State of Wisconsin
Governor Scott Walker

Department of Agriculture, Trade and Consumer Protection
Ben Brancel, Secretary

DATE: January 9, 2017

TO: The Honorable Roger Roth
President, Wisconsin State Senate
Room 220 South, State Capitol
PO Box 7882
Madison, Wisconsin 53707

The Honorable Robin Vos
Speaker, Wisconsin State Assembly
Room 211 West, State Capitol
P.O. Box 8953
Madison, WI 53708

FROM: Ben Brancel, Secretary
Department of Agriculture, Trade and Consumer Protection

SUBJECT: **ATCP 70/87−Maple Syrup Processing and Grading Standards (Clearinghouse Rule #16-044)**

Introduction

The Department of Agriculture, Trade and Consumer Protection ("Department") is transmitting this rule for legislative committee review, as provided in s. 227.19 (2) and (3), Stats. The Department will publish notice of this referral in the Wisconsin Administrative Register, as provided in s. 227.19 (2), Stats.

Background

This rule revision modernizes Wisconsin's maple syrup grade standards, which were first adopted in 1980. Wisconsin ranks fourth in the nation in maple sap production. Maple syrup grades provide a common language for describing maple syrup sold both at wholesale and retail. In 2014, Wisconsin maple syrup producers made 200,000 gallons of maple syrup, with an approximate value of $10,000,000.

Maple syrup grades are currently established by the United States Department of Agriculture (USDA), several states including Wisconsin, and the Canadian provinces of Ontario and Quebec. The USDA's Agricultural Marketing Service (USDA-AMS) adopted new maple syrup grade standards in 2015. In conjunction with the International Maple Syrup Institute, USDA-AMS upgraded the Grade A color classes so that they are based on spectrophotometric analysis. USDA-AMS also eliminated the Grade B syrup designation, which was replaced with a Processing Grade designation. The new USDA-AMS standards have already been adopted by Vermont, New Hampshire, New York, and Maine.

Rule Content

Several of the rule changes were made at industry's request to harmonize Wisconsin maple syrup grade standards with new USDA-AMS standards. Other rule changes were made to differentiate general food processing plant requirements applicable to post-concentration processing of maple syrup and production of other products derived from maple sap, and specific requirements more appropriate for facilities used solely for concentration of maple sap by application of heat (often preceded by a reverse osmosis treatment), i.e., "sugar houses." The revised rule establishes terminology and processing requirements for a range of new products related to maple syrup, such as non or partially concentrated maple sap, and water removed from maple sap by reverse osmosis. Some of the specific provisions of the proposed rule are as follows:

- The proposed rule replaces the existing Wisconsin maple syrup grade standards with those recently developed by the USDA-AMS. The alternatives of keeping the existing standards or having the Department develop new and unique standards for Wisconsin were not supported by the Wisconsin maple syrup industry.

- As suggested by Wisconsin maple syrup industry representatives, the proposed rule requires containers of maple syrup produced in a licensed food processing plant to be labeled with the grade designation that accurately describes the syrup inside the container. Containers of maple syrup produced in a facility not operating under a food processing license may be labeled with the grade designation, with the term "ungraded," or with no reference to grading. However, if Grade A color class terms or flavor descriptors from the new standards, e.g., amber and rich, respectively, are included on the maple syrup label, then the label must indicate the grade of syrup inside the container, or that the syrup is "ungraded."

- The proposed rule indicates that depending on where the syrup in a container of graded maple syrup was produced, the geographical designation "Wisconsin" or "U.S." may precede certain grade designations. The revised rule also describes requirements for labeling maple syrup as "Bottled in Wisconsin" or "Packaged in Wisconsin."

- The proposed rule contains specific requirements that address the unique characteristics of many sugar houses, without compromising public health or product wholesomeness. For example, the new rule specifically allows a tank containing maple syrup before concentration to be uncovered, as commenters from the maple syrup industry stated that maple sap in an uncovered tank cools more rapidly, leading to better quality sap, and an uncovered tank allows visual observation necessary for process control.

- The proposed rule has new, flexible but adequate requirements for the proximity of equipment-cleaning sinks, handwash sinks, and a toilet room in a licensed maple sap concentration facility.

- The proposed rule specifies that liquid maple products and maple-derived water (terms defined in the revised rule) may be transferred from a licensed concentration facility to a further-processing facility operated under a food processing plant license, provided basic sanitation requirements are met.

