



May 23, 2018

Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane
Room 1061, HFA-305
Rockville, MD 20852

Re: Equivalence Determination Regarding the European Union Food Safety Control System for Raw Bivalve Molluscan Shellfish (Docket ID: FDA-2018-N-0810)

Dear Sir or Madam:

The National Milk Producers Federation (NMPF) and the U.S. Dairy Export Council (USDEC) submit these comments in response to the March 9, 2018 *Federal Register* notice of the Food and Drug Administration's (FDA) request for public comments concerning the equivalence determination for the European Union's (EU) raw bivalve molluscan shellfish food safety control system (Docket Number FDA-2018-N-0810). America's dairy industry appreciates the chance to present its views and welcomes the opportunity to provide additional detail or discuss this issue further as needed.

NMPF and USDEC recognize that the specific topic in this *Federal Register* notice pertains to a non-dairy industry. We want to clearly emphasize that we are **not weighing in with comment on the underlying decision regarding determination of equivalence** for the bivalve molluscan shellfish industries in the U.S. and the EU. However, the U.S. dairy industry has a significant interest in the broader topic of how FDA plans to address equivalence determinations.

Our organizations have met with the agency in the past to discuss the steps and processes FDA intends to implement with equivalence determinations involving Grade "A" dairy products specifically. The current equivalence determination is the first such decision that FDA has made and, as there are equivalence determination requests pending with FDA for Grade "A" dairy products from international trading partners, we are reviewing the shellfish decision to try to gain greater understanding of FDA's perspectives, intentions, and how they may affect future equivalence determinations.

Our comments are respectfully submitted to the agency with a **focus on the processes by which an equivalence determination was reached**. Our industry appreciates the opportunity to identify

elements of the shellfish equivalence determination for which we would request future dialogue, as these concepts would pose significant concerns to our industry should they be replicated when FDA subsequently deals with Grade “A” dairy equivalence determinations. In short, we do not view the process FDA has followed for shellfish equivalence as providing a workable model for future FDA equivalence determinations, particularly in the dairy sector.

We respectfully request FDA confirm that this process will not serve as a model for subsequent equivalence determinations in non-shellfish sectors.

In summary, among our primary concerns are the following:

- This proposed approach puts all shellfish producers located outside of Massachusetts and Washington states at a distinct competitive disadvantage by granting only these two participants of the Interstate Shellfish Sanitation Conference (ISSC) access to the European market. This type of a state-specific process granting those selected an early-mover advantage over other states would be deeply problematic in the dairy industry, would run counter to nationally harmonized food safety regulations in dairy, and should not be used by FDA as a template for dairy equivalence determinations.
- In the proposed approach, FDA has embraced a radical shift from the previously established U.S. government position that European Union (EU) members should be treated as the separate nations that they are, by acquiescing to EU demands that the European Union be considered for equivalence purposes to be a single entity. As it pertains to the EU’s oversight of dairy products, the U.S. dairy industry supports FDA’s long-standing position, communicated clearly to our industry and to state regulators at the 2017 National Conference on Interstate Milk Shipments, that the EU is a collection of 28 countries that must be individually assessed on their degree of compliance with U.S. regulations. Implementation of EU regulations varies at the individual European country level, which requires unique and separate reviews of legislation and regulations, technical consultations and observations from on-site evaluations, and data and risk assessments. In light of this, FDA should confirm, as it relates to dairy equivalence determinations, a continuation of the well-established and self-evident policy that the EU is not a single entity and rather is a compilation of 28 countries, each of which would need to be individually evaluated with respect to dairy equivalence.
- While the EU retains its authority to “evaluate” new applications prior to authorizing additional U.S. states to resume exporting to the EU, under this proposed approach FDA appears to cede responsibility to the EU to determine whether additional EU countries (beyond Spain and the Netherlands) are equivalent from a food safety standpoint and able to ship to the U.S. in the future. In the context of future dairy evaluations, FDA must not abdicate its public health responsibility to a foreign entity to conduct an independent equivalence assessment on each nation seeking equivalence recognition for its Grade “A” dairy shipments to the U.S. The approach employed in this process for shellfish, if applied to dairy products, would not meet that critical bar.

