



April 9, 2018

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

RE: Petition “18-01”

Dear Ms. Porretta and Mr. Michael:

The Livestock Marketing Association (LMA) appreciates the opportunity to comment on Petition 18-01 regarding a formal definition of the terms “meat” and “beef.” The LMA is the leading national trade organization for more than 800 livestock marketing businesses located throughout the United States. LMA represents more than 75 percent of the country’s regularly selling local livestock auction markets. Livestock of all species are sold every day at LMA member markets and the long-term viability of the American animal protein industry is of paramount importance to our membership.

LMA members believe the underlying goal of food labeling should be to prevent consumer confusion while providing necessary information to allow consumers to make accurate purchasing decisions. Although consumers should absolutely be given the right of choice with respect to their diets, they should have the benefit of clear and accurate labeling when making such decisions. As such, LMA supports the Agency’s formation of a clear definition of “meat” and “beef.” Perhaps equally important is a clear outline and understanding of what is not “meat” or “beef.” Thus, any definition of “meat” or “beef” should include some type of guidance or parenthetical explanation that excludes protein derived from lab-created or plant- or insect-based “meat” or “beef” imitation products.

The LMA would also urge the Agency to avoid undefined and vague terms in any definition of “meat” or “beef.” Our constituents have voiced concern that the term “traditional manner” is one of these such terms. The LMA encourages USDA FSIS not to inadvertently hamper any innovative technological breakthroughs in the raising and harvesting of meat and beef products through a vague definition that requires “traditional” means.

The LMA appreciates your consideration of these comments.

Sincerely,

Jerry Etheredge, LMA President