



IDFA

**International
Dairy Foods Association**

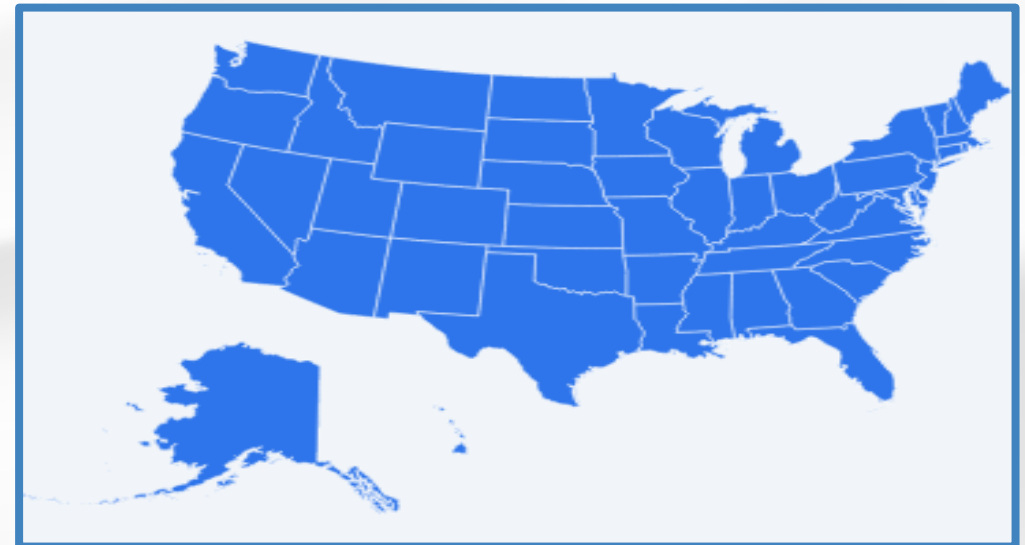
IDFA Updates

**NADRO Annual Meeting
July 14, 2026**

Danielle Quist

Vice President, Regulatory Affairs & Counsel

- Introduction to IDFA
- Current Federal Regulatory Landscape
- Dairy Recalls & Outbreaks Driving IDFA Advocacy/FDA Engagement
- IDFA Federal Advocacy Updates
 - Food Microbiological Safety
 - Food Chemical Safety
 - Nutrition



IDFA: Broad Membership



155

Dairy Company Members
(1151 locations)

69 in Milk Segment

44 in Ice Cream Segment

70 in Cheese Segment

51 in Yogurt & Cultured Segment

72 in Ingredients Segment

95

Gold Business Partners
(377 locations)

56

Business Partners
(101 locations)



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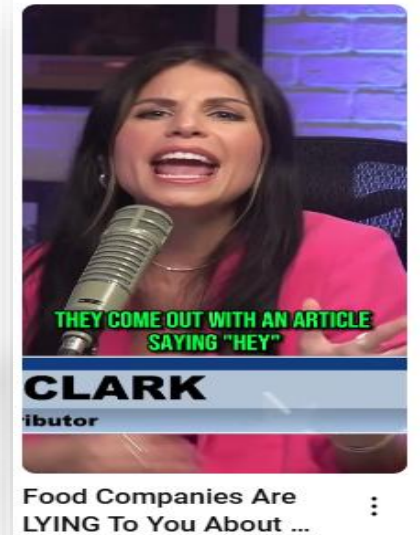
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Current Federal Regulatory Landscape

