

Gerald Carlin
RR 2 Box 203
Meshoppen, PA 18630

March 10, 2001

5981 01 MAR 16 10:54

Ms. Jennie Butler
Docket Management Branch (HFA-305)
Food and Drug Administration
Room 1061
5630 Fishers Lane
Rockville, MD 20852

Ms. Butler,

I want to take this time to comment on Docket No. 00P-0586 CP2 concerning the definition of milk and the use of filtered milk.

My name is Gerald Carlin. I am a dairy farmer from Pennsylvania and a National Director At Large for American Raw Milk Producers Pricing Association. (ARMPPA)

There are a number of issues mentioned in the NCI Citizens Petition, which need to be addressed. First, the argument that the use of ultra-filtered milk would allow greater efficiency in the production of cheese and provide "cost savings that ultimately could be passed on to consumers." Cost savings and consumer benefit are well-worn arguments, however, please note that while wholesale cheese prices fell over 20% from 1999-2000, the retail price increased slightly. Historically, food production cost savings have not been passed on to consumers. There will certainly be no long-term consumer benefit associated with the loss of American farms and increased dependence on foreign food sources.

The petition also states that cheese made with filtered milk "has the same physical, chemical and nutrition characteristics as cheese made from other forms of milk expressly permitted under existing standards." Many have noted a difference in melting characteristics of cheese made with filtered milk. Also, it does not taste as good. Many people have expressed dissatisfaction with the taste of cheese made with filtered milk.

The petition further states that use of filtered milk expands "milk sourcing options." This is true. Last year milk proteins entered the United States from 31 foreign nations. This raises a number of serious concerns. One concern is "Mad Cow Disease". Although it is not certain whether this disease can be transmitted through milk, it is certain that it can be transmitted through blood and there's bound to be small amounts of blood in a batch of milk because of injuries to a cows teats or udders. Milk taken from these cows will have blood mixed in. Also, there is a real concern about food terrorism in these products. Some filtered milk came from the Ukraine and also China, which may have contained

00P-0586

C9

unacceptable radiation levels. Inspection of these products at ports of entry is either inadequate or non-existent.

The petition states on page six that the proposed amendments also would help USDA inspectors distinguish filtered milk products used as ingredients in standardized cheeses from other milk isolates (such as chemically derived caseinates) that are produced through other separation processes which have never been encompassed by the alternate make procedure provisions for standardized cheeses.

I note here that in 1996, FDA allowed only one exception that permitted ultra-filtered milk to be used in standardized cheese. The way this petition is worded would imply that caseinates would be permitted for "alternate make procedures" in the manufacturing of non-standardized cheese.

It is, apparently, nearly impossible to currently distinguish between ultra-filtered and casein. NCI does not explain why legalizing ultra-filtered milk would make it easier to distinguish Casein. With only nine plants being inspected for make procedures by FDA during 1999, it is laughable to maintain that legalizing filtered products would make it easier to distinguish casein.

In summary, legalizing filtered milk for use in cheese making will result in inferior cheese, put people at risk from imported disease, and do further financial damage to U.S. dairy farmers. This is all about bigger profits for cheese cartels.

Sincerely,

Gerald Carlin
Gerald Carlin

Carlin
Box 203
Oppen, PA 18630-9418



Ms. Jennie Butler
Docket Management Branch (HFA-305)
FDA Room 1061
5630 Fishers Lane
Rockville, MD 20852

20857-0001

