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

**Docket No. FSIS-2020-0036
*Submitted via Regulations.gov***

Texas and Southwestern Cattle Raisers Association Comments on the United States Department of Agriculture's Food Safety and Inspection Service Publishing of Advanced Notice of Proposed Rulemaking for the Labeling of Meat or Poultry Products Comprised of or Containing Cultured Animal Cells.

To Whom it May Concern:

The Texas and Southwestern Cattle Raisers Association (TSCRA) appreciates the opportunity to submit comments on the advance notice of proposed rulemaking (ANPR) regarding the labeling of meat or poultry products comprised of or containing cultured animal cells set forth by the United States Department of Agriculture's (USDA) Food Safety and Inspection Service (FSIS).

The Texas & Southwestern Cattle Raisers Association (TSCRA) is a 144-year-old trade association and is the largest and oldest livestock organization based in Texas. TSCRA has more than 17,000 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 pastureland, primarily in Texas, Oklahoma and the Southwest.

Over generations, cattle producers have worked tirelessly to improve their herds to produce the highest quality product possible. It is a product that consumers feel safe purchasing to feed their families. However, these ranching families will soon be competing with lab technicians and factory workers who are manufacturing a product that they want to call beef but has never grazed grass to help sequester carbon or set foot in a pasture.

Our members, and cattle producers across the country, are highly concerned with the implications should this new product not be clearly labeled and differentiated from traditionally raised beef. These concerns are based on real-world experience, as beef producers are already battling the mislabeling of plant-based proteins. Consumers are misled by the use of cattle imagery and descriptions such as "beef crumble," despite the product containing zero beef. Companies with plant-based imitation products readily target traditional beef products, misleading unwary customers.

We support the formal agreement between FSIS and the Food and Drug Administration to jointly manage the production and sale of lab-grown protein products. FSIS has long been an agency that helps ensure meat sold in the U.S. the safest in the world. With these new cell-cultured products coming to market that wish to characterize themselves as "meat," FSIS has a responsibility to ensure the same stringent standards of production and food safety are applied to all market participants. Therefore, we hope that FSIS accurately labels this new lab-grown

product for what it is so that consumers have confidence in what they are purchasing to feed themselves and their families

Through this ANPR, we are pleased to see FSIS asking what we, as producers, would like to see when labeling these new laboratory-manufactured creations. As cattle producers, we are in constant competition with other proteins, weather, markets and much more when raising and selling our product. We are not concerned with competition. Instead, we are simply asking for the same clarity in labeling for these products as required for traditional beef so that products are distinguishable on store shelves. This will in turn protect the reputation of beef raised by ranchers and provide consumers with clearly defined choices in the supermarket.

As FSIS begins its process to determine the best way to appropriately name and label products comprised of or containing lab-grown protein, consumer awareness must remain the top priority. TSCRA recommends USDA adopt “lab-grown” as an unambiguous description for these products. Unlike terms that the cell-cultured community has put forth, such as “cultured,” “clean” or “cultivated,” “lab-grown” will provide a clear and unambiguous description that effectively distinguishes the product from traditionally harvested meat. We would also be comfortable with “artificially grown” or “artificially cultured” as alternatives. These terms will leave little room for misinterpretation among consumers due to Webster’s using “artificial” and “grown” in its definition of “cultured.”

FSIS, through this ANPR, has also asked the public its opinion on the blending of cell-cultured products into traditional ground beef. USDA already has requirements related to the lean-to-fat ratio within ground beef’s standard of identity. We encourage a similar precedent for a percentage related to lab-grown meat content for consumer disclosure. Under current law, the maximum fat content for ground beef is 30%. A lab-grown ratio requirement for disclosure would help set a threshold for consumer notification and should be significantly lower. Any product sourced from or using any lab-grown protein—including broths, bases and flavorings—should include a prominent and easy-to-understand “lab-grown” identifier on the label for consumers.

We all understand the importance of free enterprise and consumer choice. There is room in the marketplace for consumers who want animal proteins raised and harvested in the traditional manner, proteins grown in a lab or those who abstain from meat products all together. When it comes to accurate labeling, all will benefit from clear definitions and labeling to make their choice.

If you have any questions regarding these comments or TSCRA’s position, please contact Peyton Schumann at (512) 469-0171 or pschumann@tscra.org.

Respectfully,



G. Hughes Abell
President