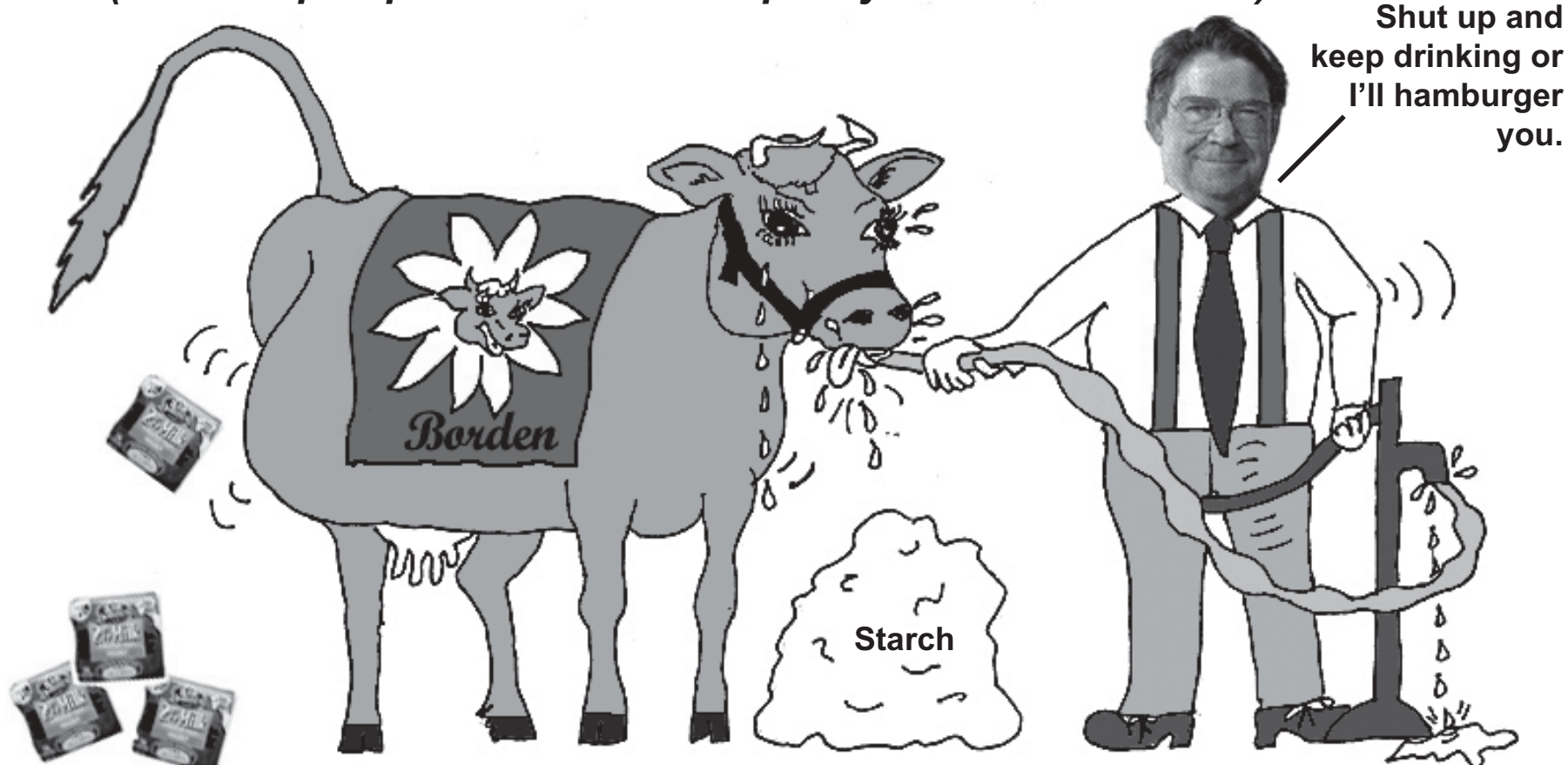


## Cheaper Ingredients!

Late at night, deep in the bowels of DFA's secret product research lab, "Elsie the Cow" suffers as her master, Gary Hanman, pumps her full of water and starch. (Effects upon product taste and quality are undetermined.)



