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September 26, 2011

U.S. Department of Agriculture
Food Safety and Inspection Service
5601 Sunnyside Avenue
Beltsville, MD 20705

Re: FSIS-2010-0012

Dear Sir or Madam:

On behalf of the American Heart Association (AHA), including the American Stroke Association (ASA) and over 22.5 million AHA and ASA volunteers and supporters, we appreciate the opportunity to provide comments concerning the common or usual name for raw meat and poultry products containing added solutions.

According to the proposed rule, the Agency plans to amend its regulations for “enhanced” raw meat and poultry products that contain added solutions. The revisions are intended to make it readily apparent to consumers when a product contains an added solution. Product labels will be required to include, as part of the product’s common or usual name, the percentage of added solution incorporated into the product and a list of ingredients in the added solution. To ensure that consumers notice this additional information, the print for all words in the common or usual name must appear in a single font size, color, and style of print on a single-color contrasting background.

AHA strongly supports this proposal. We are pleased that the Agency is responding to concerns previously expressed by AHA and others regarding the use of added solutions, particularly those that contain saltwater or sodium. Although the Agency already requires enhanced products to contain supplemental labeling that informs the consumer of the presence of an added solution, this information has not been prominently displayed on the product and may often be overlooked or unnoticed by consumers.

The Agency’s plan to require raw meat and poultry producers to include the percentage of added solution and the ingredients that make up that solution as part of the product name is a significant improvement. This change will help consumers understand that a raw meat or poultry product is not necessarily a single-ingredient product. Added solutions can change the nutrition profile of a meat or poultry product and increase the overall weight of the product, thereby increasing the purchase price for products priced by weight. We therefore support the USDA’s proposal and appreciate the Agency’s efforts to increase consumer awareness.

To further improve product labeling, however, AHA recommends that the Agency strengthen the requirements for the listing of ingredients in the added solution. As currently proposed, raw meat and poultry producers will be required to include the common or usual names of all ingredients in the added solution as part of the product name (e.g., chicken breast – 15% added solution of water and salt). For multi-ingredient components, producers will be allowed to list the common or usual name of those ingredients rather than list the individual ingredients that make up the multi-ingredient component (e.g., pork tenderloin – 15% added solution of water and teriyaki sauce). AHA is concerned that allowing producers to use common names for multi-ingredient products such as “teriyaki sauce” rather than listing the individual ingredients within the teriyaki sauce may not sufficiently alert consumers to the presence of nutrients of concern, like salt.

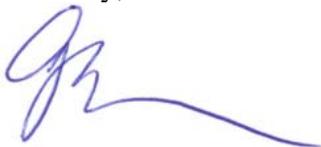
As the Agency acknowledges in the proposed rule, many of the solutions added to raw meat and poultry products contain salt. This is particularly troubling given that the majority of Americans currently consume an excess of sodium and the addition of an enhancing solution can raise the sodium content substantially. To alert consumers to the presence of added salt, the Agency should require producers to include salt in the product name whenever it is added to a raw meat or poultry product. Using the pork tenderloin example above, the Agency should require producers to specifically highlight salt as a component of the teriyaki sauce. We suggest “pork tenderloin – 15% added solution of water and teriyaki sauce which contains salt” or “pork tenderloin – 15% added solution of water, teriyaki sauce, and salt”. This would increase consumer awareness of the presence of salt and may encourage consumers to examine the product’s Nutrition Facts Panel to determine the exact amount of sodium the product contains. Consumers who are trying to monitor or limit their salt intake may also be less inclined to add salt to these products during food preparation.

Finally, we recommend that the Agency conduct consumer education as part of this labeling change. In a separate regulatory initiative, the Agency will soon require single-ingredient or ground or chopped meat and poultry products to contain a Nutrition Facts Panel. Products that include a “percent lean” statement on the label will also be required to display the product’s fat percentage to allow for easy product comparison. AHA welcomes all of these changes; they will provide consumers with valuable information that can be used during product selection and preparation. However, it will be important for the Agency to educate consumers about these labeling changes and help them make the best use of this newly provided information. To do this, we recommend a coordinated consumer education campaign.

Thank you for your consideration of our comments.

If you have any questions or require any additional information, please contact Susan Bishop, MA, Regulatory Affairs Manager, at 202-785-7908 or susan.k.bishop@heart.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Tomaselli', with a long horizontal flourish extending to the right.

Gordon F. Tomaselli, MD, FAHA
President
American Heart Association