken should not include a ton of sodium

By **BILL MATTOS**

*last updated: January 15, 2008 03:53:11 AM*

Consider this: You pick up a package of chicken breasts labeled "100% all natural" and cook them for your family. You think you've done something good for everyone's health, right?

What if you found out you've just fed your family as much sodium as if each one had eaten a bag of potato chips? It is quite possible that you did. That's because that "100% all natural" chicken could have been injected with up to 15 percent saltwater or seaweed solution -- meaning you've not only drastically increased your sodium intake, you've also paid for the weight of all that salt water.

Feel duped? Angry? Fed up? You should and so do I.

As president of the California Poultry Federation, I'm here to say your concerns are justified. The members of our trade association pride themselves on the accurate, honest labeling of the more than 15 million pounds of chicken they ship weekly to retail grocers throughout the state. If it's from Modesto-based Foster Farms, for example, and it says "fresh and natural," you have my personal guarantee that it is.

In 2007, we founded the Truthful Labeling Coalition with two other poultry manufacturers who share our core values -- Sanderson Farms in the South and Gold'n Plump in the Midwest. Our three companies have rallied the support of 40 congressional representatives, including California's senators, Barbara Boxer and Dianne Feinstein, and Reps. Dennis Cardoza, George Radanovich and Dan Lungren. They and 35 of their Democratic and Republican colleagues wrote to Chuck Conner, acting secretary of agriculture, in protest of allowing such products to be labeled "100% all natural" when in fact it might be injected with saltwater or seaweed solutions.

Our efforts also have garnered the support of leading consumer and health groups, as well as more than 30,000 concerned citizens nationwide who want to ensure the truthful labeling of fresh chicken products so consumers can make informed choices. Most recently, Perdue Farms, the nation's third-largest poultry manufacturer, joined the coalition; now, our industry representation extends from coast to coast.

We continue to urge the USDA to bring clarity and consistency to its labeling policies on the "100% all natural" issue.

We're also taking the U.S. Department of Agriculture to task on its troubling, inconsistent and contradictory decisions on the "raised without antibiotics" claim made on some poultry labels.

While we press on in Washington, we'd like to recommend that everyone read poultry labels carefully before making purchases. And, if moved to do so, to log onto [www.truthfullabeling.org](http://www.truthfullabeling.org), where you can join us in this important cause. Clearly, there are no chickens on either side of the aisle when it comes to truthful labeling.

Mattos is president of the Modesto-based California Poultry Federation.

# Chicago Tribune

January 6, 2008

## What does natural really mean?: As Americans hunger for healthier food, new efforts to define the term turn messy

Federal meat regulators this month are soliciting public comments on a label they believe will better define "natural" meat. The label, dubbed "naturally raised," would attest that a cut of meat came from an animal free of antibiotics and growth hormones.

Here's a comment from Urvashi Rangan, a senior scientist at Consumers Union: "It's not quite as bad" as regulators' definition of "natural" itself.

Ouch. Welcome to the complicated battleground over a seemingly simple word. "Natural" is an increasingly important claim to American consumers searching for healthier food.

Yet the word has long had a fuzzy regulatory definition, a condition that's increasingly under fire and not only from advocacy groups such as Consumers Union, but from some foodmakers, too, including several chicken producers and Downers Grove-based Sara Lee Corp.

Both of the nation's main food regulators, the United States Department of Agriculture and the Food and Drug Administration, are in the midst of significant reviews over what constitutes "natural." Even consumer advocates admit they don't have an easy job.

"Defining natural is very difficult and messy," said Michael Jacobson, executive director of the non-profit Center for Science in the Public Interest. Indeed, everything from soda pop to potato chips has been marketed as natural.

Jacobson's group, which tracks food labeling and nutrition issues, at least thinks it knows when a product is not natural. And it's taken to task companies it believes are misusing the natural label, including Northfield-based Kraft Foods Inc.

A year ago, the Center for Science in the Public Interest sued Kraft for marketing its Capri Sun beverage as all-natural. The suit was dropped after Kraft said it was reformulating Capri Sun and dumping the all-natural phrase.

High-fructose corn syrup, a key ingredient in Capri Sun, was the critical element in the dispute, as it has been in several other dust-ups over natural claims. Jacobson's group argues that while corn is natural, high-fructose corn syrup is man-made.

The sugar industry, the corn-sweetener business' main rival, not surprisingly agrees, and a big fight over the issue is pending before the FDA.

The term "natural" is not to be confused with "organic," a designation that is defined in much more detail by food regulators. USDA rules implemented in 2002 lay out specific production methods for foods to be called organic; animals can't generally be treated with growth hormones, for instance.

"We consider it a meaningful label," said Consumer Union's Rangan.

### Increasing appetite

The market for both organic and natural products is booming. Between 2004 and 2006, sales of natural food and beverages -- including organics -- increased 33 percent, according to a report last fall by Mintel International, a



consumer research outfit. Meanwhile, the number of new food and beverage products claiming to be all-natural or organic soared from 1,665 in 2002 to 3,823 in 2006, according to Mintel.

That increasing demand is driven partly by consumers' increasing worries about food safety, the Mintel report said. "The desire for safe and pure foods, free from additives and preservatives, is a major driver when consumers consider choosing natural over mainstream food products."

But natural doesn't necessarily mean safe, even if consumers think it does, say some food technology experts. "We can't define [natural] in terms of food safety," said Roger Clemens, a spokesman for the Chicago-based Institute of Food Technologists and a professor at the University of Southern California.

Kathy Glass, a scientist at University of Wisconsin-Madison's Food Research Institute, agreed. The "natural" tag, she added, "is more of a marketing gimmick than anything else."

Regulatory definitions don't help matters. The FDA has no formal definition for natural. It hasn't objected, though, to the use of the word for products that contain no artificial colors or flavors, or synthetic substances.

The USDA, which regulates meat and poultry, has a definition: Natural products have no artificial flavors or colors, or synthetic ingredients or chemical preservatives -- and they are "minimally processed."

But that definition deals only with an animal after it's been slaughtered. Many consumers believe natural meat also entails how an animal lived, said Rangan of Consumers Union, which publishes Consumer Reports magazine.

Last summer, 89 percent of consumers surveyed by Consumer Reports said "natural" meat should come from animals whose diet was natural and free from drugs and chemicals. In the same survey, 83 percent said those animals should also be raised in a "natural environment" -- not hemmed in small pens, for instance.

The USDA's proposal for a new "naturally raised" label is intended to address such consumer sentiments, as well as speak to concerns in the meat industry, said Billy Cox, a USDA spokesman. Some companies that specialize in naturally raised animals want such a label in order to distinguish their product.

The voluntary label, as proposed, would also assure consumers that they're buying meat from animals that never consumed feed containing animal byproducts.

The USDA unveiled the label proposal in late November and is gathering public comments through Jan. 28 before eventually drafting a final rule. Rangan acknowledged that "naturally raised" is an improvement over USDA's "natural" definition.

But it still doesn't address the issue of raising animals in confined -- and therefore unnatural -- quarters, she said.

The "naturally raised" label wouldn't replace USDA's current definition of natural; it's aimed more at serving as a marketing tool for companies and consumers. But the agency is reviewing its overall definition of natural, too, Cox said.

### **Battle lines emerge**

Contentiousness over that definition is also pitting companies against each other.

For example, three chicken producers -- Foster Farms, Sanderson Farms and Gold'n Plump Poultry -- last year formed the "Truthful Labeling Coalition" to battle poultry giants Tyson Foods and Pilgrim's Pride over natural claims. (A fifth chicken firm, Perdue Farms, joined the group last month.)

The group is petitioning the USDA to abandon its position that chicken can be called "natural," even if it's been injected with a broth of saltwater or seaweed. Such broths are allowed because they are composed of natural ingredients such as salt.

Both Tyson and Pilgrim's Pride use the practice on one line of natural products, though they also market a natural chicken without the broth. Rivals such as Sanderson Farms, as well as some consumer advocates, say adding the broth is on its face not natural because it imparts more salt than a chicken naturally has.

Lampkin Butts, president of Sanderson Farms, said the main reason for the salt-based baths is "economic." Chicken producers pump in salt broth of up to 15 percent of a chicken's weight, thus giving consumers less bird per pound for their money, he said.

But Tyson and Pilgrim's Pride say they're motivated not by economics: Tyson says that in some cases a salt marinade can lower costs to consumers.

Instead, both companies say some consumers prefer marinated chickens, finding them more tender and juicy. Tyson says it conducted a national study and found that the majority of consumers find it acceptable that salt and other natural items are added to products labeled natural.

Another natural scrap in the meat market involves sodium lactate, a natural preservative that is widely used on meats.

In 2005, the USDA changed its policy and said corn-derived sodium lactate is acceptable for meat labeled natural, in essence putting it in a similar category as salt, spices and other natural preservatives. But in October 2006, Hormel Foods petitioned the USDA to return to its original position on sodium lactate.

Hormel uses sodium lactate, but not on foods it markets as natural. It argued that sodium lactate is a preservative, regardless if it's derived from corn. And only certain natural items spelled out in USDA's regulations -- such as salt or spices -- can serve as natural preservatives. Sodium lactate isn't among those specifically spelled out.

Thus, Hormel claimed that the USDA's 2005 policy shift was inconsistent with the agency's own rules and that sodium lactate could not be classified as a natural preservative.

