



International Dairy Foods Association
Milk Industry Foundation
National Cheese Institute
International Ice Cream Association

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August 19, 2002

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Subject: Docket No. 98N-0359 - Program Priorities in the Center for Food Safety and Applied Nutrition; Request for Comments – Fiscal Year 2002-2003

To the Dockets Management Branch:

International Dairy Foods Association (IDFA) is submitting these comments on Fiscal Year 2003 Program Priorities in the Center for Food Safety and Applied Nutrition (CFSAN). The International Dairy Foods Association (IDFA) and its constituent organizations, the Milk Industry Foundation, the International Ice Cream Association, and the National Cheese Institute whose approximately 850 members operate more than 1550 processing facilities, producing eighty-five percent of all dairy products consumed in the United States.

In general, IDFA strongly supports providing the Food and Drug Administration (FDA) sufficient resources in FY03 to enable the agency to fulfill its critical role of ensuring the safety and wholesomeness of the American food supply and consumer confidence in the food safety system. In addition to their support for the CFSAN mission, dairy processors offer the following suggestions on programs and projects of high priority to them.

Major Program Areas – Nutrition, Health Claims and Labeling

IDFA urges that CFSAN elevate the priority of reviewing requests for modifying standards of identify for dairy products and allocate additional resources to such requests. Many existing standards were developed more than twenty years ago, and have failed to keep pace with technological advances in food ingredients and processing methods. Consequently, the current out-of-date standards limit product development and restrict the products dairy processors can offer to the American consumer. This priority is

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especially important to the dairy industry: more than forty percent of all food standards of identity apply to dairy products.

IDFA strongly encourages CFSAN to include in its FY03 A priority list the National Cheese Institute's petition to allow filtered milk in cheese making. This change has the support of the entire dairy industry as well as the temporary approval of the Department of Agriculture under its plant inspection and grading program. The failure to resolve this issue, which has been before federal regulators since 1999 is a significant impediment for the U.S. dairy industry, with adverse economic consequences for the dairy processors and consumers alike.

Additionally, the International Ice Cream Association (IICA) will soon submit a petition to CFSAN proposing changes to the standards of identity for ice cream and frozen desserts to make them consistent with the level of today's technology. These standards have remained unchanged for more than twenty-five years, while the industry has developed new ingredients, advances in processing technologies to match greater consumer expectations requiring the modernization of these standards.

Food Security

IDFA strongly supports CFSAN's efforts to work with the dairy industry to enhance food security and ensure a rapid response and recovery if the US food supply were deliberately contaminated. IDFA supports FDA's continued involvement with the Alliance for Food Security, believing it to be an effective method of industry-government collaboration on this problem.

IDFA fully supports the agency's modification to its work plan to add the implementation of the Public Health Security and Bioterrorism Preparedness and Response Act of 2002 to the A priority list, including staff training, developing an implementation plan, and soliciting public comment on the new regulations.

Food Safety Initiative

IDFA continues to support FDA's *Listeria* action plan and considers completion of the final draft of the Assessment of the Relative Risk to Public Health from Foodborne *Listeria monocytogenes* Among Selected Categories of Ready-to-eat Foods a high priority. IDFA believes this new scientific information should be used for future hazard evaluations undertaken for recall classification for foods such as ice cream, frozen dairy desserts, and some varieties of cheeses that do not support the growth of *Listeria monocytogenes*. IDFA further urges CFSAN to utilize this important scientific information to dictate future risk management priorities, including assessing a regulatory action limits for foods that do not support the growth of *Listeria monocytogenes*.

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Crosscutting Program Areas- International

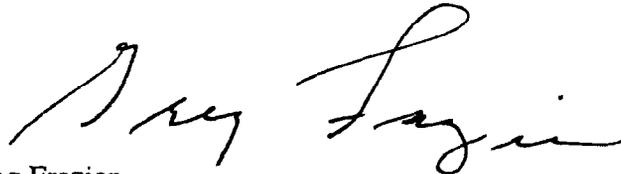
IDFA is very supportive of CFSAN's leadership role in the Codex, its committees and working groups and urges including these on the A priority list to ensure that scientifically based U.S. food safety standards are reflected in international standards.

Additionally, IDFA suggests that criteria for evaluating the equivalence of foreign food safety systems also be included on the A priority list, including the completion of FDA's international equivalence criteria. CFSAN should devote more staff and resources to streamlining the process for obtaining FDA export certificates, the review process for inclusion in the European Union (EU) Dairy Plant List Program, and the process of obtaining an Import Milk Act permit, programs critical to ensuring food safety and facilitating free trade of dairy products.

Again, IDFA appreciates the opportunity to comment on CFSAN's proposed FY03 program priorities and stands ready to answer any questions to help achieve these important objectives.

With best personal regards, I am

Sincerely,



Greg Frazier
Senior Vice President,
International and Regulatory Affairs

GF/mcs



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FAX TRANSMISSION

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Re: Docket No. 98-N - 0359 CC:

Urgent For Review Please Comment Please Reply Please Recycle

To the Dockets Management Branch:

Please note the attached letter from Greg Frazier, Vice President, International and Regulatory Affairs, International Dairy Foods Association, **Re: Program Priorities in the Center for Food Safety and Applied Nutrition; Request for Comments ---Fiscal Year 2002-2003.**

Please let us know if we can provide further assistance. Greg Frazier can be reached at (202) 220-3524 or email: gfrazier@idfa.org.