- The proposed rule defines when and how water obtained by reverse osmosis treatment of maple sap may be used for other purposes in a maple sap concentration facility operating under a food processing plant license. This latter topic was the focus of several comments received from maple syrup producers.

- The proposed rule promulgates definitions, which were refined as a result of the public hearing and comment period, for some of the new and innovative products made from maple sap and concentrated maple sap. The goal of these revisions was to provide a regulatory framework to ensure that businesses making these products adequately protect public health and do not sell misbranded items.

- The proposed rule defines "maple-derived water" as the permeate resulting from reverse osmosis treatment of maple sap and that is bottled for consumption. The revised rule contains a requirement that processes for manufacturing maple-derived water be approved by the Division.

Summary of, and Comparison with, Existing or Proposed Federal Statutes and Regulations

Businesses that only harvest maple sap are not subject to federal food safety rules, but businesses that convert the sap to maple syrup or any other food are considered "facilities" subject to the Food Safety Modernization Act and the rules that implement it. There is a federal standard of identity for maple syrup under 21 CFR 168.140, and maple syrup producers involved in interstate commerce must follow Good Manufacturing Practices as outlined in 21 CFR 117. The proposed rule essentially adopts the voluntary federal grade standards for maple syrup, with only minor modifications.

Comparison with Rules in Adjacent States

Retail sales of maple syrup in Illinois are under the jurisdiction of state or local health departments and regulations modeled on the FDA Food Code. Maple syrup sold at retail must originate in a facility subject to FDA or state inspection. Maple syrup is not one of the foods exempted from food processing rules via the Illinois Cottage Food Bill. Illinois does not license food processing plants. Production of maple syrup for wholesale is done in facilities subject to state rules that largely adopt FDA regulations.

Michigan licenses maple syrup producers who sell their product wholesale but does not require a retail food establishment license for sales of maple syrup made by a licensed producer. Maple syrup producers in Michigan can qualify for a cottage foods exemption from the food licensing requirement. Maple syrup producers who meet licensing exemptions (less than $15,000 annually in sales) must follow the same labeling requirements for their maple syrup as those outlined for other cottage food products. Michigan requires the label to read *"Processed in a facility not inspected by the Michigan Department of Agriculture & Rural Development,"* and processing maple syrup in a home kitchen for sale is not allowed. Maple syrup producers who are eligible for the licensing exemptions still must meet all requirements of the Michigan Food Law, including sanitation, building construction and design, and employee hygiene.

Iowa considers maple syrup an agricultural commodity, and thus not subject to state inspection. Notwithstanding, Iowa food processing plant regulations largely cite FDA rules. Iowa also exempts cottage food operations from licensing requirements.

In Minnesota, a license is required to legally sell maple syrup to the public unless all sap is obtained from the maple syrup producer's land and no other "off farm" inputs are used in making the product (e.g., sap from neighbors' trees). However, all maple syrup operations selling to the public are subject to inspection by the Minnesota Department of Agriculture. Labeling requirements for maple syrup are the same as for other foods under Minnesota jurisdiction.

Summary of Factual Data and Analytical Methods

This proposed rule was developed in response to requests from the Wisconsin maple syrup industry, and following a review of existing Wisconsin rules and internal policies for inspection of maple syrup processing operations. The Department also reviewed federal grade standards adopted by the USDA's Agricultural Marketing Service and administrative rules in other leading maple syrup states including Vermont, New York, New Hampshire, Maine, and Ohio. The Department reviewed extensive photographic documentation of existing licensed maple syrup processing facilities.

Analysis and Supporting Documents used to Determine Effect on Small Business

To determine the effect of this rule on small business, the Department solicited information from Wisconsin's maple syrup industry both through the formal economic impact analysis process and through the public hearing process. The Department received comments from the Wisconsin Maple Syrup Producers Association and its members, many of whom are small producers.

Effect on Small Business

The Department expects the new grade standards in the proposed rule to have a positive economic impact on Wisconsin's maple syrup industry, including small businesses. Use of a common, internationally accepted grading system will make it easier for Wisconsin's maple syrup industry to sell their product in interstate and international commerce. It will open a new market by allowing Wisconsin's maple syrup producers to sell dark maple syrup at retail, provided the syrup meets other Grade A standards. Previously that syrup would have been graded only for manufacturing uses. The rule includes standards that may allow the creation of a Wisconsin "brand" that may assist marketing.

