

From: greg.hilbert@arlafoods.com [mailto:greg.hilbert@arlafoods.com]
Sent: Wednesday, January 10, 2007 10:16 AM
To: Post, Robert
Subject: Comments on Natural definition from Arla Foods

Dear Dr. Post:

The following comments are concerning Docket No. FSIS 2006-0040 which addresses the issue of defining the term "Natural".

Some of our customers have asked for a clarification of the term natural as it applies to our whey proteins.

Arla Foods is a dairy cooperative with farms in Denmark and Sweden. The use of artificial growth hormones is not allowed in Denmark. There is no widespread use of antibiotics in dairy herds, and any use of antibiotics initiate a quarantine of the milk produced from the cow. Therefore the fluid milk is as natural as can be, when it is not produced as a pure organic product. In addition to the fluid milk, yogurt, butter and cheese we produce, we also make whey protein concentrates. These proteins are made from the whey that is generated from our cheese production. The whey is processed through a series of filters that remove lactose (naturally occurring milk sugars) thereby increasing the protein content of the dried whey. There are no artificial ingredients or chemical additives used in this process, and no chemical reactions or molecular rearrangements occur during these processes. There are no enzymatic or fermentation steps used in this process. There are no coloring or flavoring agents used in this process. The filtered liquid whey is subsequently dried to make it safe and suitable for human consumption, as is also done with crystal sugar, flour, and many other dry ingredients.

The cheese and whey process would be similar to the example used in Federal Register Volume 71 Number 233 dated Tuesday December 5, 2006 of egg yolk and albumen being separated. We are merely separating the curds and whey. A similar example could be the extraction of sucrose from sugar cane, during which plant fibers, minerals, and molasses are removed - the resulting purified syrup is also dried in a crystallizer. Without bleaching, this is also considered a natural product, however some basic processing is needed to make it suitable for use.

Furthermore, it is commonly known that the nutritional value of proteins and whey proteins in particular is excellent, and is the source of many essential amino acids.

Also in compliance with the Policy Memo shown in Vo. 71, No. 233, the whey proteins are not put through any severe processes such as solvent extraction, acid hydrolysis or chemical

bleaching.

Therefore, we are asking that the Whey Protein Concentrates from Arla Foods, and other suppliers which take the same consideration, be considered "Natural" so food processors here in the USA could use them as natural ingredients.

Best Regards,
Arla Foods Ingredients

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