



August 23, 2013

USDA Labeling Division:

Recently, Zatarain's received a USDA rejection for the naming of its "Jambalaya Flavored with Sausage" dish due to its lack of conformity with the existing standard of identity for "Jambalaya":

"JAMBALAYA:

Product must contain at least 25 percent cooked ham and one other meat or seafood must be included. A New Orleans dish involving rice and ham and usually tomatoes (shrimp or other shellfish, other meat or poultry), together with seasonings. Must show true product name, e.g., —Ham and Shrimp Jambalaya."ⁱ

This standard has the opportunity to be improved upon to provide the consumer with a more authentic product that he or she ultimately expects when purchasing a product of the Jambalaya flavor profile. As the US leader for Jambalaya flavored products, Zatarain's has introduced this type of cuisine to the national audience. Current packaging for our original Jambalaya Mix calls for smoked sausage, chicken, ham or shrimp.ⁱⁱ

While Zatarain's represents 87% of the Jambalaya flavor profile units in dry rice mixes, competitors in the category also use a multitude of protein options, calling for one or more types of protein. In both of these cases, ham is one of several options.^{iii iv}

Another misleading guideline within the standard of identity is its reference to tomatoes. Tomato or tomato flavor is usually a part of a reddish **Creole** Jambalaya. As one moves further west into the French-Canadian influenced **Cajun** part of the state, Jambalayas do not contain tomatoes and are typically brownish.

Recipes from renowned New Orleans chefs Emeril Lagasse^v, Donald Link^{vi} and John Besh^{vii} demonstrate the versatility of Jambalaya.

In closing, Jambalaya is a dish with many variations. Zatarain's believes that consumers do not expect all Jambalayas to contain ham and tomatoes. Some Jambalayas will contain both ham and tomatoes, and some contain sausage and onions. Others, chicken and shrimp. Others are vegetarian dishes. An authentic Jambalaya can contain one or more of a multitude of different proteins and vegetables. Zatarain's proposes that the current standard of identity be revised to:

"JAMBALAYA:

A Louisiana-style rice-based dish involving spices and seasonings, which may contain tomatoes. Product can contain meat, seafood, and/or vegetables such as sausage, chicken, ham, pork, shrimp or bell peppers. It must be comprised of at least 50% rice. Labeling must show true product name, e.g., — Ham and Shrimp Jambalaya."

Attached, you will find letters of support for this change from New Orleans historian and chef Poppy Tooker, as well as Chef Leah Chase, long-time New Orleanian and owner of the famous Dooky Chase restaurant.



Chef Poppy Tooker produces and hosts Louisiana Eats, a weekly NPR segment showcasing the individuals who perpetuate the food culture of Louisiana. She writes for national publications including Fine Cooking and Hallmark Magazine, and has appeared on Food Network, the History Channel and in several PBS documentaries.

Chef Leah Chase, of Dooky Chase's restaurant in New Orleans (est. 1941), is known as the Queen of Creole Cuisine. She is a member of the James Beard Foundation's *Who's Who of Food and Beverage in America* and hosts a cooking show devoted to Creole cooking. A permanent gallery in the Southern Food & Beverage Museum is named in her honor. At 90 years old, she is still cooking in her restaurant daily.

These individuals are passionate about Louisiana cooking and are experts in many local dishes, including Jambalaya. I hope their letters will aid in your decision, and I appreciate your consideration of this request to change the standard of identity of Jambalaya.

Thank you,

A handwritten signature in cursive script that reads "Caroline Gray".

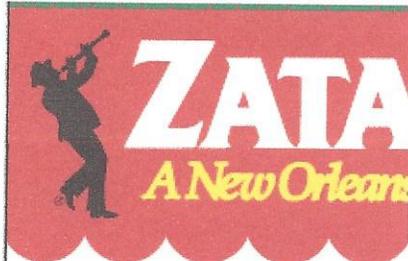
Caroline Gray
Zatarain's
82 First St.
Gretna, LA 70053



APPENDIX

i USDA Labeling Policy Book, 082005

ii



EASY COOKING

STOVE TOP DIRECTIONS

Jambalaya can be prepared with your choice of 1 pound of smoked sausage, chicken (pre-cooked), ham or shrimp,* cut into bite-size pieces.

