

December 2, 2021

Rachel Edelstein
Assistant Administrator
Office of Policy and Program Development
Food Safety and Inspection Service
1400 Independence Avenue, SW
Washington, DC 20250

**Re: Labeling of Meat or Poultry Products Comprised of or Containing
Cultured Animal Cells; Docket No. FSIS-2020-0036**

Dear Ms. Edelstein:

The North American Meat Institute (NAMI or the Meat Institute) submits these comments regarding the above-referenced advance notice of proposed rulemaking (ANPR) regarding labeling meat and poultry products made with cell culture technology (cultured meat and poultry). The Meat Institute is the nation's oldest and largest trade association representing packers and processors of beef, pork, lamb, veal, turkey, and processed meat products and NAMI member companies account for more than 95 percent of United States output of these products. The Meat Institute provides regulatory, scientific, legislative, public relations, and educational services to the meat and poultry packing and processing industry.

Consumers and industry benefit from a fair and competitive market. The Food Safety and Inspection Service (FSIS or the agency) plays a key role in maintaining a fair market by enforcing standards of identity (SOI) and ensuring that labels are not false or misleading. The Meat Institute appreciates the opportunity to provide its perspective to the agency in advance of rulemaking for these new and novel products.

**Cultured meat and poultry products should be appropriately
differentiated.**

The ANPR requests information regarding whether cultured products should be differentiated. Consumers today expect transparency, which is reasonable and should be provided. Differentiation will ensure consumers are informed and not misled, while allowing the market to remain competitive. All products that are comprised of or contain cultured animal cells should be differentiated including but

not limited to further processed products, combination food products, broths, bases, and flavors. Though the Meat Institute cannot recommend a specific term, there should be a consistent term or phrase to preclude confusion. The term or phrase should be informed by consumer research to ensure understanding. Importantly, the term or phrase should not be misleading or disparage traditional meat and poultry products.

Standards of identity must be upheld.

SOIs help maintain a fair market and ensure consistency, meeting consumer expectations. Though a new standardized term or phrase for differentiation may be warranted, the existing standards may apply if used in combination with the differentiation term or phrase. If cultured meat and poultry products use existing standardized terms, these new and novel products must be held to the strict parameters that traditional products have met for years. For standardized terms to be used, cultured products must be comparable to traditional products functionally and nutritionally, while providing the same eating experience familiar to consumers. The same should be upheld for unstandardized terms established by common usage and terms that specify form. Consumers should get the same functionality, nutritional value, and eating experience from products using the same terms.

The agency's existing robust label approval process is adequate to evaluate claims for cultured meat and poultry products.

FSIS employs a robust label approval process to evaluate claims, such as production claims, to ensure they are not false or misleading. The agency's extensive experience in evaluating claims should prove useful in reviewing claims for cultured meat and poultry products. Claims should be evaluated to ensure truthfulness and ensure they are not misleading, for either the cultured product or traditional products. For example, a claim such as "clean" or "humane" would be misleading and imply that traditional products are "dirty" or "inhumane."

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The Meat Institute appreciates the opportunity to provide these comments and welcomes the opportunity to engage in advance of rulemaking. Please contact me if you would like to discuss these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Casey Lynn Gallimore', with a stylized, cursive script.

Casey Lynn Gallimore
Director, Regulatory and Scientific Affairs

Cc: Paul Kiecker
Julie Anna Potts
Mark Dopp
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