The USDA reversed itself in late 2006, a move that in turn helped prompt Sara Lee last year to petition the agency. Sara Lee, which markets some of its bread, meat and cheese products as a natural, argued that corn-derived sodium lactate is natural, in the same league as salt.

Sara Lee also petitioned the FDA and asked it and the USDA to harmonize their definitions of natural. "The goal is uniform consistency in the marketplace," said Mike Cummins, a Sara Lee spokesman.

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### **Battle over a word**

The Food and Drug Administration has no formal definition but hasn't objected to the use of the word for products that contain no artificial colors or flavors or synthetic substances.

The U.S. Department of Agriculture, which regulates meat and poultry, defines as natural those products that are "minimally processed" and contain no artificial flavors or colors, or synthetic ingredients or chemical preservatives.

Both agencies are reviewing their definitions of natural.

"Natural," said Kathy Glass, a scientist at University of Wisconsin-Madison's Food Research Institute, "is more of a marketing gimmick than anything else."

Sources: FDA and USDA

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# The Republican.

## Truth in food labels from common sense

Thursday, November 08, 2007

Now on sale at your local market: completely unnatural foods. They are not, of course, labeled as such. There is no sign for "unnatural sodas," no refrigerator case beneath the legend "unnatural chickens." Such items wouldn't exactly be customer favorites.

So how then do their labels read?

Some of them, oddly, are labeled as "natural." And other manufacturers and producers would like to follow suit. "Natural," of course, is good marketing. Even when the product in question is about as natural as processed meat.

Two chickens are sitting side by side, one bearing a sticker calling it "natural" while the other is free from that label. Many consumers these days are going to gravitate toward the real McCoy. Unfortunately, the label may not be telling much of a story.

That's why the federal Food and Drug Administration and the U.S. Department of Agriculture are trying to come up with uniform labeling standards so that shoppers are getting what they think they are getting. And as those agencies debate the matter, food companies are weighing in - loudly. Companies want their products to be able to be labeled as "natural" And at the same time, the products of competitors should not be allowed to carry any such designation.

They may be arguing over specific ingredients, but the bottom line is that they are looking for an advantage. A manufacturer who uses high-fructose mm syrup as a sweetener wants that to be thought of as natural. Another company that relies on old-fashioned sugar thinks that such a label would be an abomination.

We've got a suggestion for the authorities: You don't need a science degree to know what's unnatural. Chicken fattened up with salt water and meats shot full of preservatives don't make the grade. In other words, authorities should use a little common sense when determining what can be called "natural."

Some food processors might not like the result, but consumers would benefit greatly.



## **Battle Over 'Natural' Food Designation**

By ANDREW RIDGES

November 7, 2007

WASHINGTON (AP) - It's a fight that has the nation's largest chicken producers squabbling, Big Sugar and Big Corn skirmishing and Sara Lee mixing it up with Farmer John. Lawmakers, too, have joined the fray, which already is thick with dueling petitions and at least one lawsuit. Meanwhile, government food regulators are uncertain how to proceed.

The question is at face value a simple one: When can food products, from chicken breasts to soda pop, rightfully be labeled as "natural?"

Wrapped up in it, however, are some far trickier questions: Is it ethical to charge for saltwater that increasingly pumps up supermarket chickens? Is the sodium lactate used as a flavoring and preservative in sliced roast beef "natural?" How about the high-fructose corn syrup that sweetens sodas?

Equally simple answers appear elusive.

"It's worth bringing in the rabbis to analyze these situations because it's complicated, it's subtle. You can argue from both sides. It has fine distinctions," said Michael Jacobson, executive director of the Center for Science in the Public Interest.

The watchdog group's take on the matter is clear: It has threatened to sue soft-drink companies like 7-Up producer Cadbury Schweppes Americas Beverages for promoting as "100 percent natural" drinks sweetened with high-fructose corn syrup.

It also has complained that chicken producers are pumping up (and weighing down) their "all-natural" birds with salt water and broth, a growing practice that 40 members of Congress recently called misleading and deceptive.

Poultry giant Tyson Foods Inc. says its marinated chickens are all natural because they contain no artificial ingredients. And its survey work suggests consumers prefer marinated chicken over "conventional chicken" anyway since it's tender and juicier, company spokesman Gary Mickelson said.

Tyson competitors, like Sanderson Farms Inc., say not so fast.

"Under any definition of the term, natural chicken does not contain salt, phosphates, sea salt, preservatives, carrageenan, nor is it pumped with up to 15 percent solution and other ingredients," Lampkin Butts, president and chief operating officer of Sanderson Farms, told a federal hearing last year.



Still, even Tyson supports revisiting the Agriculture Department's definition of "natural." In the mean time, it proposes a two-tier definition that would cover chicken, beef and pork that contains no added ingredients, plus those meats prepared with all-natural ingredients.

Other food companies have chosen their own sides in the debate. They have lodged petitions, comments and lawsuits with the government and are holding out that a definitive answer on what is (and isn't) natural is forthcoming.

At stake is a shot at increasing their share of the estimated \$13 billion-a-year market for "natural" foods and beverages - a market whose 4 percent to 5 percent annual growth outpaces that of the overall grocery category, according to Packaged Facts, a market research company.

Any sort of federal ruling would, alternately, either narrow or broaden current rules and regulations that govern use of the "natural" label.

A critic maintains that the push is a bald-faced bid to manipulate federal policy for financial gain, something the feuding parties are quick to accuse each other of doing, and not to add to the public good.

"What looks like a neutral issue or question, such as the meaning of 'natural,' is not neutral at all," said former Labor Secretary Robert Reich, who tackles the issue in the recently published "Supercapitalism."

Reich says the issue "has profound competitive consequences. Certain companies - sometimes whole sectors of a whole industry - will be advantaged or disadvantaged by how agencies define words that may appear in labels."

Meanwhile, the Food and Drug Administration and Agriculture Department both say they are weighing how to move forward.

The FDA generally allows foods to be labeled as "natural" if such a claim is truthful and not misleading and the product does not contain added color, artificial flavors or synthetic substances, spokeswoman Kimberly Rawlings said. Agriculture Department policy roughly mirrors the FDA's, though it adds that "natural" meat and poultry products cannot be more than minimally processed.

That's not good enough for industry.

The Sugar Association, in a February 2006 FDA petition seeking clarity on the issue, claims the original chemical state of sweeteners like high-fructose corn syrup - made by its arch rivals - is altered so significantly during processing that "the allowance of a 'natural' claim is exceedingly misleading," trade group president and CEO Andrew Briscoe III wrote the agency. The group represents producers of sucrose, made from sugar beets and cane.

The Com Refiners Association fired back in opposition, saying the sugar industry's claim would

draw an unjustified and inconsistent distinction between sucrose and the high-fructose corn syrup its member companies make - and which presumably would no longer be considered "natural."

"The Sugar Association's petition is a thinly veiled attempt to obtain a marketing advantage for sucrose over (high-fructose corn syrup)," Corn Refiners president Audra Erickson said in November 2006 comments to the FDA.

Meanwhile, in October 2006, Hormel Foods Corp., the maker of Farmer John and other brands, filed its own "natural" petition with the Agriculture Department, seeking in short to outlaw any natural claim on luncheon and other meats that contain sodium lactate.

The corn-derived additive is used as a flavoring and preservative. Only when a meat product uses sodium lactate as a flavoring, however, can it still be considered for a "natural" label, said Laura Reiser, a spokeswoman for the Agriculture Department's food safety and inspection service, citing a recent department decision.

"The change in the definition of 'natural' creates an exception for sodium lactate that misleads consumers who believe they are buying a product free of chemical preservatives, when they are not," Hormel spokeswoman Julie Craven said.

In January 2007, in clarifying remarks filed with the USDA in support of Hormel's petition, the Sugar Association's Briscoe weighed in and said providing a precise definition of what's natural "would help eliminate misleading competitive practices" - a clear swipe at his corn-syrup competitors.

Sugar produced from sugar beets and cane has lost ground to high-fructose corn syrup, which now accounts for a majority of the sweeteners shipped to the food and beverage industry, according to USDA statistics.

Sara Lee Corp. then followed in April 2007 with a petition to the FDA that presses that agency to define "natural" in a way consistent with the USDA. The Sara Lee petition also makes a case for considering sodium lactate "natural." The company's Hillshire Farms brand, for example, uses it as an ingredient.

"Natural preservatives, such as sodium lactate sourced from corn, are derived from plants, animals, and/or microflora and, thus, are 'natural' ingredients," its petition reads in part.

Hormel fired back in late September, filing a lawsuit that seeks a court order in part to force the USDA to rescind past approvals of "natural" labels on meat and poultry products that use sodium lactate as a preservative.

"The 'natural' thing has always been such a morass," said Urvashi Rangan, a Consumers Union senior scientist and policy analyst.



*Bakersfield Californian*

## *Eat chips or chicken?*

Nov 1, 2007

Here is today's nutrition quiz: Which food item contains more added salt: a bag of potato chips or a package of chicken breasts?

If you're like most Americans, you guessed the potato chips. But if you make a habit of reading nutritional labels, you probably know the sad truth: they're roughly equivalent in added salt content.

Many poultry processors inject chicken products with saltwater or seaweed extracts, sometimes equal to 15 percent of the weight of the pre-altered product. That adds up 370 milligrams of sodium per serving and forces consumers to pay 15 percent more for that package of chicken than they would otherwise.