1. Mix 2½ cups water and 2 tablespoons vegetable oil (optional) in 3 quart saucepan. Bring to boil. Add Zatarain's Jambalaya Mix and meat of your choice; mix well.
2. Return to boil. Reduce heat to low; cover and simmer 25 minutes or until most of the water is absorbed and rice is tender.
3. Remove from heat. Let stand 5 minutes. Fluff with fork before serving.

*If using shrimp, add during last 10 minutes of cooking time. Cook until shrimp turn pink.

iii

Creole Jambalaya Mix 8 oz.



Jambalaya, the Cajun one-pot meal, combines rice, seasonings and your choice of meats into a hearty Cajun entree!

SKU: 0-71998-00340-3

Weight: 0.50 lb

Price: \$2.05

Qty:

Add to Cart 

Directions

Stove Top: 1. In a saucepan, combine 2 1/4 cups cool water, contents of package and 1 lb seafood, chopped sausage, ham or precooked chicken. 2. Bring to a boil, reduce heat, cover and simmer 25 minutes, stirring occasionally. Microwave: 1. In a microwavable dish, combine 2 1/4 cups cool water, contents of package and 1 lb seafood, chopped sausage, ham or precooked chicken. Stir and cover. 2. Cook on High 5 minutes. Cook another 20-25 minutes on 50% power. Let stand covered 5 minutes. Stir before serving.

iv



Instructions:

- Precook 1-1 1/2 lbs. boneless chicken, pork or sausage - or any combination of the three.
- Combine cooked meat and Jambalaya Mix with 2 1/4 cups water or broth for added flavor.
- Heat mixture to a boil. Cover, reduce heat and simmer 20-25 minutes. Stir once while cooking.



-Microwave directions: Precook 1-1 1/2 lbs of meat. Place meat in covered casserole dish with Jambalaya Mix and add 2 1/4 cups of water. Microwave on high for 20-25 minutes. Stir once during cooking.

-Makes 4-6 servings

^v <http://www.emerils.com/recipe/6766/> (calls for chicken, sausage, ham, and tomatoes),

<http://www.foodnetwork.com/recipes/emeril-lagasse/creole-vegetable-jambalaya-recipe/index.html> (calls for various vegetables)

^{vi} <http://www.jamesbeard.org/recipes/old-school-chicken-and-sausage-jambalaya> (calls for chicken and sausage, no tomatoes)

^{vii} <http://abc.go.com/shows/the-chew/recipes/Shrimp-Chicken-Andouille-Jambalaya-John-Besh> (calls for shrimp, bacon, sausage, chicken, and tomatoes)

Dooky Chase Restaurant
2301 Orleans Avenue
New Orleans, LA 70119
504-821-0535

August 22, 2013

Dear Sirs;

I am writing to support a proposed change to current USDA labeling definitions of "Jambalaya." As owner and proprietor of Dooky Chase Restaurant, I have cooked and served jambalaya to my guests for over 67 years. It was a dish I grew up cooking with my mother, so at the age of 90, I must have more experience with jambalaya than most people.

I have been told that as it stands, the USDA says that in order to call a dish "Jambalaya" it must contain at least 25% ham. I can honestly say that occasionally, you may find a small amount of ham in my jambalaya – but for the last 67 years, usually my jambalaya only contains sausage.

The Creole tradition here in New Orleans is to put sausages and shrimp together in jambalaya, but when you look at how people cook here, they are creative and use whatever they have available. Most often, that does not include any ham at all.

Today in my restaurant, I find people's eating habits have changed and now I often serve a complete vegetable jambalaya with carrots, string beans, broccoli and no meat at all!

If I were asked to describe what is most important in a jambalaya and list the ingredients, which are always included – I would say that the dish must be made up of at least 50% rice. Seasonings and vegetables such as onion, celery, bell pepper and garlic are always included in some combination.

I hope you find this information helpful. I can be reached at the restaurant's telephone number listed above if you all have any more questions.

