



December 12, 2019

FSIS Docket Clerk
Department of Agriculture
Food Safety and Inspection
Room 2534 South Building
1400 Independence Avenue, S.W.
Washington, DC 20250-3700

Re: Petition to Require Accurate and Non-Misleading Labeling on Meat Processed with Non-Synthetic Nitrates and Nitrites (Docket Number: FSIS-2019-0022)

The undersigned public health organizations respectfully submit the following comments supporting the petition by Center for Science in the Public Interest and Consumer Reports urging the US Department of Agriculture’s Food Safety and Inspection Service (FSIS) to prevent misleading “No Nitrate or Nitrite Added” and “Uncured” claims on processed meats. These claims confer an undeserved health halo on meat that has been processed with celery powder or other non-synthetic sources of nitrate or nitrite, when both the amount of these chemicals and the overall health risks of the products are no different from other processed meats.

We ask that the agency prohibit the terms “No Nitrate or Nitrite Added” and/or “Uncured” on all products prepared with nitrate or nitrite, regardless of source. We also urge the agency to grant the petitioner’s requests to require the statement “Nitrates or Nitrites Added” on products prepared with sources of nitrate or nitrite, ensure that these sources be declared in the ingredients list, and take steps to minimize the levels of residual nitrates, nitrites, and nitrosamines in processed meats.

Processed meat increases health risks. Numerous expert bodies, including the World Health Organization, American Cancer Society, American Heart Association, and American Institute for Cancer Research have long advised limiting consumption of processed meats, and a large and growing body of scientific evidence shows an increased risk of colorectal cancer in people who consume these products.

The International Agency for Research on Cancer has classified processed meats as “carcinogenic to humans.” Likewise, IARC has classified nitrates and nitrites as “probably carcinogenic to humans” when ingested under conditions that result in endogenous nitrosation (which is accelerated by nitrosable compounds found in meat). The Continuous Update Project, a joint project of the World Cancer Research Fund and American Institute for Cancer Research, has also concluded that “[c]onsumption of processed meat is a convincing cause of colorectal cancer.”

The current “No Nitrate or Nitrite Added” statements confuse consumers. In recent years, many manufacturers of processed meat have switched from sodium nitrite to celery juice and other non-synthetic ingredients as a source of nitrate and nitrite for coloring, flavoring, and preserving the meat. Under current USDA rules, products that use non-synthetic sources of nitrate and nitrite are permitted, and in some cases required, to bear the misleading statement “No Nitrate or Nitrite Added.” Even when qualified by the words “Except for those naturally occurring in [name of source of nitrate/nitrite],” these statements may cause consumers to believe, falsely, that the meat is free of cancer-causing compounds, and therefore healthier than other processed meat which uses sodium nitrite as a curing agent.

Celery juice and other non-synthetic sources can produce high concentrations of nitrate and nitrite, achieving similar color, flavoring, and preservative effects as sodium nitrite. Moreover, product testing has shown that processed meat contains comparable levels of residual nitrate and nitrite regardless of whether the source is sodium nitrite or a non-synthetic ingredient like celery powder.

We therefore encourage the USDA to prohibit the “No Nitrate or Nitrite Added” and “Uncured” claims on processed meat, except in the rare circumstance where no nitrate or nitrite is added from any source.

We also urge the agency to grant the petitioner’s requests to require the statement “Nitrates or Nitrites Added” on products prepared with sources of nitrate or nitrite, ensure that these sources be declared in the ingredient list, and take steps to minimize the levels of residual nitrates, nitrites, and nitrosamines in processed meats. These steps will promote public health and transparency by helping consumers better identify meats that have been processed with sources of nitrate and nitrite and to understand the purpose for which these ingredients are used.

We appreciate your thoughtful attention to this matter,

Sincerely,

American Institute for Cancer Research
Association of State Public Health Nutritionists
Balanced
Center for Communications, Health & the Environment
Consumer Federation of America
Healthy Food America
National Center for Health Research
Public Health Institute
Society of State Leaders of Health and Physical Education