



August 29, 2017

Member Organizations:

Associated Milk Producers Inc.

Bongards' Creameries

Ellsworth Cooperative Creamery

FarmFirst Dairy Cooperative

First District Association

Midwest Dairymen's Company

Scenic Central Milk Producers

Coordinator:

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Division of Dockets Management
Food and Drug Administration
5360 Fishers Lane
Room 1061, HFA-305
Rockville, MD 20852

Re: Docket ID: FDA-2017-P-1298
Request that the FDA issue regulations clarifying how foods may be named by reference to the names of other food

On behalf of the members of the Midwest Dairy Coalition (MDC), I am writing to express our strong opposition to the petition submitted by the Good Food Institute (GFI) on March 2, 2017, asking the Food and Drug Administration (FDA) to amend 21 CFR 102.5 to allow manufacturers of imitation products to label their products using common or standardized food names as long as they also use any word or phrase before that common name.

Standards of identity help to ensure transparency in labeling of food products for the benefit of consumers and food producers. The Midwest Dairy Coalition has long supported enforcement of standards of identity for dairy products, and has in the past engaged in regulatory discussions with the FDA regarding proposed changes in dairy standards of identity. The dairy farmers and manufacturers represented in the MDC take these standards very seriously, and expect others in the food sector to do likewise. Enforcement of the standards by FDA is an important part of ensuring consumer confidence in milk and dairy products.

The GFI petition would nullify or significantly dilute the meaning of dairy standards of identity by allowing non-dairy food manufacturers to circumvent those standards and the clear meaning of common dairy terms, as long as any additional word or phrase is used in front of the common name or standardized term that the product seeks to imitate. To allow this would be in contradiction to the laws established by Congress, and in conflict with FDA's current regulations with regard to standards of identity, imitation product labeling, and misbranding.

We respectfully request that FDA reject the GFI petition to amend 21 CFR 102.5.

Thank you,

A handwritten signature in black ink that reads "Steven D. Etko". The signature is written in a cursive style.

Steven D. Etko
Coordinator