



'Meat' Denominations for Plant-Based Products

During the European Parliament's last mandate, the Committee on Agriculture and Rural Development adopted a report on the European Commission's proposal for a Regulation establishing a Common Organisation of the Markets (CMOs) in agricultural products (2018/0218 COD). CMOs are intended to provide a framework for the market support schemes set up in the various agricultural sectors and are used as means of meeting the objectives of the Common Agricultural Policy, stabilising markets, ensuring a fair standard of living for farmers, and increasing agricultural productivity.

To the consternation of NGOs and the food industry alike, this report included an amendment that effectively seeks to ban plant-based products from using names that have typically been associated with meat products and preparations, such as "steak," "sausage," and "burger." In sum, this proposal would have the effect of banning widely used and widely understood terms such as 'veggie burger'. The amendment also proposes to further restrict the naming of dairy alternatives by prohibiting terms, such as "yoghurt style", "alternative to cheese" or "butter substitute."

The stated justification for the amendment is that it is intended to prevent commercial practices that mislead consumers. However, there is very little evidence to suggest that the use of the terms detailed in the amendment in the context of non-meat products is misleading for consumers. Indeed, consumers intentionally purchase these items because they do not contain meat or dairy. We therefore regard this amendment as nothing less than a thinly veiled attempt to undermine the growing success of, and restrict the market for, plant-based alternatives to animal-derived products.

Contrary to the claims of the proponents of this amendment, we argue that – if adopted by the European Parliament – restricting the use of 'meat' denominations for plant-based products is disproportionate and would actually:

- ◆ **Reduce consumer clarity:** terms such as "burger" or "sausage" are recognisable to consumers and provide guidance to them with regard to the taste, texture, preparation and appearance of plant-based alternatives to meat products (e.g. they understand that any patty-shaped product marketed as a "burger" can be grilled and served in a bun). Renaming recognised names and brands would provide no further clarity for consumers of meat and would be unnecessarily confusing to consumers of non-meat products. Indeed, one can argue that it would instead undermine the EU's consumer protection agenda by needlessly introducing uncertainty around the naming of plant-based goods.
- ◆ **Contradict the mandate of the CMOs as defined by Article 40 (TFEU):** this would essentially amount to prioritising the interests of consumers of meat over consumers of non-meat products. Article 40(2) of the TFEU states that it should "exclude any discrimination between producers or consumers within the Union."

- ◆ **Apply a disproportionate measure that will damage businesses:** it would unfairly disadvantage the producers of plant-based products, for the benefit of producers of meat (who would gain exclusive use of terms such as "burger" or "sausage"). This would be of significant detriment to existing businesses that have built brands, product portfolios and intellectual property based on names that could be restricted. It can also be argued that such a measure would be unnecessarily trade-restrictive, disadvantaging businesses from other countries, which wish to market plant-based products, in trading with the EU;
- ◆ **Form a barrier to growth for a burgeoning sector of the food industry** that has developed plant-based products to cater for the nutritional needs of a growing number of consumers who are seeking to reduce or eliminate animal products from their diets. It would make it more challenging for people to do so at a time when EU policymakers should be seeking to encourage and promote more sustainable diets;
- ◆ **Goes against consumers' choices for more sustainable food.** Plant-based foods usually have a significantly lower climate and environmental impact compared to animal-based foods. The CAP should not discourage food choices that align with the need to cut greenhouse gas emissions, as mandated by the UN's Sustainable Development Goals and the Paris Climate Agreement.

Although we strongly contend that the aims of the Amendment are not justified, we note that there are a number of **less restrictive alternatives** that could be implemented to meet the proponents' stated aims with respect to consumer clarity, rather than the requirement for a full ban on the use of such terms for plant-based products. These could include:

- ◆ **More stringent requirements for clear labelling** on the packaging of plant-based goods that emphasises that the products do not contain animal-derived meat in clear, identifiable font;
- ◆ **Using qualifiers:** i.e. allowing the use of these terms for plant-based products when the term is preceded by qualifiers, for example, "plant-based", "vegan" and "vegetarian", and reserving the terms with no qualifiers for meat products. So for example, "sausages" would have to be made from meat, but "plant-based sausages" could still be used.

Further to the above, it is pertinent to note that the AGRI committee's proposal to restrict the use of "meat" names for plant-based products has already received widespread negative coverage in the mainstream international media. Given the serious work expected from the European Parliament during this new mandate on issues such as climate change, seeking to restrict commercial speech and slow the growth of the plant-based market is counterproductive, in particular since numerous studies show the environmental and climate benefits of plant-based diets. Petitions against this proposal have already garnered around 80,000 EU citizens' signatures.

To conclude, considering the perfect clarity of the current designation for plant-based products, as well as the risk of the public disapproval regarding this amendment, along with the inconsistencies of the arguments put forward to support this stricter regulation, we respectfully urge MEPs to reject any proposals to restrict the denominations of plant-based products.

Contacts

Alexander Holst, EU Public Affairs Fellow, The Good Food Institute Europe alexh@gfi.org
 Bruno Menne, Policy Officer and Project Coordinator, SAFE-Safe Food Advocacy Europe info@safefoodadvocacy.eu
 Dr Joanna Swabe, Senior Director of Public Affairs, Humane Society International/Europe jswabe@hsi.org
 Alice Di Concello, Farm Animals Programme Officer, Eurogroup for Animals a.diconcello@eurogroupforanimals.org
 Olga Kikou, Head of Compassion in World Farming, EU Olga.Kikou@ciwf.org
 Célia Nyssens, Policy Officer for Agriculture, European Environmental Bureau celia.nyssens@eeb.org
 Louisianna Waring, Insight & Commercial Policy Officer, The Vegan Society Louisianna.Waring@vegansociety.com
 Ronja Berthold, Head of Public Affairs, European Vegetarian Union ronja.berthold@euroveg.eu
 Andreas Manz, EU Farm Animal Policy Coordinator, Vier Pfoten EU Policy Office, Andreas.Manz@four-paws.org