



April 24, 2023

Food and Drug Administration

5630 Fishers Lane Rm. 1061

Rockville, MD 20852

Docket Number: FDA- 2023- D- 0451 (*Draft Guidance for Industry: Labeling of Plant- Based Milk Alternatives and Voluntary Nutrient Statements*)

To Whom It May Concern,

Thank you for the opportunity to provide comments on the Food & Drug Administration's draft guidance for Labeling of Plant- Based Milk Alternatives and Voluntary Nutrient Statements. These comments are submitted on behalf of the Western Organic Dairy Producers Alliance (WODPA). WODPA'S mission is to preserve, protect, and ensure the sustainability and integrity of organic dairy farming, representing approximately 230 organic dairy farm families in the Western United States. WODPA is committed to advocating for organic dairies, their livelihoods and issues impacting the sustainability of the organic dairy industry.

Regarding FDA's guidance on the labeling of plant- based alternatives as "milk", we implore the FDA to aggressively hold to their precedent that only food products made exclusively from the lacteal secretion obtained from one or more healthy milk- producing animals including but not limited to cows, goats, sheep, and water buffalo be labelled as "milk". In using that definition, there should be no question as to the comparison between milk and milk alternatives in reference to labeling.

We also want to address the suggested use of a **voluntary** nutrient statement. Industry's use of these voluntary nutrient statements misleads consumers and decreases the ability of consumers to make informed dietary choices at the snap of a finger. A well-defined directive requiring nutrient statements to be clearly identified on labels is the pinnacle of well- informed consumer choices. If milk alternatives are going to be allowed to be labeled as "milk", a distinct nutrient statement should be required on the label as well. Consumers and farmers both deserve transparency in labeling.

Dairy farmers work diligently and tirelessly to meet strict quality standards, animal welfare expectations and environmental requirements for a product being produced for human consumption. Allowing alternative products to be labeled the same as nutrient dense and delicious milk and milk products disparages the work and livelihood of dairy farmers across the Nation.

WODPA thanks the Food and Drug Administration for the opportunity to comment. We thank you for your commitment to sustainable and safe agriculture and we implore you to maintain the integrity of real milk in retail labels.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lia Sieler".

Lia Sieler
Executive Director
Western Organic Dairy Producers Alliance