



Questions of Wellness

Q: Are Country Meats Smoked Snack Sticks a healthy snack alternative?

A: YES.

In an effort to improve the health of America's students the federal government has enacted regulatory wellness guidelines to help school districts develop policies that support healthy eating along with physical activity goals.

The **USDA Appendix B to part 210– Categories of Foods of Minimal Nutritional value** helps districts by listing foods of primary concern. Beef Jerky and Smoked Snack Sticks are not included on this list. This is good. Food choices that have sugar as the first ingredient are targeted. These foods represent “empty calories”. Unlike candy, cookies or sodas our products are classified as a protein snack.

Each smoked snack stick is 1 oz. and range from just 70 calories each.

Because of nutritional issues, many groups and organizations are choosing beef jerky and fundraising meat snacks to take the place of more traditional candy fundraisers. These meat snacks fundraisers are excellent sellers because they are nutritious, very tasty, and quite inexpensive, in addition to having long shelf lives due to being quite resistant to heat and moisture damage.

PROTEIN

A *complete* protein source is one that provides all of the essential amino acids. You may also hear these sources called *high quality proteins*. Animal-based foods; for example, **meat**, poultry, fish, milk, eggs, and cheese are considered complete protein sources. -**Centers for Disease Control and Prevention**
1600 Clifton Rd. Atlanta, GA 30333, USA

Protein foods include both animal (meat, poultry, seafood, and eggs) and plant (beans, peas, soy products, nuts, and seeds) sources. We all need protein—but most Americans eat enough, and some eat more than they need. How much is enough? Most people, ages 9 and older, should eat 5 to 7 ounces* of protein foods each day. -**www.choosemyplate.gov- The Ten Tips Nutrition Education Series-USDA/ United States Department of Agriculture**

ZERO Trans Fats

Trans fat raises your "bad" (LDL) cholesterol and lowers your "good" (HDL) cholesterol. Find out more about trans fat and how to avoid it. @ **Mayo Foundation for Medical Education and Research**
Because we start with a lean pork trim with an 80/20 lean to fat ratio, our products contain just 5 grams of fat each. It's important to remember, this is a meat/protein snack and not a full meal or a grain type food. Certain vitamin or fiber recommendations just don't apply when you look at a smoked meat snack. In the US it is illegal to fortify meat products with certain vitamins.

SALT?

Our products do contain sodium with a RDA of sodium at 2,400 mg (**USDA Dietary guidelines for Americans 2005**) our range is well within the norms.

NITRITES?

Aren't smoked meats high in Nitrites? Nearly 93 percent of dietary nitrite comes from leafy vegetables & tubers and our own saliva.

We feel, with the alternatives available to kids today that beef jerky and Smoked Snack Sticks offer a

healthier alternative. Having talked with **USDA** officials and nutritionist around the country, we have found that this is a shared consensus. The wellness guidelines for districts were made to improve the health of our kids. The concerns were primarily with candy and soda and the quality of their physical activity.

Sodium Nitrite: Essential to Food Safety

Sodium nitrite, a salt, is a USDA-approved food additive that gives cured meats such as ham, bacon and hot dogs their characteristic color, contributes to their flavor, and prevents rancidity by inhibiting fat oxidation.¹

Most importantly, sodium nitrite plays an essential role in protecting the food safety of cured meats.¹

Sodium nitrite added to cured meats inhibits the growth of microorganisms, specifically Clostridium botulinum and the development of the botulism toxin. In 1906, the USDA approved sodium nitrite as a food additive, and the meat industry began using it in cured meats starting in 1925.¹

Numerous scientific studies and expert organizations have concluded for decades that sodium nitrite is a safe food additive.¹ In addition, the Food Safety and Inspection Service of the USDA strictly regulates the level of nitrite in foods to ensure it remains at very low levels.¹

