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STATE OF VERMONT
GENERAL ASSEMBLY
HOUSE COMMITTEE ON AGRICULTURE
AND FORESTRY

January 25, 2019

FDA's Comprehensive, Multi-Year Nutrition Innovation Strategy
Dr. Stephen Ostroff
Deputy Commissioner of Foods and Veterinary Medicine
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Dr. Ostroff,

The Vermont House Committee on Agriculture and Forestry joins dairy farmers, processors, cooperatives, and Members of Congress in calling for the Food and Drug Administration to enforce its own food standards to prohibit the misleading labeling of plant-based products as "milk". Milk is a food that has an established standard identity defined in 21 CFR 131.110 as "the lacteal secretion, practically free from colostrum, obtained by the complete milking of one or more healthy cows". Consumers are naturally confused when nut and other plant-based products are labeled as "milk".

Allowing plant-based beverages and food items to be labelled with names that are regulated under FDA standards of identity for milk creates a misleading environment for consumers and an uneven playing field for producers of dairy milk products. Both the DMI and NEDFC studies show conclusively that consumers think that products labelled "milk" have the same nutritional benefits as dairy milk even though dairy milk has more protein, no added sugar, and no fillers or stabilizers.

The Vermont House Committee on Agriculture and Forestry strongly urges FDA to enforce the standards of identity for milk and dairy products as soon as possible.

Sincerely,

Rep. Carolyn Partridge, Chair

Rep. Rodney Graham, Vice-Chair

Rep. John Bartholomew

Rep. Thomas Bock

Rep. Charen Fegard

Rep. Terry Norris

Rep. John O'Brien

Rep. Vicky Strong