

PLANT-BASED MILKS FRAMEWORK – FDA PUBLIC COMMENTS

DESCRIPTIVE CODES

- Coding from codes from each section are aggregated by section and child codes are aggregated in parent codes.
- Apply code to entire sentences. If the comment is written in list form, the code should be applied to the fragments. If the fragments lack context without the header, the code should be applied from the beginning up until the relevant comment.
- If the commenter is speaking in the third person, assume their thoughts and ideas are their own and code as though they are speaking in the first person.

Code	Definition	When to use / When not to use	Examples	Source
COMMENT CHARACTERISTICS				
1 - AFFILIATION OF COMMENTER	Unclear whether text does or does not refer to affiliation	Apply to full comment (select all). This code or one of its child codes MUST be applied to all comments.		Dinour and Pole 2017
1.1 - MENTIONS AFFILIATION	Text or letterhead refers to affiliation	Apply to full comment (select all). Do NOT use for farmers or others who indicate a specific career, unless they specify an affiliation with a particular corporation or entity (e.g. HOOD, Organic Valley, etc.).	“Comment from Jenna Griffiths, Land O Lakes” “Comment from Anonymous Anonymous, Fitzsimons Dairy Farm”	Dinour and Pole 2017
1.2 - DOES NOT MENTION AFFILIATION	Text or letterhead does not refer to affiliation	Apply to full comment (select all).		Dinour and Pole 2017
2 - IDENTITY OF COMMENTER		Do not use. One of the child codes MUST be applied to all comments.		Dinour and Pole 2017 - code created by the Food and Nutrition Service, USDA
2.1 - ANONYMOUS	No name or contact information is provided	Apply to full comment (select all).		Dinour and Pole 2017 - code created by the Food and Nutrition Service, USDA
2.2 - IDENTIFIED WITH CONTACT INFO	Either street address, phone number, or email	Apply to full comment (select all). Do NOT apply when this appears in the “Submitter information” section.		Dinour and Pole 2017 - code created by the Food and Nutrition Service, USDA

2.3 - IDENTIFIED WITHOUT CONTACT INFO	A name but no other contact information is provided	Apply to full comment (select all)		Dinour and Pole 2017 - code created by the Food and Nutrition Service, USDA
3 - PRODUCT PREFERENCE		Do not use. One of the child codes MUST be applied to all comments.		
3.1 - PREFER DAIRY PRODUCTS	Stated or implied preference for dairy products (i.e dairy industry comment without explicit preference)	Apply to full comment (select all)		Original
3.2 - PREFER PB PRODUCTS	Stated or implied preference for PB products (i.e. animal welfare supporter that shows strong opposition towards dairy industry without explicit preference)	Apply to full comment (select all)	<p>"I actually prefer almond milk over all other milks, but I do also consume soy milk."</p> <p>"I have use plant based milk for 10 years."</p>	Original
3.3 - PREFER BOTH	Stated consumption or preference for both dairy and PB products	Apply to full comment (select all)	"I'm not a vegetarian, and I use both dairy milks and vegetable/nut milks."	Original
3.4 - UNCLEAR OR NEUTRAL PREFERENCE	No clear preference for dairy or PB products is stated	Apply to full comment (select all)	"Plant based milks are just as good as milk from cows..."	Original
4 - POSITION ON LABELING		Do not use. One or more of the child codes MUST be applied to all comments.		
4.1 - SUPPORT MILK IN PB LABELING	Explicit support for labeling PB products with terms typically used to denote dairy products	Apply to full comment (select all).	<p>"Totally fine, not confusing."</p> <p>"Yes, consumers are not stupid-- we know what we're buying!"</p> <p>"I do not believe that public is confused by the use of the word Milk in non dairy drinks."</p> <p>"I support the continued labeling of plant-based products with names that include milk, cultured milk, yogurt, and cheese."</p>	Original
4.2 - OPPOSE MILK IN PB LABELING	Explicit opposition for labeling PB products with terms typically used to denote dairy products	Apply to full comment (select all).	<p>"As a dairy farmer it is important to me that labeling and packaging of these alternative products is advertised truthfully. The ONLY way to accomplish this is to not use the term "milk" or "dairy" or any other terms referencing real dairy products when labeling these alternative products."</p> <p>"I believe that FDA needs to verify and enforce the these existing</p>	Original

