

### McDonald's Breaded Mozzarella Sticks: Adulterated & Misbranded

#### by Pete Hardin

See page 3 for more details. Dairy farmers' promotion dollars developed this adulterated & misbranded crap!

McDonald's – the nation's biggest fast-food chain – is violating federal law by selling adulterated, misbranded "Breaded Mozzarella Sticks."

A laboratory test commissioned by *The Milkweed* reveals presence of large amounts of plant-based starch in McDonald's "Breaded Mozzarella Sticks." Starch content from this analysis was 3.76%. Starch is not a legal ingredient or additive in cheese products labeled "Mozzarella," according to standards of identity established by the United States' Food and Drug Administration (FDA).

Under FDA rules, consumer products marketed and sold using the name of a cheese bearing an FDA standard of identity may not deviate from the list of approved ingredients. Starch is NOT an approved ingredient for any of the four Mozzarella varieties listed in FDA's standards of identity: Mozzarella, low-moisture Mozzarella, part-skim Mozzarella, and low-moisture partskim Mozzarella.

#### Starch is cheap and holds water!

Why would McDonald's allow plant starch in the "Breaded Mozzarella Sticks?" For food processors and marketers, plant starch products such as those derived from potatoes, corn and peas are miraculous, money-making fillers. Starches are far cheaper, per unit, than cheese. But the real bonus to food processors and marketers is starch's moisture-holding capacity. Starch may hold up to ten times its own weight in water. Thus, by simply adding one unit (by weight) of starch to a batch of food being processed means that up to ten units (by weight) of extra water may also be added to the mix ... and the resulting product will maintain its overall general consistency.

McDonald's has initially rolled out "Breaded Mozzarella Sticks" in Wisconsin, as one test market. Plans are to expand sales of that item nationwide in coming months, according ot statements by one of McDonald's dairy industry partners. Retail price for "Breaded Mozzarella Sticks" is generally \$2.39 (plus sales tax) per 2.3-oz. serving. In some instances, McDonald's also offers "Breaded Mozzarella Sticks" as a side item with Extra Value Meals for \$1 per serving. Biting into one of McDonald's "Breaded Mozzarella Sticks" is the first indication that the product is cheap. The breading material surrounding the so-called "Mozzarella" core is unduly liberal. The October 2015 issue of The Milkweed carried an article titled, "McDonald's 'Breaded Mozzarella Sticks' Barely 50% Cheese. That article analyzed the approximate weight ratios of the cheese portion (50.8%) and the breading (49.2%). That excessive breading "dumbs-down" the product's integrity. If McDonald's added any more breading to that product, the "stuff" might have been called, "Baked Breading with Mozzarella."

#### **Desperate to boost sagging fortunes**

Selling adulterated, misbranded "Breaded Mozzarella Sticks" seems contradictory to McDonald's recent emphasis on improved menu offerings.

In recent years, McDonald's U.S. sales volume and stock prices have tumbled. McDonald's has closed hundreds of stores, a downsizing due to diminished sales at some locations. Aggressive competitors such as Panera Bread and Subway have sliced and diced McDonald's sales volumes. Those competitors (and others) are gaining sales through products perceived as healthier and more nutritious, compared to had become regarded as McDonald's "same-old, same-old" fast food fare. As part of McDonald's recent menu make-over, in 2011 the company crafted a "Commitments to Offer Improved Nutrition Choices." Menu items added since then include: "Egg White Delight McMuffin"<sup>®</sup>, the Premium McWrap, a side salad offered as an alternative to French fries in the so-called "Extra Value Meals," and offering water, milk or juice as the beverage included with kids' "Happy Meals."

An on-line document posted by McDonald's reflects the corporate-wide thrust for improved nutrition and image:

"In September 2013, McDonald's Corporation partnered with the Clinton Foundation and the Alliance for a Healthier Generation to announce a global commitment that includes McDonald's top 20 markets. Through that commitment, we will use our size and scale to help educate, empower and encourage our customers to make informed, nutrition minded choices by the year 2020."

Sorry, but McDonald's customers cannot make "... informed, nutrition-minded choices ..." if the company sells adulterated, misbranded ... indeed, fraudulent products such as "Baked Mozzarella Sticks."

# Where's "Mr. Yuk" when you need him???

According to the on-line document titled, "McDonald's USDA Nutrition Facts for Popular Menu Items," a 2.3-oz. serving of "Breaded Mozzarella Sticks" included the following profiles:



Laboratory tests reveal the presence of an illegal ingredient in McDonald's "Breaded Mozzarella Sticks" – starch (3.76%) by weight. This product is both adulterated and mis-branded.

