

**Statement of Beth Briczinski, PhD., Vice President of Dairy Foods &
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**Before the
Food and Drug Administration**

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My name is Beth Briczinski, and I am a dairy foods scientist at the National Milk Producers Federation. NMPF represents the nation's dairy farmers on issues of public policy.

One focus of today's meeting is the use of animal cell culture technologies to manufacture meat, poultry and seafood products to resemble their traditional agriculture counterparts. This matters to our members because these rapidly evolving technologies also impact dairy foods: Specifically, the use of genetically modified yeast to produce proteins that share chemical identity with milk proteins. Just as laboratories can now make meat, they will soon be able to manufacture "milk protein"-based compounds for use in foods as ingredients – all without dairy animals.

When it comes to products manufactured from cell culture technology, FDA has asserted its legal jurisdiction over such products, and touted its extensive expertise and scientific experience. FDA also acknowledged that issues such as labeling and naming are relevant. While NMPF agrees that these are important, we would argue that another important issue also be considered: FDA's willingness and ability to enforce its existing regulatory authority in this area.

The U.S. dairy industry is very familiar with man-made products attempting to mimic traditional milk and dairy foods. For *decades*, manufacturers have been making fake milk and other imitation dairy beverages, and inappropriately using the names of products that have clear FDA standards of identity on the labels. You've heard of them before: "soy milk", "almond milk", "soy cheese", "rice yogurt." What began as a clever marketing tactic has led to the *rampant* abuse of standardized dairy terms, while FDA has looked the other way. Most importantly, it has resulted in misleading consumers over the nutritional composition of these products in comparison to traditional milk and its contributions to a healthy diet.

Over the last 20 years, the dairy community has made repeated requests for FDA to take enforcement action on these misbranded products. Each time, FDA has brushed off our request by claiming the issue is not an agency priority. As a result, we now have an "anything goes" attitude in the marketplace.

If the development of a regulatory framework continues to linger and enforcement is as lax for synthetic meat as it currently is for imitation dairy products, we *will* see abuse by product manufacturers, further consumer confusion, and a lack of fairness in the marketplace.

I'd like to conclude with a plea to the agency: America's dairy farmers again call for a commitment from FDA to enforce existing standards of identity and labeling regulations for dairy products. *It's well beyond time to resolve this problem.*

Thank you for this opportunity. NMPF will also be filing written comments.