

Dr. Scott Gottlieb Commissioner
US Food and Drug Administration
10903 New Hampshire Ave
Silver Spring, MD 20993



Re: The Food and Drug Administration's Comprehensive, Multi-Year Nutrition Innovation Strategy;
Public Meeting; Request for Comments
ID: FDA-2018-N-2381-0001

Dear Commissioner Gottlieb,

As a tireless advocate and educator for agriculture, I am passionate about debunking farm and food myths. I can tell you we ALL need to do a better job combating misinformation in marketing that is continually bombarding consumers today, especially as they become farther removed from a farm. Our role in truthful marketing becomes more important than ever and it's never too late to do the right thing.

Use of the term "milk" on plant-based and other laboratory-created beverages easily misleads consumers into believing all of these drinks are equal in content and nutrition. Worldwide, there are over 200 countries that do not allow plant-based beverages to be called "milk" on their labels, including our neighbors to the north in Canada and the EU, where they are called beverages or drinks.

You, the FDA, play a critical role in promoting public health by ensuring that food labeling provides consumers with reliable, evidence-based information so they can make informed choices about the healthfulness of the foods they purchase.

Following your current standard of identity used to define the word milk — specifying from lactating animals — while restricting its use on plant-based beverages is important, not only to dairy farmers, but **more so** to consumers. NUTRITION MATTERS. I speak to thousands of consumers in my travels every year as a professional speaker. The vast majority believe that plant-based beverages using the term "milk" have cow's milk in them and carry the same or better nutrition, when this couldn't be further from the truth. There is absolutely no product on the market that can compete nutritionally with cow's milk, even though they have all been able to brand themselves as equivalent through this play on words. This has made it confusing and misleading for consumers. Cow's milk is a powerhouse of nutrition with 8 grams of complete protein per serving (compared to 1g in almond or 0 g in coconut). Cow's milk contains nine essential nutrients – those crucial nutrients that your body requires for cellular function that you need to consume every day. There is NO OTHER drink available packed with as much nutrition as one 8-ounce glass of cow's milk...none.

There is a national educational program called "Food for America," where fourth graders visit farms to learn about where their food comes from. I have volunteered for 17 years, presenting a nutritional "Think Your Drink" breakout for thousands of kids. When I ask them how many glasses of milk they should be drinking every day for optimum health, according to the USDA My Plate nutritional recommendations, this is the first year I had to specify milk from a cow... the majority of kids, referenced the almond, coconut, pea, and oat milks they drink instead. After our session of reading labels and talking through the nutrition, I love to watch all the kids connect the dots, ask the right questions and come to the same conclusion by the end of our discussion every single time. There is no comparison.

Do we all need to do a better job for consumers? Absolutely. My beloved dairy industry shares in the blame. We need to better educate and connect with our consumers. We need to do a better job on innovation and packaging. We need to get what we produce to the people who need it the most. One in five kids in our country is food insecure and five out of six adolescent girls in our country are deficient in calcium. Shame on all of us. Ultimately, we need to do a better job on nutrition education, but we need your help. Stop the misleading labeling and follow your current standards of identity to help protect the integrity and identity of milk, because nutrition matters.

Additional Points to Consider:

- Milk is a leading dietary staple in the United States, yet year-over-year the regular consumption of milk decreases.
- The consumption of milk and other dairy products is also associated with a lowered risk for heart disease, type 2 diabetes, and osteoporosis.
- We see plant-based alternative products growing in popularity, while dairy farms are going out of business at an alarming rate.
- 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.
- FDA Commissioner Scott Gottlieb has publicly made the case for banning the word “milk” from the labels of plant-based products, citing consumer confusion. “One area that needs greater clarity—and which has been the subject of much discussion of late — is the wide variety of plant-based foods that are being positioned in the marketplace as substitutes for standardized dairy products,” Gottlieb said, while noting “a proliferation of products made from soy, almond or rice calling themselves milk”.

Thank you for your consideration,

Kim Bremmer, Executive Advisory Member of the American Dairy Coalition,
on behalf of the 30,000 producers nationwide represented by the American Dairy Coalition.