



December 18, 2018

Docket Clerk
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Ave. SW
Mailstop 3758, Room 6065
Washington, DC 20250-3700

Re: Docket No. FSIS-2018-0036 for “Joint Public Meeting on the Use of Cell Culture Technology to Develop Products Derived from Livestock and Poultry.” USDA-FSIS/FDA Request for Comments.

To Whom It May Concern:

On behalf of the nearly 200,000 family farmer, rancher and rural members of National Farmers Union (NFU), I am pleased to submit comments regarding the “Joint Public Meeting on the Use of Cell Culture Technology to Develop Products Derived from Livestock and Poultry.”

NFU’s member-driven policy states “We oppose...labeling alternative protein sources as meat.”¹ Furthermore, a Special Order of Business passed at NFU’s Annual Convention in 2018 states “The common names given to meat and animal products... are widely understood by consumers to be the tissue and flesh of animals that have been slaughtered for food.”² Foods produced using animal cell culture technology are not slaughtered, but rather are derived from animal cells grown in a petri dish and other growing media. Thus, NFU opposes labeling of foods produced using cell culture applications as “meat” and as related products such as “beef,” “poultry” and “seafood.”

Because of rapidly evolving technologies such as animal cell culture applications, NFU urges establishment and clarification of the standard of identity for “meat” and related products to prevent mislabeling of food in the marketplace. Existing labeling and marketing laws should be consistently enforced and regulations should be updated to promote fair competition for producers and the health and safety of consumers.

NFU is supportive of a regulatory framework for foods produced using animal cell culture technology that includes roles for both the U.S. Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) and the Food and Drug Administration (FDA). It is important that this joint regulatory framework promotes fair competition for producers and the health and safety of consumers.

¹ National Farmers Union, *Policy of the National Farmers Union*, (March 2018).”

² National Farmers Union, *2018 Special Order of Business*, “Family Farming and Livestock Production.”

NFU was also pleased to submit comments to FDA on September 24, 2018 regarding “Foods Produced Using Animal Cell Culture Technology.”³ We would like to refer FDA and FSIS to our previous comments for a more extensive treatment of several issues concerning the regulation of foods produced using animal cell culture applications.

Thank you for the opportunity to submit comments on the “Joint Public Meeting on the Use of Cell Culture Technology to Develop Products Derived from Livestock and Poultry.” If you have any questions or would like to further discuss NFU’s position on animal cell culture technology, please contact Aaron Shier, NFU’s Government Relations Representative, via e-mail at ashier@nfudc.org or by phone at 202-554-1600. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Johnson". The signature is fluid and cursive, with the first name "Roger" being more prominent than the last name "Johnson".

Roger Johnson
President

³ National Farmers Union. Comments Re: Docket No. FDA-2018-N-2155 for “Foods Produced Using Animal Cell Culture Technology; Public Meeting; Request for Comments.” September 24, 2018.