

From: [REDACTED]
To: [Porretta, Mary - FSIS](#)
Subject: Petition #18-01
Date: Tuesday, March 20, 2018 1:18:30 PM

Dear Ms. Porretta:

As a consumer I do not believe any artificial product should be labeled as beef. Only animals (cattle) raised from birth, grown and butchered in the traditional manner should be labeled as beef.

It is my understanding that consideration is being given to labeling artificial or synthetic products as beef. This is extremely misleading to the consumer and totally unfair to beef producers

Thank you for your consideration in this matter.

Bill Scoggin

[REDACTED]

From: Windy Miller
To: [Porretta, Mary - FSIS](#)
Subject: Fake meat
Date: Tuesday, March 20, 2018 12:47:08 PM

Definitely need rules for this, and another reason for Country of origin labeling. I cannot fathom that this would be considered. I can only imagine how much preservative is in it or will be for the shelf life in the store. As I consumer I want it tagged with a hazard label. As a former cattle raiser I cannot believe the lengths at how far we will go to tear down an industry. To me it is very easy to choose but why are there those who feel the need to say what is good for all, wow, fake beef will be an industry!

Windy

From: John Jacobs
To: [Porretta, Mary - FSIS](#); [Michael, Matthew - FSIS](#)
Subject: Fake Beef
Date: Thursday, March 22, 2018 8:57:03 AM

Sent from [Mail](#) for Windows 10

To whom it may concern,

I am writing this letter with concern to the “fake meat” news I’m hearing about. As a cattleman myself, it is important to my livelihood that a product of this nature is not allowed to be called beef or meat. It will put more stress on the producer and flood the market and in return weaken the return to the cattle producer. With the economy the way it is already and Agriculture in general having struggles to survive every day, I feel this would only make things worse for the cattleman. As we all know agriculture is the largest employer in the US with over 17% of American jobs going back to some form or another of Ag. I think it’s important to keep these things in mind and to not bite the hand that feeds you. The bottom line is that this product is fake. It has NO beef in it and isn’t real meat and for those reasons alone it shouldn’t be allowed to be marketed that way and or confuse the interpretation of the product to consumers.

Thanks for your time,
John Jacobs

From: Danette Komarek
To: [Porretta, Mary - FSIS](#)
Cc: [Michael, Matthew - FSIS](#)
Subject: LETTER FROM A USCA MEMBER
Date: Sunday, March 25, 2018 8:55:55 PM

When the FSIS defines words like "beef" or "meat", ranchers like me already know how it should be. I agree with the traditional use of the word "beef" as product from cattle born, raised, and harvested in the traditional manner. I have read this definition recently, and feel it covers things pretty well. I also agree that the broader term "meat" needs to be defined as the tissue or flesh of animals that have been harvested in the traditional manner. Again, pretty straight forward.

You can also count me in agreement with all of those who want to define these terms to eliminate confusion in the marketplace. Common sense terms like these have been accepted for a long time, and need to now be protected for the consumer seeking what they want. Obviously, it's just as important to say that these terms must lack any alternative protein, cultured cells, etc. We all know what need is. There's no need to confuse anyone.

Sincerely,
William Doman



From: jeremy gilbertson
To: [Porretta, Mary - FSIS](#)
Cc: [Michael, Matthew - FSIS](#)
Subject: Defining Beef
Date: Sunday, March 25, 2018 8:59:33 PM

Regarding the FSIS definition of beef or meat, a cattle producer like myself would want to see common sense be applied here. I agree with the traditional use of the word "beef" as product from cattle born, raised, and harvested in the traditional manner...or you could say meat from cows, you choose. I also agree that the broader term "meat" needs to be defined as the tissue or flesh of animals that have been harvested in the traditional manner.

You can count me in agreement with all of those who want to define these terms to eliminate confusion in the marketplace. Common sense terms like these have been accepted for a long time, and need to now be protected for the consumer seeking what they want. Obviously, it's just as important to say that these terms must lack any alternative protein, cultured cells, etc. That's not beef, and we all know it.

Sincerely,
Donnis Doman

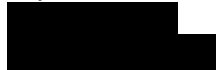


From: Hitzannville
To: [Porretta, Mary - FSIS](#)
Cc: [Michael, Matthew - FSIS](#)
Subject: Petition "18-01"
Date: Friday, March 30, 2018 2:49:34 PM

We are farmers and we want you to please limit the definition of beef to products from cattle born, raised and harvested in the traditional manner! Also the broader definition of meat should be limited to the tissue or flesh of animals that have been harvested in the traditional manner. To do so otherwise is misleading and confusing to all consumers.

Regards

Lee and Elene Hitz
Sky Meadows Farm



Sent from my iPad

From: Maxine a Kays
To: [Porretta, Mary - FSIS](#)
Subject: comment
Date: Friday, March 30, 2018 9:25:25 PM

I have been helping produce BEEF and other meats most of my life.
I am a Red Meat survivor, I love it.
I do not think it appropriate for a substance produced synthetically to be labeled or described as beef or meat. It is not meat, no matter how similar, unless it comes from a live animal born, raised, and harvested in the traditional manner.