Now a bipartisan group of 40 legislators from nine states, including Central Valley Congressmen Jim Costa and Kevin McCarthy, are calling upon the U.S. Department of Agriculture to do something about it. They want poultry processors to clearly tell consumers what they're getting -- with unambiguous labeling.

In the Oct. 11 letter, the 38 representatives and two senators said that allowing processors to add ingredients, such as sodium and seaweed extracts, and then label the products "natural," was misleading. Legislators also pointed to what they called "serious health implications" of sodium injection.

Consumers can salt and hydrate their own food without help from poultry processors. Packaging should clearly tell consumers what they're getting. Misleading labels that promote "100 Percent All Natural" products should be replaced with prominent disclosures: "May Contain Up To 15 Percent Saltwater and/or Seaweed Extracts." At least then consumers can make informed decisions between packaged chicken breasts and, say, potato chips.

# The Washington Post

## Crying Foul in Debate Over 'Natural' Chicken

By Cindy Skrzycki

Tuesday, November 6, 2007; D02

Pumped up saltwater chickens are on the regulatory menu in Washington as advocates for "natural" food demand labels that reflect what the product actually contains.

Actors wearing chicken suits were on the streets of the capital a few weeks ago, arguing that *Tyson Foods* and *Pilgrim's Pride*, the two biggest processors in the \$58 billion-a-year U.S. chicken market, shouldn't be able to call their birds 100 percent natural. That's because up to 15 percent of their weight is an injected solution of ingredients such as salt, broth and seaweed extract.

The publicity stunt, by a coalition of smaller processors, is another example of recent pressures on the government and the *Agriculture Department* to pay more attention to truth in labeling, additives and food safety.

"This is about the USDA not managing the use of the 'natural' label properly," said *Lampkin Butts*, president of *Sanderson Farms* in Laurel, Miss., one of the challengers. "Seaweed extract is in the ocean, not in chickens." His company is the nation's third-biggest publicly traded U.S. poultry processor.

Nonsense, counters *Ray Atkinson*, a spokesman for *Pilgrim's Pride* of Pittsburg, Tex., the world's biggest poultry processor. "We have 100 percent natural chickens as defined by USDA," he said. "That's what we comply with." The government test for "natural" is that the product not contain anything artificial or synthetic and that it be only minimally processed.

The Agriculture Department approved labels from Tyson and Pilgrim's Pride, reasoning that salt, seaweed and chicken broth were natural ingredients.

*Amanda Eamich*, a spokeswoman for the Food Safety and Inspection Service at the Agriculture Department, said the products are considered minimally processed because a cook can make a similar marinade at home with a fork and a plastic bag.

The word-splitting is important because about 30 percent of chicken now is enhanced with some kind of solution. Proponents say consumers prefer the moister meat that is easier to cook.

Tyson and Pilgrim's Pride processed half the 9 billion chickens raised in the United States last year, according to the *National Chicken Council*, a trade group in Washington. Chicken consumption in the country has climbed to 87 pounds per person, from 57 pounds 20 years ago.

"We have no issue with chicken that is enhanced," said Michael Helgeson, chief executive of *Gold'n Plump Poultry*, of St. Cloud, Minn. "But it shouldn't be labeled all-natural if you inject it with a solution." His company's enhanced chicken is labeled "extra tender."

*Foster Farms* of Livingston, Calif., along with Sanderson and Gold'n Plump, started the *Truthful Labeling Coalition*. The three companies, which say they add nothing to birds they advertise as natural, petitioned the Agriculture Department in July. They argued that consumers are deceived into paying for water instead of meat and are subjected to high levels of sodium.

The three companies also hired a lobbyist, a lawyer who is a former Agriculture Department official, and a public relations firm. They are gaining support from their local members of Congress.

"I would call it fraudulent," said Rep. *Dennis Cardoza* (D-Calif.), chairman of the *House Agriculture Committee's* horticulture and organic agriculture panel. Foster Farms is one of his constituents.

Forty House members sent a letter to the Agriculture Department Oct. 11, telling regulators to tighten their labeling policies. Cardoza said he is considering holding hearings.

An untreated chicken contains about 40 to 80 milligrams of sodium per four-ounce serving, the coalition said. Pilgrim's Pride uses chicken broth, salt and carrageenan, or seaweed extract, for enhancement. Its packages of boneless breasts, which bear a sign of the American Heart Association's approval, contain 330 milligrams of sodium per serving. Tyson's contain 180 milligrams.

Federal dietary guidelines say 2,300 milligrams a day should be the sodium limit for most people. Blacks, older adults and those with high blood pressure limit their intake to 1,500 milligrams a day. The *Food and Drug Administration* announced it would hold a hearing Nov. 29 on a public interest group's petition that the agency consider limiting salt in processed foods.

On the allegation of charging for water, Pilgrim's Pride's Atkinson said the company's enhanced chicken costs less per pound. He wouldn't say how much less.

*David Hogberg*, Tyson's senior vice president for fresh-meal solutions, said injecting or enhancing chickens costs the company more than it does some competitors because of the special process Tyson developed to "deliver what consumers want with less sodium."

The Agriculture Department started dealing with the additives issue after *Hormel Foods* of Austin, Minn., complained last year that its competitors were labeling deli meats as natural, even though they contained a chemical preservative.



The department held a hearing in December and was reviewing comments "to determine where we go from here," Famich said. In the meantime, Hormel sued the department over the labeling issue.

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***Stockton (CA) Record***

Selling of 'enhanced' poultry has Congress crying foul

By Reed Fujii

Record Staff Writer

November 02, 2007 6:00 AM

Poultry producers, Congress members and regulators are tussling over the classic Shakespearean question: "What's in a name?"

Or to mangle Juliet's phrase, "That which we call 100 percent natural chicken - injected with up to 15 percent brine, broth and flavor - would taste as sweet."

While such "enhanced" poultry may be labeled as natural under current U.S. Department of Agriculture rules, a number of producers and politicians are crying foul. The agency held a public hearing on the issue in December; accepted reams of ensuring comments as well as petitions and letters from the industry and politicians; and still continues to weigh all the arguments.

The latest missive came in the form of a letter, signed last month by 40 legislators including California's Democratic senators Dianne Feinstein and Barbara Boxer and Rep. Dennis Cardoza, D-Merced.

"When 40 members of Congress from nine states send a letter to the department of agriculture, they've got to pay attention," said Charles Hansen, a lobbyist working on behalf of the Truthful Labeling Coalition as well as the California Poultry Federation, who argue brine-injected chickens are anything but natural.

Jamie McInerney, Cardoza's press officer, said the USDA policy poses "an egregious problem in their labeling standards."

"People are paying too much for their chicken. For every 10 pounds of chicken, up to 1.5 pounds of it are water or seaweed," he said. A seaweed extract, carrageenan, is considered a natural additive.

The added salt found in many injected chickens is another issue for consumers, said Bill Mattos, president of the Poultry Federation, particularly for those who turn to chicken as a more healthful alternative.

"A lot of people on salt-restricted diets shouldn't be eating a lot of enhanced chicken like this," he said. "When people go buy fresh, natural chicken, they don't really believe it has anything in it besides chicken."

The labeling issue strikes right at the heart of Foster Farms, a Livingston-based poultry

producer that's built its business on fresh, natural chicken with no additives, said Greta Janz, vice president of marketing.

"We've done a tremendous amount of work to build that with consumers," she said.

But the USDA policies have blurred the lines of what is meant by "natural." As a result, consumers may not realize when they buy a chicken with a "100 percent natural" label it may have broth added to it.

A spokesman for Tyson Foods Inc., an Arkansas poultry producer, said consumers are quite accepting of natural additives.

"Our 100% All Natural Marinated Fresh Chicken includes chicken, chicken broth, sea salt and natural flavor," Gary Mickelson wrote in an e-mail. "A Tyson-sponsored national study found that a majority of consumers find it acceptable for some natural ingredients to be added to products and still be labeled or called 'natural.'"

In its comments to agriculture officials, Tyson suggests a two-part definition for products labeled natural, Mickelson wrote: "Chicken, beef and/or pork with no added ingredients or chicken, beef and/or pork products that contain only all natural ingredients."

Amanda Eamich, a press officer for the USDA's Food Safety and Inspection Service, said the agency continues to review the issue.

"We're still in the process of deciding where to go from here," she said Thursday. "(We're) considering all the issues that have been presented to us and (seeking) a determination that will have the best resolution. That could also include seeking additional public input."

Mattos said he's tired of waiting.

"If USDA is too afraid to act. We need a hearing," he said. "A

hearing before Congress." "We're hoping that we get a hearing set

up in the next month or two or early next year."



## Small Poultry Firms Push To Rein in Use of 'Natural'

By LAUREN ETTER  
May 17, 2007; Page A12

A coalition of poultry producers is mobilizing to push the Agriculture Department to tighten the definition of "natural," a word food companies often use on their labels to appeal to health-conscious consumers.

The coalition is made up of producers who don't typically use additives in their fresh chicken products. It wants the department, which is rewriting its 25-year-old definition of "natural," to craft a new one that excludes chicken products that contain anything other than chicken. The group, which includes Sanderson Farms Inc., Foster Farms and Gold'n Plump Poultry, plans to deliver its formal request to the agency in a letter this week.

