



January 11, 2007

Dr. Robert C. Post
Director, Labeling and Consumer Protection Staff
Office of Policy, Program and Employee Development
United States Department of Agriculture, FSIS
1400 Independence Avenue, SW
Washington DC 20250

Re: Docket number FSIS 2006-0040: Product Labeling; Definition of the term "Natural"

Dear Dr. Post:

The American Spice Trade Association (ASTA) is pleased to provide comments on the definition of the term "natural" to the USDA FSIS.

ASTA was founded in 1907 and represents the interests of the spice industry around the world, specifically as it relates to trade in the United States. ASTA's membership is made up of approximately 200 companies that manufacture, import, export, distribute, purchase and supply services to the spice and seasoning industry. ASTA's members manufacture and market the vast majority of spices sold in the U.S. at retail, and to food processors.

Many ASTA members sell their products, spices and seasonings, to the meat and poultry industry. The definition of the term "natural" is important to our members for this reason. In addition, because spices are regulated by the FDA, and the USDA and FDA have somewhat different definitions for the term "natural," a clarification about the definition would be beneficial for our industry.

Providing clean, safe spices is essential to our industry. Any definition of "natural" that the USDA codifies should define the acceptability of spices that have undergone any FDA-approved microbial reduction process, which would include ethylene oxide, irradiation, steam and propylene oxide, as acceptable for use in products labeled as "natural" or "all natural." The treated spices meet the requirements of the USDA's current minimal processing/not containing any artificial flavor/coloring etc. (21 CFR 101.22) definition.

ASTA supports the August 2005 FSIS guidance modification that acknowledges that natural flavorings from oleoresins or extractives could be acceptable for products bearing

“natural” claims. In addition, under FDA regulations they are clearly considered "natural" flavors.

ASTA applauds the great deal of emphasis the Agency has put on improving food safety in recent years and urges the Agency not to undercut this objective with a dramatically modified definition of “natural.”

If you would like more information about our industry or our position, please feel free to contact me at 202-367-1207.

Sincerely,

Cheryl Deem
Executive Director