			standards, and not permit plant-based beverages to be labeled as their dairy counterpart.” “I am not a dairy farmer, but I am opposed to misleading labels.”	
4.3 - UNCLEAR OR NEUTRAL POSITION ON PB LABELING	No explicit support or opposition for labeling PB products with terms typically used to denote dairy products	Apply to full comment (select all).		Original
4.4 - SUPPORT OR OPPOSE DAIRY LABELING	Explicit support or opposition for labeling dairy products with special labels that would differentiate dairy products from PB products (e.g. “cow’s milk”).	Apply to full comment (select all).	“...if we’re going to be petty why don’t we demand that milk be labeled Cow Breast Milk.” “...I do think that cows milk should carry a warning - like that on cigarettes - saying how much suffering has been caused by the manufacturing of the product and that it is a hazard to human health.” “Labels on plant-based products aren’t the problem the label on cow’s milk is.” “The liquid from a cow should properly be labeled “Mammary Discharge.”” “All the dairy industry has to do to avoid any confusion to consumers is to label milk-based products as such - for example “This product is made from cows’ milk’.”	Original
5 - FORM LETTERS AND ERRANT SUBMISSIONS		Do not use.		
5.1 - EXACT DUPLICATE	A document that exactly like another document, with only date, header, or signature variation; includes form letters	Apply to full comment (select all). Do NOT apply COMMENT CONTENT codes to exact duplicates coded here.		
5.2 - NEAR DUPLICATE	A document that is like another document, but with unique text added; includes modified form letters	Apply to full comment (select all). Apply COMMENT CONTENT codes only to novel text in near duplicate comments coded here.		
5.3 - SUSPECTED DUPLICATE	A document that appears to be a duplicate, but the coder cannot locate a match in their bundle; includes suspected form letters	Apply to full comment (select all). Do NOT apply COMMENT CONTENT codes to exact duplicates coded here.		

5.4 - OFF-TOPIC	A document that is for another rulemaking, spam, or otherwise off the topic of plant-based products.	Apply to full comment (select all). Do NOT apply COMMENT CONTENT codes to off-topic comments coded here.		
5.5 - UNUSABLE PRIMARY SUBMISSION	Primary submission is a photo or other document that does not have text that can be coded. Comment is an exact duplicate by the same commenter.	Apply to full comment (select all). If the comment includes an attachment that can be coded, apply ONLY this code to the primary submission and all relevant codes to the attachment(s)..		
5.6 - APPENDIX OR EXTRA ATTACHMENT	Additional attachment or document included with submission; not primary submission	Apply to full comment (select all).		
6 - SELF-IDENTIFICATION		Do not use.		
6.1 - VEGETARIAN	Identifies as a vegetarian, vegan, pollotarian (eats poultry and fowl only), pescetarian (eats fish and seafood only), flexitarian (very limited meat intake), or plant-based	Apply to full comment (select all).	“As a vegetarian for 14 years and now mostly vegan for 3 years...” “I will never buy any dairy or animal products!”	
6.2 - DAIRY INDUSTRY	Identifies as a farmer, rancher, or other member of the dairy industry	Apply to full comment (select all).	“I am a cattle and crop farmer in Pennsylvania...” “As a dairy farmer it is important to me that...” “As a dairy farmer's wife...”	
6.3 - OTHER INDUSTRY	Identifies as a member of another (non-dairy) industry including but not limited to individuals involved in the production of plant-based products.	Apply to full comment (select all).		
6.4 - STUDENT	Identifies as an undergraduate, graduate, dietetic intern, or other.	Apply to full comment (select all).		
6.5- OTHER	Identifies as another notable and specific individual, profession, as a follower of a special diet, or resides in another country.	Apply to full comment (select all).	“I am not a dairy farmer, but I am opposed to misleading labels.”	
COMMENT CONTENT				
1 - NUTRITION AND HEALTH ASPECTS		Do not use.		

