

## A Question of Origin

Alli Condra, *Food Safety News*, April 09, 2012

[www.foodsafetynews.com/2012/04/a-question-of-origin/](http://www.foodsafetynews.com/2012/04/a-question-of-origin/)

### Dear Reader: Where did your last meal come from?

Given our globalized food system, this is a difficult question to answer.

The question of food origin breaks down into several parts. Do we care where it *originated*? Or, do we care where it was *processed*? Does where the food comes from impact its quality? Does a food's origin impact its safety? Can we ever know as much about the sources of our food as we would like?

The answers to these questions will vary, but the bottom line is that it is a complex issue.

### Reasons to want to know

For some people, knowing where their food comes from is very important. For others, it may not matter at all.

One reason for promoting labeling has to do with the consumer's right to know. Consumers have a right to know what ingredients are in a product and where it is from, manufactured, processed, or packed. If consumers want to purchase food that was grown or produced locally, labeling should provide that information. Additionally, labeling should aid consumers if they are seeking products grown or made in a particular area--i.e. for fair trade reasons.

Similar to, but slightly nuanced from, the consumer's right to know is the goal of consumer protection, which includes health concerns. Labeling of ingredients or country of origin allows a consumer the ability to avoid certain foods they know, or suspect, will trigger a reaction.

For example, some people experience a bitter taste in their mouths (ranging from a few days to a few weeks) after eating pine nuts. The syndrome is called "pine mouth" and, although the FDA has not linked the phenomenon to any particular kind of pine nut, some studies have connected pine mouth to certain pine nuts grown in China. For those people, having the information about the origin of the pine nuts would allow them to avoid those specific pine nuts.

Labeling is important because it provides information that enables consumers to make more informed decisions about their food choices.

### Finding the answer

There are two alternate ways to answer the question of origin: purchasing food directly from the farmer at farmers markets or through community supported agriculture (CSAs); or, relying on certain government laws and regulations that are in place to aid consumers in determining where their food came from--for example, country of origin labeling and labeling requirements for packaged foods.

If the goal is to know where our food comes from, how well do these systems accomplish that goal?

### Farmers markets and CSAs

Participating in direct marketing, or face-to-face transactions, is one way consumers can find out where their food comes from. Farmers markets and CSAs will generally provide a quick and clear answer because a consumer is able to ask the farmer directly about the food being sold.

In a CSA, a person purchases a share of the produce that will be grown on a farm and later, during the growing season, will receive a box of produce from that farm on a weekly basis.

Farmers markets, like CSAs, provide an opportunity for farmers and consumers to interact and for consumers to ask the farmer about the produce they are selling. An additional source of information comes in the form of market rules and regulations: farmers markets are governed by a set of rules that dictate where the produce can come from and provide a method of enforcement of those rules.

For example, some farmers markets require the sellers to be the actual growers of the produce. Despite the challenges in defining a "producer-only" market, in "producer only" markets, all of the food sold will have been grown locally (subject to whatever definition of "local" the market requires). Other farmers markets do not require the seller to have actually grown the produce.



Is purchasing from a farmers market or CSA an effective way to find out where one's food comes from? Generally yes. The benefit of these face-to-face transactions is that the consumer can inquire of the farmer where the food came from. Farmers markets and CSAs have an added benefit because customers are usually purchasing whole foods (simpler to trace), rather than prepared products containing a variety of ingredients.

### **Country of origin labeling**

According to the United States Department of Agriculture's Agricultural Marketing Service (AMS), country of origin labeling (COOL) is a "law that requires retailers, such as full-line grocery stores, supermarkets, and club warehouse stores, [to] notify their customers with information regarding the source of certain foods."

Foods that must be labeled under the country of origin rules (the "covered commodities") include various types of meat; wild and farm-raised fish and shellfish; fresh and frozen fruits and vegetables; peanuts, pecans, and macadamia nuts; and ginseng.

If a covered commodity has been processed in certain ways, the packaging does not have to include the country of origin designation. In order to be excluded from the COOL rules, the process must result in a "change of character" in the covered commodity. Those processes include cooking (e.g. frying, broiling, grilling, boiling, steaming, baking, roasting), curing (e.g. salt curing, sugar curing, drying), smoking (hot or cold), and restructuring (e.g. emulsifying and extruding).

For example, a whole melon, pineapple, or flat of strawberries will have to be labeled with its country of origin; but, according to COOL Frequently Asked Questions, a fruit cup that contains those fruits (melons, pineapple, and strawberries) is not required to be labeled with the country of origin. Other examples of "processed food items" are roasted peanuts, breaded chicken tenders, fish sticks, and teriyaki flavored pork loin.

