



August 15, 2014

Mr. Michael Taylor
Deputy Commissioner for Foods
U.S. Food and Drug Administration, Bldg #1
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Mr. Taylor:

Thank you to you and your team for joining us at the American Cheese Society (ACS) 2014 Annual Conference in Sacramento. I hope the partnership which we established there will continue in the coming months and years, and ultimately will ensure reasonable, clear, sustainable guidelines for the continued safe production of cheese using traditional methods.

Per our discussions, we will move forward as follows:

- ACS will meet with FDA 2-4 times annually, connecting proactively rather than merely in response to urgent situations.
- FDA will review and share feedback on the ACS Best Practices Guide for Cheesemakers which is currently under development by our Regulatory & Academic Committee.
- The limits for non-toxigenic e-coli specified in the recently updated guideline will be reviewed, and consideration given to raising the limit to a more feasible level to allow for the continued safe production of raw milk cheeses. As we expressed, these newly lowered limits ostensibly have the effect of banning raw milk cheese—something you made very clear was not FDA's intent.
- Where wood surfaces for cheese aging are concerned, you were crystal clear that this practice will continue to be permitted so long as the wood is clean and in good condition. Inspectors must be kept abreast of this, as while we were meeting in Sacramento, state inspectors were visiting cheesemakers specifically to examine wood surfaces.
- ACS will stay in contact with Bill Correll, and work with his compliance division to foster understanding, training, and practical applications that ensure product safety and the type of specialized inspectors you envision.
- Issues that impact ACS members and other industry stakeholders will include such groups early on in the discussion. This may include engaging peer reviewers, like Dr. Dennis D'Amico and Marianne Smukowski.
- When situations of concern arise, we will get in touch with the appropriate contact person at FDA for clarification right away.
- As assignments and risk assessments take place, FDA will keep ACS informed of on-going data collection, gaps in research, areas where ACS members might be able to provide beneficial information, and will provide as much advance notice as possible before changes are implemented which might inordinately impact cheesemakers.

We realize this is an extensive and aggressive list of goals, but we believe that through ongoing and clear communication, we will be able to successfully work jointly to ensure consumers continued access to safe, delicious cheeses made using traditional methods.

It was a pleasure meeting you, and we look forward to continuing the open dialogue started in Sacramento. We invite FDA representatives to attend next year's conference which takes place in Providence, RI from July 29 – August 1, 2015.

Sincerely,



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cc: Mike Landa, Director, FDA Center for Food Safety and Applied Nutrition (CFSAN)
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Bill Correll, Acting Director, Office of Compliance, FDA CFSAN
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Megan Bensette, Advisor, Communications and Public Engagement, FDA OFVM
Greg O'Neill, ACS Chairman (Co-Owner, Pastoral Artisan Cheese, Bread & Wine – Chicago, IL)
Dick Roe, ACS Vice-President (VP Administration, Gourmet Foods International – Atlanta, GA)
Kate Arding, ACS Board Director and co-chair of ACS Regulatory & Academic Committee
(Co-Owner, Talbott & Arding Cheese and Provisions – Hudson, NY)
Marc Druart, ACS Board Director (Emmi Roth USA – Berlin, VT)
Marianne Smukowski, ACS Board Director and co-chair of ACS Regulatory & Academic
Committee (Outreach Program Manager, Wisconsin Center for Dairy Research – Madison, WI)
Dr. Dennis D'Amico, ACS Board Director (Assistant Professor of Dairy Foods, Department of
Animal Science, University of Connecticut – Storrs, CT)
Mateo Kehler, ACS Member (Cheesemaker, Cellars at Jasper Hill – Greensboro, VT)