1.1 - CALCIUM	Calcium content of dairy or plant-based products is noted and/or the health implications of calcium consumption are noted	Apply to relevant text.	<p>“If you look at what nutritional value of whole milk it is low in fat, high in protein and contains high levels of needed nutritional ingredients such as calcium...”</p> <p>“While many consumers know that dairy products provide nine key nutrients necessary for healthy child development and adult health...”</p>	Original
1.1.1 - BIOAVAILABILITY	Bioavailability or absorption of calcium are mentioned	Apply to relevant text.		Original
1.1.2 - CALCIUM CONTENT	Calcium content of dairy products, plant-based products, or both are noted	Apply to relevant text.		Original
1.1.3 - HEALTH BENEFITS/PROBLEMS	Health benefits and statistics related to calcium in the diet, or health problems and statistics related to a lack of calcium in the diet are noted	Apply to relevant text.		Original
1.1.4 - OTHER	Another idea about calcium unrelated to bioavailability, calcium content, and/ or health benefits/ problems is discussed	Apply to relevant text.		Original
1.2 - VITAMIN D	Vitamin D content of dairy or plant-based products is noted and/or the health implications of Vit D consumption are noted	Apply to relevant text.	<p>“...vitamin A & D that plant based milk has to be added to come close to dairy milk.”</p> <p>“While many consumers know that dairy products provide nine key nutrients necessary for healthy child development and adult health...”</p>	Original
1.3 - PROTEIN	The protein content of dairy or plant-based products is noted and/or the health implications of protein intake are noted	Apply to relevant text.	<p>“In a recent survey, 73% of consumers believed that almond based drinks had as much or more protein per serving than milk, even though milk has 8 times as much protein.”</p> <p>“If you look at what nutritional value of whole milk it is low in fat, high in protein and contains high levels of needed nutritional ingredients such as calcium...”</p> <p>“While many consumers know that dairy products provide nine key nutrients necessary for healthy child development and adult health...”</p>	Original

1.4 - SUGAR	The sugar content of dairy or plant-based products is noted and/or the health implications of sugar intake are noted	Apply to relevant text.		Original
1.5 - OTHER ESSENTIAL NUTRIENTS	Other macro or micro nutrients of dairy or plant-based products are mentioned and/or the health implications of other essential nutrients are noted	Apply to relevant text.	<p>“The vitamins, minerals, fat, and protein levels are different, which some consumers might not realize.”</p> <p>“If you look at what nutritional value of whole milk it is low in fat, high in protein and contains high levels of needed nutritional ingredients such as calcium...”</p> <p>“While many consumers know that dairy products provide nine key nutrients necessary for healthy child development and adult health...”</p>	Original
1.6 - OBESITY	Weight, BMI, or obesity	Apply to relevant text. Use for references to weight implications or weight-loss implications of consuming dairy or plant-based products.		Original
1.7 - DIGESTION	Breaking down or absorbing nutrients	Apply to relevant text. Use for references to difficulty digesting dairy or plant-based products such as lactose intolerance, IBS, or generally not feeling well after consuming dairy or plant-based products.	<p>“Dairy milk can cause a lot of gas in me, so I like having the option of using almond or rice milk, and I certainly don’t confuse the two when I buy them or use them at home”</p> <p>“People shouldn’t be drinking cows milk. we do not need to drink dairy. We are unable to digest it after a certain age.”</p>	Original
1.8 - ALLERGY	Dairy or plant-based product allergies	Apply to relevant text. Use for references to allergies to dairy or plant-based products. Do NOT use for references to lactose intolerance.	<p>“In fact, I am disappointed that some plant based “dairy” products (like “cheese”) have casein in them. For me, that defeats my purpose”</p> <p>“I think its just fine to call plant based milks - alternative milk. It makes it easier to find especially with those of us who have dairy allergies.”</p>	Original
1.9 - PRODUCT HEALTHFULNESS	General comments on how “healthy” or “unhealthy” PB products or dairy products are, about the superior health characteristics of either PB products or dairy products or when the nutritional differences between PB products and dairy are compared	Apply to relevant text.	<p>“The public is choosing delicious, healthy plant-based milk”</p> <p>“Almond, Soy or other plant product Are healthier that’s no confusion about it”</p> <p>“I am glad that the plant based “dairy” products do not have the same nutritional profile as animal dairy products do, since, from my reading, regular consumption of animal milks are not healthy.”</p>	