# **The Milkweed** <sup>12/15</sup>

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Calories: 200 Calories from Fat: 90 Total fat: 10 grams % Daily Value (of fat): 15 Saturated Fat: 4 grams % Daily Value (of Saturated Fat): 21 Trans Fat: 0 grams Sodium: 560 grams % Daily Value (of Sodium): 23

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## **Clarification: What to Call McDonald's Mozzarella Sticks?**

#### by Pete Hardin

Last month, *The Milkweed* revealed that McDonald's Mozzarella Sticks contained 3.76% starch – an apparent violation of the standard of identity for Mozzarella as dictated by the federal Food and Drug Administration (FDA).

We referred to the product as "Breaded Mozzarella Sticks." Pardon any confusion about references to "Breaded Mozzarella Sticks" in the December 2015 issue of *The Milkweed*. McDonald's offers varying descriptions of the product, which, if the cheese portion contains starch, is assuredly not Mozzarella. After further research, we conclude that, perhaps more accurately, the phrase should be "Mozzarella Sticks." McDonald's refers to the product in a variety of ways:

• The listing on McDonald's website for consumer information about the nutrition content of the product refers to the "stuff" as "Baked Mozzarella Sticks."

• In display materials at McDonald's franchises selling the "stuff," the reference is simply to "Mozzarella Sticks."

• On cash register receipts following purchase of the "stuff," the listing is for "Mozzarella Sticks."

• But the shipping box in which the breaded products are shipped to individual McDonald's franchises, the product is referred to as "Breaded Ovenable Mini Mozz Sticks."

• In television advertisements, McDonald's repeatedly refers to the products as "Mozzarella."

• Perhaps most damning: McDonald's serves customers "Mozzarella Sticks" in a small box, which contains the product claim "made with real mozzarella" for the 2.3-oz single serving. Real Mozzarella does NOT contain starch.

Curiously, at the end of the long list of ingredients for the "Mozzarella Sticks," the shipping box notes: "Deep-fried in soybean oil." Deep-fried? What the heck ever happened to "Baked Mozzarella Sticks?" "Deep-fried in soybean oil"? That doesn't sound "baked." Half-baked?

Some may argue that McDonald's novel phrase "Mozzarella Sticks" may be deemed technically appropriate, because the phrase "Sticks" appears in a type size 50% or less than the word "Mozzarella" on the consumer package.

BUT the qualifier on the consumer package that reads, "made with real mozzarella," is seemingly impossible to finesse, if regulators' laboratory tests confirm the presence of starch in the cheese portion of the product. That was the result found in lab tests commissioned by *The Milkweed*.

#### "Plant 55-337" is Sargento Foods, Inc.

On the cardboard shipping box that contains 24 lbs. (six 4-lb. bags) of "BREADED OVENABLE MINI MOZZ STICKS," the plant from which these products are sourced is identified. That plant identification listed is 55-337. That's the Sargento Foods, Inc. plant at Kiel, Wisconsin. Sargento Foods is a major player in the state and national cheese industry.

The shipping box notes that the product must be stored at temperatures at or below  $0^{\circ}$  Fahrenheit or lower.

Is Sargento Cheese the original manufacturer of the "BREADED OVEN-ABLE MINI MOZZ STICKS" ... or is Sargento Cheese simply breading and packaging product sourced from another firm? That question may be partially answered by the listing for Sargento Foods, Inc. found in the Wisconsin Dairy Plant Directory for 2014-2015.

According to the current Wisconsin Dairy Plant Directory, the list of activities conducted at Sargento Foods' Kiel, Wisconsin plant includes:

**"Breading Cheese,** Cut, Wrap, Grind, Shred, DI Extended Run, Grade B Processing >1,000,000 lbs, Processed Cheese, Snack Dips (Bold emphasis added.)

Clearly, the activities regulated by DATCP at Sargento Food's Kiel, Wisconsin plant include "Breading Cheese." Sargento Foods' Kiel, Wisconsin plant is NOT listed as a producer of Mozzarella cheese.

#### Complaint filed with Wisconsin Agriculture Department

During the first week of 2016, the Food Safety Division of the Wisconsin

### **List of Ingredients**

# BREADED OVENABLE MINI MOZZ STICKS

INGREDIENTS: LOW MOISTURE PART SKIM MILK MOZZARELLA CHEESE (PASTEURIZED MILK, CHEESE CULTURE, SALT, ENZYMES), BLEACHED WHEAT FLOUR, WATER, VEGETABLE SHORTENING (SOYBEAN), ENRICHED BLEACHED WHEAT FLOUR (NIACIN, REDUCED IRON, THIAMINE MONONITRATE, RIBOFLAVIN, FOLIC ACID), YELLOW CORN FLOUR, CONTAINS 2% OR LESS OF: SALT, LEAVENING (SODIUM ACID PYROPHOSPHATE, SODIUM BICARBONATE), DEXTROSE, YEAST, DOUGH CONDITIONER (ASCORBIC ACID, L-CYSTEINE MONOHYDROCHLORIDE), SPICE EXTRACTIVE, SUGAR, BUTTERMILK, MODIFIED FOOD STARCH, ONION POWDER, GARLIC POWDER, MALTODEXTRIN, NATURAL FLAVOR (INCLUDING BUTTER), WHEY, NONFAT MILK, CITRIC ACID, EGG, SODIUM ALGINATE, CALCIUM CHLORIDE, RICE FLOUR, DEXTRIN, XANTHAN GUM, PARSLEY, COLOR (ANNATTO, PAPRIKA EXTRACT, TURMERIC), DEEP FRIED IN SOYBEAN OIL.

