



TENNESSEE FARM BUREAU FEDERATION

November 12, 2024

Rachel Edelstein
Assistant Administrator
Office of Policy and Program Development
Food Safety and Inspection Service
United States Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250-3700

Re: Docket No. FSIS-2024-0010; Availability of FSIS Guideline on Substantiating Animal-Raising or Environment-Related Labeling Claims

Dear Assistant Administrator Edelstein:

The Tennessee Farm Bureau Federation (TFBF) appreciates the opportunity to respond to the Food Safety and Inspection System (FSIS) request for comment on the rule titled, *Availability of FSIS Guideline on Substantiating Animal-Raising or Environment-Related Labeling Claims*. TFBF represents a diverse group of commodity producers across the state and, with over 695,000 members, is the largest general farm organization in Tennessee. Our policy is developed through a grassroots network of farmer members who identify, research, deliberate, vote on, and adopt policies on various issues related to agriculture and rural living, including labeling of food products.

The United States food supply is the safest, highest quality, most abundant, and most affordable in the world. Farmers recognize a safe food supply is important to the integrity of the agricultural industry but, most importantly, to the well-being and health of the consumer. Integrity in food labeling is a vital element in maintaining food safety. TFBF supports consumer-friendly, science-based labeling of agricultural products providing consumers with useful information concerning the ingredients and nutritional value. Labels should not be required to contain information on production practices not affecting nutrition or safety of the product.

As new and emerging technology reaches the market, we encourage thorough and continued research. Agricultural products using approved technologies should not be required to designate individual inputs or specific technologies on the product label. We

oppose misleading statements implying food is superior and/or safer when produced using certain production practices over other approved practices.

TFBF also opposes the use of environmental claims in the marketing of the product which are not verified by USDA as a regulatory agency and based on peer-reviewed, sound science. The false labeling or “greenwashing” of any food product claiming to having less impact on the environment provides confusion and misleads consumers about the nutritional value and safety of a food product.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Eric Mayberry". The signature is written in black ink and is positioned below the word "Sincerely,".

Eric Mayberry

President

Tennessee Farm Bureau Federation