

CHEESE REPORTER

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Cheese Marketing Practice



Dan Strongin
ASQ CMQ/OE
Uncorporate
Consultant

The FDA and Wooden Shelves

Like many of you, I read about the FDA and wooden shelves for aging cheese. I noticed a couple of interesting things in what happened. The sequence of events was as follows:

- June 8: Got a convincing tweet linking to blog post on the FDA allegedly banning aging cheese on wood. <http://bit.ly/1jgUVH>

- June 10: Got e-mail from Nora Weiser, the executive director of the American Cheese Society, with links to a position paper on wood shelves and a press release. <http://bit.ly/1nZ0ORj>

- June 11: Received e-mail from Nora with link to FDA clarification: not banning. <http://1.usa.gov/1q4rnYH>

- June 13: E-mail from Dan Carter: Forbes article with an overstated headline, but great content: <http://onforb.es/1jKgRhJ>

Lessons

First Lesson:

Events move like quicksilver these days with social media. We need to keep that in mind and, like the ACS and artisan cheese makers did, figure out ways to get ahead of them.

Second Lesson:

The Artisan Cheese Industry has grown up! There were a few panicked e-mails about being forced to break the law to survive, but quick, assertive, but calm action by Weiser, and others, helped bring a positive result to what could have been a crisis.

Third Lesson:

The argument was raised that the decision would have devastating impact on the artisan cheese sector, quoting the ACS press release, "Many of the finest and most renowned cheeses from around the world are at risk of disappearing from the US market if regulatory and enforcement changes under FSMA eliminate traditional materials and methods."

I have consulted, in my work, with other industries that are regulated by the FDA, and learned from them. Their strategy is to engage with the scientists who provide much of the scientific basis for the FDA's decisions. They go to their presentations, and conferences, even sending people for a week to study with them and build relationships.

By engaging with them, they are able to encourage experimentation. Most of these scientists are sympathetic, and have budgets and laboratories to work with. What I learned?

- Be proactive.
- Don't wait for a crisis.
- Ask questions like "is protecting ourselves from things that don't happen diverting resources from the things that DO?"

The FDA Vision and Mission

To know how to engage, you need to know what drives whom you will be talking with. Luckily, there is a new government sponsored resource available, online, called Strategic Mark-up Language, or StratML. (A worldwide web of intentions, stakeholders, and results – whose explicit purposes are outlined at <http://xml.fido.gov/stratml/index.htm#DefinitionPurposes>).

The FDA Vision Statement

"FDA is dedicated to world-class excellence as a science-based regulatory agency with a public health mission. We aim to provide effective and innovative leadership—both domestically and internationally—to protect health, prevent illness, prolong life, and promote wellness."

And FDA's Mission Includes:

"The FDA is charged with protecting the public health by ensuring the safety, efficacy, and security of human and veterinary drugs, biological products, and medical devices; ensuring the safety of foods, cosmetics, and radiation-emitting products; and regulating

tobacco products." Full text available at: <http://xml.fido.gov/stratml/carmel/FDAwStyle.xml>

The most important argument is the Scientific. It trumps all other arguments, including traditional practice and commercial. Tradition will point the way.

But the FDA vision and mission available through StratML make it clear, the best way forward is to engage scientists to find the proof which practice suggests is there, in dialogue with the FDA. In the case of wooden shelves, based on tradition and experience, the real science will almost certainly come down on the side of the cheese maker. The overwhelming number of outbreaks in commercial cheese take place once a cheese leaves the factory, post-process, not on wooden shelves. <http://bit.ly/food-safetee> originally published here, all three columns combined

The agency is made up of people doing their job: not jack booted thugs. I learned this years ago at the ACS conference at the Culinary Institute in Hyde Park. At the time there was a heated debate going on over using raw milk in aged cheese. A deputy director of the FDA was speaking at the invitation of some academic fanatics for Zero Tolerance for raw milk.

To my surprise, the fellow from the FDA was far more reasonable, explaining to me the FDA's stance on raw fluid milk was limited by jurisdiction, not moral judgement. If sold within 25 miles of the source and did not cross state lines, they would have no say in it, it was up to the states. This was a very different impression than what I had been led to expect by all sides in the debate, and brought me back to one of the essential lessons of my life: the essence of what my consulting is about:

Get everyone touched by a problem at the table. Create shared purpose. Talk openly and with civility: all sides sharing everything they think and feel into a shared pool of meaning. Through safe, complete, respectful dialogue, things change, usually for the better.

In this case, Hippocratic Oath applied to the mass distribution of food might work as a shared purpose: "First, do no harm."

Marketing Message

My marketing message for this month: you have to find the things

you can do that customers want or need, and will buy. Even today, most talk about the importance of customers is just lip service.

Which leads me to the last thing learned: the US federal government has become more transparent. The Internet has ripped apart many of the barriers between them and us. We need to engage with them, not just when there is a crisis but before crises happen. We need to help them, and ourselves, find the best science and together find how best to apply it.

The statement by the FDA representative issued on the 10th of June says much the same things:

"Historically, the FDA has expressed concern about whether wood meets this requirement and these concerns have been noted in its inspectional findings. However, the FDA will engage with the artisanal cheesemaking community, state officials and others to learn more about current practices and discuss the safety of aging certain types of cheeses on wooden shelving, as well as to invite stakeholders to share any data or evidence they have gathered related to safety and the use of wood surfaces. We welcome this open dialogue." www.fda.gov/Food/NewsEvents/ConstituentUpdates/ucm400808.htm.

Note: they do not ask for commercial impacts. It is not their mission to worry about those. That is Commerce and USDA (you can find their strategic visions on the StratML site as well).

So let's take their invitation. Let's find the scientists that have the ear of the FDA, and talk with them.

When most governmental agencies have added their strategic vision and mission to StratML, you will be able to study the USDA's, or Commerce, or any other agency, state, local or international, that has interest or influence over the industry. Know your customer. ^{DS}

Dan Strongin runs a training and consulting company focused on delivering affordable online solutions to everyday business problems, including his udemy course: Understand Your Business, Earn More Money. Dan can be reached via email at dan@danstrongin.com or by phone at (408) 512-1086, or you can visit and blog or get discounts on his courses on his site: <http://www.managenaturally.com>.