



19 November 2022

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

Re: Questions on Notice pertaining to the inquiry into the definitions of meat and other animal products

The Alternative Proteins Council (APC) is pleased to provide responses to questions taken on notice during the hearing held 8th November 2021.

1. Membership of the Alternative Proteins Council

We note that the membership of the Alternative Proteins Council is publicly available on our website at www.alternativeproteinscouncil.org and was included in our submission to the inquiry as Appendix 1. The current membership is as follows:

Australian Plant Proteins	Nestlé Australia
Berger Ingredients	ProForm Foods
Coco & Lucas Kitchen	Rogue Foods
Fenn Foods	Sanitarium
Food Frontier	Simplot Australia
GrainCorp	Unreal Co
Harvest B	v2 food
Impossible Foods	Vow
Live Kindly	



2. Guidance from the Australian Charities and Not-for-profits Commission

Senator McDonald asked whether the APC or Food Frontier had sought guidance from the ACNC regarding compliance with the Commission's requirements.

The APC would refer this question to Food Frontier as the organisation required to be governed by the ACNC. The APC also notes that the Chair asked the same question of Food Frontier later in the day, receiving an answer directly.

3. Provide the Committee with a list of products which use meat terminology on label

We attach a copy of the most comprehensive research available entitled '*Plant-based meat alternatives sold in Australia: An analysis of product labels*'.¹

This recent and comprehensive research examined 252 products across Australian supermarkets, finding that:

- 100% of the 252 plant protein products available in Australian supermarkets as of July 2021 included 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.
- 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.
- 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.

APC Secretariat

Attachment: *Plant-based meat alternatives sold in Australia: An analysis of product labels*

¹ Food Frontier. Labelling analysis of 252 plant-based meat alternative products sold in Australian national retailers (Aldi, Coles, IGA, Woolworths) as of 5 July 2021 [Internet]. Melbourne: Food Frontier; 2021 Aug 13 [cited 2021 Aug 13]. Available from: <https://www.foodfrontier.org/reports>.

PLANT-BASED MEAT ALTERNATIVES SOLD IN AUSTRALIA:

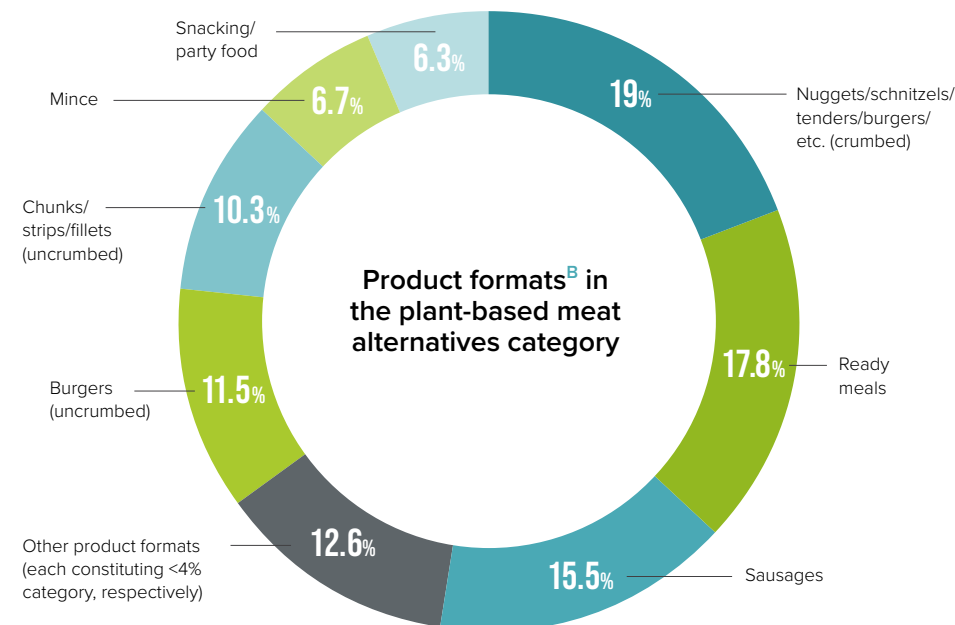
AN ANALYSIS OF PRODUCT LABELS

The **plant-based meat alternatives category** in Australia has grown to include a wide variety of products available in grocery chains nationwide. An increasing number of these products are made domestically, **presenting new opportunities for Australian grain, legume and vegetable growers** to sell into this emerging value-adding supply chain.

As the product labelling of plant-based meat alternatives is the subject of [a recent Senate Inquiry](#), **this quantitative analysis seeks to provide data on how products are labelled across the entire category** as of July 2021. This analysis excludes traditional plant protein products such as lentil burgers and falafel.

Food Frontier, as an independent think tank, advocates for an evidence-based approach to policy decisions, and affirms that simple, clear and concise front-of-pack information is important to **inform consumers about these products**.

