



February 1, 2017

Susan Mayne, PhD
Director, Center for Food Safety and Applied Nutrition (CFSAN)
Via email: Susan.Mayne@fda.hhs.gov

Re: Plant Based Foods Association Update

Dear Dr. Mayne:

We are writing to provide an update on our progress since we met on September 27th 2016. We appreciated the opportunity to sit down with you and your colleagues, and to tell you about the newly formed Plant Based Foods Association. The plant-based foods industry is experiencing continuous growth with many new products being introduced into the marketplace each month, fueled by ever-growing consumer demand.

We also write in response to the letter dated December 16, 2016 sent to you by various members of Congress complaining about plant-based milk products and asking the FDA to take enforcement action to prevent alleged misbranding. We respectfully maintain that such products are properly labeled with their “common or usual name” or “appropriately descriptive term,” per 21 C.F.R. 101.3(b)(2) and (3), and we note that courts have agreed with this position.

That said (and as we discussed at our meeting), our members seek consistency in their labeling, especially for emerging food varieties. To help address this, we have begun to:

1. Create a formal ‘standards committee’ in our association to address labeling and related issues
2. Engage experts with experience in these matters to guide our process
3. Invite all relevant companies in the plant-based foods industry to participate.

Out of this process we hope to gain important information from industry members, along with other experts, on how to best standardize labeling terminology for many plant-based foods. We will continue to update the agency on our progress and would appreciate your feedback from time to time as we move forward, to help us find an appropriate solution.

If in the meantime, if you need any information from us on this burgeoning sector of the U.S. food sector, industry trends, or our members’ products, please do not hesitate reach out to us. We appreciate your engagement and look forward to building a productive working relationship.

Sincerely,

Michele Simon
Executive Director

Jaime Athos
Board Chair