



13 August 2021

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra

Re: Definitions of meat and other animal products

1. The Alternative Proteins Council (APC) is pleased to provide this submission on behalf of its members to the Senate Inquiry (members are listed in Appendix 1). The APC was established in March 2021 as the representative group for Australia and New Zealand's alternative proteins sector.
2. While APC's members produce or process protein products sourced from plant, animal and alternative proteins, our focus is primarily on plant and alternative proteins. The UN's Food and Agriculture Organization (FAO) have six protein categories: plant, meat, eggs and dairy, wild catch fish, aquaculture, and alternative. For the purposes of clarity throughout our submission, APC will refer to plant or alternative protein products.
3. The APC is grateful that the Senate Inquiry provides a platform for a national level discussion about the benefits alternative proteins offers to the Australian economy, Australian workers, Australian farmers, and Australian consumers.

Summary

4. Plant and alternative protein products have been around for centuries, with plant protein alternatives available in Australia for well over 100 years. While many plant and alternative protein products are therefore not new, their more recent product formats as burgers, bacon, sausages and mince, for example, has caught the attention of conventional protein sectors.
5. In recent decades, dairy alternatives such as soy, almond or oat milk have increased in popularity with consumers, co-existing in the marketplace alongside their conventional dairy counterparts, and often produced by companies involved in both plant-based and conventional products. We are now witnessing this positive development in the plant protein alternatives sector globally and in Australia.



6. The plant protein sector is one component of the broader plant and alternative proteins sector, and has seen a notable increase in mainstream retail and foodservice outlets with industry revenue, the number of products available in the supermarket and employment all doubling in the last financial year.¹ The sector is forecast to grow to about \$5B by 2030 according to modelling by Alpha Beta for the Food and Agribusiness Growth (FIAL) Centre,² with similar modelling conducted by the Australian Farm Institute³ for Agrifutures, and the CSIRO.⁴
7. The Government has twice reviewed the matter of plant-based product labelling, with the Ministerial Forum on Food Regulation finding existing policy settings fit-for-purpose, and the Minister for Agriculture's recent working group recommending the development of voluntary industry guidelines.
8. Nationally representative market research data⁵ demonstrates that consumers are buying plant protein products not because they're mistaken, but because they're actively seeking out plant-based options - the plant-based nature of the product is the key selling point, with manufacturers keen to highlight this.
9. Plant protein products carry clear qualifiers consistent with the Australian New Zealand Food Standards Code (ANZFS) requirements where the name of the food or description of the food must be sufficient to indicate the true nature of the food.
10. Plant protein products can generally be 'vegan', 'vegetarian' or 'plant-based'. These terms are recognised ISO standards and PAS (publicly available specification) standards.
11. Recent research analysing 95 plant protein products in Australian supermarkets has shown that when compared like-for-like with conventional meat sausages, mince, burgers and bacon, plant protein options are on average nutritionally comparable or superior,⁶ and have the added benefit of dietary fibre and in most cases considerably lower saturated fat than their conventional meat counterparts.
12. Plant and alternative proteins are emerging in the context of a global population growing to 10 billion by 2050, and as an export oriented, value-added product complementary to Australia's existing food system well positioned to contribute to Australia meeting soaring global demand for protein. Without strong support for this industry domestically, Australia risks forgoing a valuable new export opportunity.
13. With cultivated meat products (referred to as 'synthetic' in the Terms of Reference) still several years away from commercial reality in Australia, the APC considers that it is too early to hold an informed conversation on their nomenclature.



Economic & agricultural opportunities (TOR 1(c))