Gratefully yours,



Leah Chase

Poppy Tooker
2210 Jefferson Avenue
New Orleans, LA 70114
504-899-7374
poppy@poppytooker.com

August 23, 2013

Dear USDA Labeling Division,

Recently, it has come to my attention that the USDA requires labeling on certain food products called "Jambalaya" specifying that the dish include at least 25% ham.

I have made a lifelong study of New Orleans and South Louisiana foodways and taught classes on the subject for over 30 years. Additionally, I do food commentary on the New Orleans' PBS station, WYES each Friday evening and host an NPR affiliated radio program called "Louisiana Eats."

I am a cooking teacher, a cookbook author and also write for a variety of food related periodicals. Earlier this year, I authored a piece designed to be the definitive article on Cajun vs. Creole jambalaya, published in the February-March 2013 issue of Fine Cooking magazine. (See attached.)

The Crescent City Farmers Market Cookbook, which I wrote in 2009, includes a thoroughly 21st century jambalaya - Kale Jambalaya. Fourth generation Louisiana farmer, Jim Core's jambalaya combined brown rice and fresh kale with Andouille sausage for a healthy, modern twist on an old favorite.

Since the early 1700's, Southern Louisiana has been home to a disproportionate number of devout Catholics whose religious beliefs include the requirement to fast from meat on Fridays and during Lent. Even those religious dietary laws did not keep jambalaya off of the Friday dinner table. Many jambalayas incorporate only shellfish, such as shrimp and oysters with no meat at all.

Extensive recipe research allows other recognized authorities to weigh in on the debate. In one of Louisiana's earliest cookbooks, "The Picayune's Creole Cookbook" (1901), Creole Jambalaya contains "a pound of fresh pork and a dozen chaurice sausages" combined with 1-1/2 cups uncooked rice and the usual seasoning spices and vegetables.

The classic jambalaya recipe from "Chef Paul Prudhomme's Louisiana Kitchen" includes 1/2 cup Andouille sausage, 1/2 lb. shrimp and 1-1/2 dozen oysters.

The main ingredient found in the Tabasco's McIlhenney family's life-long cook, Eula Mae Dore's jambalaya was a 3-pound chicken.

Since 1984, Marcelle Bienvenu has been the definitive voice of Creole and Cajun cooking through her Times-Picayune weekly columns and many cookbooks. Marcelle grew up in the heart of Cajun country and has recorded those memories (and recipes) in her 2006 book. "Who's Your Mama, Are You Catholic, and Can You Make A Roux?" Marcelle's "Jambalaya – My Way" incorporates 1 cup of ham with 1 pound of shrimp and 3 dozen oysters. Clearly, the seafood proteins far outweigh the ham in Marcelle's jambalaya.

In short, the current USDA regulation governing a minimum of 25% ham in order for a dish to be labeled "Jambalaya" is a great deviation from the true dish as it was conceived almost 300 years ago in Louisiana and still endures today.

Rice is jambalaya's defining ingredient – NOT ham! I strongly encourage the USDA to make the percentage of rice the vital ingredient in labeling our Louisiana heritage dish, jambalaya.

Respectfully yours,

A handwritten signature in cursive script that reads "Poppy Tooker". The signature is written in black ink and has a long, sweeping horizontal line extending to the right from the end of the name.

Poppy Tooker



Cajun-Style Chicken
and Sausage Jambalaya

Jambalaya

No matter which way you make it—Creole or Cajun—this Louisiana rice dish is comfort food at its best. BY POPPY TOOKER

EVER SINCE HANK WILLIAMS FIRST SANG “Jambalaya, a crawfish pie, and a filé gumbo” in his 1952 hit song “Jambalaya (On the Bayou),” the world outside Louisiana has been confused about the difference between two of those delicious dishes, jambalaya and gumbo. It’s simple: Gumbo is a stewy soup that’s served with cooked rice. Jambalaya is a rice dish, rather like a hearty meat-and-vegetable-studded pilaf. It’s beloved across the South but nowhere more than in southern Louisiana, where I was born, raised, and still live.