Department inspections of maple sugar houses have proven challenging over the years. The major end product at most of these facilities (maple syrup) is not potentially hazardous, and the raw material is exposed to the heat of boiling, which precludes microbial growth. Thus there is little concern about microbial food safety hazards in relation to the process. However, many facilities are in remote locations and there is a small risk of product contamination related to characteristics of the facility, e.g., pests, pieces of wood, characteristics of equipment, or, chemical contaminants from non-food-grade equipment used in harvesting, transporting, or concentrating maple sap. This situation makes the rigorous enforcement of all requirements of ATCP 70 (Food Processing Plants) difficult for the maple syrup industry and the Department. Most facilities already meet the requirements of the revised rule, so the revised rule will have little effect on a sizeable proportion of the industry. Small businesses that do not currently meet the proposed facility requirements for maple syrup operations may face some facility-upgrade costs, particularly installing a three-compartment sink for cleaning, rinsing, and sanitizing

equipment, and any upgrades in areas of their facility in which finished syrup is stored and packaged. Businesses processing maple-derived water or maple sap water may face facility-upgrade costs.

Small Business Regulatory Review Report

The Small Business Regulatory Review Board did not issue a report on this rule.

Public Hearings

The Department held four public hearings:

August 16, 2016	Wausau, Wisconsin
August 17, 2016	Menomonie, Wisconsin
August 18, 2016	LaCrosse, Wisconsin
August 19, 2016	Madison, Wisconsin

Following the public hearings, the hearing record remained open until September 2, 2016, for additional written comments. The hearings were well-attended with nearly 30 persons at the first two. *Appendix A* contains a summary of the persons attended the hearings and who submitted written comments.

Changes from the Hearing Draft

The Department modified the final draft rule to address all of the Rules Clearinghouse comments and also made the following changes from the hearing draft:

- Made grading of maple syrup mandatory for those holding food processing licenses, but left it as an option for those selling strictly at retail.
- Made it possible to label syrup as "ungraded."
- Removed the provision requiring facility standards to be upgraded if a reverse osmosis unit was included in the sap concentration process and recognized the use of the resulting reverse osmosis water as suitable for cleaning facilities and equipment provided it had been stored for not more than 24 hours.
- Removed a requirement to cover tanks holding maple sap before it was concentrated by boiling.
- Added a definition of when the geographical designation "Wisconsin" could be used to label maple syrup containers.
- Added more specific language to define sap-derived products.

Appendix A

Proposed ATCP 70 & 87
RULEMAKING HEARING APPEARANCES AND TESTIMONY

Public Hearings
August 16, 2016
Marathon Co. Public Library
Wausau, Wisconsin
14 Attendees

Name and Address of Contact Person	Support, Oppose or No Position	Did the Person Speak?	Summary of Comments
David A. Lemke W7836 Perkinstown Ave. Medford, WI 54451 Representing: WMSPA and himself (Wisconsin Maple Syrup Producers)	Favor most of the proposal	Yes	• Supports education-based inspections for 1-2 seasons. • Grading proposal was "satisfactory" • Feels smaller producers may be hit harder by costs • Feels new rules and grading will help the WI industry overall • Concerned with transportation issues. Townships may have different regulations and soft-road springtime posting issues. • RO water: 24 hour limit is justifiable & there are smaller units now available. • Would like a panel of persons from Dept. at their annual meeting (Jan?)
Theresa Baroun 2546 Homestead Dr. DePere, WI 54115 Representing: Executive Director of WMSPA	Favor most and oppose part of the proposal	Yes	• Read a Policy Statement based on member survey and comments. • Advocated tiered enforcement/education approach to new standards by 1/1/2018. • Would like mandatory grading standards. • Dislikes idea of allowing wood frames on evaporator hoods. Dripping is possible. • Wants to have sap collection tanks left uncovered to facilitate inspection and cleaning. Sap will be filtered after it leaves the tank. • Wants allergen-containing defoamers banned. • Submitted IMSI position paper on maple water designations • Would like Dept representation at Jan. Winter meeting in Wausau.

