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SCOTT FRAZIER
Chapman Ranch

April 9, 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:

Texas Farm Bureau appreciates the opportunity 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. Our membership consists of farm and ranch families across Texas that raise livestock along with the grasses and grains that feed them. Crop farmers also benefit from the development, production and sale of plant based protein foods.

False and misleading marketing tactics derived from lax labeling standards for meat substitute products negatively impact traditional farmers and lead to confusion for consumers.

We support opportunities for all types and sizes of farmers and ranchers to capture the highest and best value for their products. However, we do not support the use of commonly known and industry recognized "meat" terms in the labeling and advertising of all lab-grown and plant-based alternatives.

We specifically request that FSIS:

- Prohibit product 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; and
- Limit the definition of "beef" to product from cattle born, raised and harvested in the traditional manner.



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We also believe the definitions, as identified above, should be added to FSIS's Food Standards and Labeling Policy Book.

We appreciate your consideration of these comments and look forward to working with you to implement these definitions.

Sincerely,

Tracy Tomascik
Associate Director
Commodity and Regulatory Activities