Supplemental Pizza Q's & A's to Address the Names of Non-Traditional Pizza-Like Products and Pizzas with Modified Cheeses

New Questions/Answers:

Naming Non-Traditional Pizza-Like Products
In the absence of a pizza with meat standard, the prevailing regulations on naming meat and poultry products apply. According to the regulations (9 CFR 317.2(c)(1) and 381.117(a)), when a product's name is not guided by a standard of identity, products are named using a recognized common or usual name, if one exists, or a descriptive naming approach. After further consideration, the Agency has determined that a modification to the naming convention for certain non-traditional pizza-like products is needed. This modification relates to the continued use of the "common or usual" naming conventions of traditional pizza products. A question has also been added to clarify naming conventions with respect to the use of modified versions of standardized cheese products.

1. Q. What naming approach is acceptable for non-traditional pizza-like products that consist of the four traditional components (i.e., bread-base component used as a crust, shell, or other similar way; tomato sauce; cheese; and meat/poultry component) and only differ in their "form" from a traditional pizza, e.g., rolled, filled, or stuffed in a crust or breading, and fried or baked?

A. Such products could be named with the common or usual "traditional" pizza name; however, the basic nature or characteristics would also need to be identified, e.g., how the "form" of the product differs from the traditional pizza product. Examples would be "pepperoni pizza in rolled dough and fried," "sausage pizza enclosed in crust," "Combination pepperoni and sausage pizza folded and sealed," and "chicken pizza wrapped in a dough pocket." The term "sandwich" is not sufficiently descriptive for the form of the product because an enrobed or formed pizza is not defined as a traditional sandwich.

2. Q. Do imitation/substitute cheese and modified versions of standardized cheese (per 21 CFR 130.10) need to be included in the product name on the labeling of traditional pizzas and non-traditional pizza-like products that consist of the four traditional components (i.e., bread-base component, tomato sauce, cheese, and meat/poultry component) and only differ in their "form" from a traditional pizza?

A. All of the traditional components of a traditional pizza that are present at 2 percent or more of the formulation do not need to appear in the common or usual product name. However, when "cheese" is included in the product name, or when a descriptive name is used that includes all the components that are present at 2 percent or more of the formulation, the amount of real cheese must be equal to or greater than
that of the imitation, substitute, or modified versions of standardized cheese in the product or the imitation/substitute/modified cheese must be included in the product name. For example, a product identified as a "Bacon, Cheddar Cheese, Hickory Flavored Sauce, and Sourdough Pizza," that contains 15 percent Cheddar and Reduced Fat Mozzarella Cheese would be expected to contain Cheddar at greater than 7.5 percent of the product formulation. Otherwise, the reduced fat cheese would need to be declared as part of the product name.

3. Q. Can a traditional pizza contain only a modified version of the standardized cheese for the required cheese component, or will this make the pizza a "non-traditional" pizza-like product requiring a descriptive name?

A. Yes, a traditional pizza can contain only a modified cheese. Modified versions of standardized cheeses are actually covered by a "general standard of identity" in 21 CFR 130.10. In order for such products to contain novel ingredients, they must be identified with the standardized name in addition to a nutrient content claim. Thus, a pizza with a modified cheese would be regarded as a traditional pizza. However, the product name or other label features (e.g., starbursts) could not simply state the term "cheese" because of the nature of the modified standardized cheese and its required special labeling. Any statements regarding cheese would need to use the correct name of the component consistent with 21 CFR 130.10, e.g., “fat free mozzarella cheese” and “reduced fat cheddar cheese.”

Revised Question/Answer to Address Modified Versions of Standardized Cheese:

Section V. Naming of "Traditional" and Non-Traditional, Descriptively Labeled Pizza-Like Products

8. Q. When should real cheese and imitation/substitute and modified versions of standardized cheese be declared on non-traditional, pizza-like products?

A. The final rule stated that ingredients above two percent are characterizing ingredients. Consistent with the final rule, non-standardized products, including non-traditional pizza-like products, that highlight "cheese" or an imitation/substitute/modified cheese in the product name or on the principal display panel (PDP) must contain more than two percent real cheese for that cheese ingredient to be a characterizing ingredient. For descriptively named pizza products, cheese and imitation/substitute/modified versions of standardized cheese used at characterizing levels, i.e., above two percent, would be reflected as part of the product name. (Guidance on the common or usual names of cheese products is found in FDA standards of identity regulations (21 CFR § 130.10 and Part 133).)