Statement of Interest

CalChef Foods LLC, operating under Kevin’s Natural foods, is trying to produce a Stroganoff like dish which does not meet the USDA standard of identity. Calchef Foods is submitting this petition in the hopes that our Stroganoff like sauce may be identified as such, and would not have to have the title Stroganoff excluded from the label. Our executive chef and marketing team based this recipe to simulate a Strogenoff dish in a format that would allow it to meet the rigorous qualifications of the Paleo and Gluten Free organizations. These certifications are viewed by our customers as being dietary identification markers of our products, that are sought after in supporting their wellness. Many of our customers have gluten sensitivity, sugar tolerances or may need support in weight loss. Our executive chef and owners formulate these recipes with the purpose of our customers in mind. Our products are provided a kit form where the sauce, beef and noodles are packaged separately. Our sauce and noodles are produced under FDA inspection but combined with the packaged meat prior to shipment. All items are combined in a tray and sleeved in the kit with the expectation that they are combined and cooked together with the customer. Our chef used specialized yeast extract and additional wine to replicate the slightly tart savory cream sauce based off of Russian Stroganoff cuisine.

Statement of Action

Allow the use of the title “Stroganoff” along with disruptive adjectives such as “like, inspired, or flavored” to associate the similarities of the sauce and also identify it is an alternative to the standard. “Beef Stroganoff – Inspired Entree with Cauliflower Noodles, Stroganoff Inspired Entree made with tender strips of Grass Fed Beef, Cauliflower noodles, and a rich, savory sauce.” Is an accurate description of our product and is not misleading to the consumer.

Supportive Request

Per Food Standards and Labeling Policy Book (2005), Beef Stroganoff is described as “A dish with a creamy sauce prepared with beef cut into narrow strips or cubes and sautéed. Product labeled “Beef Stroganoff” should be prepared with a formula, which includes at least 45 percent beef, or 30 percent cooked beef.

1. Then product must contain 10% sour cream
2. 7.5 percent sour cream, and 5 percent wine
3. 9.5 percent whole milk, 2 percent sour cream, and 2.5 percent wine.
4. Beef Stroganoff with noodles – Cannot contain more than 50% noodles

Kevin’s natural food – Beef Stroganoff – Inspired meal

1. Product contains 34.4% noodles
2. Raw beef to sauce ratio is 47.8%, which is cut into strips
3. 11.85% Coconut Milk (24% fat)
4. 5.71% wine
5. 4.76% Clarified butter (40% butter fat)

Our product is very similar to the stroganoff standard with the exception of not containing sour cream. The flavors and recipe were formulated to be simulate a traditional Stroganoff off sauce. Per FSIS Labeling Requirement Guidelines A Guide To Federal Food Labeling Requirements for Meat, Poultry and Egg Products (2007, pp 30,31)

“A label for a product that is an imitation of another food shall bear the term “imitation” immediately preceding the name of the food imitated and in the same size and style of lettering as the product’s name. An ingredient - 30 - statement must follow the imitation product name. USDA has informally followed FDA’s approach with regard to imitation labeling and products not being nutritionally inferior. Products that resemble but are not nutritionally inferior to standardized meat or poultry products need not bear the “imitation” designation, provided that the meat or poultry content is conspicuously disclosed. 71 If a product is nutritionally inferior to the standardized product, it must be labeled “imitation” as part of the product name.

Back in April 2021 were able to identify a Teriyaki based sauce “Teriyaki - like”. Our Teriyaki-like sauce used the gluten and soy free alternative ingredient of coconut aminos. Since the commission of this product in 2019 our Teriyaki-like product has sold millions with not one concern from a customer. As mentioned in the statement of interest, our customers value our products, their certifications and nutritional benefits they offer. We feel that our Stroganoff sauce falls under a very similar scenario.

Conclusion

We feel our product is not nutritionally inferior to the standard of identify of Beef Stroganoff. We believe that labeling our product “Beef Stroganoff – Inspired Entree with Cauliflower Noodles, Stroganoff-Inspired Entree made with tender strips of Grass Fed Beef, Cauliflower noodles, and a rich, savory sauce.” is accurate and not misleading to the customer. Our customers, which retailers includes Costco, specifically requested a Paleo and Gluten free certified product they can name Beef Stroganoff which meat our current certification standards. Not being able to describe our product as “beef Stroganoff –inspired” would terminate this product. This product could bring $10-20 million dollars in revenue for annually to Cal Chef foods, similar to our Korean-Style Beef meal kits.