



# Safe Tables Our Priority

*America's Voice for Safe Food*

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April 21, 2008

Charles Gioglio  
Labeling and Program Delivery Division  
Office of Policy and Program Development (OPPD)  
Food Safety and Inspection Service  
U.S. Department of Agriculture  
Room 2925 South Building  
1400 Independence Avenue, S.W.  
Washington, DC 20250

Dear Mr. Gioglio,

I am writing to you regarding labeling language that has been submitted to FSIS by Hormel Meats on product that has been packaged using a CO-MAP process. As you well know, this has been a highly controversial issue resulting in several congressional hearings and extensive media coverage.

Over the past few months S.T.O.P. has been engaged in extensive discussions with both Hormel and Cargill, Inc., in an attempt to develop acceptable labeling language for case-ready meats that have been packaged using a CO-MAP system. Our concerns stem from the color change that occurs during the process and the indefinite preservation of that color even after temperature abuse or past the point when the product is spoiled. Our intent was to help develop language that would adequately warn consumers that the color of the meat could not be counted on as an indicator of the actual freshness of the meat and the necessity to look at "Use or freeze by" date.

While we came close to agreeing on some labeling language, we made it clear that, if it was to have S.T.O.P.'s support, it was necessary to have both the labeling, i.e., the positioning, font size, etc., and the labeling language itself be tested by several focus groups to ensure that the general public would understand the message we were attempting to convey. S.T.O.P. was to be involved with the companies in developing the design and questions for the focus groups in order to minimize any bias. This did not occur and we have since backed away from the project.

I am concerned that company representatives may have prematurely represented this latest label to government officials as one supported by S.T.O.P. I feel it necessary to inform you that the process we started with the companies never came to a joint collaborative conclusion and we

cannot therefore support the current proposed language which may not do an adequate job of educating and informing consumers about the necessity to use factors other than color as a determinant of freshness when purchasing meat packaged in a CO-MAP system.

Thank you very much for your attention.

Sincerely,

Nancy Donley  
President  
(773) 353-4818 Direct Line

CC: Joe Swedberg, Hormel Foods  
Mike Robach, Cargill