



At the request of FDA, at the FSIS/FDA/CDC Public Meeting: Give a 4-minute statement on the views of the American Cheese Society and artisan cheesemakers on foodborne illness source attribution.

Thank you for inviting the American Cheese Society (ACS) to present the views of small cheese producers on foodborne illness source attribution and product traceability. I am Kate Arding, a current board director of the American Cheese Society, the leading association supporting and promoting North American cheeses and cheesemakers. ACS has some 1,500 members including artisan, farmstead, and specialty cheesemakers as well as many dairy farmers, retailers, distributors, academics, and enthusiasts.

There are several aspects of foodborne illness source attribution of concern to ACS members. When considering traceability, we hope the FDA will consider three key points:

1. Science-based risk assessments which consider where the highest risks have statistically been, and which recognize the unique, traditional techniques of artisan cheesemaking
2. Establishing reasonable record-keeping requirements with a direct correlation to scale and risk
3. Education and outreach for the farm, facility, distributor, inspector, and state departments of agriculture

1. Science-based risk assessments which consider where the highest risks have statistically been, and which recognize the unique, traditional techniques of artisan cheesemaking

Ready-to-eat processed food, high volume producers, and post-production contamination are where the highest risks have statistically been, so ACS suggests that new and potentially costly tracking requirements be focused on those areas and relevant businesses. Small dairies and cheesemakers create products that meet all state and federal safety parameters and requirements, but they achieve these successful ends through means which differ from those of commodity producers. Studies have shown reliable low pathogens associated with small farms and food processors including farmstead cheese facilities. ACS hopes to work with the FDA to develop sound, science-based safety protocols for this specific industry, and to create the best practices for monitoring and mitigating risk.

Cheesemakers are hardworking, passionate, and conscientiously dedicated to continuing their successful track record of producing safe, healthful, diverse, and delicious foods. Many ACS members are third-party certified to help ensure their practices are safe and current. The American Cheese Society asks that the FDA keep the unique traditional methods of artisan producers in mind while developing any system for foodborne illness traceability. It is ACS's position, and the epidemiological data confirm, that raw milk and pasteurized milk cheeses can be, and are routinely, made safely. Production processes with clear steps, monitoring, testing, and well-designed and implemented safety or HACCP plans are reasonable and can be created while still following many traditional methods.

2. Establishing reasonable record-keeping protocols with a direct correlation to scale and risk

FDA has stipulated that reporting requirements may not require a facility to change business systems to comply. We rely on this, and on the FDA to follow record-keeping parameters established by Congress:

- they must relate only to information that is reasonably available and appropriate;
- they must be science-based;
- they may not prescribe specific technologies to maintain records;
- the public health benefits must outweigh the cost of complying with the requirements;
- they must be practical for facilities of varying sizes and capabilities;
- to the extent practical, they may not require a facility to change business systems to comply;
- they must allow for the maintenance of records at a reasonably accessible location, provided that the records can be made available to FDA within 24 hours of a request; and
- they may not require a full pedigree, or a record of the complete previous distribution history of the food from the point of origin.

We also hope the FDA will consider the differences that are integral to artisan production, and which allow small businesses to operate, providing viable livelihoods and economic structures for farm communities. Any changes or additional record-keeping requirements that overburden small businesses will ultimately adversely impact local economies and communities. In ACS's first industry-wide survey conducted in 2011, 73% of responding cheesemakers said they plan to grow their operations in the next five years, and 23% strive to retain their current size. This stability and growth will further strengthen communities and boost the economy. Dr. Catherine Donnelly at the University of Vermont has examined the benefit of small cheesemakers to their communities, and found that for a farmer with 50 cows, annual gross revenues from fluid milk would total \$100,000. Making artisan cheese from that same milk would transform that into one million dollars, and employ many more people. Given the importance of small businesses to local communities and the overall economy of the nation, ACS asks to be kept abreast of any record-keeping requirements which could inordinately impact these small producers so they have time to plan and adjust accordingly.

3. Education and outreach for the farm, facility, distributor, inspector, and state departments of agriculture

ACS is growing along with its members, and is offering the most relevant and timely educational opportunities to our cheesemakers. We actively seek FDA's cooperation and collaboration in this educational process, and to that end have invited John Sheehan to participate in a panel discussion on "Working Proactively to Assure Cheese Safety" at our annual conference this August in Raleigh, North Carolina.

As an industry resource, ACS recognizes the important educational role we play. This year, we will continue our emphasis on food safety by further defining best practices for our members, and providing more tools to help them create and improve HACCP plans. Per our 2011 survey, almost three-quarters of ACS member cheesemakers currently have a HACCP plan in place. Through outreach, education, training, resources, and certifications provided through land grant universities, some 2,900 extension offices nationwide, and associations like the American Cheese Society, we can ensure that cheesemakers have the tools and information they need to proactively adhere to industry best practices and comply with regulations. We recommend active FDA participation in industry education, and expanding outreach exponentially through collaborative efforts.