



EAPF'S POSITION PAPER ON FOOD DENOMINATIONS FOR PLANT-BASED PRODUCTS

Clear labelling for consumers

Brussels, 28 August 2020

Given excessive pressure of current agricultural and food systems on the environment, scientists and policymakers alike are calling for a transition towards sustainable, resilient food systems. This is the ultimate goal of the EU Farm to Fork Strategy (May 2020), which recognises the role of plant-based diets in such transformation. It is thus crucial to guide consumers by providing accurate points of reference when looking for alternatives to animal-based meat and dairy products and to avoid unjustified structural competitive hurdles hindering the transition.

Yet, political discussions on the European Commission's proposal for a Regulation establishing a Common Organisation of the Markets (CMO) in agricultural products ([COM\(2018\)394](#)) already threaten the very objectives of the new EU agri-food policy.

The European Parliament's Committee on Agriculture and Rural Development adopted its [report](#) on the CMO proposal during the last legislature (2019). It introduced two amendments intended to forbid plant-based foods from using names associated with:

- Meat, meat cuts and preparations (Amendment 165) (e.g. 'steak', 'sausage', 'burger', 'escalope', 'filet');
- Dairy preparations (Amendment 171) (e.g. 'yoghurt style').

In this context, terms such as 'plant-based burger' or 'vegan sausages' would be banned. This would be in clear contradiction with the EU's ambition to promote sustainable food patterns and consumption. It is thus essential for the EU to secure fair access to the single market for plant-based foods to enable the transition to sustainable food systems.

The European Alliance for Plant-based Foods (EAPF) calls on policymakers to safeguard the use of 'meat' denominations for plant-based foods, and avoid further restrictions on dairy-inspired preparations (e.g. 'style', 'substitute').

Impacts of a ban on the use of 'meat' denominations on plant-based foods

Reserving terms commonly associated with meat to animal-based products would discriminate against different segments of the plant-based food value chain:

- **Consumers.** EAPF supports the ambition of the AGRI committee to ensure that food information is correct and truthful. In addition to this principle, **food names should not 'be ambiguous or**

confusing for the consumer'. Food denominations play a crucial role in consumers' decision-making at the shelf. Terms such as 'sausage' or 'steak' suggest a certain shape, preparation and texture of the product. Thus, their use in relation to plant-based foods – e.g. as in 'black bean burger' – contributes to clear labels, easy to understand¹. It complements the most crucial piece of information consumers are after – 'black bean' in this case, which relates to the nature of the food (plant-based). **A growing part of the population is looking for alternatives to animal-based products**, whether for dietary reasons (vegetarianism, veganism) or simply to balance their consumption of meat and dairy out of health or environmental considerations. Those consumers voluntarily seek plant-based foods. Prohibiting widely understood denominations such as 'burger' or even 'yoghurt style' for plant-based products could affect consumers' perception of the foods. Instead, achieving sustainable food systems requires diversity in sustainable food choices;

- **Food industry.** The food industry is highly innovative, and a significant part of R&I efforts focuses on alternatives to animal-based products. However, a ban on meat and dairy-inspired denominations for plant-based foods would create barriers for innovative companies – especially SMEs and start-ups. Their access to the single market and their communication towards consumers will become a challenge, as consumers will adapt to new plant-based innovation more easily, when they can associate – and yet clearly distinguish – with already existing products, they are familiar with. Ultimately, this could slow down innovation in the European food industry;
- **Farmers.** According to Article 40(2) of the TFEU, *'[...] [t]he common organisation shall be limited to the pursuit of the objectives set out in Article 39 and shall exclude any discrimination between producers or consumers within the Union'*. Yet, restricted market access for plant-based foods would inevitably discriminate against farmers standing at the beginning of the value chain, and affect their livelihood. This would run counter to the objectives of the CAP to increase agricultural productivity, ensure a fair standard of living, and stabilise markets. Plant-based foods present opportunities for many farmers to strongly engage in sustainable practices, and to supply crops to even more diverse value chains.

As they stand, the amendments of the European Parliament's AGRI Committee report of April 2019 **contradict the political ambitions of the EU Green Deal and the [Farm to Fork Strategy](#)**, which explicitly acknowledges that:

'Moving to a more plant-based diet with less red and processed meat and with more fruits and vegetables will reduce not only risks of life-threatening diseases, but also the environmental impact of the food system'.

Communication 'A Farm to Fork Strategy, point 2.4, p.13.

¹ 'One bite at a time: Consumers and the transition to sustainable food', Analysis of a survey of European consumers on attitudes towards sustainable food, BEUC, June 2020. http://www.beuc.eu/publications/beuc-x-2020-042_consumers_and_the_transition_to_sustainable_food.pdf

Call for political support

EAPF calls on policymakers to enable the use of meat-related names on plant-based foods and prevent further restrictions on dairy-inspired terms. EAPF thus calls on MEPs to:

- **Reject Amendment 165** in relation to terms associated with meat. However, mindful of concerns over potential risks to mislead consumers, EAPF would support a compromise amendment allowing those denominations for plant-based foods under specific conditions. Article 17 of the Food Information to Consumer Regulation (EU) No 1169/2011 requires to enable consumers 'to know the true nature of the food and to distinguish it from foods with which they could confuse it'. Thus, denominations shall be allowed only when 1) the plant-based nature of the food is explicitly mentioned on the front of pack (e.g. 'plant-based sausages', 'vegan filet'), and 2) all information appear in close proximity to the name of the product to ensure clear labelling for consumers. Pictorial representations of the product should also not mislead consumers;
- **Reject amendment 171.**
- **Consider** language for a new amendment to Regulation (EU) 1308/2013 that could promote the objective of enabling European consumers to make healthier and more sustainable food choices, and at the same time be consistent with the objectives of the Farm to Fork strategy.

The European Alliance for Plant-Based Foods (EAPF) brings together like-minded organisations in the plant-based value chain around a unique mission: To put plant-based foods at the heart of the transition towards more sustainable and healthy food systems. The Alliance represents the entire plant-based value chain: Food producers and manufacturers, NGOs, nutritionists, research & academia, and consumers.