Name and Address of Contact Person	Support, Oppose or No Position	Did the Person Speak?	Summary of Comments
Gene Knoll N 3358 Sunset Rd. Medford, WI 54451 Representing Cooperative Network	Favor most and oppose part	Yes	• Pointed out that not all sap producers "cook". RO unit should not be a deciding issue in upgrading requirements. • Favors allowing RO water for cleaning. • The proposed rules are good to standardize sanitation requirements. • Favors addressing "maple water" to get ahead of it. • Also has issues with transporting sap. Stated that he may travel through 3 townships with his sap and all have different rules.
Jim Adamski W9482 County Rd. F Antigo, WI 54409 Representing: WMSPA & Adamski's Sugar Bush, LLC	Supports the proposal for the most part.	Yes	• Appreciates opportunity to be heard. • Strongly supports grading rules. Should be mandatory! • Advocated state sealing of tankers. • Noted that WI is "25 years behind Canada" and that Canada has a check-off system to fund inspection and grading. • Would like to send out Grading Cards/Charts with state license renewals. • Would like to see a "grace period" for using old grading labels.
Allan Herrmann W 1001 Ledges. Colby, WI 54421 Representing: Himself	Mostly in Favor	Yes	• Appreciates opportunity to be heard. • Supports the rules – Especially grading. • Concerned that "big operators" might use rules against smaller ones. • Against allergens in defoamers. • Concerned about how grading would be enforced.
Gregory Nemetz N 2744 County Rd. CC Clintonville, WI 54929 Representing: Did not state	Favors part and opposes part	No	
Jon Baroun 2546 Homestead Dr. DePere, WI 54115 Representing: WMSPA	Supports the proposal	No	• The grading rules will make a "more uniform and fair system". • Grading will "help the public by knowing what they are purchasing".
Shanda Hubertus W 8145 Long Lake Dr. Clintonville, WI 54929	Favor part and oppose part	No	• Agrees with majority of WMSPA comments and views.

Name and Address of Contact Person	Support, Oppose or No Position	Did the Person Speak?	Summary of Comments
Representing: Herself			• 100% in favor of grading regulations • Trouble meeting equipment costs such as NSF, 3-compartment sink as well as license requirement to sell outside her home.

Public Hearing
August 17, 2016
Menomonee Public Library
Menomonee, Wisconsin
15 Attendees

Name and Address of Contact Person	Support, Oppose or No Position	Did the Person Speak?	Summary of Comments
Michael Cox 16743 County Rd. G. Stanley, WI 54768 Representing: Himself	Favor part and oppose part	Yes	• Spoke in detail about RO not being the "trigger" to bring producer into compliance with ATCP 70 requirements. • RO is just part of concentration process.
Ted Simpson PO Box 2142 Mihana, WI 54857 Representing: WMSPA, President	Favor part and oppose part	Yes	• Agrees with majority of WMSPA comments and views. • In favor of mandatory grading regulations. Should be a "phase-in" period to allow use of existing labels. • Cautions against "witch-hunt" type enforcement. • Allow RO water for cleaning for more than 24 hours. • Opposes covering sap tanks prior to production in order to facilitate inspection and cleaning. • Opposes non-approvable materials like wood for evaporator hood frames. • Very much opposes allowing allergenic defoamers • Wants "grandfather exemption" (for himself and other very small operators) if Department makes RO the trigger for ATCP 70 requirement compliance. • Notes that RO is an energy savings measure and should not be a penalty item.
Steven Anderson 2388 40th St. Cumberland, WI 54829 Representing: WMSPA & Himself	Favor proposal	Yes	• Submitted IMSI statement on Maple Water • Favors Mandatory Grading. • Worried about unequal enforcement.

Name and Address of Contact Person	Support, Oppose or No Position	Did the Person Speak?	Summary of Comments
			• Should enforce label standards, e.g., "100% WI Syrup" should not have MN sap. • Cautions about treating "maple water" to make shelf-stable product. It changes characteristics and should be closely regulated. • Road – use issues raised. Similar problems. Noted two drafts being proposed to Legislature.
Shirley Caspar E 2639 730th Ave. Menomonie, WI 54751 Representing: Not noted	Favor part and oppose part	Yes	• Wants standardization of grading and of inspection. • Noted that Vermont does not have inspection. • Had bad experience with WI inspector this past year due to Inspector's strict enforcement of ATCP 70 building requirements. • Wants Inspectors who inspect maple syrup operations to have a checklist of things to look for (better, more consistent training)
Dan Carlson 802 150th Avenue Amery, WI 54001 Representing: Himself	Favor part and oppose part	Yes	• Would like grading to be optional for color and mandatory for flavor and other characteristics. • Allow use of RO water after more than 24 hours storage. Claimed syrup runs may be longer and water is just stored for that time. • Against requiring cover on sap tank prior to use. Require cover only after sap is cooked, i.e. on syrup holding tank. • Do not require handwash sink in unheated boiling room. • Similar issues with road use. Noted how many roads are sub-standard to begin with. • Suggested a sliding scale for RO holding times based on ambient air temperature. • WMSPA would like to help Dept develop inspection check list. • Support "improvement-plan" philosophy for dealing with deficiencies rather than harsh enforcement.
Gerald Trainor 403 15th St., NE Menomonie, WI 54751 Representing: Herself	Favor part and oppose part	No	• Does not favor time limits on the storage of RO water before its use.
Mike Flanum 180 8th Ave. Clear Lake, WI 54005 Representing: Kripple Kreek Syrup Company	No comment	No	• Did not submit opinions or comments
Ron Trainor N 4956 Cty. Rd. Q Menomonie, WI 54751	Favor part and oppose part	No	• No written or oral comments