Despite our love for the stuff, jambalaya (pronounced

juh-m-buh-LI-yah) is also a source of contention and much debate among Louisianans. While there are countless recipes for the dish, depending on where you live in the state and how your ancestors prepared it, there are two main styles: Creole (or red), which gets its color from the addition of tomatoes, and Cajun (or brown), which is tomato free and usually a deeper color thanks to more aggressive browning of the aromatic vegetables and meats. Which style is best is a topic so heatedly discussed that it’s been known to cause friends and even relatives to part ways.

Continued on page 5

per, and celery—is mandatory in both Cajun and Creole cooking. After that, whether it should include chicken, smoked and fresh sausages, shrimp, oysters, or crab, or any combination thereof, is your prerogative.

I also believe that the best jambalaya starts with a homemade stock, which is why I include that step in my recipes. It's an easy thing to make using the ingredients

that will go into the jambalaya, and the dish is so much better for it.

Above all else, jambalaya should be deeply flavorful, wonderfully comforting, and plentiful enough to feed a crowd without breaking the bank. Get that right and you've made jambalaya just as it should be.

creole-style shrimp jambalaya

A creole-style (red) jambalaya always includes tomatoes. I like using tomato paste instead of canned or fresh tomatoes because it adds deeper flavor and gives the finished dish a rich hue. The shrimp are cooked for a long time, which may seem odd, but this method yields a flavorful jambalaya with tender—never mushy—shrimp. If you can find head-on shrimp, this is the place to use them; just remove and discard the heads at the point in the recipe where you peel and devein the shrimp. Serves 6

- 6 scallions, thinly sliced (about 1 cup), trimmings reserved
- 3 medium stalks celery, finely chopped (about 1 cup), trimmings reserved
- 1 medium yellow onion, finely chopped (about 1 cup), trimmings reserved
- 2 lb. large (31 to 35 per lb.) shrimp, preferably wild-caught
- 2 oz. (4 Tbs.) unsalted butter
- 1 medium green bell pepper, stemmed, seeded, and finely chopped (about 1 cup)
- ¼ lb. ham, cut into ¼-inch dice
- 3 Tbs. tomato paste
- 1 dried bay leaf
- ½ tsp. chopped fresh thyme
- ¼ tsp. cayenne
- ¼ tsp. chili powder
- ¼ tsp. ground allspice
- Pinch of ground cloves
- Kosher salt
- 2 cups long-grain white rice
- 1 tsp. sweet paprika
- Hot sauce, preferably Crystal (optional)

In a 4-quart heavy-duty saucepan, combine the scallion trimmings, celery trimmings, and onion trimmings with 5½ cups of water, bring to a boil over high heat. Add the shrimp, let the water return to a boil, and cook until pink and cooked through, about 3 minutes. Remove from the heat and let sit for 3 minutes. Strain through a sieve set over a large glass measuring cup, reserving the stock. You will need 4½ cups of stock, so add water if necessary. When cool enough to handle, peel and devein the shrimp. Discard the shells and trimmings;

Melt the butter in a 5- to 6-quart enameled-cast-iron Dutch oven (or other heavy-duty pot) over medium-high heat. Add the celery, onion, and bell pepper and cook, stirring often, until softened, about 7 minutes. Add the ham and the reserved shrimp and cook, stirring often, until any excess moisture evaporates and the ham and vegetables begin to brown, about 5 minutes. Add the tomato paste and cook, stirring, until a shade darker, about 3 minutes. Stir in the bay leaf, thyme, cayenne, chili powder, allspice, cloves, and 1½ tsp. salt. Stir in the rice. Add the reserved stock and bring to a boil. Cover, lower the heat to maintain a simmer, and cook undisturbed just until

the rice is tender, 20 to 25 minutes. Check the rice for doneness in several places.

Remove the pot from the heat. Sprinkle the paprika over the jambalaya and, using a fork, gently fluff the scallions and paprika into the jambalaya. Cover and let stand for 10 minutes to let the flavors meld. Serve with hot sauce, if you like.

A native New Orleanian, Poppy Tooker is a chef, culinary instructor, radio host, and the author of The Crescent City Farmers Market Cookbook. □