252 PLANT-BASED MEAT ALTERNATIVE^A PRODUCTS REVIEWED¹



Example terms^C to indicate product is meat-free^D

Size of terms reflects frequency of use in product names^E across 252 products



Example front-of-pack label^F for a plant-based meat alternative product

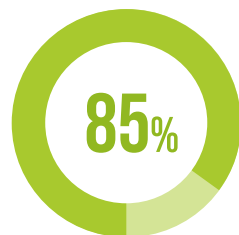


¹ Labelling analysis of 252 plant-based meat alternative products sold in Australian national retailers (Aldi, Coles, IGA, Woolworths) as of 5 July 2021, completed by Food Frontier. Data is available for reference [here](#)

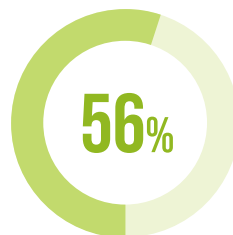
Use of qualifier terms



of products use **one or more terms** on the front-of-pack label to indicate they are meat-free.

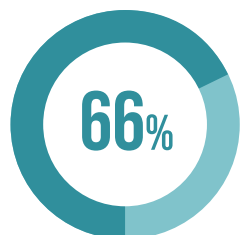


of products use **two or more terms** on the front-of-pack label to indicate they are meat-free.



of products use **three or more terms** on the front-of-pack label to indicate they are meat-free.

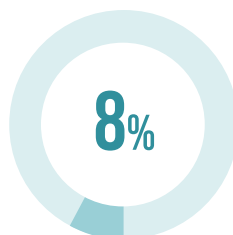
Use of animal meat terms



of products **do not use an animal meat term** in the product name, and instead typically display terms that describe the products' format (e.g. 'burger', 'mince', 'tenders'), thus indicating their intended use.

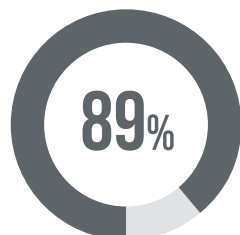


of products **use an animal meat term in the product name that is modified to indicate they are meat-free** (e.g. 'beefy', 'chicken-less'), thus describing the products' style.

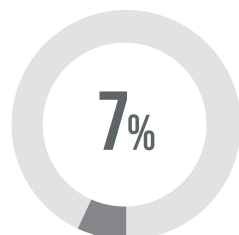


of products **use an unmodified animal meat term** in the product name (e.g. 'beef', 'chicken'), along with **an average of 2.4 terms either in the product name or elsewhere on the front-of-pack label that indicate they are meat-free.**

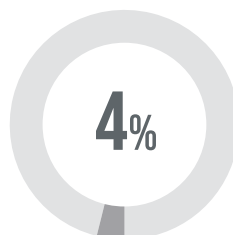
Use of animal depictions



of products **do not use animal depictions** on the front-of-pack label.



of products **use animal depictions occupying less than 10%** of the front-of-pack label.



of products **use animal depictions occupying more than 10%** of the front-of-pack label.

Key for Data Analysis

A - Plant-based meat alternative: Products that are made from combinations of plant proteins, oils, spices, seasonings and other plant derivatives, including starches and common food additives. Generally, these products use plant proteins (most often in the form of protein isolates, concentrates and flours) or mycoprotein (protein derived from fungi) as a base to achieve a more meat-like appearance and texture than traditional meat alternatives, such as lentil burgers.

B - Product format: Term describing a finished food product, such as 'burger', 'sausage', 'tender', 'slices', etc, which is more relevant to the process used to create a food than the origin of the food's ingredients.

C - Terms: A word or phrase used in a descriptive manner to communicate a product's ingredients, style or flavour. Includes modifications (see definition I below).

D - Meat-free: A product that does not contain animal meat.

E - Product name: The primary product title, which does not include the brand name and is the most visible portion of the name as it appears on a product label. Note: For a meat-free term to be considered part of the product name in this analysis, the term must have the same prominence as the product name (similar font size; of equal visibility to the product name). If a qualifier term was included near the product name, but in a smaller or significantly different font or style, leading to a lower prominence and visibility than product name, it cannot be counted as part of the product name and was included as a front-of-pack term.

F - Front-of-pack label: The area on the front of a product that lists the product name, along with other brand and marketing imagery and information.

G - Animal meat term: Refers exclusively to words: beef, chicken, duck, pork, fish, prawn, scallop, salmon; or variations on these words such as 'beefy', 'chicken-style', which modify the term to indicate the product is meat-free. Does not include terms indicating the format of a food product, as per definition B above.

H - Product style: Term describing a product's flavour characteristics.

I - Modification: A modification on an animal meat term changes the meaning of the original term to indicate that the product is meat-free; for example, 'beefless', 'chick'n', 'pork-style', 'chickenie'.



[CLICK TO DOWNLOAD DATABASE](#)