



PBFA Oral Remarks at FDA Hearing July 26, 2018

Good afternoon. I am Shannon Campagna, Senior Policy Advisor at the law firm Alston & Bird and I am here on behalf of the Plant Based Foods Association. PBFA was founded in 2016 to represent the interests of companies producing meat and dairy alternatives. Today the association has grown to 114 members.

We appreciate the opportunity to speak here today, and we join others in applauding the FDA's goal of modernizing standards of identity.

While grocery sales overall are generally flat, sales of plant-based foods are growing quickly. PBFA will soon release new data from Nielsen that shows growth in the double digits over the past year.

American consumers are sophisticated and well informed. Consumers who purchase plant-based foods are keenly aware of why they are making these choices and do so for many reasons: sustainability, health, allergies, ethics, variety and taste.

There is much discussion about the use of the word "milk" to identify plant-based alternatives. For our members, and as the data shows, for many consumers, the word describes the functionality of the product. Our research shows that 78% of cow's-milk drinkers agree that the word "milk" is the most appropriate term for products such as soymilk and almondmilk.

Our use of the term is not meant to diminish the value of cow's milk produced by dairy farmers, but rather to use terms that have been understood and accepted in the marketplace as the common and usual name for more than 30 years.

To help ensure a consistent approach among our members, last year, PBFA convened a Standards Committee to establish voluntary standards for the labeling of plant-based milks. We recently shared that finished document, along with the results of our consumer survey, with the FDA.

The voluntary standard recommends that labels clearly identify the main ingredient as part of the word "milk" or be labeled as a "plant-based milk," along with clear disclosure of the main ingredient. We also recommend that the principal display panel contain the words "dairy-free" or "non-dairy," as these were the phrases that resonated the most in our consumer survey.

Ultimately, the question is whether current regulatory definitions can keep up with innovation? We are living in a time of rapid innovation in food and America is leading the way. Consumers are entitled to the benefits of this innovative American spirit and the delicious new plant-based offerings in the marketplace, from both startups and established brands. We urge the FDA to adopt policies that encourage this innovation, not stifle it, and that will allow consumers to make informed choices. Plant-based food producers offer options that consumers want and recognize. If those foods are forced to be identified by obscure, contrived names that consumers are unfamiliar with, innovation will be stifled, and consumers will be deprived of the choices they deserve.

The FDA has the unique opportunity to support this growing industry and the millions of American consumers who are voting with their dollars.

Our members are committed to working with FDA and look forward to finding a solution to this important issue. Thank you.