



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

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Mr. George Haines, Jr., Chief
Documentation Approval & Supply Service Section
National Marine Fisheries Service
P. O. Drawer 1207
Pascagoula, MS. 39568-1207

Dear Mr. Haines:

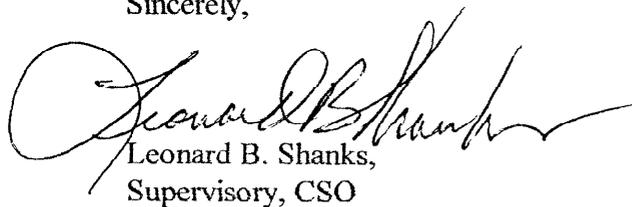
We are in the process of updating the Commercial Item Description for Tuna, Canned, A-A-20155A, November 16, 1992, to include Tuna, in Pouches. During this process I have noticed there are parts of 21 CFR 161.190, the Standard of Identity for Canned Tuna that cannot be verified, by the current test methods for pouch tuna. The Standard of Identity for Canned Tuna does not provide the methods for determining solid pack, chunk pack or the fill of container for pouch tuna. I recommend that the Standard of Identity is change to include procedures for pouch tuna or a new standard is developed for pouch tuna. I have listed below areas of the Standard of Identity that I feel would not apply to pouch tuna:

- Para. 161.190 (a)(3)(i) "**Solid or solid packs** consist of loins free from any surface tissue discolor by diffused hemolyzed blood, cut in transverse segments to which no free fragments are added". The current process for pouch tuna does not allow for the packing of this form of pack.
- Para. 161.190 (a)(3)(ii) "**Chunk, chunks, chunk style** consist of a mixture of pieces of tuna in which the original muscle structure is retained. **The pieces may vary in size but not less than 50 percent of the weight of the pressed contents of a container is retained on a ½ inch mesh screen**". The method for determining the piece size mention in this section is explained in Para. (c)(2). It required the tuna to be **pressed by a tuna press**. The pouch tuna cannot be pressed as required by this section. Because there is no official method of determining the piece size of tuna in pouches, the pouch tuna should not be label as solid or chunk pack.



- Para. 161.190(c)(2) Fill of Container: “ The standard of the fill of container for canned tuna is a fill such that the average weight of the **pressed cake** from 24 cans, as determined by the method prescribed by paragraph (c)(2) of this section, is not less than the minimum value specified for the corresponding can size and form of tuna ingredient in the following table.” The method described in this paragraph cannot be applied to pouch tuna. Recommend the fill of container be determined by either a drained weight or by deducting the weight of the pouch (packaging material) from the gross weight of the pouch.

Sincerely,



Leonard B. Shanks,
Supervisory, CSO

cc: F/SI
E. Staiger