Subject: Plenary vote on meat and dairy denominations for plant-based products

Dear Member of the European Parliament,

Next week, as part of the AGRI Committee’s CMO Report\(^1\), you will vote on two amendments dealing with how plant-based meat and dairy alternatives can be named. The European Consumer Organisation, BEUC, urges you to reject both.

**Amendment 165 – The ‘veggie burger’ ban**

Amendment 165 of the AGRI Report seeks to ban meat denominations for plant-based products (such as ‘veggie burger’, ‘vegetarian sausage’, or ‘plant-based steak’). Several justifications have been put forward for such prohibition, yet none of them holds true.

A survey of consumers on attitudes to sustainable food BEUC conducted last year\(^2\) found that most consumers do not appear to be concerned about the naming of veggie ‘burgers’ or ‘sausages’, as long as the products are clearly identifiable as vegetarian/vegan. On average, only 1 in 5 consumers (20.4%) think the use of ‘meaty’ names should never be allowed on vegetarian/vegan products. Most respondents (42.4%) believe these names should be permitted provided that the products are clearly labelled as vegetarian/vegan, and 1 in 4 (26.2%) do not see any problem at all with using such names (11% have no opinion) (see chart annexed to this letter).

Terms such as ‘burger’ or ‘steak’ have been used on plant-based meat alternatives to inform consumers on their usage – as many consumers are not yet familiar with these relatively new products.

Just like their meat counterparts, plant-based products vary in quality\(^3\) (incl. nutritional quality, notably as regards salt levels\(^4\)) and level of processing\(^5\), tests by consumer groups have found. Yet, a chicken burger\(^6\) being highly processed does not prevent it from being called a burger.

1 Report by the AGRI Committee on the European Commission’s proposal for a Regulation establishing a Common Organisation of the Markets (CMOs) in agricultural products (2018/0218 COD).
2 BEUC, One bite at a time: consumers and the transition to sustainable food, An analysis of a survey of European consumers on attitudes towards sustainable food, June 2020.
6 See example of a chicken burger product sold in Belgium made from the following ingredients: mechanically separated poultrymeat 70%, water, breadcrumbs (wheat), salt, herbs and spices (celery), dextrose, powdered vegetables (onion, garlic), flavour enhancer (E621), lactose, hydrolysed soy protein, antioxidant (E300). Accessed on 12 October 2020.
As the Farm to Fork Strategy underlines, European consumers need to move to “a more plant-based diet with less red and processed meat”. For this to happen, a range of attractive, affordable, and convenient alternative sources of proteins must be available to them. The attractiveness of alternative protein sources depends on them being easily identifiable by consumers. The denomination of meat-free products should neither mislead consumers nor discourage them from buying these products. The use of culinary ‘meaty’ names on plant-based foods (such as ‘steak’, ‘sausage’, ‘burger’) makes it easier for consumers to know how to integrate these products within a meal, and as such should not be banned.

Amendment 171 – Naming of dairy alternatives

Currently, terms such as ‘milk’, ‘cream’, ‘butter’ and ‘cheese’ are already reserved for products derived from milk under EU law.

Amendment 171 seeks to further restrict the naming of plant-based dairy alternatives by prohibiting terms such as ‘yoghurt style’ and ‘cheese substitute’, and more generally any reference to dairy terms (e.g. ‘creamy’) in commercial communications for plant-based dairy alternatives.

We see no valid justification for such wide-ranging restrictions. There is no point in making plant-based dairy alternatives less identifiable by and attractive to consumers, when we know they need to shift to a more plant-based diet.

Against this background, BEUC respectfully calls on you to support a separate vote on both amendments, and to reject them.

We thank you in advance for considering the above ahead of next week’s vote on the CMO Report.

Yours faithfully,

Camille Perrin
Senior Food Policy Officer

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7 The vegetarian/vegan nature of the product should always be clear to the consumer. As such, the use of misspelled names (e.g. Dutch “kipstuckjes” instead of “kipstukjes”) is more likely to mislead consumers than the original ‘meaty’ name with a qualifier (“vegetarische kipstukjes”).
Figure 22: Q9 - “To what extent do you agree that companies use meat-related names like sausage and burger to describe meat-free vegetarian products (e.g. a veggie burger)?” [Base: all respondents]