



Docket number FSIS–2013–0019

**Comments submitted by American Cheese Society at FSIS/FDA Public Meeting, May 22, 2013**

---

The American Cheese Society (ACS) is the leading organization supporting and promoting cheese in North America. In this role, ACS represents some 1,500 producers, distributors, retailers, and discerning consumers who appreciate the diversity and quality of American-made artisan, farmstead, and specialty cheeses. We are pleased to comment on the Draft Interagency Risk Assessment which looks at *Listeria monocytogenes* in retail delicatessens.

According to the Specialty Food Association's latest "State of the Specialty Food Industry" report, cheese makes up 22%, the largest single category, of the specialty food sector, representing \$3.6 billion in sales in 2012. Artisan and specialty cheeses displayed, presented, and cut to order by knowledgeable professionals are an extremely important part of the retail mix for cheese and specialty shops, grocery stores, and delicatessens. As such, when considering food safety and procedures that may reduce the risk of listeriosis, we ask that FDA and FSIS will keep these products, and the following points, in mind:

1. **Focus on solutions and procedures to reduce risk that have the potential to be implemented regularly, consistently, and cost-effectively in real-world settings, including small specialty retail environments**
2. **Emphasize the importance of education, training, and upholding the highest professional standards among retail delicatessen workers.**
3. **Consider consumer demand for cut-to-order cheeses, and the potential economic impact on both large and small retailers of any changes to the availability of, and consumer access to, such items.**

1. **Focus on solutions and procedures to reduce risk that have the potential to be implemented regularly, consistently, and cost-effectively in real-world settings.**

ACS hopes that any new requirements for mitigating risk in retail settings will focus on strategies that can be implemented regularly, consistently, and in a manner that will not be cost-prohibitive to both large retailers and small, independent retailers. We also hope that any such strategies will take into account the unique needs of those retailers selling artisan products that are often made using traditional methods and require different care and handling than commodity products. We welcome the opportunity to share our insights and expertise with FDA and FSIS as any new requirements for retailers are developed, to ensure that they can be implemented in a realistic and effective way for retailers of all shapes and sizes.

2. **Emphasize the importance of education, training, and upholding the highest professional standards among retail delicatessen workers.**

In 2012, ACS offered the first ever Certified Cheese Professional™ Exam. 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. Retailers large and small have embraced the Certified Cheese Professional™ designation as a way to distinguish their employees and enhance food safety in their facilities. The first professional certification of its kind, the exam has garnered

international support and interest as well, particularly with French and British organizations with which ACS strives to work closely.

In addition, ACS offers its members on-going education through educational sessions at our annual conference, year-round webinars hosted on our website, and 24/7 access to online resources like our Body of Knowledge, which outlines key subject areas in which industry professionals should be well-versed. Examples of past and up-coming educational offerings include sessions for our members on:

- Handling Cheese in a Retail Environment
- Working Proactively to Mitigate Risks and Promote Cheese Safety
- The Law and the Practicalities of Food Safety in the Retail Workplace
- Storage Temperatures Necessary to Maintain Cheese Safety
- Retailer Best Practices: A Virtual Roundtable
- Safe Cheese Storage – A Science-Based Approach

Recognizing that education and food safety go hand-in-hand, ACS asks that FDA and FSIS seriously consider the role of education, training, and the development of specific high standards for professionals working behind the delicatessen counter in any new recommendations. We believe this focus, which has been central to our own work, can make a significant difference in ensuring the safety of ready to eat products sold at retail.

**3. Consider consumer demand for cut-to-order cheeses, and the potential economic impact on both large and small retailers of any changes to the availability of such items.**

Practices that may prevent risk of listeria in retail settings, as outlined in this report, include the use of growth inhibitors in suitable products, the strict control of temperature during refrigerated storage, and the pre-slicing of products. ACS would like to remind FDA and FSIS that artisan and specialty products are often produced differently, and should be handled differently, than commodity products. Artisan and specialty cheeses may not maintain their integrity if recipes are modified, when storage temperatures are set too low, or when products are pre-sliced and packaged before shoppers arrive. In general, it is difficult to pre-package and sell fine cheeses that often retail in excess of \$30 per pound to discerning customers who wish to order very specific portion sizes, and who expect that fine cheeses will be sold in peak condition.

If new rules or guidelines don't take the unique needs of artisanal products into account, then retailers may lose a significant source of revenue. We believe strongly that consumers deserve access to a wide variety of cheeses sold in optimal condition, and we hope that FDA and FSIS will keep this in mind when developing any new rules or guidelines. We hope they will develop sound, science-based safety protocols that are realistic for both producers and retailers within the thriving \$3.6 billion specialty cheese market.

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. Through outreach, education, training, resources, and professional certifications from associations like the American Cheese Society, we can ensure that cheese retailers 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. We ask you to involve ACS and our specialty retail members as you consider any regulatory changes.