



EC Register for Interest Representatives No 109356110578-03

August 2019

## EVU Position

### **Sales Denominations of Vegetarian Meat Alternatives**

Vegetarian alternatives to meat products have been on the market for at least a century. As many of them have been developed and produced specifically to resemble the “originals”, they are marketed under similar sales denominations, such as “vegan sausage” or “vegetarian cutlet”. This had never been met with criticism until the vegetarian alternatives made their way from a health food shop niche into mainstream supermarkets, expanding their sales figures accordingly in many EU member states. Only now are certain stakeholders calling for a legal ban on “meaty names” for vegetarian alternatives.

**It is EVU’s position that “meaty names” on vegetarian meat alternatives guide consumers’ purchase decisions in a useful way without the danger of deception under the premise that**

- **the vegetarian characteristic is communicated clearly on the packaging and**
- **the vegetarian product is sufficiently similar to the meat products whose denomination it bears.**

**These requirements are met by the vast majority of vegetarian products using meat denominations. New regulations limiting this practice that has been applied for decades are not needed. On the contrary, for the benefit of consumers and the food industry, the use of “meaty names” for vegetarian meat alternatives should remain possible.**

#### ***Informative Food Labelling***

“Meaty names” for vegetarian alternatives to meat products convey important information on what consumers can expect of a product. These denominations guide consumers in their purchase decisions in a straightforward way. If meat alternatives needed to be given new, non-established names, customers would have to get information on appearance, taste, texture, preparation etc. by means of additional text and pictures on the packaging. This would - for no plausible reason - overcomplicate the purchase process for consumers and limit their ability to make their own shopping decisions.

#### ***No Signs of Deception***

The vegetarian nature of meat alternatives is an important sales argument. Hence, producers and retailers communicate it clearly on the packaging: “vegan sausage”, “vegetarian cutlet”. Consumers are not misled by the use of “meaty names” for vegetarian alternatives. They know what to expect when buying products marketed as “vegan” or “vegetarian”.

This was demonstrated by a representative survey conducted by the Federation of German Consumer Organisations (vzbv).<sup>1</sup> Only four per cent of German customers have ever unintentionally bought a vegetarian product instead of a meat product or vice versa. This is a very low figure that one would likely see in the case of other foods that resemble each other in

---

<sup>1</sup> <http://www.vzbv.de/dokument/veggie-bratwurst-und-veganer-kaese-geschmacksinformation-oder-verbrauchertaeuschung> (German).



EC Register for Interest Representatives No 109356110578-03

appearance, no matter the clarity of labelling (e. g. blackberry jam and blackcurrant jam). The findings of the survey are particularly telling as Germany is the country with the widest variety of vegetarian products on the shelves.

### ***Vegetarian Products not Fundamentally Different***

The main difference between meat products and vegetarian meat alternatives has to do with whether they contain meat. Most other characteristics, however, in particular other ingredients (such as spices), texture, taste, methods of preparation etc. are similar.

In fact, only if the alternative product is sufficiently similar does the use of “meaty names” make sense for consumers. Bluntly put, a piece of unprocessed tofu should not be marketed as “vegan sausage” because the product would not meet the expectations fuelled by the denomination.

### ***Positions of Stakeholders***

#### *Food Industry*

The food industry’s assessment of “meaty names” on vegetarian products is divided. In those member states where sales numbers of vegetarian products are still relatively small, meat producers seem to be particularly opposed to the continued application of established labelling practices. The opposite is true for the German meat industry, which has widely acknowledged the potential of this market segment and has begun to produce vegetarian foods itself. Accordingly, the German industry association BVDF’s stance is very liberal.

Nevertheless, the German farmers’ association and conservative politicians have successfully pushed for an initiative that culminated in guidelines for vegan and vegetarian alternative products with resemblance to animal-based foods which the German Food Code Commission published in December 2018. These guidelines make arbitrary distinctions between and within product categories (marketing a “vegan sausage” would still be allowed, while a “vegan salami” would have to be intricately re-named as “vegan tofu sausage salami style”) and are hardly applicable for producers and food control agencies alike, which is why they have not had a big impact on the veggie market, yet. A coalition of EVU’s German affiliate ProVeg and companies as well as representatives of the veggie alternatives market segment expressed their frustration about the guidelines in a joint statement and called for more sensible and consumer-friendly labelling policies.<sup>2</sup>

#### *EU Politics*

Within the negotiations on a reform of the Common Agriculture Policy (CAP), the Agriculture Committee of the European Parliament adopted an amendment for the Common Market Organisation (EU reg. 1308/2013) that would ban the use of any terms typically associated with animal-based foods for products that do not contain meat. This far-reaching interference in the veggie market segment has gained widespread

---

<sup>2</sup> [https://proveg.com/de/wp-content/uploads/sites/5/2019/06/06062019\\_Leitsatz\\_Statement.pdf](https://proveg.com/de/wp-content/uploads/sites/5/2019/06/06062019_Leitsatz_Statement.pdf) (German)



EC Register for Interest Representatives No 109356110578-03

criticism<sup>3</sup> and brought about several petitions calling to stop this ban on the marketing of “veggie burgers”.<sup>4</sup> Though the outcome of this proposal is not yet clear, as it will have to survive the voting of the whole plenary as well as trilogue negotiations, many civil society organisations, EVU among them, ranging from animal welfare to environmental interests, have started efforts to prevent this ban.<sup>5</sup>

Yet, in the past, the Commission has made it clear that it disapproves of restricting current labelling practices. In response to Written Questions by Members of the European Parliament in June and December 2016, responsible Commissioner Vytenis Andriukaitis made clear that the European Commission does not see any need for additional regulation as “the applicable provisions provide sufficient legal basis to protect consumers from being misled”.<sup>6</sup>

Consequently, this issue will keep on sparking discussions as the plant-based market is continuing to grow.

---

<sup>3</sup> <https://www.economist.com/leaders/2019/06/29/europe-heroically-defends-itself-against-veggie-burgers>

<sup>4</sup> <https://proveg.com/stop-the-veggie-burger-ban/> and <https://www.vegan.at/inhalt/petition-veggie-burger-verbot-der-eu-verhindern>

<sup>5</sup> [https://www.euroveg.eu/wp-content/uploads/2019/07/Open-Letter-to-AGRI-MEPs-on-PB-denoms\\_July19\\_signed.pdf](https://www.euroveg.eu/wp-content/uploads/2019/07/Open-Letter-to-AGRI-MEPs-on-PB-denoms_July19_signed.pdf)

<sup>6</sup> <http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2016-003771&language=EN;>

[http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2016-008161&language=EN.](http://www.europarl.europa.eu/sides/getAllAnswers.do?reference=E-2016-008161&language=EN)