



# IDFA

International  
Dairy Foods Association

## IDFA Updates

Wednesday, July 16, 2025

NADRO, Burlington , VT

## Who is IDFA?

### New Administration: What does this mean for policymaking and IDFA?

- Deregulatory, pro industry & pro agriculture
- Federal government downsizing & reduced budgets
- State governments filling policymaking voids
- Make America Healthy Again (MAHA) agenda driving policymaking priorities

### IDFA's Food Safety Focus Areas



# International Dairy Foods Association - IDFA



- Trade Association, 300 members, most milk, cheese, ice cream, yogurt & cultured products, dairy ingredients produced/marketed in U.S.
- Advocate/lobby for dairy coops/processors
- 25 staff members: legislative, public relations/communications & regulatory/scientific affairs teams
  - Regulatory/Scientific Affairs Team of five (5); Dr Sam Alcaine is the newest hire



# New Administration and HHS/FDA

**Issue:** Deregulation, government downsizing, budget reductions/restrictions, major HHS/FDA reorganizations **slow federal policymaking**, while States fill the void **creating chaos**.

**Why this Matters:** Potential to Inhibit industry's ability to innovate, adopt new technologies, and use new and novel ingredients.



# White House OMB Request for Information



- **Issue:** OMB RFI solicits ideas for deregulation, IDFA submitted comments May 12; **HHS also solicits ideas for deregulation, IDFA submitted comments July 13.**
- **Why this Matters:** Opportunity to drive smart policymaking that directly impacts dairy
- **Comment Recommendations**
  - Rescind Parts of Preamble in Yogurt SOI Final Rule
  - Update Dairy SOIs to Permit UF/MF/NF Milk and Permit it to be Called Milk in Ingredient Statements on Product Labels
  - Review Food Traceability Final Rule
  - Revoke Recordkeeping Requirements for Hydrolyzed/Fermented Foods w/ “Gluten-Free” Claims
  - Rescind USDA cuts to the family WIC milk allotment



# What Is Make America Healthy Again?

Began as a political action committee (PAC) in September 2024

- To advance “the health-focused policies championed by Robert F. Kennedy Jr. (RFK Jr.) through the reelection of President Donald J. Trump” – MAHA PAC

**Aligns strongly with:**

1. Reducing corporate influence in public health & environmental policy
2. Eliminating harmful chemicals from food, water, & air
3. Reducing chronic disease, especially in children
4. Project 2025 priorities to restructure key public health agencies (FDA, CDC)



Got Milk? Mark McAfee Talks Raw Milk, Gut Health, and Sustainable Farming

Food Companies Are LYING To You About ...



# Key Food Topics

- Dietary Guidelines
- Processed vs Whole Foods
  - Defining/Reducing Consumption of UPFs
  - Reduce Added Sugars
  - Healthy Fats/Inflammation
- Limit Additives/Certified Colors
- Environmental Contaminants
  - PFAS & Heavy Metals
- Pesticides
- Microplastics
- Raw Milk

Plenty of Opportunity for Dairy!



# IDFA MAHA Strategy

## Overarching Goals:

- ❖ Put Dairy in 'Good for You' Food Category
- ❖ Partner with USDA, HHS, White House
- ❖ Proactively Defend Dairy

## Congress & USDA

- Protect Dairy In SNAP
- Expand SNAP Dairy Nutrition Incentives
- Roll Back WIC Cuts to Dairy Benefits
- Restore Whole & 2% Milk in Schools & WIC
- GRAS Modernization

## HHS & FDA

- Expand Dairy in Dietary Guidelines to All Fat Levels
- Proactive Post Market Assessment Program
- Inform Definition of Ultra Processed Foods & FOPNL
- Prevent Loosening of Regs on Raw, Unpasteurized Milk

## States

- Protect Dairy in SNAP (no restrictions / exclude dairy)
- Protect Dairy from Ingredient Bans
- Exclude Dairy from UPF Definitions to Inform School Food Bans



**CLARK**

Contributor

Food Companies Are LYING To You About ...



