



Principles for Labeling Cultivated Meat



Madeline Cohen
Senior Regulatory Attorney
The Good Food Institute



Photo courtesy of Upside Foods

GFI at a Glance

GFI is a philanthropy-powered 501(c)(3) nonprofit working to create a sustainable, healthy, and just food system by catalyzing the alternative protein industry through three key areas of work:



Science and Technology

Bridging gaps in scientific research, funding, and talent across the alternative protein sector.



Corporate Engagement

Partnering with companies and investors across the globe to drive investment, accelerate innovation, and scale the supply chain—all faster than market forces alone would allow.



Policy

Advancing government investment in sustainable proteins as well as fair regulation and legislation.

We work as a force multiplier, bringing the expertise of our departments to the rest of the world.



United States
Brazil
India

Israel
Europe
Asia Pacific

Promoting Consumer Understanding

- Labels should allow consumers to understand the taste, texture, and uses of these products
- Labels should clearly indicate species to ensure consumers can avoid allergens
- Products are not yet available in stores, limiting the value of current consumer research
- Common or usual names are developed through usage over time
- A top-down mandate to use a specific term may ultimately harm rather than help consumer understanding
- Multiple common or usual names apply to some foods
- 75% of companies surveyed are currently using the term “cultivated” to refer to these products

Ensuring a Level Playing Field



- Allow consumer-preferred nomenclature so long as allergenicity and composition are communicated
- Avoid disparaging or unfavorable nomenclature
- Consider explanatory statements
- If differentiation is required, permit a menu of differentiating terms
- Allow use of familiar terms where applicable (e.g., “burger,” “steak,” or “fillet”)
- Allow claims and voluntary disclosures that can be substantiated

Advancing Innovation & American Leadership in the Sector



- Other countries, including China, are investing in cultivated meat technology and working to create flexible regulatory frameworks for these products
- USDA should avoid labeling regulations that disadvantage the U.S. cultivated meat industry by limiting innovation
- The industry is still young, new products and methods of production are likely to develop. Labeling rules should be flexible enough to accommodate these advances.

Considering Global Harmonization

- Inconsistent customs codes and food categorization rules could burden cultivated meat companies with cost-prohibitive tariffs and products could be held upon import into other countries
- The U.N. Food and Agriculture Organization and World Health Organization have also conducted work related to cultivated meat nomenclature that may influence other countries
- 30+ industry stakeholders in the APAC region signed a memorandum of understanding, aligning on the term “cultivated” as the preferred English-language descriptor for food products grown directly from animal cells

Complying with the First Amendment



- The First Amendment protects non-misleading commercial speech
- It safeguards a company's right to share truthful information and the right of consumers to receive accurate commercial information
- If the government seeks to restrict truthful commercial speech, it must show that the restriction directly advances a substantial government interest and is not more extensive than necessary
- Labeling rules that do not narrowly and directly advance such an interest may violate the First Amendment



Contact: madelinec@gfi.org

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