



South Dakota Farmers Union

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December 23, 2018

Docket Clerk

U.S. Department of Agriculture Food Safety and Inspection Service 1400 Independence Ave. SW Mailstop 3758, Room 6065 Washington, DC 20250-3700

Re: Docket No. FSIS-2018-0036 for “Joint Public Meeting on the Use of Cell Culture Technology to Develop Products Derived from Livestock and Poultry.” USDA-FSIS/FDA Request for Comments.

To Whom It May Concern:

South Dakota Farmers Union (SDFU) represents family farmers and ranchers across the state of South Dakota, with a sprawling membership of nearly 17,000. I write as the voice of this membership to express concern in the continued development of foods composed of alternative protein sources that are grown in laboratories using animal cells. These products are not derived from animals born, raised, and harvested in a traditional manner, and should not be permitted to be marked as “meat” or any related term, such as, “beef, pork, poultry, etc.” or to bear a U.S. Department of Agriculture (USDA) meat inspection stamp.

Farmers and ranchers in our state represent the founding values of production agriculture and the desire to provide consumers with wholesome products that can be easily obtained in a fair and honest market place. Without the establishment and clarification of the standard identity for “meat” and related products the well being of producers and consumers alike stand to be jeopardized. Existing labeling and marketing laws should be consistently enforced and regulations should be updated to promote fair competition for producers and the health and safety of consumers.

Along these same lines, SDFU is supportive of a regulatory framework for foods produced using animal cell culture technology that includes roles for both the USDA, Food Safety and Inspection Service and the Food and Drug Administration (FDA). A Special Order of Business passed at SDFU’s Annual Convention in 2018 states “If a stamp is used on cell cultured proteins, SDFU asks USDA to create a separate USDA stamp or marking for cell cultured proteins that are inspected by the USDA and by states, using a different format and color ink on the stamp. Neither the Federal or State meat inspection stamps shall appear on the cell culture protein products, retail packaging or wholesale containers or shall the USDA grade shield appear on any cell cultured product or packaging. While we believe these products should be required to pass the same strict standards of food inspection as meat products that come from animals raised in the traditional manner, we do not believe they are the same category of food and therefore should not bear a USDA meat inspection stamp.”¹

¹South Dakota Farmers Union, *2018 Special Order of Business*, “Promotion of Meat Products”

In the eyes of the consumer “meat” is the common name given to the tissue and flesh of animals that have been slaughtered for food. Foods produced using animal cell culture technology are not slaughtered, but rather are derived from animal cells grown in a petri dish and other growing media. Thus, SDFU opposes labeling foods produced using cellular applications as “meat” or any related term such as “beef, pork, poultry, etc.”

It is the responsibility of the FDA to ensure foods bear appropriate labeling and insignia that is not false or misleading. Labeling foods produced using animal cell culture technology as “meat” or allowing them to harbor a USDA meat inspection stamp would undoubtedly be considered false and misleading. If FDA fails to fulfill its duty consumers will be unable to make educated and health conscious purchasing decisions.

Inadequate market competition is a pressing issue facing nearly all agriculture producers across our state. Family producers are in a constant battle to maintain already dwindling numbers of farms and ranches. Major meat packers and processors such as Tyson Foods and Cargill have already invested in start up companies working to bring foods produced using animal cell culture technology to market. Fairly and accurately labeling and stamping animal cell cultured products would help in protecting family farmers and ranchers.

In short, it is critical for the well being of the American consumer and producer that a clear standard of identity for “meat” and related products is established and that this standard is implemented consistently across the federal government.

On behalf of our membership, I thank you in advance for your consideration of these comments.

Sincerely,

Doug Sombke
S.D. Farmers Union President