Name and Address of Contact Person	Support, Oppose or No Position	Did the Person Speak?	Summary of Comments
Representing: Maple Essence Farms			
David Close 219 2nd Ave., E Knapp, WI 54749 Representing: Todd Thompson, Knapp Hills Sugar Bush	No comment	No	• No written or oral comments
John Morley 1346A State Hwy. 48 Luck, WI 54853 Representing: Not stated	No comment	No	• Registered to speak but did not.
Shanda Hubertus W 8145 Long Lake Dr. Clintonville, WI 54929 Representing: Herself	Favor part and oppose part	No	

Public Hearing
August 18, 2016
North Community Library
LaCrosse, Wisconsin
2 Attendees

Name and Address of Contact Person	Support, Oppose or No position	Did the person speak?	Summary of comments
Rodney Swerman 2614 Baumgartner Drive La Crosse, WI 54603 Representing: WMSPA and himself	Support the proposal	Yes	• Favors grading. "It needs to happen". • Sugar shack with RO unit doesn't need to meet ATCP 70 requirements. • Endorses 48 hr. limit on holding RO water, but can live with 24 hrs. • RO water is often the cleanest water available. • RO water reduces carbon footprint substantially. • Could live with "Ungraded" label.
Phillip Gudgeon E 8533 Cherry Grove Rd. Viroqua, WI 54665 Representing: Kickapoo Gold and equipment sales	Favors part, opposes part	Yes	• Favors grading. Vast marketing improvement. • Favors mandatory across-the-board grading. • Sugar shack with RO unit doesn't need to meet ATCP 70 requirements. Does need good water supply! • Can live with 24 hrs. holding time. • Against wooden hood supports. • Pointed out that an uncovered sap tank cools faster and this is better for quality. • Could live with "Ungraded" label.

Public Hearing
August 19, 2016
DATCP Building
Madison, Wisconsin
1 Attendee

Name and Address of Contact Person	Support, Oppose or No position	Did the person speak?	Summary of comments
Jim Adamski W 9482 County Rd. F Antigo, WI 54409 Representing: WMSPA and Adamski's Sugar Bush, LLC.	Favor the proposal and have questions	Yes	• In favor of mandatory grading. Not willing to endorse "Ungraded" label, but not registering in opposition.

Written Comments

Person/Organization	Position/Comments
Tim Sternitzky (tim@themapledude.com) Constituent Comment form from Nancy Mistele at the Office of Business Development Case # CAS-01819-M4Q4J6 (no date on doc.)	Other states allow the sale of "Maple Water". Respondent feels WI business would be at a disadvantage if this term were not allowed.
Letter to Erin Nutter from Jim Adamski for CDL Wisconsin and Roth Sugarbush No date	Very much in favor of using RO water in the maintenance of the RO machine due to its exceptional purity when compared to the almost uniformly "hard" water from most Wisconsin wells.
Letter to Steve Ingham (DATCP) from Anne Reynolds, reynoldsmaple@gmail.com Dated: June 27, 2015	In favor of uniform grading standards as described in Vol. 32, Issue 2 of *The Wisconsin Maple News*. Will help level the field for Wisconsin producers.
e-mail to Steve Ingham (DATCP) from Steve Stoner, DATCP Technical Section Supervisor Dated: January 4, 2016	Feels RO water that is only used for backwashing the membrane system and not stored for than 24 hours, it was not a problem. If longer, we should reserve the right of approval on the process. Offers to draft language.
e-mail to Steve Ingham (DATCP) from Tim Anderson, DATCP Field Services Section Chief Dated: January 7, 2016	Endorses early draft version of ATCP 87, but has no strong opinions or experience.
e-mail to Steve Ingham (DATCP) from Jim Adamski, Syrup Equipment salesman and producer Dated: January 13, 2016	References the letter he sent to Erin Nutter cited above.
e-mail to Steve Ingham (DATCP) from Steve Anderson, Packer and Distributor of Syrup and representative of: Wisconsin Maple Syrup Producers Association (WMSPA) Dated: March 17, 2016	• In favor of adopting the new grading system • Would like the process to move quickly • Would like grading to be mandatory for all syrup sellers.