Industry giants like Tyson Foods Inc. and Pilgrim's Pride Corp. recently have started labeling their products as "100% Natural," even though they are mechanically injected or tumbled with a marinade solution that consists of sea salt, water and in some cases starchy products like carrageenan, a seaweed extract that helps chicken breasts retain moisture.

The Agriculture Department currently decides on a case-by-case basis which products can use the "natural" label. The agency is guided by a one-page general principle that says "natural" products can't contain any artificial flavor, artificial color, chemical or synthetic ingredient. It also says that the product can only be "minimally processed."

Industry practices have changed significantly since 1982, when the policy was written. For years food companies relied more on chemicals in the manufacturing process. But today, they are increasingly using sophisticated industrial processes, rather than loads of artificial additives, to make products that meet consumer ideals of healthiness and taste.

The result is a blurring of lines as an increasing number of consumers are drawn to packages labeled "natural," "fresh," "free-range" or "organic." Last year, Tyson introduced a new line of products called "100% All Natural Marinated Fresh Chicken." The chicken is either injected or tumbled with a marinade solution containing chicken broth, sea salt and "natural flavor." Pilgrim's Pride, the nation's largest chicken producer, also recently introduced a line of "natural" chicken that contains chicken broth, salt and carrageenan.

Tyson says extensive surveys show that consumers prefer the enhanced chicken over conventional chicken. Pilgrim's Pride spokesman Ray Atkinson says the ingredients used to enhance chicken are all naturally occurring and that they don't "fundamentally alter the product."

Smaller poultry producers are crying foul. They say they have been using "natural" on their labels for years as a way to distinguish their products, which typically contain nothing but chicken. Now they contend that the big players are diluting the integrity of the "natural" label. "Seaweed occurs naturally in the ocean -- not in chickens," says Lampkin Butts, president of Sanderson Farms.

They also say big producers are misleading consumers by selling them a product that contains higher moisture content, which means more weight, without prominently declaring that on the label. The solution can account for as much as 15% of the weight of a package of Tyson's "All Natural" boneless skinless chicken breasts. The product typically costs the same per pound as its untreated chicken products.

Enhanced chicken also typically contains more sodium. A breast of untreated chicken contains less than 50 milligrams of sodium, compared with 320 milligrams of sodium in a single serving of Pilgrim's Pride's "100% Natural" split breast with ribs.

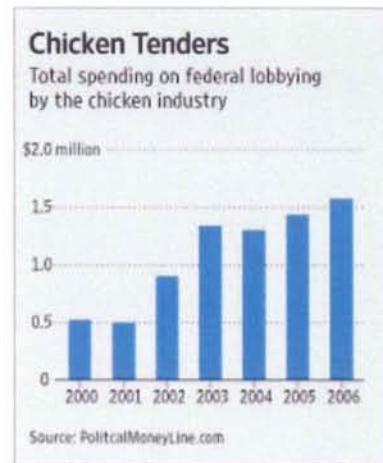
Dr. Stephen Havas, vice president of the American Medical Association, is concerned the added sodium "has potential health implications" because most consumers aren't reading labels on "natural" chicken because they expect it to be free from any additives.

The poultry coalition plans to ask the Agriculture Department to require poultry-product labels to include a more prominent description of what exactly the product contains. Currently the labels, which say something like "enhanced with up to 15% chicken broth" may not pop out to the casual shopper, even though the department requires the lettering to be no smaller than one-quarter the size of the largest letter on the label.

Robert Post, the department's director of labeling and consumer protection, says poultry processors using the injection method can advertise their product as "natural" even though injection requires a giant machine that sticks metal needles into the chicken. He says that is because, in the agency's views, the process is similar to the kind of tenderizing processes that consumers can use at home.

The coalition may face an uphill battle on Capitol Hill. Last year Tyson Foods, through its political action committee, spent \$185,000 on federal campaign contributions, while Foster Farms, spent \$8,000.

But smaller chicken producers have had success fighting the big boys before. In the late 1990s, a similar coalition succeeded in getting the Agriculture Department to forbid processors from labeling chicken as "fresh" if it had been chilled below 26 degrees Fahrenheit. The group's official slogan was "If you can bowl with it, it's not fresh" and it generated publicity by actually bowling with frozen chickens.





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**SPECIAL REPORT**

## Injection and Marination

by Allison Bardic, Senior Editor

Whether they're injected, massaged, or vacuum tumbled, marinated products are becoming more prevalent in meat cases everywhere. Consumer benefits range from the tender, moist, characteristics associated with enhanced meats to the convenience of marinated products that are ready to cook, easy to prepare, and packed with flavor.

"We've found there is a significant preference for enhanced products versus non-enhanced products," notes Dan Emery, vice president of marketing for poultry processor Pilgrim's Pride Corporation, Pittsburg, TX. "Consumers may not like the idea of enhancement, but when you show them enhanced product side by side with non-enhanced product and ask them to taste it, they clearly prefer it."

### The injection debate

For about a year Pilgrim's Pride has offered a complete line of exact-weight and non-exact-weight enhanced poultry products, generally defined by the industry as fresh, whole-muscle meat that has been injected with a solution of water and other ingredients that may include salt, phosphates, seasonings, and flavorings to enhance its texture, flavor, and consistency.

Among the major forces driving poultry enhancement, Emery points to enhanced products' ability to retain moisture, even when overcooked, resulting in consistent product tenderness. "When you cook enhanced chicken, it doesn't dry out. It's a lot more forgiving than non-enhanced varieties," says Emery. "It's definitely juicier and more tender. The only real negative is that you can't say it's 'all-natural.'"

Similarly, a study focusing on moisture retention, completed last year by the National Cattlemen's Beef Association Center for Research & Knowledge Management and led by Kansas State University's Jim Marsden, noted that, "Beef cuts injected with solutions designed to keep the cut tender and juicy even at higher cooked temperatures might lead to more consistently good eating experiences ... Needle injected or enhanced beef products may be one method that affords the consumer a more consistent eating experience."

Most consumers don't realize they're buying enhanced products when they do, however. Emery observes that his company's Butterball brand of turkey is hugely popular with consumers who have no idea it is enhanced. "No one reads the label, and if you have a superior product, consumers will buy it," he says.

Opponents of enhanced products, however, counter that they are just another way for manufacturers to generate more profits by selling meat that's pumped full of water.

Laurel, MS-based Sanderson Farms this year launched a consumer education initiative designed to shed light on enhanced chicken, for example. "By purchasing this altered chicken, many shoppers are paying for more than they realize - and it's turning out to be extra water, salt, and phosphates," the company contends. "Labeled 'enhanced with chicken broth,' this processed poultry absorbs the liquid, which accounts for up to fifteen percent of the product's weight, and could cost consumers, if all chicken were enhanced in this manner, an extra \$2.9 billion each year."

Sanderson Farms, dedicated to producing 100-percent chicken naturally, emphasizes that it does not add water, salt, and phosphates to increase the weight of its Sanderson Farms brand of fresh chicken. "Consumers need to be made aware that some of the chicken on the market contains extra water, salt, and phosphates," stresses Bill Sanderson, director of marketing for Sanderson Farms. "We urge shoppers to take an extra second to check the label on the front of the package, read the fine print on the back, and look for words like 'enhanced,' 'chicken broth,' or 'solution.'"

Sanderson Farms' initiative was followed up with a public awareness campaign led by the Modesto, CA-based California Poultry Federation (CPF) that also strongly urged consumers to read product labels. "Some markets across the Western United States offer only enhanced chicken in their fresh meat case, which at first glance appears to be fresh but isn't... We want to assure consumers that if they are buying fresh California chicken, they are not paying for water and salt," says CPF President Bill Mattson. "We are not saying there is anything wrong with enhanced chicken, but we do believe that consumers need to be made aware of the issue and should be educated that they have a choice when selecting chicken products from the fresh meat case."

Emery stresses that Pilgrim's Pride's enhanced poultry solution includes a binding agent to help maintain chicken's moisture. "A lot of companies use sodium as a binding ingredient, causing their products' sodium levels to go through the roof, but we use something else," he says, adding that for those consumers who prefer non-enhanced products, the company continues to offer that alternative as well. "Our corporate stance is that we are going to offer both products. Both have a benefit."

### Rubs and marinades

An endless variety of marinades also are at processors' fingertips, giving them the ability to build multi-levels of flavor. While the main purpose of marinating is to allow food to absorb flavors of the marinade or, as in the case of tough meat, to tenderize it, rubs typically consist of a blend of dry spices and herbs applied directly to the surface of meat or poultry.

For its part, Smithfield, VA-based Smithfield Packing Co.'s marination techniques combine a pump, then an application of hand-coated rubs. "We believe the benefit is uniform application of rub, and our pump levels are as low or lower than most competitors'," says Jim Schloss, vice president of marketing, Smithfield Foods.

Among the chief advantages of Smithfield's marinated products, Schloss points to their response to the consumer's need for taste, convenience, and variety. Today's trade need to feature items that appeal to consumers who can pick up such products as Smithfield marinated pork, beef, or turkey and have a dinner on the table in 45 minutes or less, he assesses. Other factors include the growing number of children and men who cook, and marinated products' optimal format for grilling which, as Schloss notes, has

"become an American pastime."

