

## MSG is sometimes hidden in food with labels that say "No Added MSG," "No MSG Added," and "No MSG"

We found these the other day at Trader Joe's in Chicago:

Imagine ORGANIC Free Range Chicken Broth  
Ingredients include "natural flavor" -- and Imagine doesn't tell what is in the "natural flavor" and/or provide an analysis of the amount of processed free glutamic acid in their product.

Kitchen Basics Natural Chicken Stock  
Ingredients include "chicken stock," "natural flavor," and "vegetable stocks" -- and Kitchen Basics doesn't tell what is in the "chicken stock," "natural flavor," and "vegetable stock," and/or provide an analysis of the amount of processed free glutamic acid in their product.

Manufacturers are acutely aware that many consumers would prefer not to have MSG (1) in their food.(2) Some manufacturers have responded by using "clean labels," i.e., labels that contain only ingredient names they think consumers will not recognize as containing MSG -- names such as "hydrolyzed soy protein." Others advertise "No MSG," "No MSG Added," or "No Added MSG," even though their products contain MSG.

Most offenders are small processors who are possibly being misguided by the FDA, the USDA, and/or consultants. Hain and Campbell's, both large companies, are among those who have been alerted to both the deception that they are perpetrating and the illegality of what they are doing, yet continue with what the FDA has termed deceptive and misleading labeling.

Placing "No MSG," "No MSG Added," or "No Added MSG" on food labels has been deemed by the FDA to be false and misleading under section (403)(a)(1) of the Federal Food, Drug and Cosmetic Act when the label also lists any hydrolyzed protein as an ingredient since it contains MSG.(3) Thus, to advertise "No MSG," "No MSG Added," or "No Added MSG" when there is MSG in a product is illegal.

At one time, the FDA responded to the illegal use of the term "No MSG Added," with both a Regulatory Letter and threat of seizure and injunction in case of non-compliance.(4) At one time, State Attorneys General sued manufacturers that made such claims, and won consent decrees from them, and sometimes imposed fines.(5-6) But when the FDA began to look the other way, and the State Attorneys General

turned their attention to other matters, the deceptive and misleading use of "No MSG" and "No Added MSG" once more began proliferating.

Following the FDA's announcement in 1995 that "...FDA considers foods whose labels say "No MSG" or "No Added MSG" to be misleading if the food contains ingredients that are sources of free glutamates, such as hydrolyzed protein,"(7) the incidence of such misleading and deceptive labels regulated by the FDA began to decline. At the same time, similar labels regulated by the United States Department of Agriculture (USDA) continued proliferating. At the USDA they don't simply fail to enforce the regulation. The USDA actually approves labels of meat and poultry products that claim "No MSG," "No MSG Added," or "No Added MSG" when they contain free glutamic acid.

Clearly, it is false and misleading to claim "No MSG" or "No MSG Added" on a product label when MSG is present, even if it is present as a constituent of an ingredient.

Those making such claims should be able to demonstrate, through valid tests for free glutamic acid content, that there is zero free glutamic acid in their products.

Even if one could assume that a particular label reflected the ingredients actually in the product (which one cannot), review of product labels to determine the presence of MSG would not be satisfactory, and will not substitute for analysis of end product. The number of products/ingredients /substances that contain MSG is not finite, i.e., new ingredients that contain MSG are invented and/or renamed every day. To keep track of them would be virtually impossible. Moreover, MSG can be freed from protein during processing or manufacture given appropriate conditions. For example, any ingredient that contains a bit of protein can be hydrolyzed if hydrochloric acid, enzymes, heat, and/or other substances or conditions that cause glutamic acid to be separated out of its host protein are present. Hydrolyzation of protein inevitably creates some (processed) free glutamic acid (MSG).

Only if there is zero free glutamic acid in an end product can one legitimately claim that there is no MSG. The burden of proof for a claim about the absence of MSG must lie with those making the claim.

### **If you write or call to ask whether or not there is MSG in a product...**

If you want to find out if there is processed free glutamic acid (MSG) in a product, you must ask the manufacturer for information about "free glutamic acid." Don't ask about "MSG." Manufacturers find it convenient, when speaking to consumers, to tell them that there is no "MSG" in their product, meaning that there is no ingredient called "monosodium glutamate." Even if a manufacturer tells you there is no MSG in a product, there may be autolyzed yeast, hydrolyzed pea protein, carrageenan, sodium caseinate, enzymes, and a whole slew of other ingredients that contain or create processed free glutamic acid (MSG) during manufacture.

