



IDFA

**International
Dairy Foods Association**

“Natural Cheese” Process Verified Program Proposal

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Legislation Status:

House Version:

- Bipartisan bill introduced in 2019.
- Did not advance to markup in Committee before recess.
- Future of House bill uncertain given reaction of Committee chair.

Senate Version:

- Bipartisan bill introduced in 2019.
- Lead Senate sponsor is attempting to attach Senate bill to larger bill during upcoming session.
- Working on advocating with Committee staff to ensure its support.

Why AMS, not FDA?



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Objective: Develop a method for natural cheese manufacturers to market their products as “natural cheese”.



Focus on marketing; not a label claim



Agricultural Marketing Act (7 U.S.C. 1621–1627) directs and authorizes the Secretary of Agriculture to “facilitate the efficient and competitive marketing of agricultural products”.

AMS program development to support product and marketing decisions, consumer demands, and new technology.

Process Verified Programs

PVP Origins and History



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- *Historically developed in mid-1990s to allow USDA oversight over and implementation of private or international standards not recognized by the World Trade Organization (e.g. ASTM standards) in order to facilitate marketing claims.*
- *Originally developed for international trade barriers (e.g. BSE, hormones) and marketing claims*
- *Typically used for meat products historically; no dairy PVP has ever been created before.*
- *Now PVPs exist across a range of animal and non-animal products (still mostly meats, still no dairy).*
- *PVPs still mostly focused on trade barriers.*

In 1997, an audit-based breed control program was developed for live animals and products from such animals.

In the late 1990s, the Non-Hormone Treated Cattle (NHTC) Program was developed in response to the EU discovering prohibited growth hormones in beef products shipped from the U.S.

In 1999, the PVP was revised to include quality management system criteria consistent with ISO 9001 requirements. This provided the necessary oversight and confidence in third-party auditing firms that certified live animals to specified marketing claims.

In 2003, the PVP addressed the Bovine Spongiform Encephalopathy (BSE) problem in the U.S. that triggered the closure of most export markets for U.S. beef.

In 2006, the Poultry PVP began with Perdue Foods claiming their chicken is raised on an all vegetarian diet at a single complex only to later expand their PVP company-wide having 7 PVP claims.

Over 20+ years, the PVP has grown from the need for livestock claims to include many other facets within the agricultural community including the recent claims made by the poultry industry such as antibiotic claims and now Non-GMO claims.

Summing up the CFR:

- *To provide voluntary, user-funded, impartial verification services that ensure agricultural products meet specified requirements.*

In real terms:

- *Verification of a private (non-U.S. government) marketing claim by AMS auditors (separate from regulatory label oversight).*

Agricultural Marketing Service

PVP: What It Is Not

- NOT a regulatory program or regulatory-based
 - versus Organic Program, which is a USDA regulatory program that includes standards development and enforcement
- NOT a “label approval program or process”
 - Labels are regulated and approved by USDA FSIS or FDA as truthful and not misleading (for calories, ingredients, etc.)
- NOT a stand-alone “Standard” – PVP merely verifies a standard submitted by a company



Examples of PVP Claims and Logos

Non-Exhaustive List of Examples of Types of AMS PVPs:

Commodity	Claim(s)
Beef	Grass Fed, Beef Tenderness
Poultry	Meat Tenderness, All Vegetarian Diet, No Antibiotics Ever, Free Range, Cage Free
Pork	Ractopamine Free, Never Fed Beta Agonists
Lamb	Quality Assured for Tenderness, Juiciness, Flavor
Corn	Non-GMO/Not produced using genetic engineering
Soy	Non-GMO/Not produced using genetic engineering
Cellulose & Soluble Fibers	Non-GE (Not produced using genetically engineered fiber food ingredients)
Honey	Source Verified (traceability to country of origin)