- The proposed approach does not fully address nontariff barriers to the EU market that have harmed U.S. shellfish producers since 2009. Tearing down trade barriers within Europe is a problem that also plagues U.S. dairy producers; U.S. steps to facilitate U.S.-EU dairy trade (including any FDA work on dairy equivalence with the EU) must address the various unjustified EU nontariff barriers to dairy trade and not be solely confined to the context of the type of trade concerns that impact EU exports to the U.S.
- This process represents a notable deviation from the well-established, deliberative and transparent process that has to-date guided equivalence determinations by the U.S. government. In addition, it is not clear from the *Federal Register* notice docket the degree to which inter-agency consultations on this process took place to ensure that other agencies' expertise in related areas was drawn upon as FDA developed its approach and ultimate recommendations. As FDA proceeds with considering how best to advance work on dairy equivalence determinations, we recommend: 1) modeling FDA's approach on that established by USDA's FSIS (proposed rule – revised proposed rule – final rule) with the goal of increased opportunities for public input and transparency, and 2) prior to rule-making ensuring that FDA consults closely and regularly throughout the entire equivalence determination process with USDA and USTR given their experience with and expertise in the topic of equivalence determinations and trade.

In the sections below, the above points are elaborated further:

1. All U.S. Dairy Producers and Processors Adhere to Uniform Food Safety Standards and Must Be Treated Equally

NMPF and USDEC recognize we do not have an in-depth familiarity with the details of the Interstate Shellfish Sanitation Conference (ISSC) and the National Shellfish Sanitation Program (NSSP). Our basic understanding of the NSSP is that it is a federal-state cooperative program, much like how our Grade "A" Milk Safety Program is administered by the states with FDA oversight through the National Conference on Interstate Milk Shipments (NCIMS).

Using NCIMS and the Grade "A" Program as our reference, we find it concerning that only two states (Massachusetts and Washington) would be permitted to export to the EU. This decision suggests that the food safety systems in these two states differ in some significant way, which contradicts the national uniformity that is a hallmark of federal-state cooperative programs like the Grade "A" Milk Safety Program and NSSP.

NMPF and USDEC note that such discrepancies or variabilities are not prevalent in the U.S. dairy industry and would not support adoption of such an approach for the dairy industry. The FDA should not undermine consumer confidence in, and reliance by both industry and state regulators upon, the uniform food safety standards that FDA oversees through the NCIMS by selecting only certain states to grant preferential dairy export rights. The potential market chaos and economic advantages that could reasonably result from certain states being bestowed "early-mover" status is well noted in the docket by a shellfish producer in New York who stated:

“As an oyster farmer in New York, I strenuously object to the monopoly being given to two states, Massachusetts and Washington, to export to the EU. They are being given a glaringly unfair trade advantage over the 20 other oyster cultivating states. As Andrew Carnegie once said, ‘The first man gets the oyster, the second gets the shell.’”

A Connecticut shellfish harvester likewise notes in the docket:

“Hand-selecting states to participate creates a monopoly that even later participation by other states would be difficult to reverse.”

In addition to the competitive advantage concerns that such a process would pose in the dairy industry, there are also the broader systemic concerns regarding how this approach may be replicated with respect to trade with other partners that may, in turn, similarly seek to bifurcate authorized zones of supply from the U.S. It is not clear from the *Federal Register* notice whether this type of over-arching process precedent has been considered in consultation with USTR and USDA. NMPF and USDEC urge the agency to confirm in writing that it would not authorize a similar early-mover approach in the dairy industry in light of the fact that the Grade “A” Milk Safety Program, with NCIMS, assures a national and uniform regulatory structure for dairy products with consistent implementation, compliance, and enforcement.

2. The 28 Countries Comprising the European Union Merit Individual Equivalence Consideration

For years, in trade agreement negotiations, the EU has repeatedly emphasized its desire for all 28 of the countries that are EU members to be recognized as a single entity as if they were merely portions of one nation. However, at the same time, the EU conveniently continues to operate in all other international trade respects as a collection of 28 nations. For example, in the critically important Codex Alimentarius forum, the EU has a total of 28 votes – one for each of the countries that are members of the EU. The United States is a single country; the EU is a bloc of 28 countries and equivalence recognitions should reflect this reality.

