



National Milk Producers Federation

National Milk Producers Federation • 2101 Wilson Blvd., Arlington, VA 22201 • 703-243-6111 FAX 703-841-9328

Agri-Mark, Inc.
Arkansas Dairy Cooperative Association
Associated Milk Producers, Inc.
Cass-Clay Creamery, Inc.
Continental Dairy Products, Inc.
Cooperative Milk Producers Assn.
Dairy Farmers of America, Inc.
Dairymen's Marketing Cooperative, Inc.
Dairylea Cooperative Inc.
Ellsworth Cooperative Creamery
Farmers Cooperative Creamery
First District Association
Foremost Farms USA
Humboldt Creamery
Just Jersey Cooperative, Inc.
Land O'Lakes, Inc.
Lone Star Milk Producers, Inc.
Manitowoc Milk Producers Coop.
MD & VA Milk Producers Cooperative Association, Inc.
Michigan Milk Producers Assn.
Mid-West Dairymen's Company
Northwest Dairy Association
Prairie Farms Dairy, Inc.
St. Albans Cooperative Creamery, Inc.
Scioto County Co-op Milk Producers' Assn.
Select Milk Producers, Inc.
Southeast Milk, Inc.
Swiss Valley Farms, Co.
Tillamook County Creamery Assn.
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.
Zia Milk Producers

Dockets Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service (FSIS)
300 12th St. SW
Room 102 Cotton Annex
Washington, DC 20250

March 5, 2007

RE: Docket No. FSIS-2006-0040E Product Labeling: Definition of the Term “Natural”

To Whom It May Concern:

The National Milk Producers Federation (NMPF) is submitting the following comments to the United States Department of Agriculture's (USDA) Product Labeling: Definition of the Term “Natural” Docket No. FSIS-2006-0040E. The National Milk Producers Federation, based in Arlington, VA, develops and carries out policies that advance the well being of dairy producers and the cooperatives they own. The members of NMPF's 32 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of nearly 50,000 dairy producers on Capitol Hill and with government agencies. While this FSIS matter concerns the use of the voluntary claim “natural” for labeling of meat products and poultry products, the use of the term “natural” is also important for dairy products.

NMPF cautions FSIS to ensure that any changes in the use of the voluntary claim “natural” for labeling of meat products and poultry products does not interfere with the ability of dairy processors to use the term “Natural” or “All Natural” on fluid milk products. According to the Food and Drug Administration the terms “Natural” and “All Natural” may appear on the principle display label for fluid milk products.

Milk products that are manufactured without added color, synthetic ingredients and artificial flavors can be labeled as “Natural” or “All Natural”. The Standard of Identity for milk (21 CFR 131.110) provides for the use of optional ingredients including, vitamin A, vitamin D, carriers for vitamins A and D, and flavors. When these optional ingredients are added to milk that is labeled as “Natural” or “All Natural”, all of the

Jerry Kozak, President/Chief Executive Officer

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ingredients must be natural. 21 CFR 130.10 provides for the use of other ingredients when milk is modified to make a nutrient content claim (i.e., “low fat” milk, “reduced fat” milk, etc.). As with any other food that is labeled as “Natural” or “All Natural”, all of the ingredients used in milk that is manufactured under 21 CFR 130.10 must be natural.¹

Additionally, a standard term of reference in cheese manufacturing is “natural cheese.” “Natural cheese” is used as a generic descriptor for both cheeses with a Federal standard of identity² and non-standardized cheese made by conventional cheese making procedures. In cheese manufacturing, these “natural cheeses” are differentiated from process cheese, process cheese food, and process cheese spread.³ NMPF again seeks to ensure that any changes in the use of the voluntary claim “natural” for labeling of meat products and poultry products does not interfere with the use of the standard term of reference in cheese manufacturing to “natural cheese.”

NMPF is concerned that some commenters to this notice will suggest to FSIS that the term “natural” should be extended from food processing to animal production practices. We strongly believe that the intention of USDA Policy Memorandum 55 (dated November 22, 1982) is to regulate the use of the term “natural” for post-harvest processes (food processing and manufacturing). NMPF does not support any efforts to extend the use of the term “natural” to livestock production practices. The USDA Agricultural Marketing Service is currently addressing production practices through a potential “naturally raised” label claim. Another venue that already addresses livestock production practices is the USDA National Organics Program which entails both pre- and post-harvest requirements.

Thank you for the opportunity to submit these comments. If you have any questions or require elaboration on any part of these please contact me.

Sincerely,



Jamie S. Jonker, Ph.D.
Director, Regulatory Affairs
National Milk Producers Federation

¹ From “QUESTIONS AND ANSWERS FROM THE FD 578 ADVANCED MILK PROCESSING COURSE (JULY 25-29, 2005)-BENSALEM, PA; FD 578 ADVANCED MILK PROCESSING COURSE (AUGUST 8-12, 2005)-SAINT PAUL, MINNESOTA; CENTRAL REGION MILK SEMINAR (OCTOBER 18-20, 2005)-WHEELING, WV; AND THE PACIFIC/SW REGION MILK SEMINAR (NOVEMBER 28-DECEMBER 1, 2005)-SAN ANTONIO, TEXAS”

² 21 C.F.R. 133.102 through 133.168 and 133.181 through 133.196

³ 21 C.F.R. 133.169 through 133.180