

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

May 22, 2007

Honorable Richard A. Raymond, M.D.  
Office of the Under Secretary  
United States Department of Agriculture  
1400 Independence Avenue, S.W.  
Washington, DC 20250

Dear Dr. Raymond:

We are writing to share our concerns over the Food Safety and Inspection Service's (FSIS) labeling guidelines for so-called "enhanced" poultry products.

As you may know, under 20-year-old Policy Memoranda, domestic poultry may be injected with up to 15% saltwater solutions. However, the label alerting consumers to the added ingredients is only required to be ¼ the size of the largest letter in the product name. This misguided policy has allowed such euphemisms as the phrase, "Enhanced with up to Fifteen Percent Chicken Broth" in a font size many consumers would be hard-pressed to read, much less really understand. Furthermore, last year FSIS began allowing poultry processors to label these "enhanced" products as "100% All Natural" even though fresh chicken does not "naturally" contain such ingredients as saltwater or seaweed extract.

A 2004 report from the National Institute of Standards found that this labeling is "ineffective at best, and misleading at worst." We strongly agree.

In a series of recent surveys conducted around the country, over 70 percent of consumers were unaware that some poultry companies routinely inject additives into chicken. Indeed, because the type is so small, almost 3 out of 4 consumers failed to even notice it on the label. When the "solution statement" was pointed out and explained to consumers, over 90 percent responded that they opposed the practice of saltwater injections. Today, unbeknownst to them, consumers are paying more than \$2 billion in added saltwater weight for fresh poultry.

This issue extends beyond simply the economic costs enhanced chicken. Misleading labeling of fresh poultry as "100% Natural" is also a serious health concern for millions of Americans who are unknowingly consuming increased levels of sodium. For example, a four ounce serving of boneless, skinless chicken breast free of saltwater or seaweed extract contains approximately 45 mg of sodium, while chicken breasts pumped with these additives can contain up to 370 mg of sodium for the same four ounce serving. That is nearly eight times the average sodium level of fresh poultry.

USDA's requirements for raw poultry products dictate that processors are allowed to add saltwater to poultry at any level so long as the package contained an "appropriate qualifying statement" to inform the consumer of the amount of the added solution. This policy has allowed for the use of deliberately-misleading terms like "enhanced" or "moistened" and processors can use the term "chicken broth" instead of saltwater. However, in the 20 years since these regulations took effect, "enhanced" poultry has grown rapidly. Today, nearly 30 percent of all poultry is injected with a saltwater solution.

We believe that it's time for USDA to change its policies to ensure that today's consumers are able to make informed choices about their food and are not assessed additional costs for injected products while adding huge amounts of sodium to their diets. Specifically, we urge USDA to require that so-called "solution statements" be more prominent on poultry labels, that the statement clearly indicate each of the solution's ingredients, that euphemisms such as "enhanced" be prohibited, and for bone-in fresh poultry, the manner in which the solution was added. We also request that the "Natural" label claim to be universally prohibited on these "pumped-up" products.

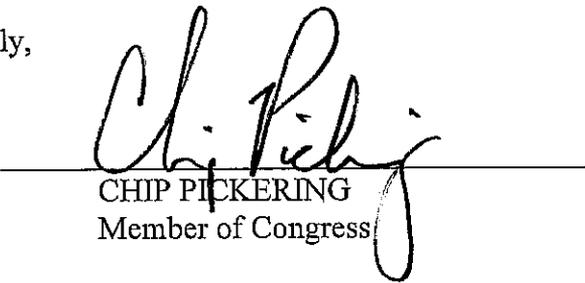
Finally, while we are aware that USDA has recently started a rulemaking concerning the "Natural" label claim, it is our understanding that FSIS has the authority to make the necessary changes to the labeling guidelines without a formal rulemaking process. Indeed, FSIS made interim changes earlier this year to its labeling policies with respect to sodium lactate. 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.

Thank you for your consideration of this vitally important matter. We look forward to your prompt response.

Sincerely,



DENNIS CARDOZA  
Member of Congress



CHIP PICKERING  
Member of Congress