Principles for Labeling Cultivated Meat

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Photo courtesy of Upside Foods
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.
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
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