14. Australia's emerging plant and alternative protein sectors are still relatively young, but are growing steadily. Many Australian plant protein product manufacturers currently utilising imported ingredients, due to the lack of local protein fractionation facilities, are making progress to source Australian-grown ingredients for use in plant protein and dairy alternatives.
15. As the sector grows, and fractionation capacity increases, plant protein products will provide new opportunities for Australian farmers to supply their produce into a value-added domestic supply chain, rather than into the more volatile global commodity markets. This is particularly beneficial given that more than half of the value of Australian agricultural production comes from cropping; value that can be enhanced through value-adding such as protein fractionation.
16. This means new jobs in regional communities where new plant protein processing and product manufacturing facilities are being built. Plant protein products alone are projected to generate nearly \$3B in Australian sales by 2030⁷ – contributing to the Australian Government's industry-led goal of a \$100B food and fibre sector by 2030.
17. The growth of plant and alternative proteins must be viewed in the global context of a growing global population, projected to increase to 10 billion by 2050. Population growth combined with rising affluence in many markets will cause a projected increase in global demand for meat by 73% by 2050.⁸ Plant and alternative proteins can increase the capacity and diversity of our protein supply given production resource limitations.
18. Separately, demand for plant proteins specifically, is also growing. In some export markets such as China and Thailand, this demand is expected to increase 200% by 2025.⁹
19. Analysis by the Food and Agribusiness Growth Centre (FIAG) in 2019¹⁰ highlights the forecast growth trend of the different protein types: conventional meat will be the highest by value, plant protein will be the highest by volume, and alternative proteins will be the fastest growth in demand.
20. Global protein demand growth reveals a real and tangible opportunity for Australia to export both conventional meat and plant and alternative protein products. These two sectors can comfortably co-exist to grow the value of our agri-food sector and position Australia to take advantage of the growing global protein demand opportunity.



21. Some of the world's largest meat producers such as Cargill,¹¹ Tyson¹² and JBS,¹³ also active in Australia, are repositioning themselves as protein producers, given their significant investments in plant and alternative proteins. Australian conventional meat businesses are also increasingly diversifying into the plant protein space, with several having launched plant protein products in the domestic market.
22. The APC believes it is ill-informed for certain parties to attempt to 'protect' conventional agricultural sectors, when the evidence shows that alternative proteins provide both economic benefits, and an opportunity for farmers, constituting a complementary addition to Australia's food system.
23. In 2020, Agrifutures commissioned the Australian Farm Institute to quantify the size of the opportunity presented by plant and alternative proteins. Their report¹⁴ concluded that: "*the emerging market for alternative proteins should be seen not as a threat to existing production systems but as a means of diversifying choices for producers, processors and consumers to fill the growing gap between global protein demand and supply.*" The APC fully supports the sentiment expressed by Agrifutures and the Australian Farm Institute.

Previous examination of this issue (TOR 1(a))

24. The former Ministerial Forum on Food Regulation (now the Food Ministers Meeting), at the request of the former Minister for Agriculture, examined the issue of plant-based product labelling in both 2018 and 2019, finding existing regulations fit-for-purpose.
25. The current Minister for Agriculture convened a 'working group' under the auspices of the Department of Agriculture, Water and the Environment (DAWE) to again examine the issue. The Working Group comprised a cross section of organisations from meat and livestock, horticulture and the food industry. This Working Group undertook extensive industry consultation, with a majority of members agreeing that a voluntary approach to the labelling of plant protein products, consistent with existing Australian Consumer Law and the ANZFS, is the preferred way forward. The APC affirms this approach and is actively engaging in discussions regarding voluntary guidelines. The department's full discussion paper and recommendation is currently with the Minister for Agriculture for consideration.

Clear labelling of plant protein products (TOR 1(a), 1(c) and 1(d))

26. The APC believes that clear product labelling is of critical importance to enable consumers to make informed purchasing decisions. Front-of-pack labelling on plant protein products should clearly convey that these products do not contain animal meat. Consistent with existing research and industry recommendations, the APC supports the Ministerial Forum's findings that current regulations are fit-for-purpose.

27. For clarity, the APC refers to the following:

- **Qualifiers:** Plant protein products in Australian supermarkets should convey to consumers the nature of the food as required by the ANZFS. Qualifiers such as 'plant based', or 'meat free' must be used in a product's name or elsewhere on front-of-pack to show that they do not contain animal flesh.
- **Utility terms:** Widely understood utility terms, such as 'burger' or 'mince', communicate to the consumer how to use a product in a recipe or meal. This draws on universal terminology that enables busy shoppers to make informed decisions.
- **Animal-specific meat terms:** Terms such as 'beef' or 'chicken', when qualified – e.g. 'beefy' or 'chicken-style' – can be used to indicate flavour characteristics of a food, while also indicating the product does not contain animal meat.

