



November 18, 2021

TO: U.S. Department of Agriculture, Food Safety and Inspection Service
1400 Independence Avenue SW, Mailstop 3758
Washington, DC 20250-3700

RE: Labeling of Meat or Poultry Products Comprised of or Containing Cultured Animal Cells
[\[Docket No. FSIS-2020-0036\]](#)

The [International Food Information Council \(IFIC\)](#) appreciates the opportunity to submit public comments to the Food Safety and Inspection Service (FSIS) pertaining to the labeling of meat and poultry products comprised of or containing cultured cells derived from animals. It is our hope that IFIC's consumer insights can assist the Agency in answering proposed Question 1¹ as it develops labeling requirements for cell-cultured meat and poultry products.

IFIC is a §501(c)(3) nonprofit educational organization with a mission to effectively communicate science-based information about food safety, nutrition and agriculture. One of IFIC's objectives is to elevate the understanding of Americans' eating habits and attitudes toward nutrition and food labeling through consumer research, which we have been conducting for decades. We view consumer research as a critical first step in 1) determining consumer understanding of these issues and 2) examining how knowledge, perceptions and attitudes can impact behavior. This research also supports the development of educational strategies that can be used to bridge knowledge gaps for the American public and inform the policy decisions made by federal agencies.

In November 2020, IFIC surveyed 1,009 American adults for its "[Plant and Animal Protein Choices: Consumer Viewpoints and Purchasing Behaviors](#)" survey.² This research shed light on considerations involved in protein choice as well as familiarity with and interest in products comprised of or containing cultured animal cells (in this survey, the term "cell-based/lab-grown meat" was used). In terms of familiarity, over half of survey takers (56%) said they had heard of cell-based/lab-grown meat, while 34% had not heard of it and 10% were not sure. Curiously, 14% also said they eat cell-based/lab-grown meat at least sometimes, a signal of confusion about the source of animal proteins that are currently accessible in the U.S. market.

This survey also examined purchasing preference between cell-based/lab-grown meat and traditionally raised meat. Survey respondents were provided with a theoretical scenario in which they had the choice between cell-based meat option and an option made from the original animal protein source, with both being the same in taste, look and cost. Nearly three in four (74%) said they would purchase the original animal protein source, while 19% said they would purchase the cell-based option. Eight percent said they would not purchase either product.

Subgroup analyses found that people under age 45 were more likely to say they would select the cell-based meat option compared to those 45+ (24%, vs. 15% ages 45-64 and 12% ages 65+), while those who

¹Question 1: "Should the product name of a meat or poultry product comprised of or containing cultured animal cells differentiate the product from slaughtered meat or poultry by informing consumers the product was made using animal cell culture technology? If yes, what criteria should the agency consider or use to differentiate the products? If no, why not?". [Docket No. FSIS-2020-0036](#).

² International Food Information Council. *Plant and Animal Protein Choices: Consumer Viewpoints and Purchasing Behaviors*. January 2021. <<https://foodinsight.org/plant-and-animal-protein-consumer-survey/>>

identified as white were more likely to say they would choose the original animal protein source, as compared to African Americans and Hispanic/Latinx subgroups (77% vs. 65% and 68%, respectively).

These findings should also be viewed in the context of factors involved in making protein choices more broadly. When asked which factors are most important when including protein in their diet, 64% of survey takers ranked taste in their top three choices, followed by type of protein (56%), healthfulness (52%) and price (51%). Animal welfare (22%) and environmental sustainability (18%) appear to be far less important when considering protein options.

Results of this IFIC survey demonstrate that while a considerable number of Americans have heard of cell-based/lab-grown meat, gaps in familiarity and understanding remain. Further, at this point in time acceptance of these products is dwarfed by a preference for traditionally raised animals, a hurdle that will likely require investments in consumer awareness and education to overcome. In addition, long-standing purchase drivers such as taste, healthfulness and price will continue to drive protein purchasing behaviors as new protein options become available.

Though the topics covered within our consumer research vary, one consistent thread is that consumers value *transparency* when making food choices. In alignment with this theme, IFIC supports efforts by FSIS to increase consumer clarity on meat and poultry products made with cultured animal cells.

IFIC looks forward to future opportunities to support FSIS's strategies to help Americans make informed food decisions and achieve optimal health.

Sincerely,



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