

28 June 2021

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs
and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Via email: rrat.sen@aph.gov.au



Dear Committee Secretariat,

Thank you for the opportunity to provide input to the Senate Rural and Regional Affairs and Transport Legislation Committee on the definitions of meat and other animal products. We are a global animal welfare organisation and have been campaigning for over 50 years to end animal cruelty and suffering. Right now, we're prioritising issues where change can improve the lives of the greatest number of animals by transforming the global food system. Our submission will focus primarily on addressing point one (a) under the committee's terms of reference, regarding the potential impact of the use of descriptors such as 'beef' or 'meat' on traditional animal protein products. We will briefly comment on points (b) through (c) regarding the potential health and economic impacts. Ultimately, our submission suggests that the use of these descriptors by plant-based companies is having little to no impact on the economic viability of traditional meat sectors.

When considering whether there is any 'impairment of Australian meat category brand investment', it is useful to look at the impact the current labelling has on consumers. A peer-reviewed study from 2020 examined whether consumers were 'confused' by the use of terms that are typically associated with animal-based products, such as 'milk' and 'beef'. The study looked first at whether consumers believed that either a plant-based beef burger or a plant-based vegetable patty, came from an animal. In both cases,

participants thought it was either very unlikely, or unlikely that either product came from an animal.¹ This suggests that the use of the term plant-based beef burger did not mislead or confuse consumers – they were able to discern that this was not from animals. The study also looked at whether consumers thought that 'plant-based deli slices: Bologna style', or 'sandwich slices', were from animals.² Interestingly, the study found that while most participants thought it was very unlikely, or unlikely that the 'plant-based deli slices: bologna style' were made from animal protein, the majority of participants thought it was 'likely' that the generically named 'sandwich slices', contained animal meat.³ This suggests that not only do terms such as 'plant-based beef burger' not mislead consumers, requiring generic labelling such as 'sandwich slices' may in fact lead to more confusion among shoppers. This study suggests that consumers are still able to make informed choices when buying plant-based products that use terms often associated with animal meat. This ability to discern that the products are not in fact from animals, suggests that the current labelling laws would be unlikely to impair investment or profitability of the meat sector.

Furthermore, it is worth noting that terms such as 'burger', 'sausage', and 'milk' are functional descriptors. They explain to consumers the way in which the product can be used, not the content of the product. Again, looking to the peer-reviewed study from 2020, the researchers looked at consumer's understanding of 'cultured vegan butter', compared to 'cultured vegan spread.' They found that consumers were better able to understand how the 'cultured vegan butter' could be used, and what it would taste like, as opposed to how 'cultured vegan spread' could be used.⁴ Similarly, terms such as 'plant-based beef burger' help consumers understand the function and taste of the product. If the goal of product labelling is to ensure that consumers

¹ Jareb A, Gleckel, 'Are Consumers Really Confused by Plant-Based Food Labels? An Empirical Study' (2020) *Journal of Animal and Environmental Law*,

² Ibid 21.

³ Ibid.

⁴ Ibid 20.

can make informed choices about their purchases in the context of a free market, then allowing the continued use of these terms will help deliver that outcome. It will provide consumers with the information they need to understand the functionality of the full range of products on offer. Providing this information is not distorting the market or disadvantaging the animal protein sector, it is simply giving consumers the clarity they need to make their own purchasing decisions.

Looking now to the potential health implications of the labelling of these products, we would suggest that this matter should not be a factor in determining whether plant-based products can use terms such as 'sausage' and 'burger.' Australia has stringent requirements in place ensuring that products list their ingredients and, further, that they display the health star rating associated with that product. This already ensures consumers are fully informed on what the product contains and whether it is a 'healthy' option. Even within the meat sector, the nutritional value of 'beef sausages' vs 'chicken sausages', varies considerably. The term 'sausage' does not connote a particular nutritional standard or value in and of itself. Therefore, allowing products to be labelled as, 'plant-based sausages' or similar, would not mislead consumers as to their nutritional value. The nutritional value of food is already adequately covered by existing labelling requirements and should not be the subject of further review by this committee.

Finally, with regards to point (c), we suggest that the current labelling of plant-based products should have minimal impact on areas such as the use of imported products, or on regional employment. With regards to imported products, this is something that should be covered under country-of-origin labelling. World Animal Protection fully supports the use of clear country-of-origin labelling on food products. We recently made a submission to a Department of Industry, Science, Energy and Resources review of the Country-of-Origin labelling laws calling for improvements to country-of-origin labelling on imported pork products to make it clearer to consumers when the bacon

or ham they are purchasing has come from Australia, and when it has come from somewhere with lower standards such as the United States. The current labelling laws mean that even within meat categories, consumers may not have all the information they need to understand where a product originated from. Restricting the right of plant-based companies to use terms such as 'plant-based beef burger' will not address this concern. The Government simply needs to strengthen their country-of-origin labelling requirements to ensure transparency for consumers.

With regards to regional employment, it is worth noting that plant-based industries are also becoming increasingly significant employers in regional Australia. For example, V2 Foods recently opened a new factory in regional Victoria that will scale up overtime to employ more regional residents.⁵ The 2020 Food Frontier Report further demonstrates the role that plant-based food industries will have in providing crucial employment opportunities for Australia. From the 2018-19 financial year through to 2020-21, the industries' direct contribution to employment (full-time equivalent), increased by 137%.⁶ The report went on to demonstrate that there would also be a benefit for Australian farmers in producing the primary product that is used for much of these plant-based products, giving regional Australian farmers strong growth opportunities.⁷ This demonstrates that the plant-based sector is not a threat to regional employment but could instead become a significant employer in coming years, having already demonstrated considerable growth over the last financial year. Undermining the sector and limiting their ability to sell their products will not benefit the Australian people or regional farmers, for whom this growing industry presents new market opportunities.

⁵ Australian Food News, 'V2 Confirms \$20m Wodonga Factory Investment' (December 2019) <https://www.ausfoodnews.com.au/2019/12/03/v2food-confirms-20m-wodonga-factory-investment.html>

⁶ Food Frontier, *2020 State of the Industry: Australia's Plant-Based Meat Sector* (annual report) 16.

⁷ Ibid 36.

We thank you again for the opportunity to provide input into this inquiry. As indicated above, World Animal Protection submits that the current labelling is not misleading consumers; nor is it impacting negatively on the investment in traditional animal meat sectors. The plant-based sector is a burgeoning industry that will provide jobs and investment for the future. The goal of the Government should simply be to ensure that consumers have clear information on which to base their independent purchasing decisions. The current labelling of these products achieves this goal. We would not support reform in this area. The only area in which World Animal Protection does support reform is for country-of-origin labelling which should apply consistently to animal and plant-based protein products. We hope the concerns we have raised are considered by this committee. We are available to provide more information if required and would appreciate being informed of any further consultation opportunities. We also consent to our submission being made publicly available.

Yours sincerely,

Simone Clarke
Executive Director
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