



Texas and Southwestern Cattle Raisers Association

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*The*  
**Cattleman**



December 18, 2018

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

Docket ID: FSIS-2018-0036  
Agency: Food Safety and Inspection Services (FSIS)  
Parent Agency: United States Department of Agriculture (USDA)

*Submitted via electronic mail to [www.regulations.gov](http://www.regulations.gov)*

RE: Comments on the use of cell-cultured technology to develop products derived from livestock and poultry

The Texas and Southwestern Cattle Raisers Association (TSCRA) appreciates the opportunity to comment on the potential hazards, oversight considerations, and labeling of cell cultured food products derived from poultry and livestock tissue.

TSCRA is a 141-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has more than 17,500 beef cattle operations, ranching families and businesses as members. These members represent approximately 55,000 individuals directly involved in ranching and beef production who manage 4 million head of cattle on 76 million acres of range and pasture land primarily in Texas and Oklahoma, but throughout the Southwest.

As U.S. cattle producers, TSCRA respectfully requests the U.S. Department of Agriculture (USDA) and Food and Drug Administration (FDA) take immediate action to preserve a fair and competitive marketplace for all meat food products, regardless of the method in which these products are produced.

TSCRA firmly believes USDA's Food Safety Inspection Service (FSIS) must have primary jurisdiction over cultured protein products. As these new products come to market, USDA oversight is the best way to ensure cell-cultured protein is safe and accurately labeled. USDA oversight is also consistent with existing federal laws, which give USDA the responsibility for regulating all meat food products.

Consumers deserve the highest food safety standards when it comes to the products they put on their family's table. USDA-FSIS inspects processing facilities daily; by contrast, FDA only inspects facilities once every several years. Continuous, daily inspection by highly-trained professionals is a hallmark of USDA-FSIS that keeps consumers safe. It will also ensure that all meat food products are treated equally. Under USDA-FSIS oversight, any product purporting to be a meat food product will be subject to the same inspection procedures as traditional products.

In addition to food safety, under the law USDA is obligated to ensure all meat food product labels provide consumers with the appropriate information to make informed purchasing decisions. Consumers deserve to know if the product they are buying is naturally produced beef, or a meat food product manufactured in a laboratory. Under USDA-FSIS, labels are based on sound science and must receive approval before entering the market, adding an additional layer of protection against deceptive claims made by producers of cell-cultured protein. By contrast, FDA does not require label pre-approval and has a history of failing to enforce labeling standards.

Consumers can trust USDA to enforce stringent food safety standards and prevent the false or misleading marketing of cell-cultured protein. Please ensure that USDA oversight is solidified before these products hit the commercial. Anything less would be a disservice to consumers and livestock producers alike.

If you have any questions regarding these comments, please contact Peyton Schumann at 512-469-0171 or at [pschumann@tscra.org](mailto:pschumann@tscra.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Robert E. McKnight, Jr.", written in a cursive style.

Robert E. McKnight, Jr.  
President

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