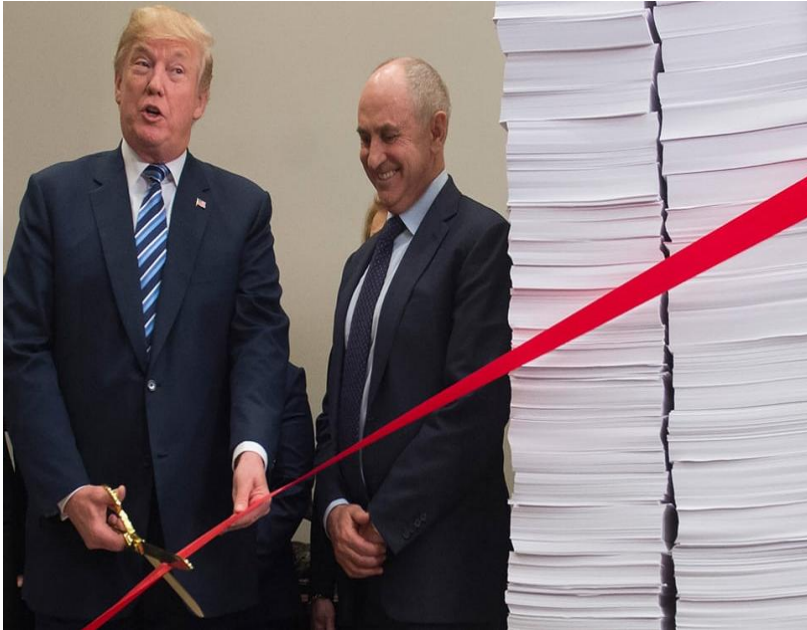
Key MAHA Food & Nutrition Issues

Reducing Chronic Disease

- Dietary Guidelines
- Level of Processing
- Limiting Food & Color Additives
- Ingredient Transparency (e.g., GRAS Substances)
- Healthy Fats / Reducing Inflammation
- PFAS, Heavy Metals & Microplastics
- Limiting Pesticide Use



Deregulation Remains a Priority



Why Deregulation

- Reduce regulatory burden on industry
- Flexibility to innovate & adopt new technologies & ingredients

10-1 Presidential EO Accounting

- Revoking/withdrawing rules/guidance, deregulatory & priority for agencies
- FDA examples:
 - Proposed revocation of 52 SOIs; facilitates issuance of 5 regulations/guidance documents
 - Review guidance, opportunities for withdrawals

What this Means for Industry

- Targeted/limited policymaking, [MAHA & deregulation](#)
- Enforcement discretion, not rulemaking
- State legislative activities to fill void
- Opportunities to reshape federal regulatory landscape

2025 Spring Unified Regulatory Agenda



FDA			
Amend Food Traceability Rule to Extend Compliance Date	Final Rule	7/2026	Deregulatory
Revocation of 52 Standards of Identity (18 Dairy)	Final Rules	11/2026	Deregulatory
GRAS Modernization	Proposed Rule	12/2026	MAHA Strategy
Use of UF/MF Fluid Milk in Cheeses/Cheese Products	Final Rule	9/2026	Deregulatory
Use of Salt Substitutes in Standardized Foods	Final Rule	7/2026	Deregulatory
Front of Pack Nutritional Labeling	Final Rule	12/2026	MAHA Strategy
USDA-AMS			
BE Food Disclosure Standard: Update List of BE Foods	Request for Information	7/2026	Transparency
BE Food Disclosure Standard: Digital Disclosures	Proposed Rule	8/2026	Transparency

- Jan 2026: Human Foods Program Guidance Under Development List
- Feb/June 2026: Human Foods Program 2026 Priority Deliverables
- April 2026: Human Foods Program Priority Research, Data, and Method Needs

FDA Policy Priorities

- Food Microbiological Safety
- Food Chemical Safety
- Nutrition





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Dairy Outbreaks & Recalls

Driving IDFA Advocacy Priorities & FDA Engagement



Dairy in the News – Outbreaks & Recalls

Issue: Dairy products continue to be implicated in foodborne outbreaks/recalls

Our Goal: Reduce dairy outbreaks/recalls, positioning dairy products among the safest in the marketplace

U.S. Foodborne Outbreaks November 2025-2026

- *Clostridium botulinum* (organic, whole milk dried dairy powder) in powdered infant formula
- *E.coli* 0157:H7 in raw cheddar cheese



ByHeart Infant Botulism Outbreak

IDFA advocates for risk/scienced based Clostridium botulinum control strategies

ByHeart Outbreak

- Sickened 48 infants in 17 states, no deaths
- **Domestically produced powdered infant formula (PIF) using U.S. raw milk and organic whole milk dairy powder implicated**
- **Less than 1% of infant formula sold in U.S.**
- Organic whole milk powder isolates from one supplier match finished product & clinical sample isolates via WGS
- No root cause identified for contaminated dairy powder