Periodically, controversy has emerged concerning the proposed link between sodium nitrite in cured meats and the endogenous formation of carcinogenic nitrosamines under certain conditions.¹ However, studies by the U.S. Food and Drug Administration, the National Academy of Sciences, the Joint Food and Agriculture Organization/World Health Organization (FAO/WHO) Expert Committee on Food Additives, and the American Medical Association (AMA) conclude that the use of sodium nitrite in cured meats is safe and not associated with cancer risk in humans.¹⁻⁴ In 2003, the FAO/WHO Expert Committee, based on its review of the scientific literature, concluded that the findings “do not provide evidence that nitrite is carcinogenic to humans.”³ In 2004, the AMA concluded that the risk of “developing cancer as a result of consumption of nitrites-containing foods is negligible.”⁴

Earlier, both the U.S. Department of Health and Human Services' National Toxicology Program, the world's leading authority on the toxicological safety of chemicals, and California's Office of Environmental Health and Hazard Assessment's Developmental and Reproductive Toxicity Identification Committee concluded that nitrites are safe at the levels used and do not cause developmental or reproductive toxicity.¹

A 2012 scientific review of human safety controversies surrounding nitrite and nitrate in the diet by University of Wisconsin researchers affirms the general safety of nitrite and nitrate in human health.¹ If nitrite caused cancer, people would be advised to avoid swallowing since saliva accounts for approximately 93% of the total daily intake of nitrite.^{1,5}

Not only is sodium nitrite a safe and regulated food additive, but “today, the regulatory controls, and more stringent plant production practices have essentially eliminated all regulatory nitrosamine concerns in meat,” state the authors of the above scientific review.¹ Industry efforts have lowered residual nitrite levels in cured meat products in the United States by approximately 80 percent since the mid-1970s.^{1,5,6} Residual nitrite levels in cured meats conventionally cured with sodium nitrite continue to be minimal, and are not different from nitrite concentrations in meats not manufactured with sodium nitrite (i.e., cured using alternative methods), according to a recent national survey of cured meat products available at retail.⁷ The overall nitrite level from all cured meats was !

10 ppm (1 mg/100 g),⁷ a level similar to that found in a similar survey reported in 1997.⁶

A recent article identifies “nitrites in cured meats cause cancer” as one of five health scares you can ignore, and adds that “you’d have to eat about 100 hot dogs just to take in the same amount of nitrite that your body naturally produces each day.”⁸

Evidence is mounting that nitrite may have several health benefits. Through normal metabolism, the human body generates nitrite and converts it to nitric oxide. Called the “Molecule of the Year” by Science Magazine in 1992, nitric oxide may help heal wounds, promote blood clotting, control blood pressure, enhance brain function, and boost immunity. Research has shown that nitrite may guard heart, lung and brain tissue against cellular death when they become starved for oxygen.⁹

Scientists at the National Institutes of Health have concluded that nitrite is a potential new treatment for organ transplantation, heart attacks, sickle cell disease, brain aneurysms, leg vascular problems and even pulmonary hypertension, an illness that suffocates babies.¹⁰

Nitrites come from a variety of sources. Nitrates, which the body converts to nitrites when they come in contact with saliva in the mouth, are found mainly in vegetables. The nitrates in vegetables account for 80% to > 90% of nitrates consumed.^{1,5} Cured meats and drinking water make a small contribution to total nitrate intake.

- Most (93%) nitrite comes from saliva, with only a very small amount directly contributed by foods.¹ Less than 5% of the intake of nitrite and nitrate comes from cured meat; the rest is derived from saliva and vegetables.⁷

The amount of nitrate (a precursor of nitrite in the body) in some vegetables can be very high: ⁵

- Spinach contains 740 mg per 100 g of food
- Collard greens contain 320 mg per 100 g of food; and,
- Broccoli contains 40 mg per 100 g of food.

The amount of nitrite in cured meats is much lower: ⁵

- Ham contains .89 mg per 100 g of food;
- Bacon contains .38 mg per 100 g of food; and,
- Hot dogs contain .05 mg per 100 g of food.

Our products, with their high protein, low calories and zero trans fats fit the bill perfectly. States like Connecticut have listed products like ours on their recommended lists of fundraising food alternatives. We want you to feel good about your choice of allowing our healthful products be used in your school.

DEPARTMENT OF AGRICULTURE

Food and Nutrition Service

7 CFR Parts 210 and 220

[FNS-2011-0019]

RIN 0584-AE09

National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010

AGENCY: Food and Nutrition Service, USDA.

