

## Food Ingredients

Version 1.0: September 2021



### Reason for Standard

Processed and ready-to-eat foods can contain a wide swath of ingredients. While some ingredients are well-known staples and pose little health concern, many take the form of refined sugars, hydrogenated fat, empty carbohydrates and fillers, preservatives, stabilizers, artificial dyes, artificial flavorings, and other unrecognizable additives.

There is strong and growing evidence that processed foods contribute to obesity and the rising prevalence of chronic diseases, such as heart disease, diabetes, and cancers.<sup>i</sup> Unfortunately, the United States regulatory system assumes most ingredients and additives are safe until proven dangerous and the evidence showing their harm must be irrefutable.<sup>ii</sup> Therefore, many additives with anecdotal evidence or limited research that raise questions concerning their safety remain widely used in food products without restrictions.

Beyond the health impact of consuming highly processed and less healthy food ingredients, there are also the additional social and environmental concerns surrounding any food production and crop, such as the use of pesticides, presence of Genetically Modified Organisms (GMOs) and treatment of workers.

While US Department of Agriculture's (USDA) organic certification program evaluates many food ingredients to ensure minimal health and environmental impacts (and prohibits some of the most concerning), there are certain additives that are not excluded by the organic standards and require additional scrutiny.

PCC always encourages our shoppers to choose wholesome and nutrient dense foods, but we also want to offer the healthiest prepared and ready-to-eat foods with the fewest additives possible. Our standard was developed using the precautionary principle to help accomplish this goal and ensure we are not selling prepared and ready-to-eat foods that are harmful to people or the planet when consumed in moderation.

### Scope

This standard applies to ingredients in food and beverages in the grocery and bulk departments.

### Standard

#### 1. General Products Requirements

- 1.1. Products sold must not contain any unacceptable ingredients found on our list of [Acceptable and Unacceptable Food Ingredients](#).
- 1.2. Products sold must adhere to any qualifications of use established on our list of [Acceptable and Unacceptable Food Ingredients](#).

- 1.3. PCC strives to offer safe, minimally processed packaged foods, and takes a precautionary approach to avoid ingredients or additives with substantial evidence indicating acute toxicity or harm to human health or the environment.
- 1.4. Vendors are encouraged to limit the use of additives and to seek less chemically processed alternatives.
- 1.5. High risk genetically engineered (GE) ingredients must comply with PCC's [GE Ingredient and Labeling Standard](#).
- 1.6. Where applicable, ingredients must comply with PCC's [Fair Labor Standard](#).
- 1.7. Vendors are encouraged to seek third-party certifications to verify ingredient claims.

## 2. Ingredient Requirements

- 2.1. PCC does not accept products with ingredients that are patented or those without available health and safety data.
- 2.2. PCC does not accept products containing artificial colors (FD&C colorants), flavors, and sweeteners.
- 2.3. PCC does not accept products containing ingredients at high risk of being nanoparticle in size, such as titanium dioxide or silicon dioxide.
- 2.4. PCC does not accept products containing ingredients that have been irradiated.
- 2.5. PCC does not accept products containing artificial preservatives, such as parabens.
- 2.6. PCC does not accept products containing hydrogenated oils or trans fats.
- 2.7. Oils as single ingredients cannot be produced through hexane or solvent extraction methods. Vendors are encouraged to source non-solvent extracted oils for multi-ingredient products and PCC gives preference to products with oils clearly identified as produced without chemical solvents.

## Standard-Specific Glossary

**Additives** are substances added to packaged foods to serve a specific purpose, such as preserving flavor or freshness or enhancing taste, appearance, or other sensory qualities. There are numerous subcategories of food additives based on their function; examples include preservatives, colorants, pH balancers, emulsifiers, stabilizers, and anti-caking agents. Additives can be safe and natural, like beet juice used for coloring, or they can be synthetic and potentially harmful to one's health, like parabens used for preservation.

**Genetically Engineered (GE)/Genetically Modified Organism (GMO)** does not have a standardized definition. (In part, this has created some of the problems for achieving GE transparency and reaching consensus on how best to identify and communicate this with consumers.) Many authorities, however, would define GE food or GMOs as a living organism whose genetic material (otherwise known as DNA) has been artificially manipulated in a laboratory through genetic engineering. Genetic engineering creates combinations of plant, animal, bacteria, and virus genes that do not occur in nature or through traditional crossbreeding methods.