Smithfield Packing's marinated products encompass pork, beef, and turkey. Marinated pork varieties include tenderloins, loin filets, center cut loin roasts, center cut boneless chops (regular and thick cut), boneless sirloins, St. Louis ribs, and Chef's Prime roasts, of which Teriyaki, Peppercorn, and Italian Garlic and Herb flavors are consumer favorites.

Smithfield's marinated St. Louis rib flavors are Sweet and Sassy and Burgundy Peppercorn, while the marinated beef is a USDA Choice shoulder tender available in Herb Rubbed, Southern Basted, and Oven Roasted flavors. Turkey tenderloins come in Teriyaki, Southern Basted, and Lemon Pepper varieties.

"The latest meat and poultry marination trends are the use of more cuts such as St. Louis ribs; the move to extend the number of proteins a company markets; and different flavors to appeal to trends such as Pan Asian, various Hispanic cultures, and South American flavors," Schloss adds, noting that Smithfield's only significant production challenge related to the marination process deals with product changeovers. "We constantly search for the flavors that will appeal to the masses and thus enable us to have larger production runs."

Among its marinated products, Excel Corporation, a Wichita, KS-based Cargill Meat Solutions company, offers Sterling Silver® premium beef, pork, turkey, or ham, Honeysuckle White turkey, Shady Brook Farms turkey, and Tender Choice beef. The company's newest offerings include Sterling Silver Lemon Pepper Pork Loin filet, Home-style Pork Tenderloin and Pork Filets, Burgundy Peppercorn Pork Tenderloin, Sweet Ginger Teriyaki, Pork Loin Filet, and Tenderloins; Tender Choice Onion Garlic Beef Rib eye, Steakhouse Beef Rib eye, and Lightly Seasoned Rib eye (These flavors are also available for strip loins). In addition, Honeysuckle White/Shady Brook Farms has introduced Lemon Garlic, Rotisserie, and Home-style Turkey Tenderloins.

"The focus [regarding marination] has been to create product lines that improve the consumer eating experience," explains Norman Bessac, vice president of marketing for Cargill Meat Solutions. "We believe the work we have done in marinations and flavorings has allowed us to develop a complete line of products that offer consumers a great eating experience. Because consumers like the flavor and cooking performance, we have seen incremental sales for the category."

Bessac notes that Excel's most notable marination challenge has been to provide products with the correct level of seasoning to achieve an intense flavor without overwhelming the meat's flavor. "Using the right flavorings that do not hurt shelf life has also been important," he adds. "In the non-flavored pork items, making sure that we are adding the right level of marination to positively affect the cooking process without adding too much liquid or salt ... We match up process flow and procedures with the finished product requirements/characteristics. In our experience, we have not found one process that fits all of our needs. Making sure the product exceeds consumer expectations is the key focus and includes flavor, purge, and cooking process."

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## MEAT THE CHALLENGE

Retailers are finding a market for meat products pumped with enhancing solutions designed to make cooking a snap

By ROSEANNE HARPER

Consumers may not know why they don't overcook the pork loin anymore, but if they're happy with the end result — a perfectly cooked entree — then that's what counts, retailers said.

Enhancing fresh meat and poultry with a solution of broth, a sodium and water solution or a citric acid mixture is not new, but it's gaining ground. In its 2004 national meat case survey, Duncan, S.C.-based Cryovac found that 21% of fresh meat was enhanced. Broken down by species, the Cryovac figures show 45% of pork, 23% of chicken and 16% of beef was enhanced. The National Cattlemen's Beef Association, Centennial, Colo., and the National Pork Board, Des Moines, Iowa, co-sponsored the study.

Retailers, with their suppliers, have created highly touted private-label lines with some enhancement that makes for a more appealing texture, sometimes more flavor and always a product that's easier to cook, they

said. At the other end of the spectrum, there are retailers making a big thing of the fact that their fresh meat contains no added ingredients. Health and diets are another issue. Dietitians over the years have raised concerns that enhanced meats may not be a good choice for consumers on sodium-restricted diets.

Marsh Supermarkets' line of Marsh Signature Pork has other special attributes in addition to enhancement, Dewayne Wulff, Marsh's vice president of meat operations, is quick to point out.

"It's a total program," he said. "The meat comes from one breed of hog. We get it from just six Indiana farmers who raise the hogs for us, and they're monitored. The type of feed, the way the animals are raised are part of it. There's a solution of sodium phosphate added that does not exceed 7% of weight. The solution is to protect the integrity of the product and essentially make it 'goof proof' when it comes to cooking it."

Continued on Page 42









# Meat the Challenge

Continued From Page 42  
of fresh meat.

Many consumers may be completely unaware that the meat they're buying is enhanced with a solution. Indeed, the meat package's label, according to U.S. Department of Agriculture regulations, need only in-

dicate up to what percent of the meat's weight is solution and that message is in small print. However, most retailers are carrying a combination of both.

"It's to the poultry companies' credit that they're now creating packaging that in some way, sometimes by

color, distinguishes their enhanced product from their unenhanced," said Richard Lobb, spokesman for the National Chicken Council, Washington.

That is true, too, of the major pork processors, especially if there is a seasoning added, industry sources said.

Sources told SN, too, that the incidence of enhanced product merchandised in supermarkets' meat cases varies greatly from region to region and is not the rule, not yet. Meanwhile, SN's Midwest wholesaler/retailer contact said enhancement, even of pork, is seen less in the middle of the country than it is on the East and West coasts. And beef is the least likely of the proteins to be enhanced, probably because natural marbling makes the cuts less apt to dry out in cooking.



Consumers may not know it, but many chicken products contain added water.

# Deluxe Food Peet's Coffee

By DENISE CROSS

APTOS, Calif. — Deluxe Foods here is offering freshly brewed beverages at a new Peet's Coffee & Tea kiosk in the retailer's prepared-food section in the front of the store.

"The kiosk is approximately 150 square feet and resembles a smaller version of Peet's stores," said Kelly Krueger, senior account executive at Weber Shandwick Worldwide for Peet's Coffee & Tea, a Berkeley, Calif. based specialty coffee company.

Deluxe's aim is to enhance their customers' overall shopping experience. The coffee kiosk is the final phase of a seven-year remodel project to position Deluxe as a local leader in gourmet food retailing, officials at the family-owned, single-store independent said.

Shoppers can get a select line of Peet's fresh propri-



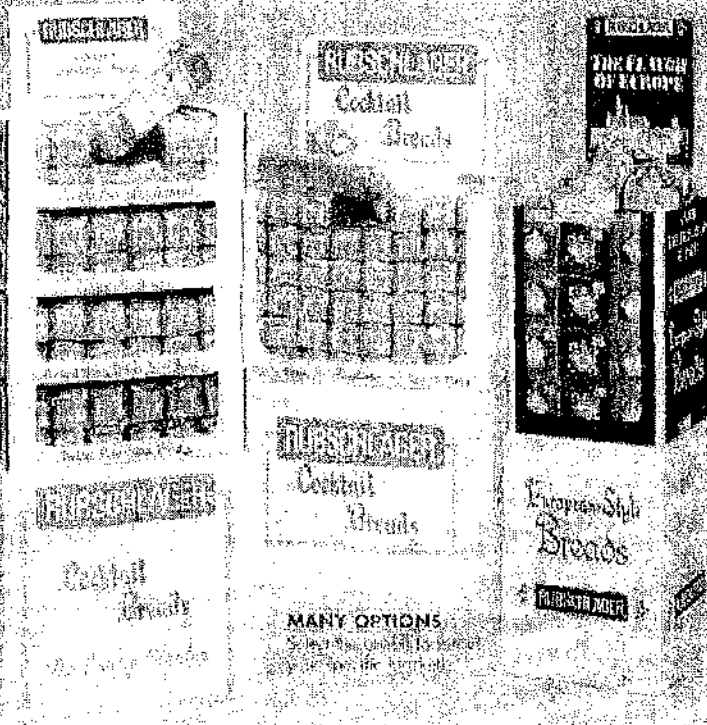
Deluxe Foods sells its own baked p

etary coffees and hand selected teas at the kiosk. There's no seating; shoppers drink the beverages as they shop. Drinks are brewed and presented according to the coffee company's standards.

A pastry display case featuring 50 assorted items

## MAXIMIZE SALES

Shopper displays make the BEST-SELLERS sell BETTER!



MANY OPTIONS

## Agenda of the Laws and Regulations Committee

Dennis Johannes  
Chairman  
California Weights and Measures

Reference  
Key Number

### 200 Introduction

The Laws and Regulations Committee (Committee) will address the following items at its Interim Meeting. Table A identifies agenda items by Reference Key Number, title, and page number. The first three digits of the Reference Key Numbers of the items are assigned from the subject series listed below. The fact that an item may appear on the agenda does not mean it will be presented to the NCWM for a vote. The Committee may withdraw some items, present some items for information and further study, issue interpretations, or make specific recommendations for changes to the publications listed below. The recommendations presented in this agenda are statements of proposal and not necessarily recommendations of the Committee. The appendices to the report are listed in Table B.

This agenda contains recommendations to amend National Institute of Standards and Technology (NIST) Handbook 130, "Uniform Laws and Regulations," 2003 edition, and NIST Handbook 133, "Checking the Net Contents of Packaged Goods," Fourth Edition. Revisions proposed for the handbooks are shown in **bold face print** by ~~crossing out~~ information to be deleted and underlining information to be added. Additions proposed for the handbooks are designated as such and are shown in **bold face print**. Proposals presented for information only are designated as such and are shown in *italic type*. "SI" means the International System of Units. "FPLA" means the Fair Packaging and Labeling Act. The section mark, "§," is used in most references in the text and is followed by the section number and title, (for example, § 1.2. Weight.) When used in this report, the term "weight" means "mass."