			<p>“... I do think that cows milk should carry a warning - like that on cigarettes - saying how much suffering has been caused by the manufacturing of the product and that it is a hazard to human health”</p> <p>“Dairy products are critical to the healthy diet of children and adults.”</p> <p>“However, I feel that many may not realize or recognize the nutritional differences between dairy milk and these milk substitutes”</p> <p>“This is clearly an effort by the dairy industry to protect their profits, as they face competition from healthier, more sustainable, and cruelty free plant-based dairy alternatives.”</p>	
1.10 - HORMONES AND ANTIBIOTICS	Reference to use of growth hormones (e.g. rBST) or antibiotics			
1.11 - OTHER NUTR AND HEALTH	Reference to other nutrition or health conditions like diabetes, metabolic syndrome, infections, bone development, skin conditions, cancer, and heart disease	Apply to relevant text. Do NOT use for general references to dairy or PB products being “healthy” or “healthier” than the other is. See 1.9 - PB PRODUCT HEALTHFULNESS and 1.10 - DAIRY PRODUCT HEALTHFULNESS.		Original
2 - PERFORMANCE CHARACTERISTICS	Performance characteristics of dairy or plant-based products including but not limited to physical properties, flavor characteristics and taste, functional properties, and shelf-life (possibly relating to use of the product)	Apply to relevant text.	<p>“I’ve used canned coconut milk for years for cooking curries”</p> <p>“The public is choosing delicious, healthy plant-based milk”</p> <p>“For many years, “milk” has been a liquid that I drank, poured on my cereal, and occasionally used in cooking. When I reached for “milk” in the refrigerator, I wasn’t reaching for it because it came from a cow. I was reaching for it because it was the liquid that I wanted to drink, or pour on my cereal, or use in cooking.”</p> <p>“These soy, almond or coconut beverage may be tasteful but they are not milk that mother nature has provided to humans for the beginning of time.”</p>	Original (based on FR docket)
3 - SUSTAINABILITY		Use for general comments regarding “sustainability.”	“This is clearly an effort by the dairy industry to protect their profits, as they face competition from healthier, more sustainable,	

