



September 21, 2018

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Submitted Electronically

Re: Docket No. FDA-2018-N-2155 for "Foods Produced Using Animal Cell Culture Technology; Public Meeting; Request for Comments."

North Dakota Farmers Union (NDFU) appreciates the opportunity to comment on Docket No. FDA-2018-N-2155 regarding "Foods Produced Using Animal Cell Culture Technology; Public Meeting; Request for Comments." NDFU, the largest general farm organization in North Dakota, represents more than 40,000 farm and ranch families and their energy and agriculture supply cooperatives. NDFU's member developed policy positions have long advocated for clear product and commodity labeling for consumer protection and information.

NDFU submitted comments to the United States Department of Agriculture (USDA) Food Safety and Inspection Services (FSIS) in support of Petition 18-01 on April 2, 2018, requesting FSIS establish labeling requirements for beef and meat products. Subsequently, the Food and Drug Administration (FDA), under the Federal Food, Drug, and Cosmetic Act (FFDCA) asserted "'food'"¹ and the "substances used in the manufacture of these products of animal cell culture technology and the products themselves that will be used for food are subject to FDA's jurisdiction and applicable statutory and regulatory food safety and food labeling requirements."²

NDFU reiterates its opposition to labeling products created using animal cell culture technology as "meat", and related products as "beef", "poultry", or "seafood". "Meat" should be defined consistently across the federal government, including the FDA and FSIS, as a product from the tissue or flesh of animals that have been harvested in the traditional manner. Products derived from alternative sources, such as synthetic products from plants, insects, or other non-animal components and any product grown or created in a lab from animal cell culture technology should be prohibited from being labeled as meat, beef, poultry, or seafood. Labeling products made using animal cell culture technology as "meat", or related products as "beef", "poultry", or "seafood" is false and misleading to consumers. Consistent, clear, and accurate labeling across the federal government will help protect and inform consumers, and eliminate the likelihood of consumer confusion, regarding the products consumers are purchasing.

NDFU respectfully requests the FDA adopt the above definition of "meat" and ensure that products created using animal cell culture technology are not labeled as "meat" and related products are not labeled as "beef", "poultry", or "seafood."

Sincerely,

NORTH DAKOTA FARMERS UNION

Mark Watne
President

¹ "Foods Produced Using Animal Cell Culture Technology; Public Meeting; Request for Comments."
<https://www.regulations.gov/document?D=FDA-2018-N-2155-0001>

² *Id.*