ACTION: Proposed rule

SUMMARY: This rule proposes to amend the National School Lunch Program and School Breakfast Program regulations consistent with amendments made in the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The HHFKA requires that the Secretary promulgate proposed regulations to establish nutrition standards for foods sold in schools other than those foods provided under the Child Nutrition Act of 1966 (CNA) and the Richard B. Russell National School Lunch Act (NSLA). The HHFKA amends the CNA, requiring that such standards shall be consistent with the most recent Dietary Guidelines for Americans and that the Secretary shall consider authoritative scientific recommendations for nutrition standards; existing school nutrition standards, including voluntary standards for beverages and snack foods; current State and local standards; the practical application of the nutrition standards; and **special exemptions for infrequent school-sponsored fundraisers (other than fundraising through vending machines, school stores, snack bars, a la carte sales and any other exclusions determined by the Secretary).**

- Schools may allow the sale of food that does not meet proposed rule standards for school sponsored fundraisers at a frequency to be determined with the help of public comments on the proposed rule.

Exempted fundraiser foods may not be sold in competition with school meals.

Foods of Minimal Nutritional Value

The following is taken from Appendix B of 7 CFR Part 210.

Appendix B to Part 210--Categories of Foods of Minimal Nutritional Value

(a) Foods of minimal nutritional value--Foods of minimal nutritional value are:

- (1) Soda Water--A class of beverages made by absorbing carbon dioxide in potable water. The amount of carbon dioxide used is not less than that which will be absorbed by the beverage at a pressure of one atmosphere and at a temperature of 60 deg. F. It either contains no alcohol or only such alcohol, not in excess of 0.5 percent by weight of the finished beverage, as is contributed by the flavoring ingredient used. No product shall be excluded from this definition because it contains artificial sweeteners or discrete nutrients added to the food such as vitamins, minerals and protein.
- (2) Water Ices--As defined by 21 CFR 135.160 Food and Drug Administration Regulations except that water ices which contain fruit or fruit juices are not included in this definition.
- (3) Chewing Gum--Flavored products from natural or synthetic gums and other ingredients which form an insoluble mass for chewing.
- (4) Certain Candies--Processed foods made predominantly from sweeteners or artificial sweeteners with a variety of minor ingredients which characterize the following types:
 - (i) Hard Candy--A product made predominantly from sugar (sucrose) and corn syrup which may be flavored and colored, is characterized by a hard, brittle texture, and includes such items as sour balls, fruit balls, candy sticks, lollipops, starlight mints, after dinner mints, sugar wafers, rock candy, cinnamon candies, breath mints, jaw breakers and cough drops.
 - (ii) Jellies and Gums--A mixture of carbohydrates which are combined to form a stable gelatinous system of jelly-like character, and are generally flavored and colored, and include gum drops, jelly beans, jellied and fruit-flavored slices.
 - (iii) Marshmallow Candies--An aerated confection composed as sugar, corn syrup, invert sugar, 20 percent water and gelatin or egg white to which flavors and colors may be added.
 - (iv) Fondant--A product consisting of microscopic-sized sugar crystals which are separated by thin film of sugar and/or invert sugar in solution such as candy corn, soft mints.
 - (v) Licorice--A product made predominantly from sugar and corn syrup which is flavored with an extract made from the licorice root.
 - (vi) Spun Candy--A product that is made from sugar that has been boiled at high temperature and spun at a high speed in a special machine.
 - (vii) Candy Coated Popcorn--Popcorn which is coated with a mixture made predominantly from sugar and corn syrup.

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Fundraisers –The sale of food items that meet the proposed nutrition requirements at fundraisers would not be limited in any way under the proposed rule. However, the law permits USDA to allow for a limited number of fundraisers to sell food and beverage items that do not meet the proposed nutrition requirements. Because of the wide variety of options available with regard to the frequency of fundraiser exemptions, the proposed rule includes two alternative approaches that provide discretion to State agencies in determining the frequency with which such fundraising activities may take place, and requests other suggestions. The proposed standards would not apply to non-school hours, weekends and off-campus fundraising events.