# IDFA's New Member Commitments



- **Eliminate**: Red 3, Red 40, Green 3, Blue 1, Blue 2, Yellow 5, and Yellow 6
- **In**: All milk, cheese and yogurt products sold to K-12 schools for use in the National School Lunch Program and/or School Breakfast Program
- **By**: Start of 2026/2027 school year



- **Eliminate**: Red 3, Red 40, Green 3, Blue 1, Blue 2, Yellow 5, and Yellow 6
- **In**: Ice cream products made with real milk
- **By**: Dec. 31, 2027

# IDFA Comment Submissions



## Completed

Dietary Guidelines Advisory  
Committee Report

Feb. 2025

USDA – High Protein Yogurt RFI

Mar. 2025

USDA-FSIS & FDA RFI - Date  
Labeling

Mar.  
2025

FDA – High Protein Yogurt RFI

Apr. 2025



## Completed

Plant-based Alternatives Guidance

May 2025

Industry Guidance: Sanitation, Low-moisture,  
& Corrective Actions...

May 2025

White House OMB Deregulation RFI

May 2025

Proposed Front-of-Pack Rule

July 2025

MAHA Assessment Report, HHS

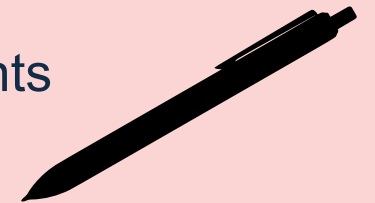
July 2025

Deregulation Suggestions to HHS

July 2025

## Next Up for Comment Development:

- FDA's Prioritization Tool for Ranking Food Substances for Post-market Assessments
- RFI for Defining UPF Foods,
- Proposed Rule to Extend Compliance Date for FDA's Food Traceability Rule



- States defining “ultra processed food” using food and color additives as a proxy for processing
- Impacts business costs, competition, R&D costs, food safety, and quality

Ban certain foods and certified colors in schools

Statewide ban of certain food and color additives

Warning labels

SNAP Waivers



**IDFA**

**International  
Dairy Foods Association**

# **Food Safety Advocacy**

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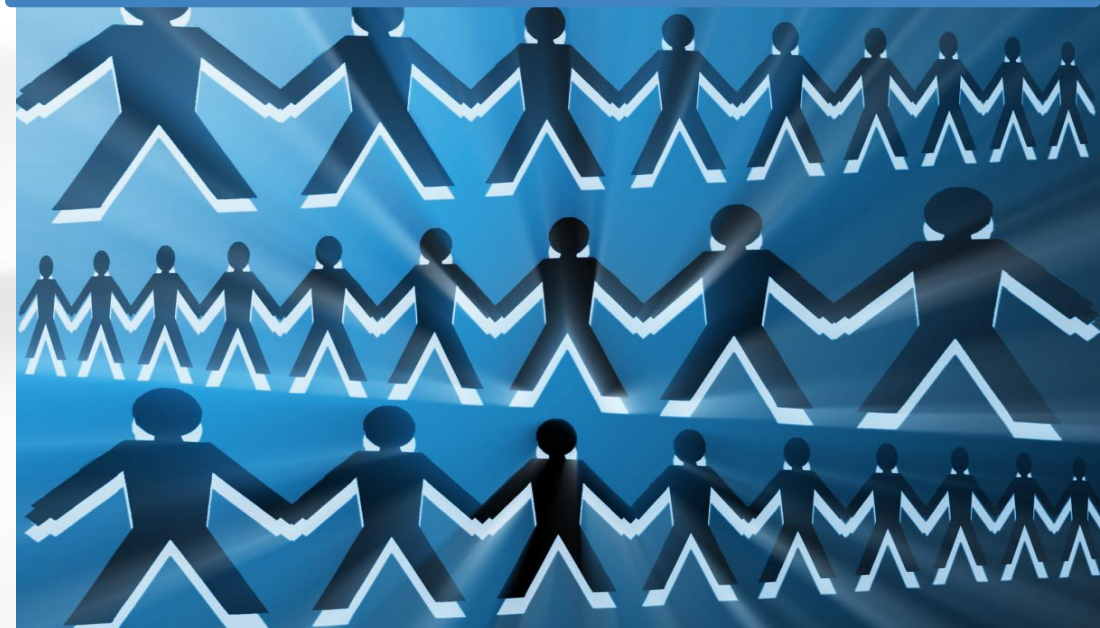
# IDFA Continues to Lead FDA Foods Coalition



