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September 18, 2001

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

Re: Docket No. 00P-1322
Public Meeting on Labeling Food Allergens
Fed. Reg., Vol. 66, No. 143, pp. 38591-38594, (July 25, 2001)

Dear Sir or Madam:

These comments are made on behalf of the International Dairy Foods Association (IDFA). IDFA is the nation's leading trade association representing the dairy industry. Our member companies manufacture the entire range of dairy products and include processors, manufacturers, marketers, distributors, and suppliers. IDFA consists of three constituent organizations, the Milk Industry Foundation, the International Ice Cream Association, and the National Cheese Institute. Member companies in these groups account for 85 percent of the dairy products consumed in the United States.

IDFA is a member of the Allergy Issues Alliance, which is a coalition of food trade associations and a leading food allergy consumer group. IDFA helped develop new guidelines for clear labeling of allergenic ingredients on food labels. IDFA strongly supports implementation of these guidelines, encourages disclosure of allergenic ingredients in clear and simple language, and is dedicated to assisting dairy processors in preventing cross contamination.

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Our commitment to the allergen initiative is demonstrated through our member outreach. Although dairy processors are conscientious about compliance with labeling requirements for allergenic ingredients, IDFA urges all members to review their policies and verify that they are operating within the new allergen guidelines. Further, we recommend that member companies follow these recommendations:

- 1) Review formulations to identify the presence, if any, of the 8 major allergens.
- 2) Contact ingredient suppliers to determine if ingredients they supply contain any allergens, including components of flavors, colors, incidental additives and processing aides, which may not be required to list specific ingredients.
- 3) Review their current labels to ensure that if any allergens are present they are included in the ingredient declaration in terms that are easily understood by consumers. The dairy industry is currently using the following labeling guidelines, which are among the options listed in the Allergy Labeling Guidelines issued by the Allergen Issues Alliance:
 - Use of a parenthetical statement following the ingredient name or class of names that identifies the presence of an allergenic ingredient. For example, caseinate (derived from milk); and
 - Use of a commonly understood name that identifies the presence of the allergen such as “natural walnut flavor.”
- 4) Advisory statement should not be used as a substitute for Good Manufacturing Practices (GMP). Only use advisory label statements such as “may contain ___” when all four of the criteria established in the Allergen Guidelines are met. These criteria are:
 - The presence of a major food allergen is documented through visual examination or analytical testing of the processing line, equipment, ingredient or product, or other means.

- A major food allergen is present in some, but not all, of the product.
- The presence of a major food allergen is potentially hazardous.
- The risk of presence of a major food allergen is unavoidable even when current GMP's are followed.

The dairy industry has a good track record on the allergen issue. Recalls for undeclared allergens in dairy products are rare. However, we are committed to continuous improvement. This is demonstrated by our efforts to educate our members on this important issue through a variety of outreach programs. These programs include:

- 1) Providing publications to member companies on implementation of the Voluntary Food Allergen Labeling Guidelines.
- 2) Instruction through our Labeling Manuals for Milk, Cheese, and Ice Cream.
- 3) Training through two workshops on allergens scheduled for October. These are open to the entire dairy industry as well as ingredient suppliers.
- 4) Education of ice cream manufacturers through a workshop entitled "Ice Cream Best Practices" to explain the allergen issue and industry's labeling requirements.

IDFA appreciates the opportunity to comment on the proposed regulation and would welcome the opportunity to discuss these issues. We would be glad to answer any questions or provide any additional information.

Respectfully submitted,



C. Gordon Brown
Senior Vice President, Scientific & Regulatory Affairs

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

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