Based upon our review of the proposed determination, the basic steps of an equivalence process – review of legislation and regulations, technical consultations and observations from on-site evaluations, and data and risk assessments – are only performed for specific growing areas of the Netherlands and Spain. All subsequent determinations of equivalence with EU member countries will not follow these discrete steps, but will follow an abbreviated process, based on the assumption and assertion by the EU that the underlying food safety systems are implemented similarly within other areas. From the perspective of NMPF and USDEC, FDA has abandoned its longstanding and self-evident position that the EU is not one country. This represents a dramatic shift in the agency’s previous stance – and the position that continues to be taken by U.S. regulators at FSIS and APHIS – that each EU member country needs to be individually assessed by FDA to sufficiently safeguard the health of U.S. consumers.

For the dairy industry, this raises questions of whether FDA intends to employ such an approach with all trading blocs that assert regulatory conformity of their individual country members and of

whether a similar approach would be applied with respect to individual provinces/counties/zones of other trading partners that cannot demonstrate equivalence at the national level. Moreover, we note that the U.S. government had previously maintained a uniform position – followed consistently to date by USDA’s FSIS and APHIS, as noted earlier – that the EU consists of 28 countries that merit individual equivalence evaluations. Given the discrepancies in this approach proposed by FDA compared to the process established and practiced by USDA, we request FDA to confirm if this shift in policy was established in consultation with other U.S. agencies.

As it relates to future equivalence considerations for dairy products, NMPF and USDEC urge FDA to confirm that, with respect to dairy products, the agency will continue to recognize the fact that the EU is not a single nation with a single national food safety authority, but rather remains a bloc of countries unified on some regulatory matters but with variances in implementation at the national level.

It is not uncommon for derogations from EU-level regulations to exist at the national level. For example, it was only upon careful country by country research by USDA’s Foreign Agricultural Service offices eight years ago that the U.S. became aware that EU member states were not uniformly implementing and enforcing a regulation regarding somatic cell count levels. Fortunately, this did not pose a food-safety concern, but the lack of consistency in implementing EU regulations at the national level underscored the wisdom of FDA’s prior commitment to: 1) evaluating each EU country individually with respect to equivalency with the U.S. Grade “A” milk safety system; and 2) retaining FDA’s responsibility to itself ensure imports are complying with appropriate U.S. food safety criteria.

3. FDA Should Maintain Its Responsibility to Ensure U.S. Food Safety Standards Are Met

While the proposed approach is limited to equivalence recognition for very specific geographical areas, processes are also established by which growing areas and processing facilities could be added to the equivalence determination.

The table below briefly summarizes the processes described:

Steps for adding growing areas and processing facilities in the EUMS (Fed Reg 10492)	Steps for adding new U.S. states to the equivalence determination (FDA website with Q&A¹)
EUMS seeking to export shellfish into the US will notify the EC	U.S. states will notify the FDA of their intent to export shellfish to the EU
EC will confirm that the growing areas to be used for harvesting product intended for export to the US have a Class A designation	FDA will confirm that the U.S. State is in conformance with NSSP requirements
EC will confirm that the growing area controls, including those specified in the <i>Guides</i> , are in place...	FDA will confirm that growing area controls are in place...

¹ <https://www.fda.gov/Food/InternationalInteragencyCoordination/InternationalCooperation/ucm599919.htm>. Accessed May 20, 2018.

EC will notify FDA of the EUMS notification...	FDA will notify the EC of the U.S. state(s), ... to be recognized
FDA will update the ICSSL as appropriate	EC will evaluate the application to recognize the facilities and growing areas eligible for export

In the proposed approach, FDA makes an abrupt departure from NMPF and USDEC’s expectations by effectively granting European Commission officials the ability to determine whether additional EU member countries’ regulations and consistency of implementation are equivalent to U.S. shellfish requirements.

NMPF and USDEC note with concern that the EU has not similarly ceded its responsibility to evaluate new equivalence applications for U.S. shellfish exports to FDA. We call attention to the final step in these processes: expanding equivalence determinations to future U.S. states stipulates that the EU Commission “will *evaluate the application* [emphasis added] in order to add the facilities and growing areas to the EU Commission web site as appropriate” whereas the parallel point in the approval process for adding future EU member countries as equivalent to ship to the U.S. simply notes that FDA “will update the ICSSL as appropriate”.

