



**Iowa
Cattlemen's
Association**

November 2, 2021

Docket Clerk
U.S. Department of Agriculture, Food Safety and Inspection Service
1400 Independence Avenue SW, Mailstop 3758
Washington, DC 20250-3700

Docket No. FSIS-2020-0036
Food Safety Inspection Service

Submitted electronically via <https://www.regulations.gov>

Re: Labeling of Meat or Poultry Products Comprised of or Containing Cultured Animal Cells

To whom it may concern:

The Iowa Cattlemen's Association (ICA) is a grassroots organization representing more than 8,000 independent cattle producers and stakeholders affiliated with the beef cattle industry. We submit the following comment in response to the advance notice of proposed rulemaking for the labeling of cell cultured meat and poultry products.

Transparency in Storytelling

As cattle producers, we take great pride in responsibly and sustainably caring for cattle so we can produce nutritious, wholesome beef for consumers. The beef production story begins before calves are born. Cow-calf producers choose genetics that will provide optimum traits for herd development and beef production.

We protect the health of our herds with the responsible use of antibiotics, preventative care, and nutrition. We utilize best practices in husbandry, like Beef Quality Assurance, to maintain our commitment to quality throughout each segment of the beef supply chain. The technology we use to feed cattle has increased productivity; we're producing more beef with less cattle than ever before.

Consumers have asked to learn more about beef production, and they want to know where their food comes from. For 36 years, cattle producers have invested in the promotion of the beef their cattle produce through the Beef Checkoff. This promotion helps cattle producers share the story of production with consumers—from pasture to plate. This is an effective tool used to market high-quality, nutritious beef traditionally harvested from bovine.

Companies that choose to produce alternative products derived via cell culture technology in laboratories should not benefit from the hard work and investment of the cattle industry. Cattle producers have built consumer confidence and trust in beef through transparency and by meeting the expectations of consumers. Alternative products comprised of or containing cultured animal cells do not share the same story as beef, and should not be labeled or marketed as such.

ICA supports the use of labeling requirements to accurately inform consumers. The U.S. Department of Agriculture (USDA) is best-equipped to ensure fair and accurate labeling and safety of lab-grown products for consumers. We believe alternative products comprised of or containing cultured animal cells meet the statutory definition of a meat byproduct, which is why the USDA Food Safety Inspection Service (FSIS) must establish and enforce appropriate labeling requirements now. The absence of clear labeling requirements for alternative products comprised of or containing cultured animal cells will create confusion for consumers in the marketplace.

Differentiating by Definition

ICA requests the FSIS limit the definition of “beef” to a product from cattle born, raised, and harvested in a traditional or conventional manner.

ICA further requests the definition of “meat” to be limited to the flesh of animals that have been harvested in a traditional or conventional manner.

Nomenclature for slaughtered meat established by common usage, statute, or regulations should not be included in the names or standards of identity of products derived from cultured animal cells. Cuts of beef are designated by physical location and characteristics that can only be found in cattle. Standards for beef cuts are followed for branding and marketing purposes. Cultured animal cell products must not stake claim to the names widely utilized and accepted for cuts of beef to ensure consumers are able to differentiate between products on the shelves of grocery stores. FSIS should establish a regulatory standard of identity under its authorities in the Federal Meat Inspection Act for foods comprised of or containing cultured animal cells.

Terms/images that should not be utilized to label cultured alternative products: beef; derived from beef; cultivated; clean; natural; any depiction of a bull, cow, steer, or heifer; any label/brand that is currently utilized for the marketing of beef, e.g. Certified Angus Beef; Non-Hormone Treated Cattle (NHTC); any reference to cattle breeds, e.g. Angus, Hereford, Charolais, Simmental, Brahman, Limousin, Shorthorn, Holstein, Gelbvieh, or Longhorn; slaughter-free; antibiotic-free

Terms that would be acceptable for labeling of products comprised or containing cultured animal cells: lab-grown; cell-cultured; created in a laboratory; alternative protein; synthetic; animal cell culture technology; bioengineered

The beef we produce is often imitated, but never duplicated. FSIS must establish labeling requirements for alternative products bioengineered with animal cells, without damaging the integrity of beef raised by cattle producers. Fair and accurate labeling will provide the transparency that consumers desire and deserve.

We appreciate the opportunity to provide comment on this important matter. Questions related to this comment may be directed to Cora Fox, director of government relations, at (515) 296-2266 or at cora@iacattlemen.org.

Respectfully,



Richard Godfrey
President, Iowa Cattlemen’s Association