Vern Kays



Ginger Hill Angus
Brooke and Ann Miller

March 21, 2018

FSIS Docket Clerk
United States Department of Agriculture
Food Safety and Inspection Service (FSIS)
Room 2534 South Building
1400 Independence Ave., SW
Washington, DC 20250-3700
Attention: Ms. Mary Porretta, Petitions Manager; Mr. Matthew Michael, Director,
Issuances Staff, Office of Policy and Program Development;
E-mails: Mary.Porretta@fsis.usda.gov; Matthew.Michael@fsis.usda.gov

Re: Letter in Support of the February 9, 2018 Petition to Establish Beef and Meat Labeling Requirements: To Exclude Product Not Derived Directly from Animals Raised and Slaughtered from the Definition of “Beef” and “Meat” filed by the United States Cattlemen’s Association (USCA); Petition 18-01

Dear Ms. Porretta and Mr. Michael:

Ginger Hill Angus is a family owned and operated pure bred seed stock Angus operation. I am a third-generation cattleman and have been in business my entire life (over 50 years). My wife Ann and I are also healthcare providers with Ann being a registered nurse as well as a Family Nurse practitioner. I am board certified physician in Family Medicine and have been in practice for 30 years.

We support the petition filed on Feb. 9, 2018, by the U.S. Cattlemen’s Association (USCA) which requests the Department of Agriculture, Food Safety and Inspection Service (FSIS) to establish certain beef labeling requirements. In particular we support the petitions request that the FSIS limit the definition of “beef” to products from cattle, born, raised, and harvested in the traditional manner. We also support the request to exclude products derived from alternative sources from being labeled as “beef”. We support the definition of “meat” as being limited to the tissue or flesh of animals that have been harvested in the traditional manner and not to include alternative sources, such as synthetic product from plants, insects, or non-animal components and any product grown in a lab from animal cells.

There are currently no labeling requirements applicable to products labelled as “beef” or more broadly as “meat” mandated by law. As reviewed in the petition, non-beef products marketed as “beef” are being mislabeled and are causing consumer confusion.

FSIS has primary responsibility for the regulation of food labeling for meat producers under the Federal Meat Inspection Act (FMIA). The FMIA states that meat or meat food products shall be “misbranded” if its “labeling is false or misleading in any particular.” See 21 U.S.C. § 601(n)(1).

Products are considered to be mislabeled where, amongst other things, they are “offered for sale under the name of another food,” are “an imitation of another food, unless {the} label bears, in type of uniform size and prominence, the word ‘imitation’ and immediately thereafter, the name of the food imitated,” or “purports to be or is represented as a food for which a definition and standard of identity or composition has been prescribed by regulations” without conforming to the applicable definition and standard. *Id.* at § 601(n)(2)-(3), (7).

FSIS regulations for the “labeling and preparation of standardized products” further provide that “any product for which there is a common or usual name must consist of ingredients and be prepared by the use of procedures common or usual to such products{.}” See 9 C.F.R. § 319.1.

Currently, FSIS regulations at 9 C.F.R. §§ 412.1 – 412.2 require that modifications to the labeling requirements be submitted to the FSIS for approval. The FSIS considers labeling claims for meat on a case-by-case basis.

In assessing whether the labeling is misbranded or misleading, FSIS will look to whether the food labeling practices are causing consumer confusion.

In our experience consumer confusion occurs when the alternative products identified in the petition are placed next to beef products and are labeled as ‘beef.’” As shown by the exhibits to the petition, this is already occurring in the market place. Further, as explained in the petition, non-beef products which use the term “beef” in the product name are very likely to cause customer confusion.

Any alternative protein: soy-based, vegetable-based, synthetic protein, cultured cells, *etc.* should not be allowed to use the terms “meat” or “beef” on their products. Additionally, the definition of “meat” should be limited to the tissue or flesh of animals that have been harvested in the traditional manner. Food products derived from alternative sources such as a synthetic product from plant, insects, or other non-animal components and any product grown in labs from animal cells should not be labeled as “meat.” These products need to create their own identity.

There is need for accurate labeling and relaying correct information to consumers; the current use of terms “beef” and “meat” on alternative protein products that are not derived from livestock are misleading and inaccurate. The petition seeks to establish accurate labeling of all products and asks for clarification on what can be labeled as “beef” or “meat.”

As health care providers, we have seen how food labels can be confusing and also deceiving to consumers. Case in point, the food industry quite often will label a product

as “low fat” with the intended result being to actually deceive the consumer into believing their product is healthier than those not labeled as such. Generally speaking, these products labeled as “low fat” are typically very high in sugar with other additives which actually cause a great deal of harm to those very same consumer’s health. The same thing can be said of these alternative protein products that are trying to deceive the consumer into thinking that they are a healthier version of what they imitate, meat. In reality, there are many studies that show the health benefits of beef but none that prove whether these imitation products are nutritious or healthy. In our medical experience food products that are processed and not natural can cause many adverse health related illnesses including obesity, diabetes, cancer and heart disease.

In sum, we fully support this petition. Consumers should not face confusion due to misleading labeling at the meat counter. Current use of terms “beef” and “meat” on products not derived from cattle raised in the traditional manner creates confusion in the marketplace and is very deceiving.

Thank you for your attention to this matter.

Respectfully submitted,

Brooke Miller MD

A black rectangular redaction box covering the signature of Brooke Miller MD.

Ann Miller FNP

A black rectangular redaction box covering the signature of Ann Miller FNP.