Given our understanding of the federal-state cooperative program and the ISSC, and assuming shellfish achieves the same national uniformity as the Grade “A” Milk Safety Program with NCIMS – the condition that the EC “evaluate” the application from the U.S. seems excessive; even more so when such an evaluation by the agency responsible for protecting the public health of our nation’s food supply is non-existent. Without knowing additional details about the NSSP and the ISSC, we cannot understand why the FDA established this asymmetrical process for shellfish where the EU retains its oversight responsibilities to evaluate new applications, yet FDA relies on EU assessments of conformity to approve new applications. Such an approach would not at all be acceptable for future equivalence determinations for dairy products.

In addition, the proposed approach notes that some changes to guidance and practice are required by shellfish growers in Spain and the Netherlands to ensure the resulting products accurately meet U.S. requirements. For instance, the documents note that FDA indicated that both countries must “ensure that human waste is not discharged into shellfish production areas”. Although the documents indicate that the competent authority “will adopt guidelines to ensure that human waste is not discharged in shellfish production areas”, it is not evident from the documents provided that these new rules will have been implemented for a specified period of time prior to trade commencing and that FDA will have confirmed a record of compliance by shellfish growers with the new guidelines.

Our industry believes that the “trust but verify” adage is appropriate in this case. Recent press reports highlight the importance of the FDA maintaining its own capacity to verify the compliance of EU exporters with U.S. requirements. A May 16, 2018 *Food Safety News* article² indicated pervasive

² <http://www.foodsafetynews.com/2018/05/norovirus-found-in-almost-70-percent-of-oysters-for-sale-in-uk/#.WwleaJch3b0> (Accessed May 20, 2018).

problems of food-borne illness due to consumption of contaminated shellfish in at least one EU member country:

*“About 12,000 people in Briton are poisoned by contaminated oysters each year; 11,800 of which are due to norovirus, according to the researchers at the Centre for Applied Marine Sciences on Anglesey. According to recent findings from two studies **“more than two-thirds of the shellfish on sale is infected with the contagious norovirus** [emphasis added].”*

According to the most recently published research³, a total of 630 samples, originating in five EU member states (including the two growing areas included in the current equivalence decision) were collected from the United Kingdom and tested for norovirus. Prevalence and levels of norovirus were lower in samples originating outside of the UK (55% of samples positive) than in samples in the UK (72% of samples positive). If contamination rates of European shellfish are so high in the United Kingdom, a highly developed EU country with presumably an otherwise relatively strong food safety system, it calls into question how diligently EC and member country authorities are actually ensuring compliance with existing EU requirements, let alone how diligent they may be in policing the additional requirements mandated of those European regions the EU may opt to designate as equivalent in the future.

Additionally, as it pertains to the dairy industry, revisions are made to the requirements in the Grade “A” Milk Safety Program through the biennial NCIMS Conference. Because equivalence determinations are only made at a single point in time, NMPF and USDEC believe it would be incumbent upon FDA to ensure that, as these periodic updates or revisions to regulations are made, that the exporting country demonstrate – and that FDA verify – compliance with these modified regulations. This would put those new requirements on par with existing requirements, for which we presume FDA would need to see a consistent track record of compliance by the foreign producers to provide assurance that the regulations are being sufficiently followed in the areas under consideration for equivalence. If additional requirements and updates are made to the Grade “A” Milk Safety Program without also mandating these requirements of countries for which equivalence has been determined, it would put the domestic dairy industry at a distinct disadvantage.

We note that FSIS has a process for notifying foreign countries it has found to be equivalent for certain products of relevant U.S. regulatory changes and seeking confirmation of the country’s updated compliance. A parallel process for ensuring continual compliance with the U.S. programs under FDA’s oversight is not detailed in the docket despite the importance of this stage of forward-looking compliance measures.

We urge FDA to maintain its full public health regulatory responsibilities as they relate to future dairy-trade matters, to outline how it would do so moving forward were FDA to grant equivalence for Grade “A” dairy products to a trading partner, and to clarify the rationale for why a different avenue was taken in the case of this proposed approach for shellfish trade.

³ Lowther, et al. Food and Environmental Virology. Published online May 2, 2018.
<https://link.springer.com/content/pdf/10.1007%2Fs12560-018-9338-4.pdf> (Accessed May 21, 2018)

4. Europe's Nontariff Barriers Must Be Addressed

FDA's announcements accompanying the proposed approach note that the EU is reopening its market to U.S. raw shellfish (from the two authorized U.S. states). What is not noted, however, is whether various other nontariff barriers to trade that U.S. exporters face will also be addressed. Instead, the exercise seems to have been limited to the scope of products for which the EU has expressed export concerns, rather than the full scope of products for which both countries collectively have had nontariff export challenges.

