"No MSG" labels on foods containing glutamate are misleading

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Brussels, Belgium

- Scientific association established in 1970
- A CODEX observer organization

c/o: Ajinomoto Co., Inc.

Tokyo, Japan

INTRODUCTION

MSG (sodium glutamate) is just one form of glutamate

- Glutamate is the most abundant amino acid in food/nature
- Glutamate stimulates savory taste (umami). Savory sauces (fish, soy, oyster, Worcester) or bouillons are very rich in glutamate.
- Human body does not distinguish MSG from other glutamates and metabolizes all glutamates identically

Vegetables (mg/100g)	
Cabbage	50
Spinach	48
Tomato	246
Green asparagus	49
Corn	106
Green peas	106
Onion	51
Mushroom	42

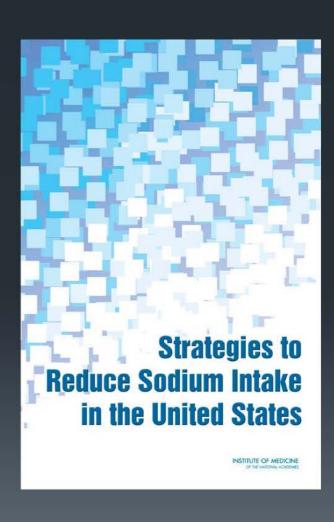
MSG safety is a resolved matter (not a topic of this presentation)



www.cfs.gov.hk/english/multimedia/multimedia_pub/multimedia_pub_fsf_108_02.html

Food Glutamates (etc., MSG) have important roles

- 1. Reduction of sodium intake (by app. 30% when replacing salt)
- 2. Improvement of salivary secretion (elderly)
- 3. Serving as the key source of energy for intestines (enabling protein digestion)



MSG was recognized as natural

The USDA ruled that MSG, produced by fermentation, is natural (Dec. 2011)



United States Department of Agriculture Food Safety and Inspection Service Office of Policy, Program & Employee Development Washington, DC 20250-3700

December 2, 2011

Mr. Martin J. Hahn General Counsel The Glutamate Association P.O. Box 14266 Washington, D.C. 20044-4266

Dear Mr. Hahn,

This letter is in response to your letter dated May 23, 2011, which you submitted on behalf of The Glutamate Association (TGA) appealing the Food Safety and Inspection Service (FSIS), Labeling and Program Delivery Division's (LPDD), decision to deny the use of monosodium glutamate in meat and poultry products bearing "natural" claims.

LPDD has reconsidered its decision and will permit the use of monosodium glutderived from natural materials, containing no artificial flavoring, coloring, or preservative, or any other artificial or synthetic ingredient, and that is a fermentation and other physical treatments that FSIS has consider processed" in meat and poultry products bearing "natural" claims are manufactured through acid hydrolysis or characteristic products bearing "natural" claims

As described in your original request and clarified in your appeal, monosodium glutamate was first produced by the acid hydrolysis of vegetable proteins. Later, monosodium glutamate was produced by chemical synthesis using acrylonitrile as the starting material. FSIS considers these traditional production methods to be more than "minimal processing." However, the process by which the majority of monosodium glutamate is now produced begins with fermentation. Specifically, the fermentation process begins using bacteria from genera such as Brevibacterium, Arthrobacter, Micorbacterium, and Corynebacterium or various species of yeast. Carbohydrate sources (e.g., com and tapioca) are used as starting material with other nutrients. When the glutamate levels reach the optimal concentration, the fermentation broth is then processed through search.

... will permit the use of MSG derived from natural materials, containing no artificial flavoring, coloring, chemical preservative, or any other artificial or synthetic ingredient, and that is a product of fermentation and other physical treatments that FSIS has considered "minimally processed" in meat and poultry products bearing "natural" claims. . .

LABELING

US FDA Policy on "No MSG" Claims

FDA does not permit "No MSG" claims on foods with naturally occurring free glutamate

November 2012 FDA Q&A on MSG:

- "... foods with any ingredient that naturally contains MSG cannot claim "No MSG" or "No added MSG" on their packaging."
- Recognized MSG occurs naturally in HVP, autolyzed yeast, hydrolyzed yeast, yeast extract, soy extracts, and protein isolate, as well as in tomatoes and cheeses

US FDA Policy on "No MSG" Claims

2004 Warning Letter (a food containing oyster sauce)

"FDA has repeatedly advised consumers and industry that it considers such claims as "No MSG" and ``No added MSG" to be misleading when they are used on the labels of foods made with ingredients that contain substantial levels of free glutamate"

Other countries

- The Canadian Food Inspection Agency, the FSA of the UK and Food Standards Australia and New Zealand (FSANZ) stated that a "no MSG" claim was not acceptable on a product with detectable glutamate.
- the Codex Standards also stated that,

"Prepackaged food shall not be described or presented on any label or in any labeling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect."

Hong Kong situation

- Food companies are using "no MSG" or "no additive" (negative campaigns) as aggressive marketing tools.
- The Hong Kong Public Health & municipal Services Ordinance (No. 132) governs labeling of foods in Hong Kong.
- The Ordinance says that labeling should not mislead as to food nature, substance or quality.

Analysis and Discussion

Negative MSG claims on products with detectable glutamate:

- are misleading, because "No MSG" or "No added MSG" leaves consumers with the impression that product does not contain glutamate.
- undermine perception of MSG, feed distrust of the general public to food companies, and decrease standing of regulatory bodies.
- do not solve any issue, as they push food companies to replace one form of glutamate with another (savory sauces etc).

IGTC respectfully asks the Centre for Food Safety to consider forbidding "no MSG" claims on food with detectable glutamate