#### Subject Series

NIST Handbook 130 - General .....	210 Series
Uniform Laws .....	220 Series
Weights and Measures Law (WML) .....	221 Series
Weighmaster Law (WL) .....	222 Series
Engine Fuels, Petroleum Products, and Automotive Lubricants Inspection Law (EFL) .....	223 Series
Uniform Regulations .....	230 Series
Packaging and Labeling Regulation (PLR) .....	231 Series
Method of Sale Regulation (MSR) .....	232 Series
Unit Pricing Regulation (UPR) .....	233 Series
Voluntary Registration Regulation (VRR) .....	234 Series
Open Dating Regulation (ODR) .....	235 Series
Uniform National Type Evaluation Regulation (UNTER) .....	236 Series
Engine Fuels, Petroleum Products, and Automotive Lubricants Regulation (EFR) .....	237 Series
Examination Procedure for Price Verification .....	240 Series
Interpretations and Guidelines .....	250 Series
NIST Handbook 133 .....	260 Series
Other Items .....	270 Series

CURRENT PROPOSAL: Amend Handbook 133 § 3.2 Gravimetric Test Procedure for Liquids as follows:

3. ~~For milk, select a volumetric measure equal to the label declaration. For all other products, select a~~ volumetric measure that is one size smaller than the label declaration. For example, if testing a 1 L bottle of juice or soft drink, select a 500mL volumetric measure.

**BACKGROUND AND JUSTIFICATION:** Currently, Handbook 133 can be interpreted to state that you must use a volumetric measure equal to the label declaration when testing milk. The previous 3<sup>rd</sup> Edition Section 4.7, allowed for the use of a smaller sized measure. Milk should not be excluded from all other products. This proposal would allow the jurisdictions to continue to use the same measure so they would not be required to purchase new equipment

**HISTORY OF ITEM:** This is a new item. First introduced at the 2003 CWMA Interim Meeting, CWMA recommended adoption of this item.

## 260-6 Amend § 3.11 and MAV Table 2-10

SOURCE: Western Weights and Measures Association (WWMA)

CURRENT PROPOSAL: Amend the application and header of Handbook 133 Table 2-10 as follows to allow the MAVs that apply to Mulch and Soil to also apply to similar products, such as Wood Shavings and Animal Bedding:

Table 2-10. Exceptions to the Maximum Allowable Variations for  
Textiles, Polyethylene Sheeting and Film, Mulch and Soil, and Other Similar Products Labeled by Volume,  
Packaged Firewood, and  
Packages Labeled by Count with Less than 50 Items

Amend Handbook 133 § 3.11 to read:

### 3.11. Mulch and Soil, and Other Similar Products Labeled by Volume

**BACKGROUND AND JUSTIFICATION:** A manufacturer of wood fiber products feels that their wood shavings, labeled by volume, should receive the same MAVs as "Mulch and Soils." The product could conceivably be used in as many different applications as "Animal Bedding," "Insulation," "Mulch," (A Horticultural Above Ground Dressing), etc. The reasons for allowing expanded MAVs for Mulch and Soil also apply to other similar products. Item 250-10, which was adopted at the 83<sup>rd</sup> National Conference on Weights and Measures in 1998, and was entitled "Bark Mulch, and Other Organic Products – Maximum Allowable Variations" discussed the reasoning and the necessity for the expanded MAVs. This reasoning also applies to other similar products with irregular particle sizes and shapes, and that have poor measurement repeatability because of inherent product characteristics.

**HISTORY OF ITEM:** This is a new item. First introduced at the 2003 WWMA Meeting, WWMA recommended adoption of this item. The SWMA recommended that this item be withdrawn because there was insufficient data provided to justify further consideration.

## 270 OTHER ITEMS

### 270-1 Enhanced Product – USDA/FSIS Meat and Poultry Products

SOURCE: Central Weights and Measures Association (CWMA)

CURRENT PROPOSAL: The NCWM shall:

- (1) Establish a Working Group to study current market conditions for enhanced versus non-enhanced meat and poultry products, to determine the extent to which water and/or other added solutions are no longer retained in the product at the time of sale (i.e., are lost into the packaging material or are otherwise free-flowing) recognizing Federal regulations that are in place which govern labeling of such products; and



- (2) Direct the Working Group to make recommendations to the L&R Committee based on findings of the study concerning what is to be considered "reasonable moisture allowances" when conducting Handbook 133 inspections of enhanced meat and poultry products.

**BACKGROUND AND JUSTIFICATION:** Meat and poultry processors have been marketing fresh meat and poultry items to which water-based solutions of various compositions have been added, ostensibly with the claim that the solutions "enhance juiciness and/or flavor" and overall palatability. Wet tare testing in the State of Michigan has revealed that those solutions leach into the soaker pads and packaging material and are no longer contained in the product at the time of sale. Thus, they do not accomplish the stated purpose. This means that consumers are paying for water solutions: (1) at fresh meat and poultry prices, and (2) that are no longer part of the product. This causes economic harm to consumers and the marketplace.

In addition, fresh poultry has been processed for decades using a bath chilling method which causes the carcasses to uptake water to the extent that the USDA/FSIS has placed percentage limits on the amount of additional water the poultry is allowed to absorb (8 % whole/12 % cut up). Labeling on "enhanced products" that has been allowed by the USDA/FSIS ranges from "contains up to 33 % of a solution" to "up to 33 % of product weight is added ingredients." This labeling appears to be ineffective at best, and misleading at worst.

Dry and/or dry-used tare testing of these products cannot:

- (1) detect the levels of solutions claimed on packaging.
- (2) detect to what extent the artificially added moisture has leached from the products and has been either absorbed in soaker pads, or remains free-flowing in the packaging material.
- (3) yield data with which to determine "reasonable variations" from the stated net weight.

Recent laboratory tests on fresh, "enhanced" poultry products sold in the State of Michigan have revealed moisture losses ranging from 2 to 6.5 ounces.

USDA estimates indicate that with respect to chilled poultry, in 1996 consumers paid for 1.5 billion pounds of retained water at a cost of nearly \$1 billion. (USDA/FSIS, Retained Water in Raw Meat and Poultry Products; Poultry Chilling Performance Standards, Docket #97-054P, September 8, 1998, p. 48974.) Poultry with a processed water uptake of up to 8 % (whole) or 12 % (cut up) of net weight is being sold "enhanced with up to a 15 % of a solution," resulting in a product for which a consumer is paying for 23 % water.

The initial thrust of the USDA/FSIS proposed rulemaking was to accommodate legitimate water uptake claims on the basis of meeting food safety requirements. However, comments have been submitted that seriously challenge the poultry industry's assertion that batch chillers are the preferred, best method to chill carcasses to enhance food safety. On the contrary, according to several scientific submissions to the proposed rulemakers, bath chillers may actually perpetuate and facilitate the spread of pathogens. The USDA/FSIS also found that several poultry packers are "targeting" the upper water retention limits, regardless of any food safety concerns.

Current labeling of products for added solutions is extremely vague and potentially misleading to consumers. Consumers' economic interests are not being protected without changes to the inspection system requirements. The consuming public has not been fully informed of the economic impact of paying meat and poultry prices for water. This will eventually surface in the media, however, and weights and measures officials must be able to address the "reasonableness" of this practice.

**HISTORY OF ITEM:** This item was originally brought to the Committee by the CWMA in 2000. At that time the CWMA was recommending that the Committee:

- A. In concert with the NCWM Administration and Public Affairs Committee, provide an opportunity for a Technical Demonstration at the NCWM 2001 Interim Meeting in Phoenix, Arizona, on the economic impact on U.S. consumers due to moisture loss from fresh meat and poultry products that have been "enhanced" through the addition of "solutions" (water, sodium phosphate, etc.) or have otherwise gained moisture during processing (i.e., fresh poultry). It is requested that the Technical Demonstration, to be presented on behalf of the CWMA by the State of Michigan, be conducted during a joint session of the NCWM Standing Committees due to the nationwide scope and economic impact of this issue; and

- B. Establish a Working Group to begin a study, on a nationwide basis, if possible, to determine the extent to which consumers in the U.S. are paying for water and/or other added solutions that are no longer retained in the product at the time of sale (i.e., are lost into the packing material or are otherwise free-flowing); and
- C. Direct that the Working Group recommend a testing method that may be utilized by weights and measures jurisdictions to determine the amount and/or reasonableness of the moisture loss documented and what "gray area," if any, should be applied to these products; and
- D. Direct the Working Group to examine labeling of "enhanced" fresh meat and poultry (including fresh poultry that has gained weight due to water absorption as a result of processing) to determine if current labeling is sufficiently descriptive and uniform to allow U.S. consumers to make informed purchasing decisions and to recommend changes if the labeling is found to be non-uniform and/or otherwise deficient.

The CWMA requested that this item be given a high priority by the NCWM, and that the goal be for the Working Group to report on its findings during the 2001 NCWM Annual Meeting Technical Session.

In 2001: At the January Interim Meeting the Committee commented that it is difficult for weights and measures officials to conduct net content inspection in accordance with NIST Handbook 133 procedures without defined reasonable moisture allowances. The Committee therefore recommended that the NCWM establish a Working Group to study current market conditions and recommend moisture allowances (the current proposal). At the July Annual Meeting this item was adopted by the NCWM.