If you are told that all of the MSG in a product is "naturally occurring," thank the manufacturer for that meaningless information, but explain that all processed free glutamic acid (MSG) is referred to as "natural" by the FDA -- so "natural" tells you nothing. In fact, as the word "natural" is defined by the FDA, the food ingredient "monosodium glutamate" is "natural."

It is the amount of processed free glutamic acid in the product that will determine whether or not you might suffer an MSG reaction. If the manufacturer claims not to know whether or not there is processed free glutamic acid (MSG) in his or her product, ask that the product be analyzed for free amino acids, including free glutamic acid. There are tests for measuring free glutamic acid. The AOAC Official Methods of Analysis (1984) gives one method. There are others. The cost of testing should be no more than \$100.

We have been advised by the FDA that if any such misbranded products are brought to their attention, they will act to correct the situation. To report misbranded products to the FDA, please call the FDA at 888-723-3366 between 10 a.m. and 4 p.m., eastern time - and keep a record of your call.

**The most recent submissions of illegal labeling from conscientious label readers:**

(Examples include names of ingredients that sometimes or always contain or create MSG)

**KcKay's** Chicken Style Instant Broth and Seasoning

"NO MSG ADDED"

Autolyzed Yeast

(In addition, they use disodium inosinate and disodium guanylate -- expensive flavor potentiators that work synergistically with processed free glutamic acid (MSG) -- and, we are told, are only cost effective when used with processed free glutamic acid (MSG))

**Spice Bouquet** Adobo seasoning

"No additives or MSG"

Hydrolyzed Vegetable Protein

**Lightlife Foods** Smart Ground

"No MSG"

Soy Protein Concentrate, Soy Sauce, Natural Flavors, Malt Extract, Wheat Starch

**Lightlife Foods** Tofu Pups

"NO MSG"

Soy Protein Isolate, Yeast Extract, Carrageenan, Natural Smoke Flavor

**Campbell's** Healthy Request Cream of Mushroom

"No MSG"

Modified Food Starch, Whey Protein Concentrate, Maltodextrin, Flavoring

(In addition, Campbell's used disodium inosinate and disodium guanylate -- expensive flavor potentiators that work synergistically with processed free glutamic acid (MSG) -- and, we are told, are only cost effective when used with processed free glutamic acid (MSG))

**Lawry's** Tenderizing Beef Marinade Spices & Seasonings

"No MSG Added"

Modified Food Starch, Natural Flavoring

**Simply Organic** Macaroni & Cheese

"Our products DO NOT contain MSG, hydrolyzed vegetable protein..."  
Natural Flavors, Organic Autolyzed yeast extract

**Geno's** All-In-One Sauce

"No MSG"

Soy sauce, Worcestershire sauce (...hydrolyzed corn and soy protein...), Natural flavoring, Modified food starch

**Cardini's** Herb Poppy Seed Dressing (Low Fat)

"NO MSG ADDED"

Maltodextrin, Modified Food Starch, Whey Protein Concentrate, Natural Flavor

**Simply Organic** spicy chili

"Our products do not contain MSG..."

Organic Autolyzed Yeast Extract

**Modern Products** All Natural Vege-Sal All Purpose Vegetized Seasoning Salt

"NO MSG ADDED"

Soy Sauce, Hydrolyzed Vegetable Protein

**Hain** Pure Foods All Natural Chicken Broth

"No Added MSG"

Chicken Broth, Chicken Base, Autolyzed Yeast Extract

**Campbell's** Healthy Request Minestrone

"Contains No MSG"

Contains: Chicken stock, high fructose corn syrup, chicken flavor, Disodium inosinate, Disodium guanylate, Flavoring

(Disodium inosinate, Disodium guanylate are expensive additives that work synergistically with processed free glutamic acid (MSG). It would not be cost effective to use them if there were no processed free glutamic acid (MSG) in the product.)