			and cruelty free plant-based dairy alternatives.”	
3.1 - GOVERNANCE	How the food system is controlled pre-consumer; the process of making and implementing decisions	Do not use.		Morgan et al. 2019 adapted from El-Hage Scialabba 2014
3.1.1 - INDUSTRY ETHICS/INFLUENCE	Influence of the food industry in the food system	<p>Apply to relevant text.</p> <p>Use for comments that refer to the power and responsibility that the food industry has within the food system. Also, use for comments on food industry ethics, including that refer to consumer deception by the food. Comments about the role of lobbyists and/or other representatives of the food industry in interacting with the government should also be coded at 3.1.2 - GOVT ETHICS/INFLUENCE.</p>	<p>“In no other industry would manufacturers be able to falsely advertise their products. When it comes to people’s health, they deserve true and accurate information. Please stop allowing this false advertising to continue.”</p> <p>“Dairy is the term the dairy industry should use rather than worrying about the word Milk. This is just a silly complaint by the dairy industry.”</p> <p>“Regulation in this area seems over-reaching and frivolous, and based on the weight/money of the Dairy Council/Dairy Lobby to play games and make things more difficult for any producer of food that doesn’t benefit their associations constituents.”</p> <p>“This is clearly an effort by the dairy industry to protect their profits, as they face competition from healthier, more sustainable, and cruelty free plant-based dairy alternatives.”</p> <p>“That is why dairy not being bought as much--because many of us who grew up drinking and eating these products, once we found out about the cruelty--we stopped using them. If the government didn’t bail out this industry (with taxpayer dollars)--it might be gone now.”</p> <p>“Dairy companies should not be allowed to hold a monopoly over this food niche. Non dairy plant based companies should be allowed a fair opportunity to compete with big dairy.”</p>	Morgan et al. 2019 adapted from El-Hage Scialabba 2014

<p>3.1.2 - GOVT ETHICS/INFLUENCE</p>	<p>Influence of the FDA/government in the food system</p>	<p>Apply to relevant text.</p> <p>Use for comments that refer to the explicit power of the FDA/government in the food system. Also, use for comments on FDA/government ethics within the food system. Comments that relate to interaction with lobbyists and/or other representatives of the food industry should also be coded at 3.1.1 - INDUSTRY ETHICS/INFLUENCE. Also use this code when lack of trust in government or dislike of big government is mentioned.</p>	<p>“Regulation in this area seems over-reaching and frivolous, and based on the weight/money of the Dairy Council/Dairy Lobby to play games and make things more difficult for any producer of food that doesn’t benefit their associations constituents.”</p> <p>“Consumers are desperately in need of plant-based milks while the majority of America’s small dairy farmers suffer in poverty, subsisting on government subsidies just to throw their milk away.”</p> <p>“That is why dairy not being bought as much--because many of us who grew up drinking and eating these products, once we found out about the cruelty--we stopped using them. If the government didn’t bail out this industry (with taxpayer dollars)--it might be gone now.”</p>	<p>Morgan et al. 2019 adapted from El-Hage Scialabba 2014</p>
<p>3.2 - ENVIRONMENTAL INTEGRITY</p>	<p>Preservation or degradation of the environment</p>	<p>Apply to relevant text.</p> <p>Use for references to: environmental contaminants and pollutants (including nutrients, pesticides, pharmaceuticals, odors, and fine particulate matter); depletion and replenishment of arable land and water; climate change; biodiversity; genetic modification; materials and energy used in the food system (e.g. the degree of processing, food waste, and packaging).</p> <p>Also use for references to organic agriculture.</p>	<p>“I hope to leave a better and healthier planet for those who come after me”</p> <p>“The production of dairy from animal milk wreaks havoc on communities and the environment.”</p>	<p>Morgan et al. 2019 adapted from El-Hage Scialabba 2014</p>
<p>3.3 - ECON RESILIENCE</p>	<p>Economic resilience - ability to cover costs (including negative externalities), generate a positive cash flow, and adequately remunerate workers and shareholders, as well as have savings or assets to cope with changes and shocks</p>	<p>Apply to relevant text.</p> <p>Specific topics may include farm business investment, profitability, and vulnerability to withstand environmental, social, and economic shocks, or the impact of food systems on local economic development, including impacts through employment, payment of taxes, and procurement through local suppliers.</p>	<p>“Consumers are desperately in need of plant-based milks while the majority of America’s small dairy farmers suffer in poverty, subsisting on government subsidies just to throw their milk away.”</p> <p>“Additionally, having grown up on a dairy farm and seen the current struggles of the industry, it is important to protect the dairy industry.”</p> <p>“That is why dairy not being bought as much--because many of us who grew up drinking and eating these products, once we found out about the cruelty--we stopped using them. If the government didn’t bail out this</p>	<p>Morgan et al. 2019 adapted from El-Hage Scialabba 2014</p>