28. Current product labelling:

- 100% of the 252 plant protein products available in Australian supermarkets as of July 2021 include a qualifier on front-of-pack labels, and the vast majority of products – 85% – include at least two qualifiers on front-of-pack, with 56% of products including three or more qualifiers on front-of-pack.¹⁵
- Most product names use utility terms, and 34% use animal-specific meat terms. Of the total 252 products analysed, 26% use an animal-specific meat term that is modified to indicate it is meat free, using phrases such as 'fishless' 'chicken-style' 'pork-free' etc. Only 8% of products use an unmodified animal meat term in the product name (such as 'pork', 'chicken'), accompanied by an average of 2.4 front-of-pack qualifiers to indicate the product is meat-free.¹⁶
- Less than 11% of products use depictions of animals on their product packaging, and only 4% use animal imagery that comprises more than 10% of the front-of-pack label – and in all instances, these images are



accompanied by an average of 3.4 front-of-pack qualifiers indicating that the product does not contain animal flesh.¹⁷

Consumer demand & understanding

29. Nationally representative consumer research indicates that 91% of Australians have never made a mistaken purchase of a plant protein product thinking it was its conventional counterpart, while of the remaining 9%, it was more likely vegans or vegetarians who purchased a product containing animal-derived ingredients.¹⁸ In Europe, consumer surveys¹⁹ show that the vast majority of European citizens overwhelmingly back the continued use of 'meaty' names for plant protein products. The APC also notes the recent release of a survey commissioned by a variety of animal agriculture industries which contains significant methodological irregularities, rendering its results questionable.
30. In its submission to this Inquiry, the Australian Competition and Consumer Commission provided definitive evidence that it 'has not received information that the labelling of plant-based substitute products is an issue causing consumer detriment'.²⁰ The ACCC added that 'a court would view the overall impression conveyed by the labelling of these products as unlikely to mislead an ordinary consumer', and that 'most retailers...have these products located separately [...which] makes it even more unlikely for consumers to be misled'.
31. The APC is unaware of any reliable quantitative evidence to suggest that consumers are mistakenly purchasing plant protein products, with substantial evidence demonstrating the contrary, including direct evidence from the ACCC. The plant-based nature of products is the motivation for consumer purchase.
32. Plant protein alternatives have been around for centuries, with APC member Sanitarium's "nut-meat" on Australian shelves since 1912²¹. Just as consumers understand that the use of 'steak' in steak and onion chips and 'butter' in peanut butter refers to a characteristic of these products and not their contents - with examples across the supermarket, from potato chips to noodles and stocks - Australian consumers understand the use of 'sausage', and 'bacon' on plant protein alternative products describes the utility or flavour of these products.
33. Plant-based dairy alternatives such as soy milk have developed a substantial consumer following in recent decades, and now coexist with their conventional dairy counterparts. These products are often produced by traditional dairy companies attempting to expand their product range into plant-based categories and appeal to all consumers and changing consumer preferences.



34. Plant protein product manufacturers are responding to consumer demand for plant protein options, using terminology and clear qualifiers consumers understand. If familiar and well understood terms were to be restricted, manufacturers would be forced to concoct contrived terminology, which would simply confuse consumers, an approach contrary to the spirit of clear consumer information, choice, and innovation.

The importance of consumer choice

35. The labelling of products is regulated by Australian Consumer Law and the ANZFS. Appropriate mechanisms exist should issues be identified. Fundamentally, what one food sector can and cannot say on packaging should be determined by evidence, consistent with regulation, recognising the importance of business innovation and consumer choice.

The international labelling experience

36. As plant and alternative protein categories have expanded around the world, similar labelling conversations have occurred in other jurisdictions. In 2020 the European Parliament rejected an amendment proposing to ban terminology such as 'burger', 'sausage', 'steak' for plant protein alternatives, although it passed an amendment on dairy alternatives. This vote by the EU parliament is now in a discussion phase known as the 'trilogue' between European Union member states, the European Commission, and the European Parliament. APC's understanding from European stakeholders is that the amendment is likely to be modified.
37. In the USA, restrictions on plant protein alternative terminology have been proposed multiple times, and in the majority of states these proposals were rejected. Where they were adopted, many states chose to allow plant proteins to use "traditional" animal meat terms so long as the labels include clear qualifiers indicating the product contains no animal ingredients. At a national level, efforts to codify restrictions on plant protein and dairy alternative labelling through Congress have also failed.
38. There have also been similar challenges to labelling terminology, resulting in failed bills in: Arizona, Colorado, Hawaii, Illinois, Indiana, Iowa, Kansas, Maryland, Michigan, Nebraska, New Mexico, Tennessee, Texas, Vermont, Virginia, Washington and Wisconsin.²²

