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April 10, 2018

Mr. Matthew Michael
Director, Issuances Staff, Office of Policy and Program Development
U.S. Department of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue, SW
Washington, D.C. 20250-3700

RE: FSIS Petition Number 18-01

Dear Mr. Michael:

On behalf of the Nebraska Farm Bureau Federation (NEFB) and our nearly 60,000 member families, I am writing today to comment on the recent petition to limit the definition of “beef” and “meat” to only products from live animals born, raised, and harvested in the traditional manner. NEFB certainly appreciates the opportunity to offer these comments as this has been a topic of considerable conversation within our state.

NEFB is Nebraska’s largest farm and ranch organization and is in the unique position of representing all sectors of Nebraska agriculture. From cattle and hog producers to corn, soybean, and sugar beet farmers, NEFB’s membership is comprised of the farmers and ranchers that grow and raise every commodity that is produced in the state of Nebraska. This broad range of interest also places NEFB in a unique position to represent both farmers and ranchers raising livestock as well as farmers who grow the grains and oilseeds used to make alternative protein products that are impacted by FSIS definitions.

Back in January of 2018, delegates from the American Farm Bureau Federation adopted a policy proposed by delegates from Nebraska which supported the prohibition of the use of “commonly known and industry recognized ‘meat’ terms in the labeling and advertising of all lab-grown and plant-based alternatives.” This Nebraska-led effort was originally approved by our voting members at our state annual meeting last December as the production and processing of livestock is of vital importance to our members and our state economy. Nebraska currently ranks first in commercial red meat production (over 8.1 billion lbs./year), commercial cattle slaughter (over 7.4 million head), and all cattle on feed (over 2.7 million head). All of this translates into tens of billions of dollars of economic activity as well as thousands of jobs. It is the importance of livestock to Nebraska’s bottom line and overall economy that we urge you to support this petition.

We specifically request FSIS support the following:

- Prohibit products derived from alternative sources, e.g. synthetic products from plants, insects, non-animal components, and lab-grown animal cells, from being labeled as “beef” or “meat”;
- Limit the definition of “meat” to the tissue or flesh of animals that have been harvested in the traditional manner;
- Limit the definition of “beef” to products from cattle born, raised, and harvested in the traditional manner; and

- Adding the definitions, as identified above, to FSIS's Food Standards and Labeling Policy Book.

Thank you for your consideration of our positions. Feel free to contact me or my staff with any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Stephen D. Nelson". The signature is written in a cursive style with a large, prominent initial "S".

Stephen D. Nelson
President