



April 2, 2018

Ms. Mary Porretta, Petitions Manager, Issuances Staff  
Mr. Matthew Michael, Director, Issuances Staff  
U.S. Department of Agriculture  
Food Safety and Inspection Service  
Office of Policy and Program Development  
1400 Independence Avenue, SW  
Washington, D.C. 20250-3700

Sent Via E-mail

Re: Comments on Petition 18-01 – Petition to Establish Beef and Meat Labeling Requirements filed by the United States Cattlemen’s Association (USCA)

North Dakota Farmers Union (NDFU) appreciates the opportunity to comment on Petition 18-01 requesting the U.S. Department of Agriculture, Food Safety and Inspection Service (FSIS) establish labeling requirements for beef and meat. 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.

With the invention and rapid advancement of “clean meat”, “cultured meat”, “in vitro meat”, and meatless options designed to closely imitate meat, it is imperative labeling requirements be established for beef and meat products to adequately protect and inform consumers, and to eliminate the likelihood of consumer confusion. NDFU supports the request that FSIS add to the Food Standards and Labeling Policy Book the following definitions and labeling requirements for beef and meat:

- “Beef” is product from cattle that have been born, raised, and harvested in the traditional manner. Products derived from alternative sources such as synthetic product from plants, insects, or other non-animal components and any product grown in labs from animal cells are prohibited from being labeled as beef.
- “Meat” is product from the tissue or flesh of animals that have been harvested in the traditional manner. Products derived from alternative sources, such as synthetic product from plants, insects, or other non-animal components and any product grown in a lab from animal cells are prohibited from being labeled as meat.

NDFU respectfully requests FSIS establish definitions and labeling requirements for beef and meat in accordance with Petition 18-01 filed by the United State Cattlemen’s Association.

Sincerely,

NORTH DAKOTA FARMERS UNION

A handwritten signature in black ink that reads "Mark Watne".

Mark Watne  
President