



The Honorable Carmen Rottenberg
Acting Deputy Under Secretary for Food Safety
Food Safety and Inspection Service
U.S. Department of Agriculture

May 25, 2018

Via email: carmen.rottenberg@fsis.usda.gov

Re: Docket FSIS-2018-0016, petition filed by the U.S. Cattlemen's Association

Dear Administrator Rottenberg:

The Plant Based Foods Association (PBFA) respectfully submits the following comments in response to docket FSIS-2018-0016, a petition filed by the U.S. Cattlemen's Association to ask USDA to define the terms meat and beef in such a way that would not allow makers of plant-based alternatives to use those terms.

The Plant Based Foods Association was founded in 2016 to promote the plant-based foods industry by removing obstacles to a fair and competitive marketplace for plant-based alternatives to animal products. We have 112 members, ranging from small start-ups to large established companies, including a significant number of members that manufacture meat alternatives.

Consumers are not confused by the labeling of our members' products. To the contrary, our members market to those consumers actively seeking out plant-based alternatives to conventional meat products. There is room the market for everyone.

Moreover, the petition is moot because USDA does not have any legal authority over plant-based foods. In addition, the petition is an attempt by entrenched interests in the food industry to limit competition and obtain preferential treatment by the government. Acting on this petition would contradict USDA's well-established policy of not favoring producers who use particular production or processing methods. It would also stifle innovation across the industry, impacting both producers of non-animal product and producers of animal products who utilize "non-traditional" methods.

PBFA urges USDA to reject the petition by the US Cattlemen's Association.

Sincerely,

Michele Simon, JD, MPH
Executive Director
Plant Based Foods Association