**Blue Diamond** Almond Toppers

"No MSG"

Nonfat milk solids, Cheese cultures, Enzymes, Maltodextrin, Enzyme modified parmesan cheese, Torula yeast, Natural flavor, Disodium inosinate, Disodium guanylate

**Farm House** Parmesan Pasta (Distributed by General Mills Sales, Inc.)

"No MSG"

Enzymes, Maltodextrin, Autolyzed yeast extract, Modified corn starch, Natural flavor

**The following label violations(8) were observed in 1999 on or after April 1, 1999**

(Examples include names of ingredients that sometimes or always contain or create MSG)

**Brianna's** Home Style Blue Cheese Dressing

"NO MSG"

Contains: Cheese culture, Enzymes, Vinegar, Buttermilk powder, Natural flavor, Citric acid

**Campbell's** Healthy Request Cream of Mushroom

"No MSG"

Contains: Modified food starch, Cornstarch, Whey protein concentrate, Disodium inosinate, Disodium guanylate, Maltodextrin, Mushroom powder

**Campbell's** Healthy Request Chicken Broth

"No MSG"

Contains: Chicken stock, Chicken flavor (dried chicken stock, gelatin, flavoring) Flavoring, Disodium inosinate, Disodium guanylate

**Campbell's** Healthy Request Hearty Chicken Noodle

"No MSG"

Contains: Chicken stock, Modified food starch, Maltodextrin, Disodium inosinate, Disodium guanylate, Cultured whey, Modified food starch, Soy protein isolate, Chicken flavor

**Campbell's** Healthy Request Hearty Tomato Ravioli with Vegetables

"NO MSG"

Contains: Carrageenan, Pasteurized part skim milk, Cheese cultures, Enzymes, Modified food starch, Enzyme modified butter, Cream powder, Nonfat dry milk, Disodium inosinate, Disodium guanylate

**Dominique's** New England Clam Chowder (Distributed by: American marketing Team, Bloomfield, NJ)

"No MSG Added"

Contains: Modified corn starch, Isolated soy protein, Clam broth concentrate, Yeast extract, Natural flavor

**Franco-American** SPACE GOOFS shaped Pasta with MEATBALLS in Tomato Sauce

"No MSG"

Contains: Soy protein isolate, Enzyme modified cheddar cheese, Enzyme modified butter

**Hain** Pure Food All Natural Vegetable Broth

"No Added MSG"

Contains: Autolyzed yeast extract

**Herb ox** very low sodium Instant Broth & Seasoning Chicken Bouillon with other natural flavors

"NO MSG ADDED"

Contains: Maltodextrin, Monoammonian glutamate, Gelatin, Citric acid, Natural flavoring, Disodium inosinate, Disodium guanylate

**Naturade** Fat-Free Vegetable Protein

"CONTAINS NO MSG"

Contains: 4540 mg glutamic acid per serving

**Newman's Own** Ranch Dressing

"No MSG"

Contains: Natural flavor, Yeast extract  
(Newman's has removed the "No MSG" claim from its label)

**Tony Charchere's** Lite Creole Seasoning

"NO MSG"

Contains: Maltodextrin

## **NOTES AND REFERENCES**

1. Free form glutamic acid that occurs in food as a consequence of manufacture.
2. National Food Merchandiser March, 1992. Page 16.
3. Janice F. Oliver, Director, Office of Regulatory Guidance, Center for food Safety and Applied Nutrition, FDA. Letter to Jack L. Samuels dated December 5, 1991.
4. April 10, 1990 FDA Regulatory Letter to Fantastic Foods, Inc., Novato, CA.
5. Commonwealth of Pennsylvania Plaintiff VS. S&B International Corporation, Defendant. Civil Action - Equity No. 358 MD 1992
6. Commonwealth of Pennsylvania Plaintiff VS Pepperidge Farm, Incorporated Defendant Civil Action - Equity No 257 M.D. 1991
7. FDA Backgrounder. BG 95-16 (August 31, 1995)
8. Among the ingredients listed here, hydrolyzed vegetable protein, yeast extract, autolyzed yeast extract, and gelatin always contain MSG. Disodium inosinate and disodium guanylate are expensive additives which work synergistically with MSG, and have little or no flavor-enhancing capabilities of their own. The other ingredients often, if not always, contain MSG.