Person/Organization	Position/Comments
letter to Steve Ingham (DATCP) from Jim Adamski on behalf of WMSPA Dated: March 1, 2016	• Recommendations attached for ATCP 87 • Explanation of RO use in syrup production • Offer to work with the state to craft changes to ATCP 70 and ATCP 87.
Letter to Steve Ingham (DATCP) from Allen Herrmann, President WMSPA. Dated: May 17, 2016	• Encourages the adoption of the new grading standards. • Cites giving producers a level playing field by adopting the same standards as the rest of the Maple Syrup-producing world.
e-mail to Peter Haase (DATCP) from Mike Haasl, hasslme340@yahoo.com Dated: June 1, 2016	• Endorses different facility standards for those only doing small syrup making. • Please consider birch as a syrup tree as well. • Would like, as a small operator, to sell maple sugar and candy at the Farmer's Market, but doesn't want to be Food Processor.
e-mail to Peter Haase (DATCP) from Steve Anderson, representing himself. steve@andersonsmaplesyrup.com (715) 822-8512 Dated: June 15, 2016	• Favors adopting the new International grading System for Pure maple Syrup. • Contends that it will have a positive economic impact for the state's producers. • Desires standards to be mandatory for all in our state (and in other states). • Would like some time to use up old labels • Urges restraint on the implementation of overly restrictive facility standards for everyone.
e-mail to Peter Haase (DATCP) from Mitch and Chris Hoyt on behalf of themselves. mchoyt@skinnysticksmaplesyrup.com 260 East 21st St. Marathon, WI 54448 (715) 443-3564 Dated: June 1, 2016	• Local producer with a large market – anticipating $ 500,000 by the end of the year. • Have their own grading system and standards. • Does not wish a mandatory grading system. • Argues that the true artisanal quality of his product will be lost if he has to blend in order to achieve a mandated grade with defined standards.
E-Mail to Steve Ingham From: Greg Nemetz Clintonville, WI gregory.nemetz@gmail.com dated: Sept. 6, 2016 (last submission date was 9/2)	• Appreciates opportunity for producers to be heard • Likes uniform grading standards with other states • Likes mandatory grading for all syrup that will appear in a retail setting of any kind – even farmer's market • Likes the term "Sugar house" not "shack" • Thinks RO water should be allowed up to 24 hours for facility cleaning and membrane washing. • Steam hoods should not have wood frames. • Not allow used filter papers, but allow washable filter "socks". • Opposes mandatory covering of sap tanks prior to concentration. • Only allow "food grade DE for filtering. • Not allow defoaming agents that are made from or contain known allergens.

Submitted Documents

Document	Summary
IMSI (International Maple Syrup Institute) Memorandum to: All Federal and State/Provincial maple Regulatory Authorities in Canada and the United States April 13, 2016	Re: Requirement for Labelling Regulations for Maple (Sap) Water Products See attached document. • Suggests Name of product (e.g., Pure Maple Sap Water) • Suggests Brix standard – 1-4% • Allow adjusting of sugar content by adding RO water or permeate • Suggest bottling Regulations (not water standards) • Name of RO permeate and distillate water suggestions • Labeling suggestions for liquid beverages that contain some maple. • Labeling suggestions for artificially maple flavored beverages.
Letter to Lynn Syzbist, Office of Nutrition, labeling, and Dietary Supplements 5100 Paint Branch Parkway College Park, MD 20740 From: Allan Herrmann President Wisconsin Maple Syrup Producers Association (WMSPA) (715) 223-6961 president@wismaple.org	• Request for FDA to take action on the alleged misbranding of food products. • Cite products improperly claiming or characterizing maple properties or ingredients
Position Statement from IMSI on Misrepresentation of Maple Syrup Nov. 2014	• Prevention of products from claiming maple without having any maple in them.
Letter to the FDA Commissioner from US Congress Dated March 10, 2016	• Urges action by FDA on the issue of companies making improper maple claims