

Official Comment from The Good Food Institute

Delivered at the USDA and FDA joint public meeting on “The Use of Cell Culture Technology to Develop Products Derived from Livestock and Poultry”

October 23, 2018

The Good Food Institute is a nonprofit think tank with 50 staff members across science and technology, innovation, corporate engagement, and policy. We are grateful to the USDA and FDA for engaging stakeholders in a robust and open dialogue about cultured meat, sometimes called clean meat or cell-based meat. We appreciate your commitment to enabling innovation and technological advances in the food sector and ensuring the safety of the resulting food products.

The United States has a robust regulatory regime that is more than capable of ensuring that cultured meat is safe and truthfully labeled. The regulatory path to market must assure consumer safety and confidence without imposing unnecessary or duplicative regulatory barriers to producers. As the National Academy of Sciences has recommended, there should be a single point of entry into the regulatory framework for the products of biotechnology to streamline the approval process for products like cultured meat. It is abundantly clear that the FDA has the premarket authority and expertise to be that point of entry — a position echoed by the vast majority of companies and organizations that submitted written comments to the FDA’s docket regarding foods produced using animal cell culture technology, irrespective of any other positions they hold on cultured meat. The FDA currently evaluates microbial, algal and fungal cells generated by large-scale culture that are used as food ingredients, as well as ingredients in meat and poultry, and it also manages safety issues associated with cell culture technologies in therapeutic settings. As Dr. David Welch, GFI’s Director of Science and Technology, explained to the FDA’s Science Board yesterday, the potential hazards associated with the production of foods using animal cell culture technology are not significantly different than those associated with the other forms of food production and processing that the FDA already regulates. And as was discussed yesterday, there are well established controls to effectively mitigate against these hazards.

Once premarket safety has been established, inspection and labeling requirements should ensure a truly fair and even playing field for all meat, poultry and seafood producers. In particular, if USDA exercises regulatory authority over cultured meat and poultry products, it should apply basic principles of fairness equally to cultured and conventional meat producers. Cultured meat is expected to be identical to conventionally produced meat in its basic nature, composition, and all other essential characteristics, and producers should be able to use meat and poultry-related terms on their labels. Any additional labeling requirements—including statements of identity, information about production methods, and species origins of meat—should apply equally to both conventional and cultured meat products to ensure consumer confidence and to avoid prejudicial requirements that could disadvantage producers.

As Secretary Perdue astutely observed to reporters earlier this month, “We don't want this new technology to feel like they've got to go offshore or outside the United States to get a fair regulatory protocol.” GFI agrees wholeheartedly. Some foreign governments have already begun investing in cultured meat companies as a means of addressing food security, food safety, antibiotic resistance, and climate change. The U.S. is currently home to some of the leading cultured meat companies, and the U.S. can and should play a leading role in bringing clean meat to the global market in a way that is safe, efficient, and fair. That's why it's critically important to guarantee all producers are playing on a level playing field.

We're very grateful for this opportunity to comment on the regulation of this extremely promising new technology, and we look forward to continuing this dialogue.