Notably, the proposed approach does not specify how the EU will reopen access to its market for processed shellfish – market access that was cut off when the EU abruptly shut its market to U.S. shellfish exports in 2009 after having submitted a formal equivalence request to the U.S. less than a year prior. We note with interest the timing of this move and believe that were the U.S. to take a similar step today, the EU would move swiftly to label such a step as “retaliation”.

In addition, as the proposed approach notes, its scope does not cover pesticide residue tolerances, veterinary drug residue tolerances, food and color additive maximum levels, contaminant maximum levels and product labeling requirements. These requirements are imposed on U.S. dairy producers and processors, and compliance is monitored. Failure to comply with these regulations can result in removal of a producer or processor from the IMS list (loss of the ability to ship products interstate). We note that the equivalence determination does not address the circumstances under which a shellfish producer or processor would be removed from the ICSSL. Moreover, the proposed approach also notes that despite this equivalence finding for two states, those states will continue to have to ship their products with an export certificate, while EU shellfish exports to the U.S. will not be required to be accompanied by an export certificate. This result creates an inherently imbalanced relationship, exposing U.S. exporters to considerably greater trade disruption risk moving forward. Moreover, the docket does not specify if the remaining certification requirements have, in any way, been simplified to help facilitate trade in the products the EU is reportedly prepared to designate as equivalent to those produced in the EU.

Finally, we note that although FDA has no obligation to seek approval of its equivalence determinations from the U.S. Congress and individual U.S. states, the EU's equivalence process “involves EC consultations with the EUMS and the EU Parliament”, a process that was noted to take “about” six months. As of mid-May, our industry is unaware of the EU having published a proposed equivalence recommendation, despite its pledge to do so, and so we presume that this consultation with EU member countries and the EU Parliament may still need to take place. Additionally, it is not clear whether “consultation” means a vote or other form of express permission is required for the EC to proceed with the equivalence finding at which it has arrived. This appears to be a concern not solely for the initial stage of the process but also for the restoration of market access for any additional U.S. states in the future as well. The timing, nature and content of the process for “consultations” with EU member countries and Parliament is not defined in the docket materials despite the critical importance of this information. Also unclear is the degree to which this political approval process for EU equivalence determinations is unique to shellfish or instead is pervasive for all equivalence recognitions.

While this approach – resolving only one nontariff barrier while leaving numerous others in place and relying in good faith on the future actions of the EU member countries and EU Parliament – may align with the needs of the shellfish industry, it would be entirely inappropriate for the dairy industry. Based on our industry’s experiences in trade with the EU, NMPF and USDEC do not share the shellfish industry’s confidence in the smooth functioning of the EU political process nor in the EU’s promises of continued future work to address additional barriers to U.S. exports once EU trade concerns have been alleviated.

NMPF and USDEC strongly support the Administration’s broader recognition that too often our trading partners demand much more of us to enter their markets than we demand of them; we believe that FDA is an integral part of working with its interagency colleagues in a whole of government manner to rectify that situation and ensure that the U.S. government is not bypassing opportunities to arrive at solutions that establish truly level playing fields for our exporters.

As our industry detailed in submissions to regulations.gov just a few years ago, we face a myriad of nontariff challenges in shipping a wide variety of dairy products to the EU. Granting equivalence only for the specific products for which the EU has expressed trade concerns (i.e., solely Grade “A” dairy products) would yield a deeply imbalanced outcome that would fail to appropriately ensure for full and reciprocal nontariff market access opportunities between the U.S. and EU, despite a finding that those products posing the greatest potential food safety risk are equivalent.

Should FDA advance work on a Grade “A” dairy products equivalence determination with either one or more EU member countries, this effort should be pursued in direct parallel, working in collaboration with the Office of the U.S. Trade Representative and with the U.S. Department of Agriculture, with an insistence on likewise removing the various barriers that unjustly impede access for U.S. dairy products to the EU market with respect to nontariff constraints on the full range of dairy products.

