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Matthew Michael & Mary Porretta
U.S. Dept. of Agriculture
Food Safety and Inspection Service
1400 Independence Avenue, SW
Washington, D.C. 20250-3700

(Sent via email)

Matthew Michael: Matthew.Michael@fsis.usda.gov

Mary Porretta: Mary.Porretta@fsis.usda.gov

Re: Petition #18-01

Dear Mr. Michael and Ms. Porretta:

I support Petition #18-01, regarding disallowing the terms "meat" or "beef" in labeling certain synthetic materials resembling actual meat.

I'm an American sheep producer and the editor of *Sheep! Magazine*, the widest-circulating commercial sheep producer's publication in the U.S., and possibly the world. These are my notes, not the publisher's.

Numerous concerned lamb and mutton growers brought to my attention the misleading term "clean meat." Non-farming consumers of sheep meat products too, are already becoming confused by press promotions as to whether *real meat* harvested from natural flocks is "clean."

Not one notice received has supported labeling laboratory-fabricated protoplasm materials as "meat." Nor as "lamb," nor "mutton," nor "beef." **Three objections came up repeatedly:**

Objection One: Products Derived from Incomplete Meat Fractions

Laboratory-cultured, meat-derived, protein products contain no bone matter, no connective tissue, no cartilage, no random flecks of fat (commonly called "marbling"), nor natural colors of real meat, which inform and assist consumers in choosing, cooking or discarding meat.

Labeling a product as "meat"—when it has clearly been contrived via fractional materials (incomplete meat constituents) isn't akin to labeling as "orange juice" a synthetically grown beverage cultured from juice from oranges. It's instead like labeling that cultured fluid as an "orange," when it has no other material than the juice squeezed out of the orange.

Real meat, assembled by complex and highly interactive processes in the metabolism of growing livestock, is quite different from anything

assembled from meat-derived foundation material, cultured in chemo-enzymatic fluids, agar and/or other media into a bigger piece of that fraction of the meat.

If it were meat, there'd be no need to disguise its appearance with colorants and texturing methods.

Objection Two: "Clean Meat" label deceptive to consumers

To allow lab-grown protoplasm materials to be labeled "meats" is in essence government-assisted fraud on unsuspecting consumers, specially those of long established religions, which want it killed humanely and/or by exsanguination, as current USDA rules provide.

The synthetics MUST be labeled in non-confusing, non-usurping terms.

Objection Three: Centralized Protoplasm Culturing Carries Huge Risks

If FSIS gives its imprimatur to corporate interests behind the misleading ("clean meat") labeling claim, it would open up FSIS to endless litigation, paralyzing its needed public protection activity. Those corporate interests aren't necessarily so intent on improving diets as they are on paying shareholder dividends.

NOTE WELL: The litigation for this could become very intense, with significant populations facing potentially terrifying realities.

For example, suppose an extremely difficult-to-detect prion disease like vCJD ("Mad Cow") were to develop within the "clean" lab-grown meat supply and were sent out by the railcar-load to points unknown for years before the mutation source could be identified. What then?

Individual animals exhibit *symptoms*; their contaminating potential is limited. They can be traced to offspring and parents, farms of origin, shippers, auction sites, etc. Swimming-pool sized protoplasm-culturing vats may continuously infect and *never be identified*.

Prion food borne illnesses take years to develop, showing no symptoms until far too late to cure. We know conventional meat is relatively safe, both through millennia of use and through practical science.

With a single slip-up, mutation, or radiation exposure, a cultured protoplasm gene quirk is capable of causing a biological catastrophe of Biblical proportions. Such a product should be labeled for what it is: NOT as "meat," whether "clean" or otherwise.

Respectfully,



Nathan Griffith
Editor