#### Product Sustainability Standard: Grocery

### Food Ingredients FAQ

Version 1.0: September 2021



#### Does PCC have a standard for food ingredients?

Yes! PCC screens our products against a list of acceptable and unacceptable food ingredients. (Check out the full list <u>here</u>.) This screening helps us choose products that are less processed and free of some of the most harmful (to the environment and people) ingredients, like genetically modified organisms (GMOs), parabens, aspartame, and artificial dyes. While PCC always encourages people to choose wholesome, homecooked foods, we understand that this is not always possible. Our goal is to provide healthier options in each category, from boxes of macaroni and cheese to chocolate bars. Read the full standard <u>here</u>.

#### Why does PCC allow the additives that it does?

Some additives are essential to ensure food safety and prevent unnecessary food waste. It is also important to support different dietary choices and needs, such as gluten-free and vegan, which often require different ingredients and additives. If we are going to accept some ready-to eat foods, we must also accept that they will have some additives necessary to the function of that food. We do, however, screen all the ingredients in our foods to ensure they are not linked to serious and scientifically substantiated health concerns for the general population when consumed in moderation. We also prioritize ingredients that are minimally processed and choose products with simpler formulations.

# Doesn't the FDA regulate and screen food ingredients to make sure they're safe?

The Food & Drug Administration (FDA) regulates nutrition claims, additives, and packaging of food products to ensure they are not deceptive, misleading, or acutely toxic to humans. Unfortunately, the bar the FDA sets for safety of food ingredients is not as high as many would like it to be. Most ingredients and additives are self-certified as Generally Recognized as Safe (GRAS) without needing pre-market approval from the FDA.<sup>1</sup> When the FDA first implemented this system, many ingredients already in use were grandfathered in and designated as GRAS. This group of GRAS ingredients are designated as Group 1 and include ingredients such as nitrates. Group II includes any ingredient or additive deemed GRAS since 1958.<sup>11</sup>

Read more about the concerns with FDA oversight and GRAS designations in the *Sound Consumer* article, <u>FDA Lacks</u> <u>Oversight of Food Ingredients</u>.

### What does the term "natural" mean for PCC?

The term "natural" has no legal definition, unlike the term "organic" that is legally backed by the Organic Food Production Act (OFPA) when used on food products. The FDA does have a policy on the term, to mean that nothing artificial or synthetic has been added to the food. In 2016, the agency collected public comments on a proposal to regulate and define the term, but never proceeded in finalizing a definition or rule.<sup>iii</sup> PCC has long advocated for a regulated and official definition of the term natural, because we have seen how brands can abuse and take advantage of the term's ambiguity to greenwash their products. PCC <u>submitted comments to the FDA</u> during their comment period in 2016, which included data from shopper surveys showing how consumers find the term misleading and confusing. Because the term "natural" can be essentially meaningless unless given a definition at the same instance, we attempt to clearly describe our standards, requirements, and expectations for our products and their ingredients. We use the term "natural" occasionally because it is, despite its flaws, a recognized term that can be useful in some contexts, so long as it is further clarified.

### Why does PCC allow "natural flavors" in its products?

Natural flavors are derived from plant or animal sources, such as a fruit, vegetable, meat, fish, spice, or herb. They're found in many packaged foods to enhance the flavor and are unfortunately ubiquitous throughout the natural supply chain. It is an issue that goes beyond the scope of one brand or one product category, so our strategy is to work with companies to push the industry away from using natural flavors and work with producers to reformulate, rather than eliminating many of the products our shoppers have come to enjoy. We understand that natural flavors are problematic and do give preference to products without natural flavors whenever possible. PCC currently allows them because they are so common, and they are a step better than artificial flavors, which are derived from petroleum and produced through different methods. We will continue to push producers to improve the ingredients in their products, choose options with fewer additives and natural flavors, and strengthen our position regarding natural flavors as we update and improve our food ingredient standards. You can learn more about this topic in the *Sound Consumer* article, <u>The Flavor Industry</u>.

# How do you decide whether to allow or prohibit an ingredient in foods you sell?

We take a holistic and science-based approach to determine whether to allow an ingredient and balance the risks with its prevalence in existing products PCC sells. Ingredient evaluations involve looking at the historic use of the substance, health data, environmental impact, and current regulations on use both in the United States and other relevant countries. These evaluations are then reviewed and discussed amongst PCC's Quality Standards Committee and a vote is taken on whether to allow, prohibit, or provide additional use requirements on specific ingredients. Overall, we work hard to minimize the number of additives in any foods, encourage vendors to carefully consider the essentiality of ingredients, and air on the side of caution with novel or new ingredients that appear on the market.

# I've read about the concerns with carrageenan, why do you still sell some products that contain it?

In 2014, <u>PCC stopped accepting new organic products</u> with carrageenan because of potential health concerns associated with consumption of carrageenan, such as inflammation of the bowel.<sup>iv</sup> Carrageenan is still technically allowed in organic products, as it is on the list of acceptable non-synthetics that can be used in foods labelled organic or made with organic ingredients. The National Organic Standards Board (NOSB) <u>recommended in 2016</u> that carrageenan be removed from this list, but the USDA has not followed through on this change, despite the continued requests from the organic community to remove it from the National List. PCC supports the NOSB's recommendation and thus will not accept any new organic products containing carrageenan. However, when this decision was made, we already carried many organic and non-organic products with the ingredient that shoppers rely on. Until the official organic regulations are updated, these companies do not need to reformulate. To respect these organic products with carrageenan to remain on our shelves.

### How does PCC address greenwashing and all the various label claims?

Greenwashing is the practice of misleading consumers, through the use of certain colors, images, and marketing claims, into thinking their product is better for the environment or healthier than it truly is. PCC combats this practice by verifying claims against our standards, encouraging third-party eco-certifications that are verified best practices, and getting as much information from the producers/manufacturers as possible about the products we sell. Sourcing from smaller brands with whom we can develop long lasting partnerships is another strategy that has worked well. It allows us transparency in sourcing, production, and the ability to communicate directly with the producers if we have concerns.

<sup>&</sup>lt;sup>i</sup> Kelly Damewood, "The GRAS Process: How Companies Legally Add Ingredients to Food," Food Safety News, January 30, 2014, <u>https://www.foodsafetynews.com/2014/01/the-gras-process-how-companies-legally-add-ingredients-to-food/</u>.

<sup>&</sup>lt;sup>ii</sup> International Food Information Council Foundation (IFIC) and Food & Drug Administration (FDA), "Food Ingredients & Colors" (Food & Drug Administration (FDA), April 2020), <u>https://www.fda.gov/media/73811/download</u>.

<sup>&</sup>lt;sup>iii</sup> Center for Food Safety and Applied Nutrition, "Use of the Term Natural on Food Labeling," Food & Drug Administration (FDA) (FDA, February 22, 2021), <u>https://www.fda.gov/food/food-labeling-nutrition/use-term-natural-food-labeling</u>.

<sup>&</sup>lt;sup>iv</sup> Monica Reinagel, "The Carrageenan Controversy," *Scientific American*, July 1, 2015, https://www.scientificamerican.com/article/the-carrageenan-controversy/.