Anything less – for dairy products – would unfairly advantage EU food producers at the expense of establishing a truly level playing field for U.S. food producers. This would be all the more unfortunate in light of the fact that the EU already enjoys a significant trade surplus in foods with the United States and the fact that U.S. dairy products are no less safe for EU consumers than are EU dairy products. In dairy products that surplus, driven by greater EU tariff and nontariff barriers to trade, is approximately 14 to 1 in Europe’s favor.

5. Rulemaking Should be Transparent and Consistent

Finally, dairy producers and dairy exporters have concerns with the over-arching process surrounding the shellfish equivalence determination should this model be used moving forward for FDA dairy equivalence determinations. For example:

- The equivalence process followed by another U.S. government agency (USDA’s FSIS) provides clear and public communication about the precise stage of its equivalence

determinations spanning numerous countries and numerous products⁴. We have not found record of a similar process being followed by FDA with respect to the full spectrum of its equivalence considerations so that the public can understand, in a completely transparent manner, where those evaluations stand and which issues may be problematic in terms of compliance with U.S. regulatory requirements. We appreciate FDA's commitment at the 2017 NCIMS Conference to provide for greater transparency and dialogue, yet believe that more is merited with respect to public engagement.

- Additionally, the USDA-FSIS equivalency process requires publication of a proposed rule and, at times, a revised proposed rule, both of which are subject to public review and comment. Only after all supporting science is thoroughly vetted is a final rule/equivalence finding published. We believe this model – issuing a proposed rule, a revised proposed rule that takes initial feedback into account, and only then a final rule – is a positive one that should be consistently applied across the U.S. government's equivalence determinations.
- To illustrate the importance of transparency, sufficient opportunity for public comment, and subsequent revisions in response to that input, we note that currently there is a lack of clarity surrounding how FDA determines if other food safety systems “demonstrate the same level of sanitary and phytosanitary protection” in situations where those regulations and implementation may differ from those specifically required in the U.S. If the EU's approach to achieving a given food safety outcome differs from that employed in the U.S., ample information would be needed to understand why this alternate route provides the same level of food safety protection as that required of the U.S. industry.

Moreover, if FDA ultimately authorizes an alternate route to achieving that specified food safety outcome by deeming an alternate approach to be equivalent, our industry will need to understand how this new flexibility might be incorporated into the NCIMS requirements so that U.S. companies would not be held to more exacting standards than those required of foreign companies. For instance, the Grade “A” Milk Safety Program has very specific standards for equipment (e.g. dairy manufacturing equipment, robotic milkers, etc.). If these same requirements are not imposed on imported Grade “A” dairy products, it will be paramount for FDA to use the *Federal Register* process to sufficiently communicate how the same level of food safety protection can be met without compliance to the U.S. requirements, and if the domestic industry can take advantage of the flexibility afforded to those who import to the U.S.

In conclusion, we would like to thank FDA for the opportunity to provide comments on this important issue. The U.S. dairy industry sincerely hopes that our colleagues in the shellfish industry are able to resume shipments of their safe and nutritious products to the EU without further delay.

⁴ <https://www.fsis.usda.gov/wps/portal/fsis/topics/international-affairs/Equivalence>; and table of status for equivalence determinations: <https://www.fsis.usda.gov/wps/wcm/connect/2514b05f-82b2-4c1a-a7f2-fdf4610d4d8e/Equivalence-Status-Chart.pdf?MOD=AJPERES>

NMPF and USDEC recognize that there may be unique factors and rationale that led FDA to make certain decisions under the prior Administration about how to best address issues specific to the shellfish industry. However, the dairy industry strongly urges FDA to provide confirmation that the issues cited above will not be replicated in future dairy equivalence determinations given their deeply problematic nature were they to be applied to our sector.

We appreciate the commitment from the agency to keep industry stakeholders apprised of the status of equivalence determinations for dairy products, and hope to continue to dialogue with the agency to achieve a clearer understanding of the process by which equivalence determinations will be made in the future.

Respectfully submitted,



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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 cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. Visit www.nmpf.org for more information.

USDEC is a non-profit, independent membership organization representing the global trade interests of U.S. dairy farmers, dairy processors and cooperatives, dairy ingredient suppliers and export trading companies. Its mission is to enhance U.S. global competitiveness and assist the U.S. industry to increase its global dairy ingredient sales and exports of U.S. dairy products. USDEC and its 100-plus member companies are supported by staff in the United States and overseas in Mexico, South America, Asia, Middle East and Europe.