



AMERICAN DAIRY COALITION

The *Integrity* Initiative!

Protecting the Integrity of Milk

Definition: *the quality of being honest and having strong moral principles;
moral uprightness.*

*honesty, probity, rectitude, honor, good character, principle(s), ethics, morals, righteousness, morality,
virtue, decency, fairness, scrupulousness, sincerity, truthfulness, trustworthiness*

As a branch of the American Dairy Coalition (ADC), the Protecting Milk Integrity Initiative works to advocate for the proper use of federally standardized terms established for the word “milk” on product labels. In an effort to provide clarity and consistency for consumers across the nation, ADC is urging the FDA to stop allowing the wrongful use of the word “milk” in branding on non-milk, plant-based alternative products. It is time to end this confusion and protect the nutritious, wholesome and pure reputation of milk that is confirmed in the current FDA Standard of Identity.

Current FDA Standard of Identity for Milk: *The standard of identity for “milk” is in the 21 CFR 131.110 (lacteal secretion, practically free from colostrum, obtained by the complete milking of one or more healthy cows).*

- Use of the word “milk” on product labels is confusing for consumers. It easily misleads the public to believing all products that bear the word “milk” on their label are interchangeable in quality, content, taste and nutritional value.
 - In 200 countries across the world, plant-based juices are not allowed to be called “milk” on their product labels.
 - The FDA maintains standards of identity to ensure the use of industry recognized terms have consistency to avoid consumer confusion.
 - There is no benefit to the consumer in allowing the use of products, which do not contain milk, to call themselves milk, unless it’s used to deceive consumers.
 - The dairy industry is not asking FDA to remove plant-based alternative products from the market, but rather demand they be labeled correctly according to the actual ingredients from which they are made.
- We see plant-based alternative products growing in popularity while dairy farms are going out of business at an alarming rate.
 - The state of Wisconsin alone, for example, sold out 54 dairy farms in June 2018. This is on top of the 78 dairy farms that left the business in May of 2018. Year-to-date, 338 dairy farms stopped milking cows in Wisconsin.
 - Dairy farms have gone out of business this year largely due to devastating low milk prices. Meanwhile, the sales of plant based alternative products are up 61 percent over the past 5 years -- a trend which is expected to continue to increase by up to 5 percent each year.
- Milk is a leading dietary staple in the United States, yet year over year the regular consumption of milk decreases.
 - Milk provides 30 percent of the daily recommended calcium intake for most of the U.S. population and is the primary source to provide three of the four under-consumed nutrients of public health concern as identified by the Dietary Guidelines for Americans.

- Milk contains 8 grams of naturally occurring, complete protein per 8-ounce serving.
- The consumption of milk and other dairy products is also associated with a lowered risk for heart disease, type 2 diabetes and osteoporosis.
- Non-dairy plant alternatives are not equivalent to milk in nutrient value, despite their marketing techniques that attempt to brand them as so. These dishonest branding techniques make it extremely difficult for consumers to select products that will meet their dietary needs and the needs of their children.
 - Plant-based alternatives do not naturally contain the high levels of complete protein found in milk. These complete proteins contain all the amino acids our bodies need in one easily consumed source.
 - The nutrients found in plant-based alternative milk beverages are fortified -- not naturally occurring. The bio-availability of fortified nutrients are not equal to those that are found naturally. Bottom line: our body knows the difference and cannot utilize the fortified nutrients as fully as the naturally occurring nutrients found in milk.
- Non-dairy plant alternatives vary between variety and brand, adding yet another layer of confusion to consumers when they are deceptively branded as milk. However, true dairy milk, with its standardized and color-coded milk-fat percentage packaging, is consistent no matter the brand. The dairy industry has developed their labeling system to be easy for consumers to know exactly what to expect in their dairy products. Adding non-dairy alternatives to the dairy case bearing the same name clouds the consistency and uniformity consumers have enjoyed for years when shopping in grocery stores across the nation.
 - Milk does not contain added flavors, stabilizers or preservatives, but non-dairy alternatives contain a plethora of gums, flavors, and additives.
 - The nutrient content varies greatly between style, flavor, and brand of non-dairy alternatives. There is no industry wide uniformity.
- The rise of plant-based alternatives has made it harder for members of the public to understand if they are meeting their daily requirement for nutritional needs.
 - The cost of these plant-based alternative products is higher per gallon than milk. Milk provides more nutrients for lower cost, making it an important and cost-effective source of nutrition for food regardless of income level.
 - Consumer research shows that a great deal of respondents purchase non-dairy alternatives because they are viewed as more nutritious than dairy products. This is simply not the case and the implications of allowing the public to incorrectly believe this could be detrimental to future generations.
 - The long-term effects of decreased milk consumption in children is not yet known and is difficult to project due to the large variation in nutritional content between non-milk alternatives.

Bottom line: Plant-based alternative beverages are NOT milk and cannot be used as a replacement for milk in the American diet to yield the same fulfillment of dietary needs. Allowing consumers to think this to be the case, which is exactly what misleading plant-based brands are doing, is deceptive, confusing and risky to the health of consumers. It is time the FDA puts an end to labeling lies and enforces the standards of identity for milk.