Nara Outbreak

- Sickened 3 infants in 3 states
- Formula made in Europe & exported to U.S.; made with raw milk/organic whole milk dairy powder originating from U.S.
- **Less than 1% of infant formula sold in U.S.**
- Same suppliers of organic whole milk/organic whole milk powder linked to ByHeart outbreak
- **Not enough evidence to link the two outbreaks**
- FDA investigation continues; samples of intact/open formula are undergoing lab testing



E.coli 0157:H7 & Raw Cheddar Cheese Outbreak



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- September 1, 2025 - February 20, 2026: 9 confirmed cases in 3 states, 3 hospitalizations, no deaths; CDC has deemed the outbreak over.
- FDA collected/analyzed 19 samples of RAW FARM-brand raw cheddar cheese products; one tested positive for *E. coli* O157:H7
- This strain of *E. coli* found in the cheese related to sick people's isolates *from a different 2025 outbreak*; none of the ill people in the 2025 outbreak reported consuming RAW FARM-brand raw dairy products.



Dairy Recalls: November 2025–2026

- **Infant formula**, *Clostridium botulinum* (2 outbreaks/ company recalls)
- Raw Farm **Cheddar Cheese**, shredded, block, STEC
- Honey **Cream Cheese**, undeclared allergens
- **Cottage Cheese**, inadequate pasteurization
- **Cream Cheeses & Tofu, Spreads**, *Listeria monocytogenes*
- **Romano Cheese Products**, *Listeria monocytogenes* (2 company recalls)
- **Cheddar Cheese**, *Listeria monocytogenes* (2 company recalls)
- **Ricotta Cheese**, *Listeria monocytogenes* (2 company recalls)
- **Milk**, cleaning agents
- **Ice Cream Bars**, undeclared allergens
- **Dairy Powder**, *Salmonella* (2 company recalls/multiple secondary recalls)



**PRODUCT
RECALL**

IDFA Tactics to Reduce Outbreaks/Recalls

- Drive robust policies, standards & best practices; industry education & outreach

Ice Cream Incidents

- 07/17/2025 – Recall
- 02/23/2025 – Outbreak & Recall
- 06/24/2024 – Recall
- 11/18/2023 – Recall
- 09/22/2023 – Recall
- 08/30/2023 – Outbreak & Recall*
- 07/13/2023 – Outbreak & Recall*
- 02/04/2022 – Recall

*Outbreaks with illness and/or deaths.
2015 Last Ice Cream Outbreak



**Need to change the
environment**



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Updates: Microbiological Food Safety

IDFA Focus Areas

*Listeria monocytogenes, Cronobacter & Salmonella
Clostridium botulinum*

Next Steps: *Clostridium botulinum* Spores

- **March 2026:** Cornell Pathogenic Spore Consortium Established/Meets in NYC
 - IDFA to serve as bridge between Consortium and FDA; delineates rules if engagement
- **July 13, 2026:** Regan Udahl Foundation for FDA; Industry/FDA Round Table Discussion on *C. bot.* Analytical Methods

IDFA Message to FDA:

- The agency, industry & academics need to coordinate to fill data gaps, including spore prevalence to establish a clear path forward on *C. botulinum* spore mitigation and control strategies on farm and/or in facilities
- Without timely clarity, regulatory uncertainty will persist and dry dairy powder manufacturers may be forced to reevaluate the feasibility of continuing to supply certain ready-to-eat products, including ingredients for infant formula, medical foods, and other essential nutrition products.



Goals



**Build consensus
on critical
knowledge gaps**



**Identify practical
short-term
interventions**



**Establish
opportunities for
continued
collaboration**

Held March 18, 2026

~15 Companies & Organizations (**IDFA** & NMPF), ~30 Participants

Pathogenic Spore Consortium

Key Takeaways



TAKEAWAYS

- Risk-based, targeted approach, focus -higher-risk products
- Farm-level, multi-hurdle mitigation strategies needed but alone cannot fully eliminate risk.
- Testing and hazard characterization essential, constrained by current methods & lab capacity
- Practical, cost-effective interventions, processing and technology innovation, identifying meaningful reduction or kill steps needed
- Regulatory challenges major concern, e.g., zero-risk expectations, unintended consequences such as supply disruptions, interpretation of data
- Consistent industry narrative, proactive regulatory engagement critical to maintaining consumer trust

Pathogenic Spore Consortium

Next Steps



Continuation of Consortium Engagement

Continued engagement supported by participant, bi-monthly meetings, share situational updates, and address emerging concerns



Development and Implementation of Farm Field Staff Training

Proposed development of a half-day training for farm field staff addressing transmission pathways of spores from environmental niches into bulk tank milk, translate practical best practices for various production systems. Training in both virtual/in-person formats



Deployment of a sentinel double blind surveillance program

Development of data on prevalence and levels of key pathogenic spores and indicator organisms across the powdered dairy ingredient space identified as a priority to achieve goal of establishing reasonably achievable spore targets.

