

# Our Statement to USDA on Food Labels for Animal Cell Culture Products



*By Alex Berezow, PhD — October 24, 2018*



USDA

I recently testified to the USDA about food labels for products made using animal cell culture techniques. The testimony is below.

## **USDA and FDA Joint Public Meeting on the Use of Cell Culture Technology to Develop Products Derived from Livestock and Poultry.**

USDA, South Building  
1400 Independence Avenue, SW  
Washington, DC 20250-9911

October 24, 2018

Good afternoon. I'm Alex Berezow, a PhD microbiologist and Senior Fellow of Biomedical Science at the American Council on Science and Health.

Why do we require labels on food? The answer is simple and straightforward: To provide important nutritional and health information so that consumers can make informed choices about the foods they eat. That's it. A food label is not the appropriate place for commentary about science or technology and especially politics. Unfortunately, over the past few years, we have seen activist movements whose aim is to do just that.

Consider the effort to label GMOs. This movement's mission – which is supported largely by the organic food industry – is to demonize conventional or biotechnologically enhanced agricultural in order to boost sales of so-called “natural” products. Efforts to use the power of government to force companies to place mandatory labels on products containing GMOs are fundamentally

flawed for at least two reasons:

First, there is no objective, scientific difference between foods produced using biotechnology and those produced by other means. Genetically modified corn grown in Nebraska, organic corn grown in Iowa, or corn grown in a greenhouse by an amateur gardener in North Dakota are nutritionally and chemically equivalent. The process by which a food is produced is not relevant to its nutritional content or its safety, which is why labeling makes no scientific sense.

Second, consumers assume that food labels have hidden meanings. Absence claims, such as “GMO free,” imply that there is something wrong with GMOs, and consumers interpret them to mean that.

Imagine if some corn sold in grocery stores came with the label, “Grown in Nebraska.” Consumers would conclude that there is something unique (either in a good way or a bad way) about Nebraska corn. But, in reality, Nebraska corn is the same as all the other corn grown in the United States. Therefore, forcing a company to label biotechnologically enhanced foods implies that there is something unique (again, either good or bad) about such foods. However, that’s not true, and such a mandatory label would force a company to be dishonest about its own product.

This logic applies equally to the current discussion on animal cell culture. One day, animal cell culture could be used to make “lab-grown meat,” which would allow consumers the health and lifestyle benefits of consuming meat while decreasing their impact on the environment. Thus, animal cell culture techniques should be encouraged. Mandatory labels would do the opposite, discouraging startups and innovators from exploring new ways to use biotechnology to enhance our food supply.

The FDA’s policy of “substantial equivalence” should govern foods produced using animal cell culture techniques. As long as innovators can demonstrate that their products are nutritionally equivalent to their non-biotechnologically enhanced counterparts, then companies should not be required to submit to any further regulatory burden, including mandatory labels.

Instead, the USDA and FDA should consider examining the claims made by the organic industry, whose long history of deceptive marketing practices have resulted in the spread of misinformation about biotechnology.

In summary, food labels serve one purpose and one purpose only: To provide nutritional information to consumers. The process by which a food is produced is not relevant to its nutritional content or safety profile and, therefore, absolutely should not require special labeling.

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