			<p>industry (with taxpayer dollars)--it might be gone now.”</p> <p>“Dairy companies should not be allowed to hold a monopoly over this food niche. Non dairy plant based companies should be allowed a fair opportunity to compete with big dairy.”</p> <p>“This is clearly an effort by the dairy industry to protect their profits, as they face competition from healthier, more sustainable, and cruelty free plant-based dairy alternatives.”</p>	
3.4 - SOCIAL WELL-BEING	The well-being of food producers and employees in the food system	<p>Apply to relevant text.</p> <p>Specific topics may include economic livelihood (access to a safe, decent standard of living for health and well-being for food producers and employees in the food system), ethical issues in the food system (respect and rights for food producers, their employees, and consumers), and cultural diversity (the existence and protection of a variety of cultural and ethnic groups, practices, and foods within the food system).</p> <p>Do NOT use for references to animal welfare.</p>	<p>“Consumers are desperately in need of plant-based milks while the majority of America’s small dairy farmers suffer in poverty, subsisting on government subsidies just to throw their milk away.”</p> <p>“The production of dairy from animal milk wreaks havoc on communities and the environment.”</p>	Morgan et al. 2019 adapted from El-Hage Scialabba 2014
3.5 - FOOD SECURITY	Reference to food security	<p>Apply to relevant text.</p> <p>Use for explicit references to food security and/or insecurity (including references to the affordability of PB or dairy products).</p>	<p>“Forcing plant-based companies to relabel would increase the cost to them and therefore to consumers who buy their products, especially in such a growing market where every dollar matters.”</p> <p>“Non-dairy substitutes can be twice the cost (or more!) of the traditional dairy products they are replacing. Don’t make our lives harder, please.”</p> <p>“The meat and dairy industry needs to accept the fact that plant-based cuisine is growing in popularity because it is so much healthier than eating animal food. It is better for our environment and is more affordable.”</p>	Original

4 - ANIMAL WELFARE	Refers to the physical and psychological well-being of animals	<p>Apply to relevant text.</p> <p>Use for comments regarding livestock production under conditions appropriate or inappropriate for animal welfare and health. This includes keeping animals free from hunger, thirst, injury, disease, discomfort, pain, fear, or distress, and ensuring that animals are free to express normal behavior.</p> <p>Use for comments about the overall ethics of livestock production.</p> <p>Do not code in 3.1.1 - INDUSTRY ETHICS/INFLUENCE unless the commenter specifically mentions industry ethics in relation to the ethics of livestock production.</p>	<p>“They’re kept nearly constantly pregnant and are manipulated to produce milk at such unnatural rates that many suffer from lameness and osteoporosis as their nutrients are depleted, and their bodies are exploited until they’re too exhausted to be considered profitable, at which point, they’re shipped off to slaughter”</p> <p>“People are choosing non-dairy for a variety of reasons, many of them related to factory farming and the horrendous animal abuse that is rampant in that industry.”</p> <p>“If I buy dairy I get it from my local farmer who I know and who I know treats the animals with care and kindness.”</p> <p>“...I do think that cows milk should carry a warning - like that on cigarettes - saying how much suffering has been caused by the manufacturing of the product and that it is a hazard to human health.”</p> <p>“This is clearly an effort by the dairy industry to protect their profits, as they face competition from healthier, more sustainable, and cruelty free plant-based dairy alternatives.”</p> <p>“If I buy dairy I get it from my local farmer who I know and who I know treats the animals with care and kindness.”</p> <p>“They’re kept nearly constantly pregnant and are manipulated to produce milk at such unnatural rates that many suffer from lameness and osteoporosis as their nutrients are depleted, and their bodies are exploited until they’re too exhausted to be considered profitable, at which point, they’re shipped off to slaughter”</p> <p>“People are choosing non-dairy for a variety of reasons, many of them related to factory farming and the horrendous animal abuse that is rampant in that industry.”</p>	Morgan et al. 2019
5 - DAIRY IS/IS NOT MEANT FOR HUMANS	Dairy products are or are not meant for human consumption		<p>“Cow milk is for calves. The way cow are kept is not healthy for the cows or for humans.”</p> <p>“These soy, almond or coconut beverage may be tasteful but they are not milk that mother nature has provided to humans for the beginning of time.”</p>	Original