Future Opportunities: Potential mid- and long-term opportunities, specifically concerning the implementation of a non-public data, RCA, and incident investigation sharing platform and establishment of a formal, high-impact center to drive knowledge generation and data-informed intervention strategies will be further explored in ongoing consortium meetings.

- July 13, 2026 in-person roundtable discussion topics:
 1. The risk of C. bot spokes in powered infant formula and dairy-based ingredients
 2. Learnings from the ByHeart C. bot recall, including findings from the root cause investigation, review of sulfite-reducing clostridia (SRC), screening and future testing protocol development.
 3. Opportunities to improve detection of meaningful risk while maintaining practices that are scientifically credible operationally feasible and regulatorily sound.

The foundation will publish a public report.

Joint FAO/WHO Expert Meetings on Microbiological Risk Assessment (JEMRA) Announced



Why Now: Powdered IF outbreaks/recalls across the globe due to *Clostridium botulinum*, *Cronobacter sakazakii*, *Bacillus cereus* (*cereuride*), *Salmonella* spp., *Clostridium perfringens*, *Staphylococcus aureus*

Objectives:

- Conduct risk assessment for spore-forming pathogens in powdered infant formula
- Update risk assessment and scientific advice on environmental pathogens
- Inform recommendations to strengthen controls across the production environment, including environmental monitoring



Why this is Important: New standards will impact PIF ingredient processors including those that make dried dairy powders.

FDA Microbiological Food Safety 2026 Priority Deliverables & IDFA Engagement



- **Strengthen dairy & egg safety**
 - Implement prevention strategies for Ice Cream, Hispanic style Cheese and *Listeria monocytogenes*
 - Review cheese aging practices; collaborate on best practices to ensure aged cheese is safe
- **Modernize the recall process**
- **Advance food traceability**



FDA Priority Guidance: Microbiological Food Safety



1. Sanitation Programs for Low-Moisture Ready-to-Eat Human Foods & Corrective Actions Following a Pathogen Contamination Event, Final
 - IDFA submitted comments and organized multiple meetings with FDA to discuss/inform needed changes;
 - IDFA attended April 21st Western Milk Seminar to hear FDA provide overview of final guidance/expectations
2. Hazard Analysis and Risk-Based Preventive Controls for Human Food: Chapter 10: Sanitation Program; Draft
3. Food Traceability Rule: Questions and Answers; Draft Guidance for Industry; Final

IDFA continues to provide thought leadership on control practices for pathogens, e.g., Cronobacter, in facilities that make dried dairy products



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Updates: Food Chemical Safety



Deliverables

- Expedited review of natural colors
- Targeted post market safety reviews
- Action levels for cadmium/inorganic arsenic in baby/toddler foods (Closer to Zero)
- Human exposure studies: heavy metals, PFAS, other contaminants
- Test methods, microplastics in food
- New approaches for regulating major food allergens - thresholds
- Recommendations for disclosures of ingredients impacting health, e.g., gluten labeling for Celiac disease



Why This Matters

- Consumer demand for healthier foods with fewer ingredients, more natural or naturally derived ingredients
- More scrutiny on ingredients used in food
- May require company investments in R&D and reformulation; changes in ingredients/ingredient sourcing

What We Are Hearing About FDA's GRAS Rule

- Consumers worried about the safety of new ingredients in the food supply
- GRAS has become primary pathway for regulatory approval of food substances (over food additive petitions)
- Reform focuses on “*driving transparency*”, as companies can self-certify as GRAS and not submit anything to FDA
- FDA aims to build a comprehensive assessment framework for food ingredients
- Forecasts the proposed GRAS rule will be published **prior to the midterm elections**; *“this is a priority for the administration”* and *“there is no roadblocking by the White House”* during interagency review