Health and nutrition (TOR 1(b))

39. Recent research analysing 95 plant protein products in Australian supermarkets has shown that when compared like-for-like with conventional meat sausages, burgers and bacon, plant protein options are on average nutritionally comparable or superior.²³ Across all categories, plant protein products have on average a four star health rating.
40. Plant protein products such as sausages, burgers and schnitzels offer certain health benefits over their traditional counterparts, such as dietary fibre, of which 72% of Australians are not consuming the 'Adequate Intake'²⁴ levels as defined in Australian Dietary Guidelines.²⁵ Of the plant protein products that listed dietary fibre content, 65.7% meet the FSANZ requirements to be a "good source of fibre" (at least 4g per serve). Additionally research found that plant protein products contained considerably lower saturated fat than similar conventional meat products.²⁶
41. In terms of food additives, plant protein products on Australian and New Zealand supermarket shelves contain many of the common food additives also used in conventional processed meat products, all of which have been deemed safe to consume by Food Standards Australia New Zealand (FSANZ).

Cellular agriculture (TOR 1(a) and 1(d))

42. The APC notes that "synthetic" proteins have been identified in the scope of this inquiry. Common industry terminology refers to this field of production as cellular agriculture, with major branches including cultivated meat, and products derived from fermentation processes.
43. Cellular agriculture products are several years away from commercial reality in Australia and New Zealand. The APC believes that it is premature for the Senate Inquiry to be considering regulations for an industry that is not near commercial availability, however, some important principles can be drawn from global leaders in this space.
44. The APC believes that FSANZ's existing safety assessment framework provides an appropriate mechanism to undertake relevant assessments of products during their final development and prior to market entry.
45. Labelling plays an important role in communicating the true nature and description of a product so that consumers can make an informed choice. This communication is vital in food safety considerations such as food allergen information. Labelling that differentiates cultivated meats from their conventional counterparts, whilst



specifying the type of meat or dairy contained in the product will be necessary to ensure the safety of consumers with food allergies, such as those with a shellfish or cow's milk allergy for example.

Recommendations

46. The APC recommends the Senate Inquiry:
- a. Recognise the existing regulatory settings as fit-for-purpose, consistent with the Ministerial Forum on Food Regulation's findings.
 - b. Support the alternative protein industry to develop voluntary industry guidelines for the labelling of plant and alternative protein products, in-line with existing Australian Consumer Law and the ANZFSR regulations, and consistent with the March 2021 recommendation of the working group established by the Minister for Agriculture.

Conclusion

47. Plant and alternative protein products offer a new economic opportunity for Australia, with benefits accruing across the supply chain, from R&D, to farmers, manufacturers and consumers. Plant and alternative protein products will complement Australia's existing basket of goods, further strengthening the nation's position as a leading exporter of high-quality Australian grown and made products.
48. The APC believes that policymakers have an opportunity to support the development of the plant and alternative protein sectors, which have a complementary role in Australia's food system. These sectors have a key role to play in building a healthy, secure and sustainable food system for the future, particularly through their contribution to meeting global protein demand growth through value-added Australian exports.
49. The APC supports a rational, fact-based approach to decision making, and supports recommendations that enhance the growth of the plant and alternative protein sectors, prevent unnecessary red-tape, and support consumer choice.

APC Secretariat

Email: secretariat@alternativeproteincouncil.org



Appendix 1: Membership of the APC

Australian Plant Proteins
Berger Ingredients
Coco and Lucas
Fenn Foods
Food Frontier Institute
GrainCorp
Harvest B
Impossible Foods
Live Kindly
Nestlé Australia
Proform Foods
Rogue Foods
Sanitarium
Simplot
Unreal Co.
v2food
Vow Foods

Appendix 2: References

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