- The CWMA formed a small committee to develop recommendations for the formation of the working group with the goal of providing those recommendations to the NCWM Chairman and the NCWM Laws and Regulations Committee Chairman in advance of the 2002 NCWM Interim Meeting. Henry Oppermann, Chief, NIST Office of Weights and Measures, provided copies of a previous NCWM Study Group protocol to assist in the development of this item.
- The WWMA recommended that the Enhanced Product Working Group propose a plan and scope of action for consideration by the NCWM. The WWMA encouraged the working group to invite participants from USDA, industry, and other interested parties.
- The SWMA echoed the WWMA's recommendation that USDA, industry, and other interested parties be invited to participate in the working group.

In 2002: The Committee voted to maintain this item on the agenda as Informational pending the proposed formation of an Enhanced Product Working Group by the NCWM Board of Directors.

- The CWMA reported that data collected by their committee had been forwarded to Kurt Floren, San Diego County, California, who they had been told had been appointed to lead this effort.
- The WWMA recommended that this item remain Informational to give the NCWM Board of Directors time to determine the appropriate direction regarding this item.

In 2003: The Committee voted to maintain this item on the agenda as Informational pending the proposed formation of an Enhanced Product Working Group by the NCWM Board of Directors.

- The CWMA supports keeping this item as Informational until the NCWM Board of Directors appoints the Working Group.
- The WWMA supports keeping this item as Informational until the NCWM Board of Directors appoints the Working Group. The WWMA heard from Dennis Elhart, NCWM Chairman, that he would be appointing a Work Group in the near future.
- The SWMA heard comments that this really falls under USDA jurisdiction, and current USDA regulations permit the sale of these "enhanced products." With the limited resources available to the NCWM, the SWMA recommends that a Working Group not be formed, and the item be withdrawn.

L&R Committee 2004 Interim Agenda

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Dennis Johannes, California, Chairman  
Joe Gomez, New Mexico  
Edwin Price, Texas  
James Cassidy, Cambridge, Massachusetts  
Vicky Dempsey, Montgomery County, Ohio

Vince Orr, ConAgra Foods, Associate Member Representative  
Brian Lemon, Canada, Technical Advisor  
Doug Hutchinson, Canada, Technical Advisor  
Tom Coleman, NIST, Technical Advisor  
Kathryn Dresser, NIST, Technical Advisor

**Committee on Laws and Regulations**



To: Branch Chiefs, SLD

Policy Memo 042

February 3, 1982

From: Robert G. Hibbert  
Director  
SLD

Subject: Raw Bone-In Poultry Products Containing Solutions

ISSUE: Labeling of raw bone-in poultry and poultry parts to which solutions are added.

**POLICY:** Unless addressed by other regulations and policies, water and/or oil based solutions may be added to raw bone-in poultry and poultry parts at various levels with an appropriate qualifying statement to the product name.

The statement must include terms adequate to inform the consumer of the amount and manner of the addition and include the common or usual names of the ingredients in their proper order of predominance (e.g., "Injected with up to 12 percent of a solution of water, salt, and phosphates"). Other similar designations will be considered on their merits. The statement must be contiguous to the product name and printed in a style and color as prominent as the product name. The statement of the manner and amount of addition must be one-fourth the size of the most prominent letter in the product name. The ingredients of the solution can be in print one-eighth the size of the most prominent letter of the product name. Terms such as "Basted," "Marinated", "For Flavoring" and similar terms contemplated within the provisions of Section 381.169 of the poultry products inspection regulation can not be used if the amount of the solution added is more than needed to baste, marinate, or flavor the product. In the case of bone-in poultry and poultry parts, the amount is approximately 3 percent as prescribed by the regulations.

**RATIONALE:** The addition of various water and/or oil base solutions has been approved in various products including beef for further cooking, roasts, bone-in poultry, poultry rolls, and steaks. These solutions are added by injection, marination, etc., to impart favorable flavoring and other sensory characteristics to the finished product. Existing policies and regulations, however, do not address the addition of solutions above the 3 percent level in bone-in products. Such additions are considered appropriate, but since the nature of the product is changed, it is necessary that the product name be qualified to identify the composition of the solution and the manner and the amount of the solution added. This is consistent with policies relating to the addition of solutions to other meat and poultry products. The prohibition of the use of terms such as "Basted", "Marinated" and "For Flavoring" is based on the fact that the level prescribed in the regulation for bone-in poultry products is adequate for basting, marinating, and flavoring. The use of solutions above this stated amount is unnecessary for these purposes.

To: Branch Chiefs, SLD

Policy Memo 044A

September 2, 1986

From: Margaret O'K. Glavin  
Director  
Standards and Labeling Division, MPITS

Subject: Raw Boneless Poultry Containing Solutions

**ISSUE:** Labeling of raw boneless poultry and poultry parts to which solutions are added.

**POLICY:** This policy memo replaces Policy Memo 044. Unless addressed by other regulations and policies, water and/or oil based solutions may be added to raw boneless poultry and poultry parts at any level if the addition and the amount of solution are identified. A statement indicating that the addition of a solution has taken place must appear contiguous to the product name wherever it appears on the labeling. "Contains a 6 percent solution" and "Injected with up to 12 percent of a solution" are examples of acceptable statements. The ingredients of the solution may accompany the statement or appear in locations prescribed for ingredients statements. The statement must be one-fourth the size of the most prominent letter in the product name. If the ingredients are included within the statement, they must appear in print one-eighth the size of the most prominent letter of the product name. Terms such as "Basted," "Marinated," "For Flavoring," and similar terms contemplated within the provisions of section 381.169 of the poultry products inspection regulation cannot be used if the amount of the solution added is more than needed to baste, marinate, or flavor the product. In the absence of evidence to the contrary, the amount is believed to be 8.0 percent for boneless poultry. A quality control program must also be approved by the Processed Products Inspection Division before the label can be used.

**RATIONALE:** This policy memo is being issued to clarify the nature of the statement that must accompany the product name whenever solutions are added to raw boneless poultry and poultry parts. Also the permission to place the ingredients of the added solutions in locations normally reserved for ingredients statements is being addressed to provide consistency with present policy which permits the list of ingredients to appear on an information panel (see Policy Memo 007) or in the case of products in cartons on the front riser. The regulations relating to the addition of solutions to ready-to-cook bone-in poultry, which require the solution statement including the list of ingredients to appear on the principal display panel, are still in effect. The addition of various water and/or oil base solutions has been approved in various products including beef for further cooking, roasts, bone-in poultry, poultry rolls, and steaks. These solutions are added by injection, marination, etc., to impart favorable flavoring and other sensory characteristics to the finished product. Existing policies and regulations, however, do not address the addition of solutions to most boneless products. Such additions are considered appropriate, but since the nature of the product is changed, it is necessary that the product be labeled to identify the amount and composition of the solution and its function. Furthermore, both the meat and poultry regulations require that a product have a standardized name or, if none exists, a common or usual name. If neither exists, the product must have a truthful descriptive name. Since these products have neither a standardized or common or usual name, a descriptive name is needed. The traditional name, supplemented with the required qualifiers to create the necessary distinction from the traditional product, serves this function. The prohibition of the use of terms such as "Basted," "Marinated," and "For Flavoring"

on the labeling of products containing solutions above the level necessary to baste, marinate, or flavor the product is consistent with the policies for the addition of solutions to bone-in poultry and poultry parts. The 8 percent level for boneless products is the amount of solution that would be present in the flesh of the poultry, primarily the breast and thighs, after a 3 percent solution was added to the bone-in product in accordance with 9 CFR 381.169. The need for a quality control program is consistent with the requirements of 9 CFR 381.169 for bone-in poultry.



## Our Newest Injector



## Your Newest Money Machine

The IN 33-430 Injector is built for high-speed injection. But what it's really good at is making you money. In fact, it has an array of time-saving, money making features competitive machines just don't offer:

- **Positive Displacement Pump** delivers a controlled, consistent volume of brine
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The IN 33-430 sends more product under the needles and puts more profit on the bottom line – 4% more yield than our competitors. And that's the feature processors like best.

Contact us for more information: [1-888-888-9107](tel:1-888-888-9107)

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The Marel logo consists of a stylized red 'M' shape followed by the word 'marel' in a white, lowercase, sans-serif font.



# “Hidden” Sodium in USDA-Regulated Products

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March 30, 2009

Charles M. Hansen, III  
The Truthful Labeling Coalition  
[www.truthfullabeling.org](http://www.truthfullabeling.org)



## Actual Labels of Fresh Poultry Products

- Note the huge difference in sodium content.
- Note the font size and wording of the so-called USDA “solution statement.”
- In contrast, note the large “100% All Natural” claims.
- Finally, note the American Heart Association’s “Heart Check” logo:





# PERDUE (non-“enhanced”)



PERDUE  
4 OZ. RAW  
ROASTING TO 175°F

### Nutrition Facts

Serving Size 4 oz (112g) Raw Boneless Breast  
3 oz (84g) Roasted Boneless Breast  
Servings Per Container Varied

Amount Per Serving	Raw	Cooked
<b>Calories</b>	110	110
Calories from Fat	10	10
	<b>% Daily Value*</b>	
<b>Total Fat</b> 1g**, 1g	2%	2%
<b>Cholesterol</b> 75mg, 70mg	25%	23%
<b>Sodium</b> 45mg, 30mg	2%	1%
<b>Total Carbohydrate</b> 0g, 0g	0%	0%
<b>Protein</b> 26g, 25g	52%	50%
Iron	6%	4%

Not a significant source of Saturated Fat, Dietary Fiber, Sugars, Vitamin A, Vitamin C and Calcium.