Kyle Diamantas
FDA, Acting Commissioner

Certified Color Commitments



IDFA Member Commitments

- Remove certified artificial colors from milk, cheese, and yogurt products served in K-12 schools by July 2026
- Eliminate certified artificial colors in ice cream made with real milk and sold at retail by Dec. 31, 2027
- Both commitments listed on FDA's public-facing dashboard FDA is monitoring progress on a quarterly basis



FDA Actions

- Exercises enforcement discretion allowing companies to label products “no artificial colors” when products do not contain petroleum-based colors
- Continues to fast track approval of natural color alternatives to certified colors



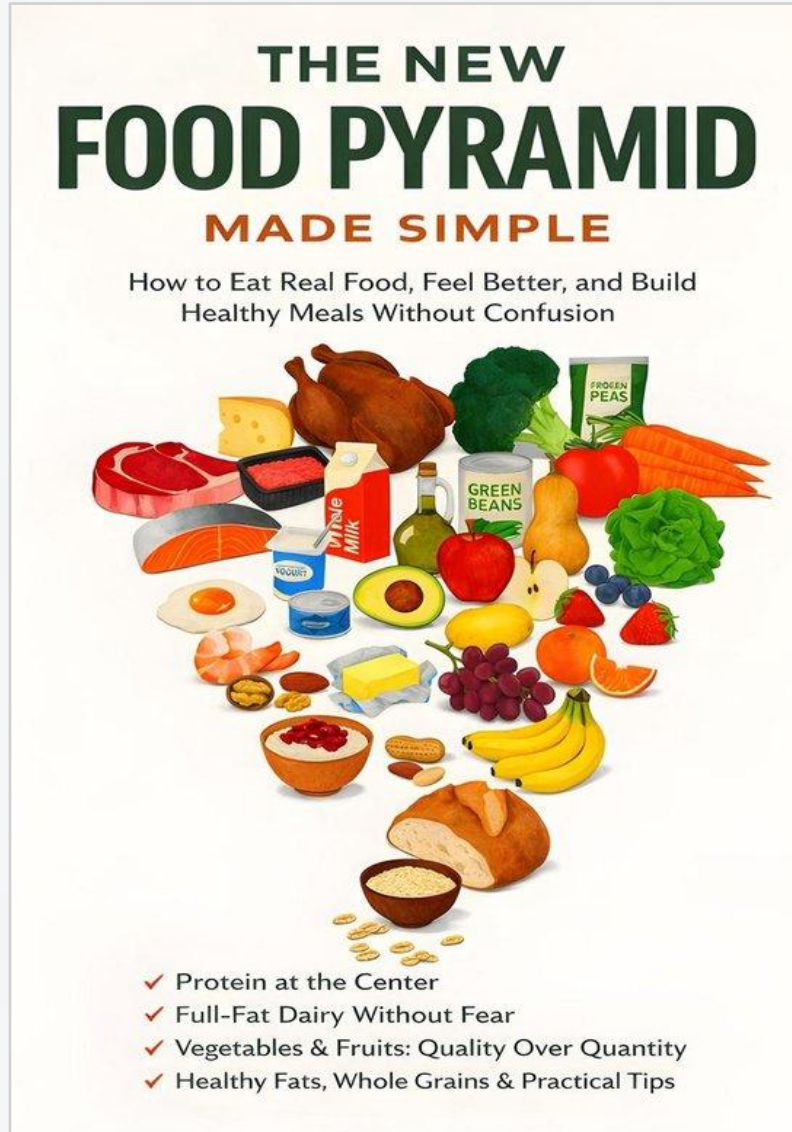
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Updates: Nutrition

Recommendations:

- Dairy maintained as a core part of a healthy diet
- Three servings of dairy each day
- Dairy at all fat levels
- Eat whole, minimally processed foods
- Avoid highly processed foods
- No added sugars, avoid non-nutritive sweeteners (kids < 10)



Next Steps:

- Apply DGA to military bases & hospitals
- Reinstate 2% and whole milk options in school meals and other nutrition programs

School Milk and Yogurt

Whole and 2% Milk: Whole Milk for Healthy Kids Act

- Potential hurdles for implementation
 - Cost
 - Calorie limits
 - Limits on how many varieties are practical for schools and milk processors to provide

Advocacy Strategy

- Conversations with USDA
- Conversations with other organizations
- Legislative action
- Comment on proposed rules



