

Summary of Testimony

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On behalf of

International Dairy Foods Association
Cheese Industry Segment Board Member

Before the

Committee on Energy and Commerce

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Healthier America: Legislative Proposals on the Regulation and Oversight of Food

H.R. 1394 Codifying Useful Regulatory Definitions (CURD) Act

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This testimony is on behalf of the International Dairy Foods Association (IDFA) and its Cheese Industry Segment Board, in support of H.R. 1394, the Codifying Useful Regulatory Definitions Act or CURD Act.

IDFA represents the nation's dairy manufacturing and marketing industry, which supports more than 3 million jobs that generate \$52 billion in direct wages and \$779 billion in overall economic impact. IDFA's diverse membership ranges from multinational organizations to single-plant companies, from dairy companies and cooperatives to food retailers and suppliers.

U.S. cheesemakers have long used the term "natural cheese" to differentiate cheeses made using a simple process that has been trusted by traditional cheesemakers for thousands of years versus "process cheeses" that are made by blending, heating, and emulsifying the original natural cheese.

While process cheese is defined in regulation, "natural cheese" is not, creating confusion and inconsistency in federal policy and in the marketplace. The CURD Act addresses this gap by codifying a long-standing, commonly understood category.

The term "natural cheese" is already used across the federal government. Federal agencies like the U.S. Department of Agriculture (USDA) and the U.S. Environmental Protection Agency (EPA), Congress, and the courts have repeatedly used "natural cheese" to refer to a distinct category of cheeses, but without a single, authoritative definition in statute.

This need for clarity is particularly timely given the recently updated Dietary Guidelines for Americans, which emphasize nutrient-dense and minimally processed foods, including full-fat dairy products. These guidelines inform federal nutrition programs and are widely relied upon by schools, healthcare providers, and consumers. Without a clear definition of "natural cheese," stakeholders may face uncertainty when applying these recommendations in practice.

The CURD Act defines "natural cheese" by specifying permitted basic ingredients and traditional processing methods, recognizing existing standards of identity, and excepting those process cheeses already defined by regulation. Consistent with long-standing governmental and industry usage, the CURD Act permits the use of the term "natural cheese" if one of two conditions are satisfied:

- It is a cheese identified by an existing FDA standard of identity (for example, Cheddar);
or
- It is a cheese not defined by FDA regulation (for example, feta) that nonetheless conforms generally to the Codex Standard for Cheese, an internationally recognized industry benchmark.

By codifying a commonly accepted and widely used category of cheese, the CURD Act will provide greater clarity and consistency for consumers, policymakers, and industry to readily distinguish natural cheeses from process cheeses. It aligns federal policy with existing usage across agencies and supports transparency in the marketplace.