

March 19, 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:

American Farm Bureau Federation 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. Farm Bureau uniquely represents both farmers raising livestock as well as farmers who grow the grains and oilseeds used to make alternative protein products that are impacted by FSIS definitions as well as false and misleading marketing tactics directed toward consumers.

Farm Bureau supports opportunities for all types and sizes of farmers and ranchers to capture the highest and best value for their products but 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.

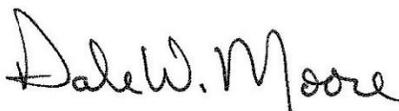
We specifically request that FSIS:

- 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.

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,



Dale Moore  
Executive Director  
Public Policy