



December 17, 2012

Mr. John Sheehan  
Director, Division of Plant and Dairy Food Safety, FDA CFSAN  
5100 Paint Branch  
College Park, MD 20740

Dear Mr. Sheehan:

As the American Cheese Society (ACS) moves towards its 30<sup>th</sup> anniversary in 2013, we wanted to update you on the on-going actions we are taking to support and enhance the knowledge, resources, and safe production and handling of cheeses among our members. Our 1,500 members consist of artisan, farmstead, and specialty cheese producers as well as distributors, retailers, academics, educators, and even consumer enthusiasts. As the leading organization supporting and promoting American cheeses, it is our goal to work in partnership with FDA and other relevant agencies to ensure food safety and continued consumer access to unique cheeses made using traditional methods.

Cheese is a value-added product that has allowed many small dairy farms to maintain viability while providing high-quality products to consumers. It is vital to us that artisan cheesemakers continue to be able to survive, grow, and thrive in this country. We hope FDA will continue to consider the economic and community benefits of these small producers, and always take into account how FSMA and any subsequent regulations or requirements might disproportionately impact small producers.

We were delighted to have Dr. Obianuju Nsofor speak at our 29<sup>th</sup> Annual Conference in Raleigh, NC this year. She informed our members that FDA has planned and budgeted for 246 inspections of artisan cheese facilities in your current fiscal year. With that knowledge, we have worked to make sure our members are prepared for inspections, understand how to work collaboratively with inspectors, and are ready to assist in educating inspectors who may lack specific knowledge about dairy facilities and/or cheesemaking.

Our Regulatory & Academic Committee is in the process of creating a resource for our members outlining best practices for cheesemakers and retailers. In addition, in 2012 we offered a number of educational sessions to encourage best practices among our members:

- Food Safety and Artisan Cheesemaking: Advanced Risk Reduction Practices and Programs , a full-day “Deep Dive” session presented jointly with The Innovation Center for US Dairy and the Vermont Institute for Artisan Cheese
- The Role of Veterinary Medicine in Health, Safety, and Quality
- Handling Cheese in a Retail Environment
- Working Proactively to Mitigate Risks and Promote Cheese Safety

- Agri-Mark/Cabot Case Study on Recall and Traceability Project Planning: From Milk to Finished Product
- The Law and the Practicalities of Food Safety in the Retail Workplace
- Culture 201: Adjunct, Protective, and Probiotic Cultures to Enhance Microbial Intervention
- On-Farm Testing: An Aid to Good Practices

We offer on-line food safety education as well, which is available to our members at anytime through our website at [www.cheesesociety.org](http://www.cheesesociety.org).

Over the past 7 years, ACS dedicated considerable resources to creating the first ever Certified Cheese Professional™ Exam, which was successfully launched and filled to capacity this year. The exam, open to cheese professionals throughout the supply chain, aims to elevate the understanding, visibility, and expectation of best practices in a way that the marketplace has clearly embraced. It will be offered annually to coincide with our annual conference.

We were recently contacted by Jack Mowbray who was seeking data from our 2011 Cheesemaker Industry Survey in conjunction with his work on the updated risk assessment for raw milk cheese, and we were happy to share this data. We would appreciate advance notice when a new target date has been set for the publication of this risk assessment. With over half of artisan cheesemakers producing some, or exclusively, raw milk cheeses, any changes could spell economic disaster for these small businesses and their surrounding farm communities. Our members and artisan cheese advocates are anxious to review and respond to the assessment as soon as the public comment period opens.

Thank you again for your continued recognition of the unique nature of the artisan and specialty cheese industry. We hope you will join us next summer for our 30<sup>th</sup> Annual Conference in Madison, WI, July 31 – Aug 3, 2013, and, as always, we are committed to taking part in any and all FDA meetings relevant to cheese in America.

Sincerely,



Greg O'Neill  
Pastoral Artisan Cheese, Bread & Wine  
ACS President (Chicago, IL)



Nora Weiser  
ACS Executive Director  
(Denver, CO)



Allison Hooper  
Vermont Butter & Cheese Creamery  
Co-chair, ACS Past Presidents' Council  
(Websterville, VT)



David Gremmels  
Rogue Creamery  
Co-chair, ACS Past Presidents' Council  
(Central Point, OR)

Cc: Dr. Nega Beru, Director, Office of Food Safety, FDA CFSAN  
Mr. Donald Kraemer, Senior Advisor, FDA CFSAN  
Dr. Obianuju Nsofor, Staff Fellow, FDA CFSAN  
Mr. John C. Mowbray, General Health Scientist, FDA CFSAN  
Senator-Elect Tammy Baldwin, WI  
Senator Dick Durbin, Illinois  
Senator Bernie Sanders, VT  
Representative Greg Walden, OR  
Representative Peter Welch, VT  
Senator Ron Wyden, Oregon  
U.S. Senate Committee on Agriculture, Nutrition, and Forestry members:  
    Mr. Michael Bennet, CO  
    Mr. Patrick Leahy, VT  
    Mr. Pat Roberts, KS (Ranking Minority Member)  
    Ms. Debbie Stabenow, MI (Chairwoman)