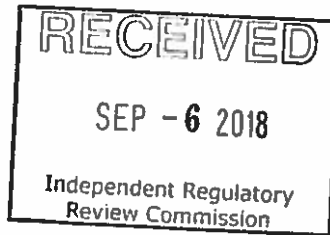


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August 28, 2018

Lydia Johnson, Ph.D.
Director, Bureau of Food Safety and Laboratory Services
Department of Agriculture
2301 N. Cameron Street
Harrisburg, PA 17110-9408

Comment
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RE: RAW CHEESE COMMENTS

Esteemed Dr. Johnson,

The Oldways Cheese Coalition promotes artisanal cheeses and protects traditional cheesemaking practices. We are a broad coalition of scientists, academics, producers, retailers, distributors, and consumers working towards better understanding of the benefits of traditional cheeses, including those made with raw milk. We are a science-based educational organization seeking to provide federal and state elected and other government officials, as well as regulatory agencies with unbiased resources.

We believe U.S. consumers should have the choice to choose safely produced raw milk cheeses, as part of a diverse diet. Current U.S. federal regulations permit the legal manufacture and importation of raw milk cheese aged for 60 days or longer. The Food and Drug Administration's (FDA's) regulations (at 21 CFR Part 133, Subpart B) are promulgated under authority of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 301 et seq.) and establish standardized definitions and requirements for 72 different kinds of cheese. These same Federal regulations allow for 57 of these standardized cheeses to be produced from raw (unpasteurized) milk.

The Pennsylvania Department of Agriculture's (Department's) current regulation for raw milk cheese is more restrictive than the Federal standards. I am writing to express our support for the amendment of current legislation of the state of Pennsylvania to allow for the local production of raw milk cheeses under the FDA's regulations. The proposed regulation would bring Pennsylvania into alignment with FDA standards and allow for the production of cheese from raw milk if: (a) the type of cheese that is being produced is a standardized cheese under FDA's standards; and (b) FDA's standards allow that type of standardized cheese to be produced from raw milk.

Producers in the state of Pennsylvania are working diligently to comply with requirements for production food in a safe and sanitary manner outlined in 21 CFR 117, Current Good Manufacturing Practice, Hazard Analysis and Risk-based Preventive Controls, which were



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mandated as part of the Food Safety Modernization Act. Therefore, we believe there are enough layers of safety within the system in place to ensure best practices for safe production of raw milk cheeses. Pennsylvania is experiencing a growth in its artisanal cheesemaking community and more certainty and fewer hurdles to enter the marketplace will ensure we encourage revitalization of the rural communities where these cheesemakers are establishing themselves. It is good for consumers and it is good for Pennsylvania agricultural communities.

In 2015, the Oldways Cheese Coalition and its collaborators conducted the first "Raw Milk Cheese Consumption and Attitudes Survey." The survey compiled responses from 2150 U.S.- based consumers and results were submitted to the FDA following a request for information under Docket No. FDA-2015-N-2596: Understanding Potential Intervention Measures to Reduce the Risk of Foodborne Illness From Consumption of Cheese Manufactured from Unpasteurized Milk.

The survey found out that 90% of consumers in the U.S. believe raw milk cheeses should be available to American consumers and that over 50% prefer raw milk cheeses and purchase them regularly. Most interesting, we found that 86% of consumers of raw milk cheese appreciate that raw-milk cheese production helps to support small dairy farmers and sustainable rural economies. The survey results were validated by a member of our Academic Advisory Committee and full information can be found on our website: www.oldwayscheese.org

We support the Pennsylvania Cheese Guild in this petition and kindly ask you to consider the harmonization of current Pennsylvania law to the Federal standards.

Sincerely,



Carlos Yescas
Program Director
Oldways Cheese Coalition
266 Beacon St. Suite 100
Boston, MA 02116