- IDFA led FDA Foods Coalition resumes quarterly meetings with FDA's Human Foods Program leaders
- **Why this Matters:** Provides opportunities to raise issues & inform/drive smart policymaking that we would not otherwise have
- **Key Takeaways of April 17 Meeting:**
  - Food **microbiological safety\*\***, food chemical safety & nutrition remain policy priorities
  - Increase domestic and foreign food facility inspections
  - New domestic inspection model under development
  - Embracing Ai & leveraging third-party audit system to work smarter
  - No regulations identified for rescission

## Coalition Workstream Priorities

- Advocate on planned FDA reorganizations
- Advocate for adequate funding/resources/expertise for Human Foods Program
- Inform and drive GRAS, inspection, and recall modernization



## Infant Formula & Cronobacter Still in Spotlight

- **IDFA Cronobacter Working Group**

- Follow-up FDA meeting cancelled due to communications freeze
- FDA contacted to reschedule, agency willing pending indicator organism method review

- **Meeting with Biomerieux**

- Initiative to develop a private database for Cronobacter WGS to expand knowledge on this bacteria; opportunity for IDFA members to participate in a working group

- **March 2025: FDA Announced Operation Stork Speed**

- To accelerate the review of new infant formula submissions
- Address ongoing concerns **about contaminants including heavy metals in infant formula**



## Ice Cream Is In The Crosshairs

- 2/23/2025 – Prairie Farms\*
- 6/24/2024 – Totally Cool Ice Cream
- 11/18/2023 - Wilcox Ice Cream
- 9/22/2023 - Lift Raft Treats
- 8/30/2023 - Ice Cream House\*
- 7/13/2023 - Big Olaf\*
- 2/4/2022 - The Royal Ice Cream Company

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



## Do We Need an Industry Commitment Initiative?

## Improve Flexibility and Safety

- Collaboration with American Frozen Food Institute continues.
- Achieve better public health outcomes by:
  - Elevating food contact surface environmental monitoring.
  - Non-zero tolerance finished product sampling program.
- Developed a Pilot Program; FDA Meetings 12/24 and 1/25
- Nutritional Shake Recall Causes FDA to Rethink Pilot and Non-Zero Tolerance Policy for Lm 2/25
- Revised Pilot Program Launch 5/2
- Concurrently IDFA to Provide EMP Best Practices/New Sampling Models through Webinars; May Engage in Mentoring, EMP Reviews



## Proactively Respond to Warning Signs

## Connecting the Dots Is Complicated

- Original Compliance Date: 1/20/2026
- Proposed 30 Month Delay
- FDA realization that it was not implementable
- Partnership for Food Traceability
  - Interoperability Challenges
  - Data Transfer Challenges
  - Pilot Studies Industry Partners
- OMB/HHS Deregulation RFIs: IDFA Commented to Review this Rule



**Implications Beyond  
Regulations**

## Foundation for Safe Dairy Processing

- Brings together equipment manufacturers, dairy processors, and regulators to set standards for hygienic design.
- Certifies inspectors and licenses symbol.
- 3-A standards required in PMO.
- Founding members: IDFA, IAFP, FPSA, and USDA/FDA
- IDFA is Vice Chair of Board, sits on TPV Committee
- Expanding to Other Food Sectors



## Rebuild Industry Engagement

# Thank you for your attention!!

## **Contact Information**

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