



# ENZYME TECHNICAL ASSOCIATION

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May 4, 2012

## **Via Email and First Class Mail**

Mr. Alfred V. Almanza  
Administrator  
Food Safety and Inspection Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250-3700

## **Re: Use of the Enzyme Transglutaminase in Meat Products**

Dear Mr. Almanza:

We are writing you in relation to statements being made in the media that suggest a potential safety or improper use issue with the enzyme transglutaminase (“TG”) in meat products. As a brief background, the Enzyme Technical Association (“ETA”) is a trade association of companies that represents manufacturers and distributors of enzyme products in North America, including the United States, Canada and Mexico. The ETA has been in existence since 1970 and has taken an active role in assisting in the development of regulations and policies that affect the enzyme industry. The health and safety of the public is the top priority for our members, and as has been well documented, enzyme food processing aids have a long history of safe use. In addition to being safe, enzymes are efficient, biodegradable protein catalysts that have been used for centuries to make countless foodstuffs including cheeses, bread, and yogurt.

As you are aware, the Food Safety and Inspection Service (“FSIS”) published a direct final rule in 2001 (66 Fed. Reg. 54912 (Oct. 31, 2001)) providing conditions under which the TG enzyme, which FDA previously found to be generally recognized as safe, could be used in meat products. The rule, which stated FSIS’ conclusion that TG was effective in improving the texture by increasing elasticity and improving cooking yields, set a limit of 65 ppm on the use level and created labeling requirements for any FSIS-inspected product processed with TG.

As an association we wish to state once again for the record that TG is safe for use in a wide variety of foods. We support the ongoing regulation of this product under continuous FSIS inspection, consistent with the 2001 regulation.

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We are aware of recent press reports and a letter from a state legislator to FSIS that allege safety concerns, “stories” of allergic reactions, and misleading representations of the meat product, that clearly focus on restaurant and banquet facilities (that fall under the jurisdiction of state and local health departments, not FSIS). However, we are aware of no factual information to support any health or safety concern or allergic reactions associated with the use of TG.

Accordingly, we reiterate our position that the data and information fully support the public record that TG is safe for use in a variety of foods. ETA supports your continuing efforts to insure that meat products processed with TG are safe, wholesome and properly labeled.

Sincerely,

A handwritten signature in cursive script that reads "John Carroll".

John Carroll  
Chair  
Enzyme Technical Association

A handwritten signature in cursive script that reads "Anthony T. Pavel".

Anthony T. Pavel  
Counsel  
Enzyme Technical Association

cc: Dr. Dennis Keefe, Director, Office of Food Additive Safety, CFSAN, FDA