**High-Risk Genetically Engineered Crop Ingredients** are identified on the [Non-GMO Project](#) list of crops and inputs that are highly likely to be GE. These include, but are not limited to, canola, corn (except popcorn), papaya, soy, and sugar beet.

**Non-GMO Project** is a nonprofit organization that certifies products that are free of genetic engineering. Their standards require verification that no genetically modified materials were used in production of a product, rather than relying on testing the final product for traces of GE material. They also engage in

education and advocacy efforts to engage consumers and protect the integrity of the non-GMO food supply chain.

**Organic** refers to the practices associated with organic food production and processing that prohibit the use of most synthetic inputs and pesticides, along with requiring other environmental and animal-friendly agricultural and food handling practices. Established by the Organic Foods Production Act (a federal law), the [National Organic Program](#) (NOP) within the US Department of Agriculture (USDA) manages the organic certification standards, enforcement, and accreditation of independent certifying bodies. Many other countries also have organic certification programs.

**The Precautionary Principle** is a theory, framework, and approach to handling new situations and innovations through a lens of precaution for health and safety. Under the precautionary principle, the burden of proof for potential harm to human health or ecosystems rests on the proponents of what is being introduced, created, or proposed for implementation. In the case of toxics or ingredients, it shifts the burden of proof that a substance is safe on those who claim it is safe, rather than requiring proof of its harm. In the United States, the regulatory approach to many consumer goods, including most food additives and personal care products has not employed the precautionary principle. Historically, most ingredients are assumed to be safe unless those who have concerns can provide irrefutable proof of harm.

**Preservatives** are additives that prevent spoilage of food, extending shelf life and inhibiting mold and bacterial growth. There are natural preservatives, such as salt, vinegar, sugar, and citrus juices, and there are synthetic or artificial preservatives like sodium benzoate or butylated hydroxytoluene (BHT). Additionally, there may be some preservatives that are synthesized, but derived from natural sources; one example is ascorbic acid, which is more commonly known as Vitamin C.

**Processed foods** have been altered in some manner from their natural state before being sold to the consumer. There is not, however, a uniform and consistent official definition of processed food. The US Department of Agriculture (USDA) defines it as food that has undergone any change from its natural state, so any raw agricultural commodity that has been washed, milled, cut, or chopped could fall under the scope of a processed food.<sup>iii</sup> Fresh baked bread or pickles brined in salt could qualify as processed foods, or minimally processed foods, containing only a few ingredients and minimal additives to make them ready to eat. They can be made with simple, wholesome ingredients, but in today's landscape, can easily contain a host of sweeteners, unhealthy fats, synthetic emulsifiers, stabilizers, preservatives, dyes, and artificial flavors.

**Sweeteners** are additives that make foods sweeter. Sugars, glucose, fructose, and sucrose-based ingredients are a sub-category of sweeteners. There are also artificial substances or chemical compounds that are not truly sugars, but still make food taste sweeter. Aspartame is an example of an artificial sweetener that is non-saccharide (sugars are monosaccharides or disaccharides).

**Ultra-Processed foods** are packaged foods that require minimal to no preparation to eat and are not whole foods that can be eaten raw, like fresh fruit. These generally contain complex formulations of ingredients and additives to enhance texture, shelf stability, color, and flavor. Examples include sugary drinks, cookies, chips, breakfast cereals, some frozen dinners, and luncheon meats.

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<sup>i</sup> Lisa Rapaport, "More Evidence Links Ultra-Processed Foods to Health Harms," *Reuters*, June 5, 2019, <https://www.reuters.com/article/us-health-diet-processed-food-idUSKCN1T61YX>.

<sup>ii</sup> Maricel V. Maffini, Thomas G. Neltner, and Sarah Vogel, "We Are What We Eat: Regulatory Gaps in the United States That Put Our Health at Risk," *PLoS Biology* 15, no. 12 (December 20, 2017), <https://doi.org/10.1371/journal.pbio.2003578>.

<sup>iii</sup> The Nutrition Source, "Processed Foods and Health," Harvard T.H. Chan School of Public Health, accessed April 6, 2021, <https://www.hsph.harvard.edu/nutritionsource/processed-foods/>.