

FDA Nutrition Innovation Strategy

July 26, 2018

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Good afternoon, I am speaking on behalf of nearly 800 Midwestern dairy farms of all sizes that make up Edge Dairy Farmer Cooperative. Thank you for this opportunity to share how dairy products fit into the FDA's Nutrition Innovation Strategy to promote public health in the evolving food and beverage marketplace.

We recognize that a major focus of this effort is providing customers with the information they need to make decisions in the grocery store that meet their individual needs. Our farmers, who proudly produce the milk that is a key ingredient for a variety of nutritious and wholesome foods, have strong feelings and progressive ideas to help you accomplish just that.

Giving customers the best information starts by accurately labeling food products. The first step toward accomplishing this begins with enforcing FDA's existing standards of identity, particularly for dairy products. Whether it's milk, cheese, or yogurt, dairy foods have a high nutritional value and taste that customers easily recognize and have come to expect. Products that do not fit the standards of identity for dairy products should not be allowed to be labeled as such. It's an issue that many of our farmers across the country feel strongly about, to say the least. Inaccurate labeling is simply not fair to farmers who have invested in those standards or to customers who may be misled into purchasing nutritionally inferior alternative products.

We applaud Commissioner Gottlieb's remarks last week that FDA intends to resolve this problem. We are encouraged by this announcement and ask that FDA act quickly to enforce the current standards of identity for milk.

While we are steadfast in our belief that existing standards of identity should be protected, Edge also recognizes there is an important opportunity to encourage innovation within the dairy case. The ability of our farmers and processors to keep up with customers' ever-changing tastes, preferences, wants and needs is important to provide options that will help ensure proper nutrition and healthy lifestyles. The 2015-2020 Dietary Guidelines for Americans tell us that most Americans underconsume dairy products and therefore miss out on access to nutrients of concern, such as vitamin D, calcium and potassium. The dairy community must have the flexibility to develop new, nutritious food and beverage products that can compete in the marketplace and meet customers' expectations. We need room from FDA to label innovative foods made with milk as the nutritious dairy products they are.

Lastly, as you consider a new label for "healthy" products, we would like to emphasize that dairy foods are well-known as an important part of a healthy diet, with milk, cheese and yogurt providing nine key nutrients. As you consider the criteria for this potential designation, please consider that both reduced-fat and full-fat dairy products deliver important nutritional value. We want to continue to provide a wide range of options for customers to help them fit their individual tastes and needs.

Edge Dairy Farmer Cooperative appreciates FDA leadership for undertaking this important effort. Please continue to include the dairy community as this process moves forward.