The Milkweed-March 2004

## – DFA illegally overwaters 'Elsie's' Singles

# Borden '2% Singles': Starch and Too Much Water

by Pete Hardin

Laboratory tests recently conducted on a sample of Borden's "2% Milk Reduced Fat Singles (Sharp)" uncovered almost 20% more moisture than legally allowed by the federal Food and Drug Administration (FDA).

Further, testing revealed the presence of starch as one percent of total weight of the Borden 2% Singles. Starch is not an approved ingredient for the federal standard of identity for "Pasteurized Process Cheese Food" under which Borden markets its 2% Singles.

Dairy Farmers of America (DFA), the nation's largest dairy farmers cooperative, owns the Borden line of cheese products.

DFA markets the Borden 2% Singles as "Pasteurized Process Cheese Food"—a federal standard of identity. Legally, FDA permits zero deviation from rules such as moisture, or for unapproved ingredients, in the case of food products sold under federal standards of identity.

### Starch + Water: cheap food ingredients

In tandem, starch and water combine to form a very cheap pair of ingredients. Starch is a popular ingredient for processed foods for firms looking to drive down costs. Starch holds approximately ten times its own weight in water! Thus, including starch at the rate of one percent (of gross product weight) effectively locks in ten percent more moisture (water).

Starch + water is a dream come true for food processing firms bent on the competitive advantage of cheaper, if illegal, ingredients. But when properly exposed, illegal presence of starch + way too much water in a standardized food can become a consumer food product marketer's nightmare.

The list of ingredients for the package of Borden 2% Singles tested, which accompanies this story, gives little clue as to how the starch may have entered the product. FDA food labeling rules specify that all ingredients in human foods be listed.

### 52.24% water ... FDA top standard is 44%

A sample of this Borden product tested at 52.24% moisture. The laboratory that conducted the testing is of national prominence. A moisture level of 52.24% is in gross violation of FDA's 44% upper limit for moisture standards in Pasteurized Process Cheese Food.

Here's the exact FDA language, found in Title 21 (Food and Drugs), Chapter 1, Part 133, Section 173, subpart (a)(3):

**"The moisture content of pasteurized process cheese food is not more than 44%, and the fat content is not less than 23%."**

The tests showed that Borden 2% Singles, marketed as "Pasteurized Process Cheese Food," violates FDA standards by containing 52.24% moisture. The specific violations include both misbranding and adulteration.

### Misbranded and Adulterated

FDA defines "misbranded food" in 21 CFR, Section 402, Part 343., which reads:

"Sec. 402 [343]. Misbranded Food.

A food shall be deemed to be misbranded—

"(a) If (1) in its labeling is false or misleading in any particular ...

"(b) It is offered for sale under the name of another food.

"(c) If it is an imitation of another food, unless the label bears, in type of uniform size and prominence, the word "imitation" and, immediately, thereafter, the name of the food imitated.

"(g) If it purports to be or is represented as a food for which a definition and standard of identity has been prescribed by regulations as provided by section 401, unless (1) it conforms to such definition and standard, and (2) its label bears the name of the food specified in the definition and standard and, is so far as may be required by such regulations, the common names of optional ingredients (other than spices, flavoring and coloring) present in the food."

The sample of Borden 2% Singles with 52.24% water does not conform to FDA standards for Pasteurized Process Cheese Food. FDA considers food products to be adulterated if they contain something in the product that should not be there, is missing, or that creates a safety or quality concern. Starch is not listed as an optional ingredient, under the FDA regulations for Pasteurized Process Cheese Food.



**Ingredients: Part skim milk, skim milk, whey, sodium phosphate, calcium, phosphate, salt, lactic acid, sorbic acid (A preservative), cheese cultures, enzymes, artificial color, xanthan gum, locust bean gum, guar gum, vitamin A Palmitate.**

### Consumer satisfaction guaranteed!

Despite the presence of illegal volume of water in Borden 2% Singles, DFA guarantees consumer satisfaction for this adulterated and misbranded product. Packages of Borden 2% Singles claim: "Borden Brings the Dairy Home. The Dairy Farmers of America take pride in bringing the fresh, wholesome goodness of the dairy home to you in every package of our great tasting Borden cheese. In fact, we guarantee it!"

Further, the package claims: "FRESHNESS GUARANTEED. If you are not completely satisfied, please contact us at 1-888-337-2407."