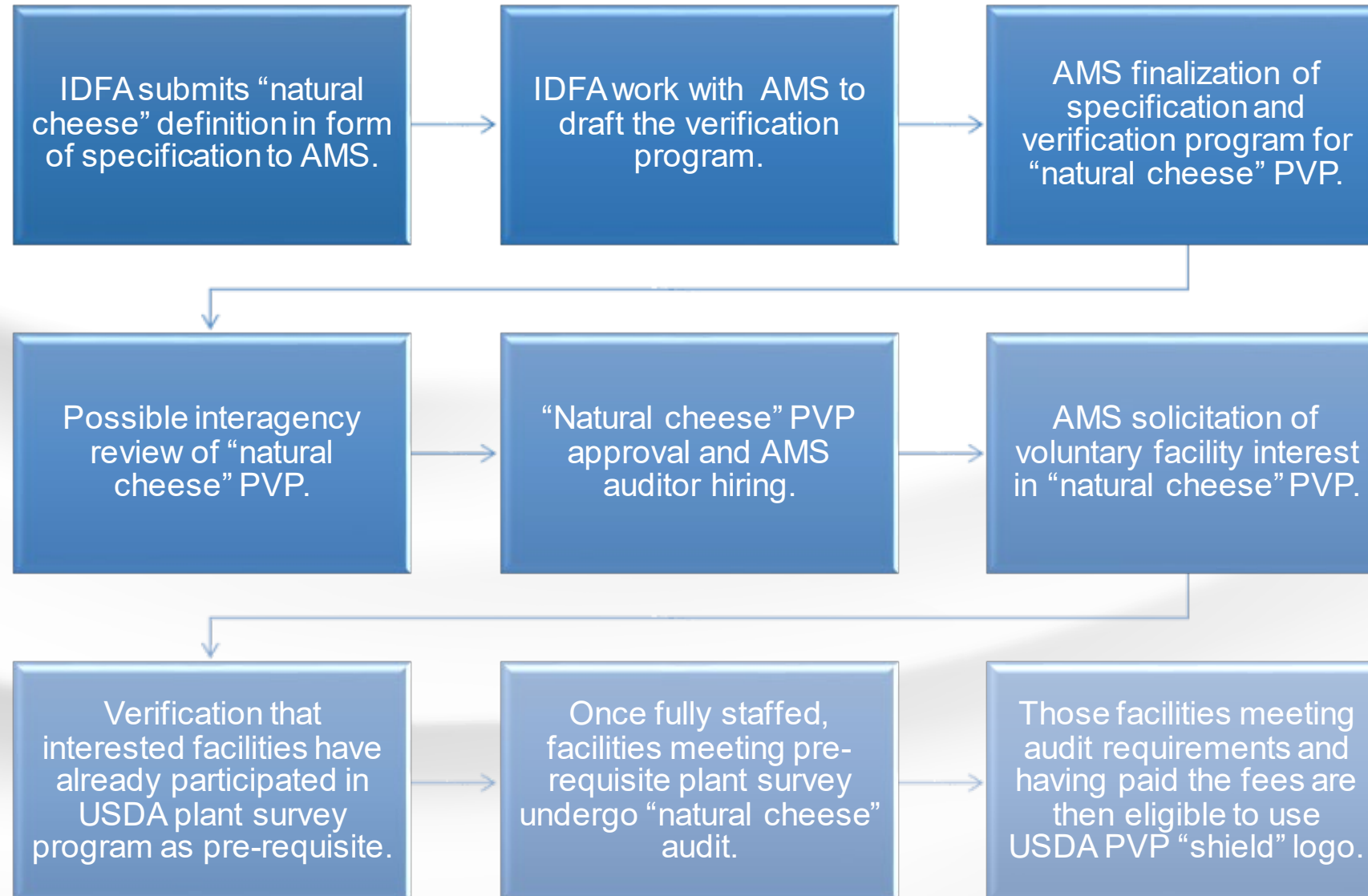
Private Logos:



USDA Logos:



“Natural Cheese” PVP Development



“Natural Cheese” PVP Pros & Cons

Pros:

- Consumer-facing statement of “natural cheese”
- Government oversight (AMS auditor) of private standard for consistency
- Voluntary, only those facilities interested in the label need to participate
- Possibly more flexible/appealing logo design
- Most large facilities likely already in USDA plant survey program (~350)
- Likely most appropriate program for “natural cheese”-style marketing
- Does not require lot-based grading

Cons:

- More expensive hourly rate than other AMS dairy programs
- No precedent PVP dairy program to serve as model
- Requires participation in USDA plant survey program as pre-requisite
- Requires AMS to hire auditing/oversight staff

What We're Proposing

- A marketing alternative to CURD Act legislative proposal to define “natural cheese”.
- Voluntary program to provide additional oversight of and confidence in the marketing term “natural cheese”, for those who use it.

What We're **Not** Proposing

- Not a “silver bullet” solution to marketing concerns or consumer perceptions.
- Not a definition for “natural” or “natural cheese” under FDA regulations.
- Not a mandatory program for anyone wishing to label the term “natural cheese”.
- Not a program that makes or defines a health claim.

With Cheese Board approval, IDFA will:

✓ ***Advocate*** →

Meet with AMS program staff and leadership and obtain their buy-in.

✓ ***Educate*** →

Draft a “natural cheese” specification with your input to supply to AMS and ensure they understand the objective of our program proposal.

✓ ***Keep You Informed*** →

Regularly provide you feedback about the status of the PVP development.



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