Some products that are imported and may fall outside of the COOL requirements because they are processed are, nonetheless, required to be labeled with a country of origin designation under other international trade rules, such as the Tariff Act of 1930.

The Frequently Asked Questions document explains: "while a bag of frozen peas and carrots is considered a processed food item under the COOL final rule, if the peas and carrots are of foreign origin, the Tariff Act requires that the country of origin be marked on the bag."

Is country of origin labeling effective? When it is required, country of origin labeling is very effective in that consumers are provided information about the source of the covered commodities. But the covered commodities are relatively few, and many covered commodities are processed before sale in such a way as to fall within the processing exemption from the labeling requirements. Consumers may know where the head of lettuce they purchased is from, but they may not be able to find out where the lettuce, tomatoes, and carrots, in their prepared salad are from.

### **Labeling requirements**

The Food and Drug Administration's (FDA) labeling requirements provide another level of information consumers can use to determine the source of their food. Under the FDA rules, food labels are required to include the name of the product, the net amount of product, the ingredients, the nutritional fact panel (with information about calories, etc), and the statement of origin.

The rules about the ingredient list require that the ingredients be listed in descending order of prominence on the side of the packaging.

The statement of origin must identify the name and location of the manufacturer, packer, or distributor. If the location provided is not the manufacturer's address, the label must clarify what the relationship is between the manufacturer and the location listed--for example, the bottling of a soda can be done "on behalf of" someone else, but that relationship must be disclosed.

It may come as a surprise that there is no requirement that the label include the source of the ingredients. Perhaps if a product is made in the United States, or consumers associate it with the United States, the question about origin never arises.

The lack of information about ingredient origins, however, may be more surprising when considering the global sourcing of our food supply. When you read the ingredient list of a packaged food at the grocery store, do you wonder where the ingredients come from?

The Food Studies Project, out of the University of Texas, posted a blog entry recently about "Agriculture and Global Food Procurement." The graphic included in the post illustrates two food products--a NutriGrain bar and a loaf of Sara Lee bread--and points out the potential sources of ingredients in each of those products.

In the NutriGrain bar, the list of sources and ingredients is as follows:

- USA: high fructose corn syrup, sugar, wheat flour (produced and milled), whole grain oats, sunflower oil, strawberry puree, cellulose, red dye #40;
- China: vitamin and mineral supplements (B1, B2, iron, folic acid), honey;
- Philippines: carrageenan;
- India: guar gum;
- Europe: citric acid;
- Denmark: lecithin (soy);
- Italy: malic acid; and
- Scotland: sodium alginate.

The loaf of Sara Lee bread names ingredients from the United States, China, Vietnam, India, Australia, Russia, Non-USA North American and various South American countries, Switzerland, Netherlands, and Other European countries. The Sara Lee statement of origin on the label lists Sara Lee's address in Illinois.

Are the statement of origin and ingredient labeling effective in conveying where the food comes from? The short answer is most likely no. The ingredients must be listed on the label, but the source of those ingredients need not be identified.

The statement of origin for these processed foods requires only the name and address of the company that manufactured or processed the food. If the ingredients are imported, but the food is processed and packed in the United States, the FDA rules apply.

### **The trouble with this information is...**

Information is a good thing for consumers to have, but there are two main obstacles to obtaining this kind of data.

First, it would be a logistical nightmare to include the sources of ingredients on labels. Labels are already packed with information and are confusing for some consumers.

Imagine trying to find space on a label for the list of ingredient sources. Because of the globalized nature of our food supply, the sources of ingredients may change on a daily basis. For example, have you ever wondered why the ingredient list on a bag of chips says "soybean oil and/or canola oil"? The company will purchase whichever oil is cheaper on any given day, and must have flexibility in their labels to reflect that reality.

Perhaps companies could include a list of sources on their website. A website has enough space to list the potential sources of ingredients without crowding the packaging label; this would, however, place a burden on the consumer to inquire on a regular basis.

Second, there are significant international trade issues with our country of origin labeling. The country of origin labeling laws were challenged in the World Trade Organization back in 2008. In November 2011, the Dispute Settlement Body ruled unfavorably to the United States as to parts of the law. In March 2012, the U.S. announced it would appeal the ruling. It is unclear whether the country-of-origin labeling laws will survive this challenge in the WTO.

### **Finally, more questions**

Knowing where our food comes from probably does matter; but even though we may want that information, the reality is that most of the time we won't have it.

So in the end we are left with more questions than answers. Aside from direct transactions with farmers, the existing regulatory schemes do provide some information about where our food comes from, but they are not able to complete the entire picture.

I must ask: What do you think about your last meal now?