

NATIONAL PORK PRODUCERS COUNCIL

The Global Voice of the U.S. Pork Industry



VIA ELECTRONIC SUBMISSION

October 21, 2021

Docket Clerk

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

RE: Docket No. FSIS-2020-0036, “Labeling of Meat or Poultry Products Comprised of or Containing Cultured Animal Cells.”

To Whom it May Concern:

The National Pork Producers Council (NPPC) appreciates the opportunity to submit comments on the September 3, 2021, Federal Register notice, “Labeling of Meat or Poultry Products Comprised of or Containing Cultured Animal Cells.” NPPC is a national association representing the federal and global interests of 60,000 U.S. pork operations. NPPC conducts public policy outreach on behalf of its 43 affiliated state association members, enhancing opportunities for the success of 60,000 U.S. hog farmers as a consistent and responsible supplier of high-quality pork that is safe, affordable, and nutritious.

The U.S. pork industry is a strong advocate for technological innovation and competition in the marketplace. The U.S. food and agricultural system is one of the most productive and efficient in the world, in part due to these two factors. We appreciate USDA-FSIS for issuing this advanced notice of proposed rulemaking (ANPR) and offer our own comments to some of the agency’s questions below.

Cell-cultured products designed to mimic real meat must face the same stringent regulatory requirements as livestock agriculture, including truthful labeling standards. Foods composed of or containing cultured meat cells are different and distinct specifically because of the process by which the foods were produced relative to meat derived from animals. Federal law prohibits labeling that is misleading by omission of material fact, and the offering of food for sale under the name of another food. As such, products comprised of or containing cultured cells derived from animals subject to the Federal Meat Inspection Act, should be named or described in a way that informs consumers about how the animal cells were produced.

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We encourage FSIS to ensure that the name or statement of identity of foods comprised of or containing cultured animal protein cells should be clear and transparent as to the source of the food, and how it was created, so that consumers can make an informed choice. Terms such as “cell cultured food product,” “cell cultivated food product,” etc. make clear that the product is not from an animal but rather is derived from animal cell culture technology. The agency should avoid terms that either inadequately describe the nature of the product, or those, such as “cell based,” that are so broad as to include actual meat or poultry products in their descriptions.

These terms inform consumers that what they are buying is derived not from a live animal but are instead the product of animal cell culture technology. The sources of these products are distinctly different, as are the processes by which they are processed and prepared. They may have differed nutritional, texture, or flavor profiles, and may also be viewed differently for a host of cultural, social, religious, or other factors. Consumers should not have to guess at the differences between products because of, for example, clever language tricks on the part of a food company producing one type of product but hoping to trade off the characteristics of another. Consumers purchase specific food products for many reasons, including nutritional and organoleptic factors. Where these vary between products, it is important that consumers are made aware of this so that they may make informed decisions about the foods that they consume.

Furthermore, USDA-FSIS should not allow terms that specify a certain type of animal protein (such as “fillet” or “steak”) to be included in or accompany the name or statement of identity of foods comprised of or containing cultured animal cells. These names generally inform consumers of the specific physical part or cut of the animal that the food comes from, and as such are not applicable to products derived from an animal cell culturing technology. Use of these terms in connection with a product grown, formed, or pressed to mimic similar products from an animal would be misleading.

As an industry committed to innovation and competition, the U.S. pork industry works tirelessly to provide consumers with safe, nutritious, and affordable products. We welcome the development of new food products that consumers can choose from, provided that the choice is informed by accurate and honest marketing of these products.

Sincerely,

Jen Sorenson
President
National Pork Producers Council