\*\*Amount in raw meat.

\*Percent Daily Values are based on a 2,000 calorie diet.





# PILGRIM'S PRIDE ("enhanced")



**BREASTS**  
 with Rib Meat  
 WITH UP TO 15% NATURAL\* CHICKEN BROTH  
**PECHUGAS**



# EAT WELL STAY HEALTHY ("enhanced")



With Up To 15% Chicken Broth

**Nutrition Facts**  
 Serving Size 4 oz (112g)  
 Servings Per Container about 4.5

Amount Per Serving	Calories from Fat 10	% Daily Value*
Calories 110		
<b>Total Fat 1g</b>		2%
<b>Cholesterol 55mg</b>		19%
<b>Sodium 330mg</b>		14%
<b>Total Carbohydrate 0g</b>		0%
<b>Protein 23g</b>		45%
<b>Iron 4%</b>		

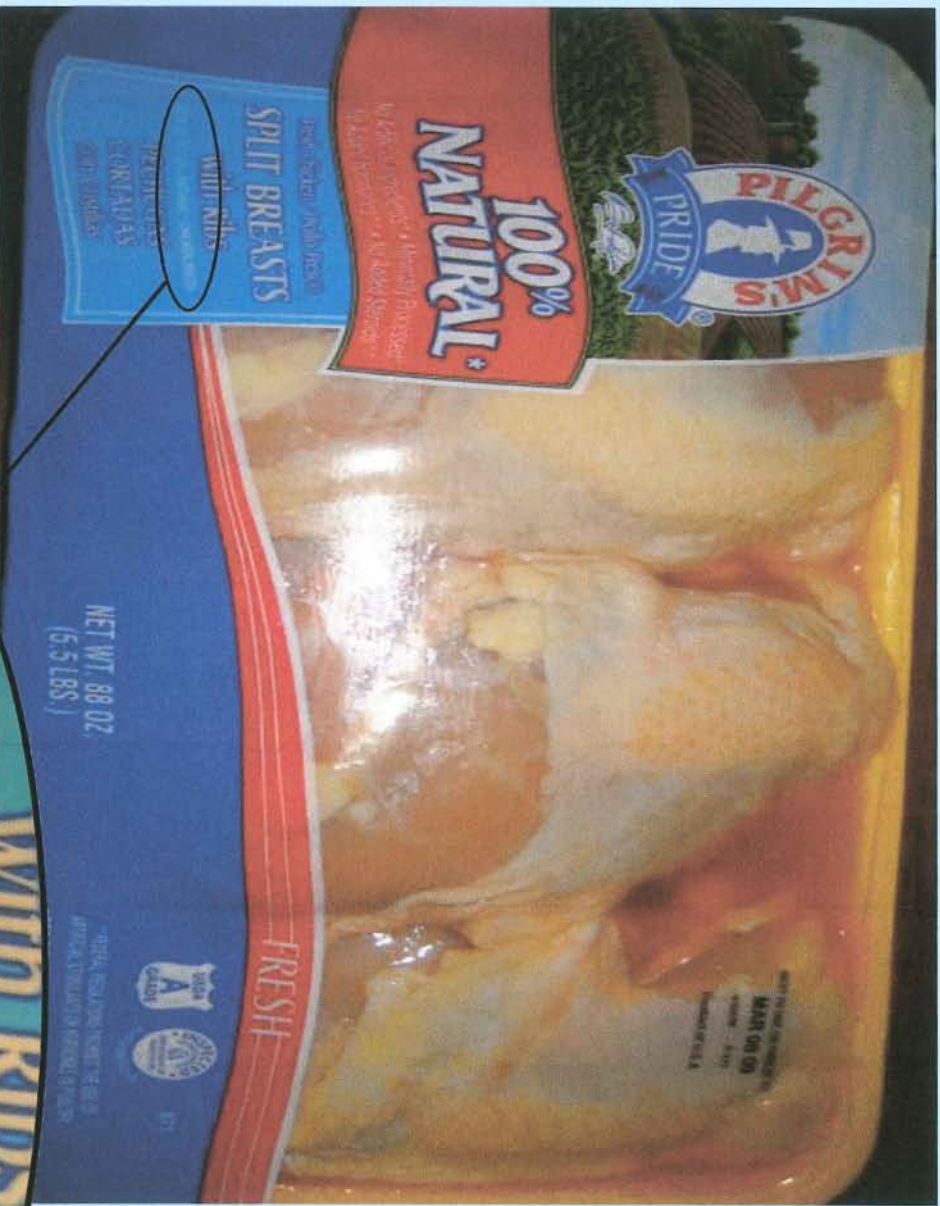
Not a significant source of trans fat, dietary fiber, sugar, vitamin C, and calcium.

\*Percent Daily Values are based on a diet of 1 on a 2,000 calorie diet.

**Chicken Broth Ingredients:**  
 Chicken Broth, Salt, Carrageenan.  
 GLUTEN FREE.



# PILGRIM'S PRIDE ("enhanced")



WITH UP TO 12% NATURAL \* CHICKEN BROTH  
**PERCUTIGAS**  
**WITH KIDS**

**Nutrition Facts**  
 Serving Size 4 oz (112g)  
 Servings Per Container ABOUT 3

Amount Per Serving	Calories from Fat 130	% Daily Value*
Calories 200		
<b>Total Fat</b> 15g		<b>23%</b>
Saturated Fat 4g		<b>20%</b>
Cholesterol 70mg		<b>24%</b>
Sodium 440mg		<b>18%</b>
Total Carbohydrate 0g		<b>0%</b>
<b>Protein</b> 17g		
Vitamin A 2%	Iron 4%	

\*Percent Daily Values are based on a diet of other people's secrets.

**Natural\* Chicken Broth Ingredients:**  
 Chicken Broth, Salt, Carrageenan.  
**GLUTEN FREE**

NET WT. 88 OZ.  
 (5.5 LBS.)



FRESH

MADE IN THE U.S.A.  
 MADE IN U.S.A.  
 100% NATURAL



# STORE BRAND ("enhanced")



## Nutrition Facts

Serving Size 4 oz (112g)  
Servings Per Container Varied

### Amount Per Serving

**Calories** 110    **Calories from Fat** 10

**% Daily Value\***

**Total Fat** 1 g    **2 %**

**Cholesterol** 55 mg    **19 %**

**Sodium** 370 mg    **15 %**

**Total Carbohydrate** 0 g    **0 %**

**Protein** 23 g

Iron 4 %    •    Vitamin C 2 %

Calcium 2%

Not a significant source of saturated fat, dietary fiber, sugars, and vitamin A.

\*Percent Daily Values are based on a 2,000 calorie diet.





## **Consumers are being misled about the added sodium of these so-called “enhanced” products.**

Numerous consumer surveys clearly confirm this:

- A 2006 Russell Research study found:
  - **91% of consumers agreed with the statement: “Fresh chicken that says it is “Natural” should not contain any type of added ingredients.”**
  - **Asked a different way, fewer than 25% of consumers said it was “okay for the label on a brand of fresh chicken to read “100% Natural” and still contain up to 15% broth.”**
- A 2004 survey on this issue concluded that.:
  - **More than two-thirds of consumers who purchased the “pumped-up” chicken were unaware that it contained added solution.**
- Finally, in 2007, Consumer Reports’ National Research Center surveyed consumers and found that **70% said that the label “Natural” should mean no saltwater was added.**





## Market Share of Saltwater-enhanced Products

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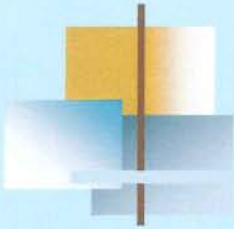
	<u>2004</u>	<u>2008</u> (est)
<b>Pork</b>	<b>45 %</b>	<b>53 %</b>
<b>Chicken</b>	<b>23 %</b>	<b>31 %</b>
<b>Beef</b>	<b>16 %</b>	<b>19 %</b>



## So, Why are processors adding more and more saltwater?

---

- USDA continues to allow misleading labeling for saltwater-enhanced products.
  - Based on Policy Memos approved between 1982 and 1986.
- There is a huge economic incentive for processors to add saltwater.
  - For just the 2008 fresh chicken market, estimates are that consumers overpaid **more than \$2 billion** for saltwater at chicken prices.
- Consumer taste preferences.
  - Processors defend saltwater-enhanced products claiming that "3 out of 4 consumers prefer the saltwater-enhanced product in blind taste tests."



# Final Thoughts

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- The average American eats about 90 pounds of chicken every year. Over 30% of that chicken is saltwater-enhanced.
- How does that chicken compare to other foods:

## Sodium content (per serving)

"Saltwater-Enhanced" Chicken	370 mg
McDonald's French Fries (Large)	330 mg
Oscar-Mayer bologna	300 mg
Frito-Lay Cheetos	290 mg
Lay's Potato Chips	180 mg
<u>Truly</u> Natural Chicken	45 mg