

Contribution to the Consultation on the EU Agricultural Marketing Standards by the Good Food Institute Europe, August 2021.

The EU's Agricultural Marketing Standards must reflect European consumption patterns and remain in line with the EU's sustainability ambitions.

The Good Food Institute Europe welcomes the opportunity to provide feedback on the proposed revision of EU marketing standards for agricultural products. We particularly appreciate the European Commission's recognition that EU marketing standards should remain coherent with changing consumer needs and preferences as available food production methods evolve over time. In addition, we applaud the Commission for identifying that such standards need to complement the Farm to Fork's ambition to make European food "the global standard for sustainability".¹

As the Commission has acknowledged², a societal shift towards a more plant-based diet is a key part of reducing the environmental impact of our food system. To this end, it is positive to see that consumers are leading the way in this shift. Demand for plant-based food has soared over the last decade in Europe. The European plant-based meat and dairy sectors have experienced double digit growth year on year, and growth is expected to nearly double³ again over the next five years.

This shift has in large part been driven by European consumers becoming increasingly conscious of the impact of their diets, with growing numbers actively seeking to reduce their consumption of animal products.⁴

This shift has also been driven by advancements which have greatly improved the plant-based offerings available to consumers. Until recently, plant-based meat and dairy had often been simplistic offerings such as tofu and black bean burgers that don't replicate the flavour, texture and overall experience of eating animal-based products.

Technological progress has resulted in a new capability to break down meat into its component parts – proteins, fats, minerals – and replicate those qualities using plant-based ingredients. This approach has demonstrated it can satisfy consumer demand for animal protein, without the huge external costs associated with conventional animal agriculture.⁵

¹ [Farm to Fork Strategy and Action Plan](#), European Commission 2020, p4

² [Farm to Fork Strategy and Action Plan](#), European Commission 2020, p14

³ [Plant-Based Meat and Dairy to become 7.5 billion market in Europe in 2025](#), ING, 2020, p3

⁴ [One bite at a time, consumers and the transition to sustainable food](#), BEUC, 2020, p14

⁵ [Livestock's Long Shadow](#), FAO, 2006

As such, this next generation of plant-based meat is reaching new people. Research shows that, globally, 90%⁶ of plant-based meat consumers are not vegetarian or vegan. According to European market research⁷, 83% of self-proclaimed 'meat reducers' consume plant-based meat.

The marketing and labelling of plant-based products is an important factor in facilitating this shift. Everyday names like "burger", "sausage" and "yoghurt" help people to know what to expect in terms of the taste, texture, preparation and appearance of plant-based food, thereby allowing these products to appeal to the widest possible segment of consumer groups. What's more, surveys show that the use of such labelling practices are overwhelmingly supported by the majority of European consumers.⁸

In light of the broad consumer support for current labelling practices, GFI Europe considers that it is unnecessary to introduce new EU marketing standards governing plant-based protein. Should the EU embark on any regulatory changes, it must ensure that any new rules reflect evolving consumer patterns and expectations, and prevent the fragmentation of the internal market for plant-based food. In so doing, the EU should:

- Ensure that its standards do not discriminate against plant-based foods in ways that undermine consumer information and choice.
- Specifically authorise marketing practices – including the use of familiar denominations – for plant-based food that seek to, or would have the effect of, better informing the consumer of the nature and use of the product.
- Ensure that plant-based products are not disproportionately prohibited from evoking or making reference to concepts associated with conventional meat or dairy categories – while ensuring full transparency to consumers about the compositional nature of their food.

Thank you for considering this submission. For further information or a more detailed discussion of the points raised, please do not hesitate to reach out to Elena Walden, Policy Manager at the Good Food Institute Europe, at elenaw@gfi.org. Thank you!

⁶ [Vegetarians, vegans aren't eating most of the plant-based alternatives: Report](#), Yahoo Finance, 2019

⁷ [European Consumer Survey on Plant-Based Food](#), ProVeg Intl, 2020, p26

⁸ [One bite at a time, consumers and the transition to sustainable food](#), BEUC, 2020, p35 and [Forsa survey on behalf of the German consumer organisation](#)

The Good Food Institute Europe is an international NGO helping to build a more sustainable, healthy and just food system by transforming meat production. We work with scientists, businesses and policymakers to advance plant-based and cultivated meat, eggs, dairy and seafood – making them delicious, affordable and accessible across Europe. We believe that making meat from plants and cultivating it from animal cells is fundamental to addressing climate change, improving public health and reducing animal suffering. GFI Europe is powered by philanthropy.