



February 23, 2017

Mary Porretta, Petitions Manager
Office of Policy and Program Development
1400 Independence Ave., S.W.
Washington, DC 20250-3700

RE: Petition for a Label on Processed Meat and Poultry Products; Petition No. 16-07.

Dear Ms. Porretta,

Please add the enclosed article "Processed Meat as Carcinogen: Time for Health Warning Labels?" by Muhammad Abdul Hadi to the record docket for Petition No. 160-07 submitted by the Center for Science in the Public Interest (CSPI). The article provides further arguments in support of the petition's request for a warning label on processed meat and poultry.

The petition calls on the Food Safety and Inspection Service to require labels that inform the public about recognized and avoidable risk of developing colorectal cancer from frequent consumption of processed meat. It is based on the convincing scientific evidence presented by the International Agency for Research on Cancer, the World Cancer Research Fund International and others that the risk of colorectal cancer increases by 15 to 20 percent for every 50 grams of processed meat consumed daily. Mr. Hadi's article provides additional information on the effectiveness of labels in encouraging the public to modify behaviors that put them at risk.

CSPI is a nonprofit, non-governmental, consumer-advocacy organization focused primarily on nutrition, health, and food safety that is supported by subscribers to its *Nutrition Action HealthLetter* and by foundation grants. CSPI does not accept government or industry funding.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Plunkett", is positioned above the typed name.

David W. Plunkett, J.D., J.M.
Senior Staff Attorney
Center for Science in the Public Interest

Enclosure



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Processed meat as carcinogen: Time for health warning labels?



The International Agency for Research on Cancer (IARC), World Health Organization's (WHO) specialized cancer agency, has recently classified consumption of processed meat (e.g., hamburgers, sausages, nuggets, hotdogs, mortadella, bacon, salami, ham, and beef jerky) as "carcinogenic to human" (Group 1) and red meat as "probably carcinogenic to humans" (Group 2A) after reviewing more than 800 epidemiological studies investigating association between consumption of red and/or processed meat and cancer [1]. The Working Group found "sufficient evidence" for colorectal cancer, 18% increased cancer risk with daily consumption of 50 g (less than the weight of one average size hotdog) of processed meat, and limited evidence for stomach cancer. Although, a meta-analysis [2], which pooled data from seven studies, has reported 19% increased risk of pancreatic cancer with daily consumption of 50 g of processed meat (RR = 1.19; 95% CI 1.04–1.36), surprisingly, the Working Group included red meat only as a risk factor for pancreatic cancer.

This calls for an immediate action plan to increase general public's awareness about the hazards of consuming processed meat with an aim to reducing its consumption. Health warning labels, among many other methods (leaflets, seminars, workshops, media campaign) can be effective in increasing awareness. Effectiveness of health warning labels has been very well documented in literature [3,4]. Tobacco package health warning labels have been effective not only in increasing consumers' knowledge about the negative health consequences of tobacco use but also in changing consumer's attitudes and behavior toward tobacco use (e.g., smoking less, smoking less around others attempting to quit) [4]. Health warning labels should be considered for processed meat as both tobacco smoking and processed meat are Group 1 carcinogens and avoiding/limiting their consumption can reduce cancer risk. Health warning labels should not be imposed only on the manufacturers of processed meat but also on products prepared using processed meat including fast food as growing consumption of fast food particularly among children and teens is alarming. It has been estimated that over one in three children in US consume fast food daily with fast food, on average, contributing about 12% of their daily caloric requirements [5]. A strategic, multilevel health promotion and disease prevention campaign targeting children, parents, teachers, and school administrators is needed. Since health warning labels are cheap yet very effective in increasing awareness and

modifying consumer's behavior, national and international public health authorities should pressurize governments to make necessary legislative changes, if required, to impose health warnings labels for food items containing processed meat. However, governments would need significant political will to sustain pressure posed by the processed meat manufacturers and giant fast food chains against the imposition of health warning labels.

References

- [1] on behalf of the International Agency for Research on Cancer Monograph Working Group V. Bouvard, D. Loomis, K.Z. Guyton, et al., Carcinogenicity of consumption of red and processed meat, *Lancet Oncol.* (2015), [http://dx.doi.org/10.1016/S1470-2045\(15\)00444-1](http://dx.doi.org/10.1016/S1470-2045(15)00444-1).
- [2] S.C. Larsson, A. Wolk, Red and processed meat consumption and risk of pancreatic cancer: meta-analysis of prospective studies, *Br. J. Cancer* 106 (2012) 603–607.
- [3] D. Hammond, G.T. Fong, A. McNeill, et al., Effectiveness of cigarette warning labels in informing smokers about the risks of smoking: findings from the International Tobacco Control (ITC) Four Country Survey, *Tob. Control* 15 (2006) 19–25.
- [4] Sambrook Research International, A Review of the Science Base to Support the Development of Health Warnings for Tobacco Packages, 2009, Available at http://ec.europa.eu/health/tobacco/docs/warnings_report_en.pdf (accessed 25.11.15).
- [5] S. Vikraman, C.D. Fryar, C.L. Ogden, Caloric Intake from fast food among children and adolescents in the United States, 2011–2012. NCHS Data Brief, No. 213, 2015, Available at <http://www.cdc.gov/nchs/data/databriefs/db213.pdf> (accessed 25.11.15).

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