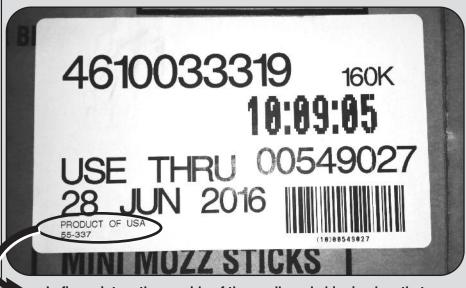
The graphic above is from a picture of the cardboard box in which McDonald's Mozzarella Sticks are distributed to local franchises. The product is described as "Breaded Ovenable Mini Mozz Sticks."

The cheese portion is described as, "Low Moisture Part Skim Milk Mozzarella Cheese." Calling the cheese portion "Mozzarella" is contradictory to test results reported last month by *The Milkweed*, which found 3.76% starch contained in the cheese. (FDA rules prohibit including nonapproved ingredients in cheeses that have a standard of identity.)

Meanwhile, the non-cheese ingredients constitute a lengthy list of semi-pronounceable words and phrases. Dairy Management, Inc. (DMI – the national dairy promotion bozos) has taken full credit for developing McDonald's Mozzarella Sticks. How much time and money did DMI spent concocting the combination of all those non-cheese ingredients?

One final thought ... Note the last five words on the ingredients statement: "Deep Fried in Soybean Oil." If McDonald's has promoted these products, at times, as "Baked Mozzarella Sticks," where did the "deep fried" part come in? Is calling the product "Baked Mozzarella Sticks" another misrepresentation to cnsumers?

## Plant #55-337



In fine print on the ourside of the cardboard shipping box that contains 24-Ib. of McDonald's Mozzerella Sticks, one finds the plant number: 55-337. That's the designation for the Kiel, Wisconsin plant of Sargento Foods, Inc.

### **WI Butter Acquisitions Coming Soon**

#### by Pete Hardin

Butter deals are brewing in Wisconsin, a state where few competing butter plants actually remain. Within the next month, details involving the seller and purchasers should become public.

Department of Agriculture, Trade and Consumer Protection (DATCP) received a formal complaint from Pete Hardin. That complaint focused on whether McDonald's "Mozzarella Sticks" are accurately advertised and sold to consumers. That complaint further noted that the cardboard shipping box, containing 24-lbs. of product retrieved from a McDonald's store in December 2015, listed Wisconsin dairy plant #55-337 as the source of the product.

Dairy plant #55-337 is located at Kiel, Wisconsin, owned and operated by Sargento Cheese.

Thus, DATCP Food Safety officials have two sticky issues involving McDonald's "Mozzarella Sticks" on their plate, so to speak.

1) Is McDonald's advertising and selling misbranded, adulterated products to consumers? It's a stretch to label product containing 3.76% starch cannot be advertised as 'made with real mozzarella."

2) Is a Wisconsin-based dairy plant either producing, or co-packing products that are possibly adulterated or misbranded. May the "MOZZ" reference on the box be interpreted as something other than "Mozzarella"? Or, does the phrase "Mozzarella Sticks" somehow elude technical interpretation as violation of FDA rules for adulteration and mislabeling?

Stay tuned!

Within Wisconsin and the Upper Midwest, possible issues involving competition at several tiers of the cream and butter sector could emerge. Those areas of competitive concern include: Reducing the number of purchasers of cream, reducing the number of sellers of cream, and possible impact upon consumer prices.

Butter is dairy's H-O-T item right now. Per-capita consumption of butter is on an upswing, nationally. That's because butter, after many decades, is once again enjoying positive news as a natural, healthy product.

Sales of butter for table use are particularly strong, as consumers want more butter. In recent months, domestic butter firms have been hard-pressed to meet demand for table-grade butter. One major butter player reportedly raised its mark-up to accounts last fall by nearly a dime per pound.

*The Milkweed* projects that more and more U.S.-produced butter will end up on tables and in restaurants. Meanwhile, imported butter and high-butterfat commodities (like anhydrous milkfat and butter-oil) will increasingly move towards industrial use (baking, candy, etc.)

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