

FDA:

Jennie Butler:

docket # OOP-0586

re: ultra-filtered milk

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I understand that you have been petitioned to change the definition of milk to allow filtered milk (powdered milk) to be reclassified as "milk". As a consumer, I protest. Right now, if I chose, I can purchase whole fluid milk, or powdered milk, or canned milk, or condensed milk. All of which have different tastes, textures, mixing abilities, cooking qualities etc. With current classifications, all are labeled differently, and as the consumer, I have the ability to pick and choose the appropriate products. I am intelligent enough to make my own choice.

If the classifications are changed, then I no longer have that choice. It is made for me. The American Dairy Farmer produces the highest quality, liquid milk in the world. The price they are paid for this high quality product is directly controlled by the manufacturers of cheese, and is a direct reflection of its end use: liquid milk or powder. Liquid milk is paid higher, but bought in lesser amounts because a surplus is purported to exist. If powdered milk is allowed to be reclassified as "milk", why would any manufacturer purchase liquid milk at liquid milk prices? What then would happen to the American Dairy Farmer? Where would our milk come from?

Ultra-filtered milk is already imported into this country, from Mexico and South America, and other third world nations. This milk powder is imported as a chemical, not as a food product, which bypasses FDA regulations, and then ends up in our foods anyway. It is imported disguised as powdered protein concentrate, and ends up in our cheese as cheese starter. If we have a surplus of milk in this country, why are we importing powdered milk products, and using them in our foods?

Powdered milk reconstituted to liquid milk does not have the same qualities as liquid milk. It does not look, taste, smell, or feel the same. It does not blend the same. It does not cook the same. It changes the texture of the products it is mixed into. If a cheese manufacturer wishes to make this change, then the quality of the cheese product will be compromised. That is the manufacturers choice certainly. If he is then allowed to market this product without labeling it as such, the consumer will then be denied his/her choice in purchasing. In fact, this is much like a bait and switch operation, fraudulent at best.

Where will this ultra-filtered milk come from? I understand that Kraft food has one of the largest milk processing plants in South America. Does not Kraft already dominate the cheese industry, and therefore the Dairy Industry? Are we going to allow them to dominate consumers as well? What quality standards will the ultra-filtered milk have to pass before and after processing? Will they be the same as current standards for our milk products? Or will they be diminished standards to allow inferior products into our foods? The American consumer has been trained for generations to associate the highest standards in the world with milk products. To be able to reclassify a lesser product to that milk standard, and still call it milk, is deceptive.

Filtered milk is already in our cheeses, and powdered casein is used in many foods, disguised as powdered protein concentrate, and cheese starter. And probably many other disguises that I am not aware of yet. Some people buy these products now. Why do the

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manufacturers feel the need to change the title? Are they afraid the people will not buy the products with these constituents, if they are called by their true names? If their product is as good as they claim, then it will have no effect on consumer utilization. By misleading the consumer, if their product is inferior, they will only delay the realization, by a period of time. By your condoning the misleading of the consumer, you create doubt and diminish the trust in your ability to protect the consumer.

Already, I feel that the FDA role as a protector and monitor of food safety has been compromised by allowing a product imported as a chemical, not as a food, to be used in the production of a supposedly wholesome food product. I am speaking of the powdered protein concentrate that is used in cheese manufacture. This is purveyed on the unsuspecting consumer public as "cheese culture" or "casein concentrate." Please do not now allow them to do the same and call it milk.

I feel that the future of our children, which is the future of our country, is being supplanted by the profit margins of our corporations. Children need wholesome foods to grow up healthy, strong and intelligent. Please call a spade a spade, and do not allow anything that is not real milk, to be called milk. Please do not allow substandard products to be masqueraded as the good wholesome products we have been trained to expect, and have a right to expect as American citizens.

Lauretta Clowes

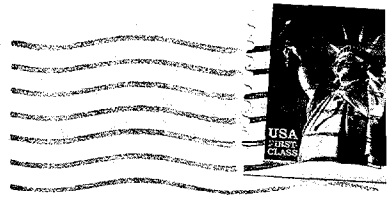
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A handwritten signature in cursive script, appearing to read "L Clowes".

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