



December 1, 2023

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Senior Science Advisor for Milk Safety
Center for Food Safety and Applied Nutrition
Office of Food Safety
U.S. Food and Drug Administration
Harvey Wiley Building, Rm. 3B-008
College Park, MD

Casey McCue, Chair
National Conference on Interstate Milk Shipments
New York State Department of Agriculture and
Markets
10 B Airline Drive
Albany, NY 12235

Dear Dr. Briczinski & Mr. McCue,

The National Association of State Departments of Agriculture (NASDA) writes to you requesting and encouraging the U.S. Food and Drug Administration (FDA) and the National Conference on Interstate Milk Shipments (NCIMS) to work with yogurt manufacturers and others to update the language in the Standard of Identify for Yogurt (21 CFR Parts 130 and 131) and the Pasteurized Milk Ordinance (PMO). Some manufacturers making strained yogurt, often referred to as Greek yogurt, requires additional processing flexibility beyond what is currently written in the standard and the PMO.

Standards of identity are essential to the success of agricultural operations across the country and the PMO is essential for assuring the safety of Grade A dairy products. Due to increased varieties of yogurt products in the marketplace, there is a need for processing flexibility for yogurt manufacturers.

NASDA represents the commissioners, secretaries, and directors of the state departments of agriculture in all 50 states and 4 U.S. territories. State agencies, including state departments of agriculture, play a vital role in implementing and enforcing our nation's system of food safety and inspection laws. NASDA works on a wide variety of issues related to labeling, inspection, and regulation of raw and processed food (including meat, poultry, and seafood) and food production, processing and marketing methods and technologies to ensure human safety and nutrition.

We appreciate your time and consideration on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Ted McKinney". The signature is fluid and cursive, with a long, sweeping tail that loops back under the name.

Ted McKinney
Chief Executive Officer

Enhance American food and agricultural communities through policy, partnerships and public engagement.

NASDA

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