Flavored Milk

- Protected as option in statute & regulation
- Current added-sugar limits; upcoming meal-based limits
- Dietary Guidelines: limit added sugars (especially <10 years of age)

Flavored Yogurt

- No statutory requirement to offer flavored yogurt
- Current added-sugar limits; upcoming meal-based limits
- Dietary Guidelines
 - Limit added sugars & non-nutritive sweeteners
 - Avoid highly processed foods, DGA includes sweetened yogurt as an example



FDA 2026 Nutrition Priority Deliverables

Priorities

- Federal definition for UPF
- Front of Pack Nutrition Labeling
- Research Agenda for NIH-FDA Nutrition Regulatory Science Program
- “Healthy” Claim Implementation
 - Amend rule, align with 2025-2030 DGAs
 - Symbol
- SOI Modernization
- Sodium Reduction: Phase 1 Target Evaluation
- Infant Formula Safety
- Labeling for Online Grocery Shopping, Industry Guidelines
- Marketing Food to Children, Industry Guidelines



Added Sugar Reduction Strategy

- Encourage industry to lower added sugar in processed/prepared foods
- New nutrient content claim: “low added sugar”
- Consumer education
- Ingredient & menu labeling
- Strategies for labeling sugar alternatives that don’t increase blood glucose
- Assess use of low/no calorie and non-nutritive alternative sweeteners

Federal Definition for Ultra Processed Food

- **July 2025:** USDA-FDA RFI, federal UPF definition
 - IDFA Comments: Insufficient science for regulatory definition; set definition only to direct science/fill research gaps
- **Jan 2026:** 2025-2030 DGA definition for “highly processed food”
 - “...any food, beverage, or engineered food-like item that is made primarily from substances extracted from foods (such as refined sugars, refined grains/starches, and refined oils) and/or containing industrially manufactured chemical additives....”
- **April/May 2026:** FDA leaders state UPF definition to be completed
 - Undergoing interagency review?
 - Will UPF definition be announced formally (rulemaking or guidance) or informally (white paper or policy statement)?

Why this Matters: Certain nutrient dense dairy foods may be characterized as ultra processed, e.g., flavored yogurt

State of California passed a law to define UPF that could result in banning certain foods in school meal programs



Front of Pack Nutrition Labeling (FOPNL)

- FDA proposed FOPNL rule published January 2025
- Approach: interpretive scheme; focus on sodium, saturated fat, and added sugars only
- IDFA concerns raised in comments: scheme not reflective of full nutrient profile/benefits of food; consumer research not fully shared in support of scheme; limited evidence FOPNL will result in positive public health impacts
- FDA received thousands of comments, under agency review/consideration
- Based on review of public comments, options for FOPNL/next steps developed for program leaders
- FDA/HHS leadership signals potential revisions to proposed rule (Biden Administration): saturated fat may be excluded; interaction with the “healthy” claim, etc.
- **Rulemaking seems highly unlikely this year**

Nutrition Info Per serving

Saturated Fat **Low**

Sodium **Med**

Added Sugars **Med**

FDA.gov

High In

Saturated Fat

Sodium

FDA.gov

IDFA Opportunity: Recommendations for Dairy SOI Updates



Why this Matters

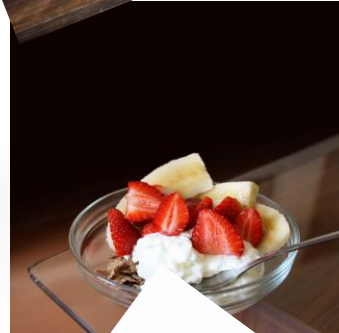
- Opportunity for dairy to recommend to FDA SOI modifications supporting industry innovation & adoption of new technologies/use of novel ingredients
- Recommendations reviewed by Hogan Lovells, NMPF

Why Now

Modifying SOIs to provide flexibility is deregulatory, provides FDA with room to propose new regulations

Next Steps

- Board discussion/agreement
- Submit/discuss w/FDA



IDFA Recommendations

1. Alternate Make procedures
2. Permit filtered milk to be used as an optional dairy ingredient
3. Permit antimycotics use on any form of cheese
4. Eliminate Phenol Equivalent Value in cheese
5. Remove hydrogen peroxide references in cheese SOIs
6. Remove “artificial color added” labeling requirement in sherbet SOI



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Thank You!

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