



GEORGIA MILK PRODUCERS, INC.

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Dockets Management Staff (HFA-305),
Food and Drug Administration,
5630 Fishers Lane, Rm. 1061,
Rockville, MD 20852

RE: Docket No. FDA- 2018-N-2381 - FDA's Comprehensive, Multi-Year Nutrition Innovation Strategy

Georgia Milk Producers, Inc., a producer-focused, producer-funded non-profit organization, appreciates the opportunity to submit comments on the importance of enforcing the standards of identity for milk and dairy products. For decades, plant-based imitations have unlawfully misbranded their products as nutritionally equivalent to real milk. This practice is inappropriate, violates the law and misleads consumers. We encourage FDA to take action against companies that manufacture dairy imitations which misuse federally-defined terms such as 'milk' and 'yogurt.'

Federal standards of identity exist for a number of foods, establishing a defined set of characteristics and terminology unique to those foods. These regulations protect consumers from false and misleading marketing of products masquerading as a standardized food. Any food product that uses a name established by a standard of identity but does not comply with the essential characteristics established by that standard, is by law misbranded (21 U.S.C. §343(g)).

A federal standard of identity has been long established for milk (21 CFR 131.110). As such, "milk" has been defined to specify that the term "milk" must only be used in conjunction with products that conform to the specific provisions of the standard – including being "the lacteal secretion... obtained by the complete milking of one or more healthy cows".

Non-dairy plant alternatives are **NOT** equivalent to milk in nutrient value, despite their marketing techniques which attempt to brand them as so. These dishonest marketing techniques make it difficult for consumers to purchase products that meet the dietary needs of their families. Real dairy products provide nine key nutrients necessary for healthy child development and adult health, such as protein, calcium and vitamin A. Imitation dairy products simply **DO NOT** match the nutritional value of real milk and dairy products.

Georgia dairy farmers follow strict regulations and use best management practices to ensure the integrity of the products they produce. By allowing imitators to label their products as the equivalent to what our dairy farmers produce is disheartening. For the last twenty years, the consumption of fluid milk has decreased. Our dairy farm families can no longer stand by and let deceitful plant-based marketing tactics slide by unchallenged. Fake foods have the right to be in the marketplace; however they do not have the right to use real milk's standard of identity.

Georgia Milk Producers urges FDA to take immediate regulatory action against dairy imitators with respect to applicable food labeling regulations. Thank you again for the opportunity to submit comments regarding this matter.

Respectfully,

Everett Williams
President and GA Dairyman