6 - EXPERTISE	Text referring to an advanced degree, job training, etc.	Apply to relevant text.	<p>“As a nurse, a nurse educator, and a label-savvy consumer, I appreciate the importance of clear language in food marketing and packaging.”</p> <p>“I have worked in the grocery industry for over a year now, specifically in a health foods store.”</p>	Shulman 2006 (cited by Dinour and Pole 2017)
7 - PERSONAL EXPERIENCE	Text providing personal anecdotal experiences that influence the commenter’s support or opposition to dairy or PB products. Text referring to any images or videos that have influenced the commenter’s support or opposition to dairy or PB products..	<p>Apply to relevant text.</p> <p>Comments that refer to a specific video source, such as YouTube, should also be coded at 8.3.2 - SOCIAL MEDIA INFLUENCERS.</p>	<p>“My daughter introduced me to almond milk. I loved it. I wish it was more accessible”</p> <p>“I have lived on a farm most of my life and I see how high quality milk is produced from well maintained and healthy dairy cows.”</p> <p>“...having grown up on a dairy farm and seen the current struggles of the industry, it is important to protect the dairy industry.”</p> <p>“They let sickos work at these dairies that get some sick Joy from stabbing cows with pitchforks and other farm impliments. The videos that I have seen would make you cry.”</p>	Shulman 2006 (cited by Dinour and Pole 2017)
8 - EVIDENTIARY SOURCE		Do not use.		
8.1 - PEER-REVIEWED JOURNAL ARTICLES	Text or citation references peer-reviewed journal articles	<p>Apply to relevant text.</p> <p>Include text or citation references to journal articles under review.</p>		Hemmerich et al. 2017
8.2 - GOVT AND INTERGOVT REPORTS	Text or citation references to government and intergovernmental reports, including the dietary guidelines	Apply to relevant text.	“The CFR has been used for years to manage the products in the marketplace, and people trust what they are buying to be what the label states.”	Hemmerich et al. 2017
8.3 - NON-JOURNAL / NON-GOVT SOURCES	Text references a source other than journal articles or government reports	Do not use.		Hemmerich et al. 2017
8.3.1 - POP PRESS BOOKS, ARTICLES, OR DOCUMENTARIES	Text or citation references popular press books, newspaper or magazine articles, documentaries, or dictionary definition	Apply to relevant text.	<p>“According to Bloomberg, and many other sources, America is drowning in animal-based milks nobody wants and hundreds of millions of gallons of animal-based milk are simply dumped every year (see, e.g., https://www.bloomberg.com/news/articles/2018-10-17/america-is-drowning-in-milknobody-wants).”</p>	Original

8.3.2 - SOCIAL MEDIA INFLUENCERS	Text or citation references social media influencers, including YouTubers, Facebook, Instagram influences, or bloggers	Apply to relevant text. Include any and all social media accounts (personal or business) .	“Companies, such as A2pX, exist to assist cow dairy farmers to transition to plant-based milk farming (see, e.g., https://www.facebook.com/A2Px1/).”	Original
8.4 - OTHER SOURCES	Text references a reason for holding an opinion that it is the view of some other source or authority such as a trusted person, healthcare professional, organization, religion, science, etc., but NOT covered by another code in this grouping	Apply to relevant text.	“A recent survey by the International Food Information Council Foundation concluded that over 90 percent of American consumers know that plant-based milks do not contain any animal milk.”	Original