



Vegan Australia  
301/49 York Street, Sydney 2000  
Email: [info@veganaustralia.org.au](mailto:info@veganaustralia.org.au)  
Phone: 0400 492 157  
Web: [veganaustralia.org.au](http://veganaustralia.org.au)

13 August 2021

# Submission to inquiry into Definitions of meat and other animal products

Vegan Australia is pleased to have the opportunity to provide a submission to the "Definitions of meat and other animal products" inquiry by the Senate Standing Committees on Rural and Regional Affairs and Transport. We hope this submission assists in ensuring the best outcomes for animals, consumers and farmers.

Vegan Australia is a national organisation that informs the public about animal rights and veganism and also presents a strong voice for veganism to government, institutions, corporations and the media. Vegan Australia envisions a world where all animals live free from human use and ownership. The foundation of Vegan Australia is justice and compassion, for animals as well as for people and the planet. The first step each of us should take to put this compassion into action is to become vegan and to encourage others to do the same. Veganism is a rejection of the exploitation involved in commodifying and using sentient beings.

## Introduction

Vegan Australia would like to make comments on the following areas covered by this inquiry.

**Product labelling:** There is very little evidence that consumers are being misled by the existing labelling of plant-based alternative products. Consumers are well protected by current labelling regulations. The Australian animal agriculture industries do not have ownership rights to common terms describing animals and their flesh.

**Economic impacts:** In terms of imports, exports and employment, there is enormous potential for plant-based alternative industries to benefit Australia significantly by responding to changing global consumer preferences. Vegan Australia recommends that the Australian government encourage, not hinder, the opportunities these new industries present to create jobs and add

value to our plant agricultural exports. In particular, labelling regulations should not be changed to restrict the use of common animal-food terms in these emerging industries.

**Environmental impacts:** The inquiry's terms of reference mention "social impacts". A healthy society requires a healthy environment and so the negative impacts of animal agriculture on the environment are relevant here. The havoc caused to the world environment by the billions of animals we raise and kill for food each year is huge. The U.N. has identified the animal industries as 'one of the most significant contributors to today's most serious environmental problems' including global warming and species extinction. The government should be encouraging a move away from animal agriculture, allowing much of the land to revegetate and so draw down carbon dioxide from the atmosphere and increase biodiversity.

**Health implications:** Concerning the "heavily manufactured protein products" mentioned in the terms of reference, we point out that one of the most dangerous such products is processed meat, considered carcinogenic by major health bodies. As for "unnatural additives" and "chemicals", again these are more likely to occur in processed meats than plant-based products. In contrast, most plant-based alternatives are made of grains, vegetables and other plant derived ingredients.

**Other related matters:** Almost all groups calling for any change to labelling regulations for plant-based meat alternatives are those with vested interests in the animal agriculture industries. We urge this inquiry to not bow to these pressure groups, but do what is right for the people and the environment.

## Product labelling

The issue of whether the labelling of plant-based alternatives is misleading to Australian consumers has been examined several times in recent years.

In 2018 and 2019 the Ministerial Forum on Food Regulation looked at existing labelling regulations and found no reason to make changes. The ACCC has also looked at this issue and found no evidence of deceptive conduct or that consumers are being misled. The ACCC concluded that current labelling is "unlikely to mislead an ordinary consumer."

Research commissioned by Food Frontier found that "91% of Australians have never mistakenly purchased a plant-based product thinking it was its meat-based counterpart, or vice versa." In fact the most confusion was due to meat-based products being purchased by those looking for plant-based products.

Outside of Australia, research by Cornell University Law School found that "consumers are no more likely to think that plant-based products come from an animal if the product's name incorporates words traditionally associated with animal products than if it does not."

While there is little evidence that consumers are being confused by the labelling of plant-based alternatives, there is some evidence that they would be confused if restrictions were put on terms they were already accustomed to. The Cornell University Law School research found that "omitting words that are traditionally associated with animal products from the names of plant-based products actually causes consumers to be significantly more confused about the taste and uses of these products."

The Cornell University Law School research concluded that "legislation prohibiting companies from using words like 'beef' and 'butter' on their labels does not advance the government's interest in preventing consumer confusion."

We note also that the Food Standards Code allows non-animal products to use terms associated with animal products providing the context ensures consumers are not misled.

The only research we could find that found a potential for consumers to be confused by plant-based labelling was a survey commissioned by Australian red meat, chicken meat and seafood industry groups. The survey was poorly designed and the methodology used was flawed. It used clearly leading questions, it used a small, unrepresentative sample of the many plant-based products available for sale, it used only one animal meat control product, and it required participants to evaluate products after viewing packaging for only 3 seconds. While it claims to have found "potential consumer confusion", it provides little evidence that consumers are actually being confused in a normal supermarket setting.

The reason plant-based foods are labelled using terms associated with animal products is that it helps consumers know how to use the product and what it might taste like.

Plant-based alternative meat makers use words like "mince" and "burger" on their labels because the products are used in a way similar to the more traditional meat-based products. This is the clearest way of describing the utility and style of such products. US meat producer Tyson uses terms such as "burger", "sausage", "bratwurst", "ground", "nuggets" and "buffalo style" on their plant-based products. These terms help consumers, not using them would make it less clear.

While terms associated with animal products are used on plant-based alternative labels, the labels also include clear indications that the products are not animal-based. Terms such as 'meat-free', 'veggie', 'vegan' and 'plant-based' are used to indicate the ingredients of the product. Plant-based non-dairy products always clearly display the name of the plant used to make the milk, yogurt or cheese, whether soy, oat, almond, coconut, rice, etc.

It is not in the interests of plant-based alternative makers to confuse their customers. Their target market is the growing number of people who are looking for plant-based foods. They are not trying to pass off their products as meat-based nor are they trying to mislead consumers who want to buy a meat product to accidentally buy their product. Companies give accurate

information to their customers because they want them to keep buying their products, not to fool some people into buying it once.

The Australian animal agriculture industries do not have ownership rights to common terms describing animals and their flesh and so can not claim that these terms are being "appropriated". Trade mark law does not apply here, only consumer protection and food safety law.

An analogy with the current situation could be the paper industry in the 1970s trying to stop the rise of personal computers by calling for a ban on the use of the words 'document', 'folder' or 'menu' because they claim to own those words! Similarly it is equally ridiculous to think that the post office would try to stop the rise of electronic messaging by calling for a ban on the use of the term e-mail!

As shown above there is no need for a change in current regulations. There is also no apparent call by consumers to change the current regulations. Hence, Vegan Australia recommends that no changes be made to the current labelling regulations to restrict the use of common terms used to describe animal foods.

## Truth in labelling

Vegan Australia supports the push by the Australian animal industries for "truth in labelling". We call for mandatory labelling of animal products with text and images showing the horrific conditions under which the animal was bred, raised and killed. These should not give the rosy view of bucolic farm life typical of animal industry marketing. These should honestly show the suffering endured by the animals on the way to the consumer's plate, "so consumers know exactly what they're getting", as stated by a member of this committee.

For examples of the treatment of farmed animals in Australia and how this can be addressed by labelling see "In depth reports on Australian animal exploitation industries" and "Dairy industry: label your products honestly" in References.

## Economic impacts

The inquiry's terms of reference mention "imported ingredients" as an issue for plant-based products. It is also concerned about the impact on regional employment of the labelling of plant-based products. These economic issues are addressed in this section.

In general plant agriculture contributes about half of Australia's \$60 billion agricultural exports. While many animal industries also have strong exports, for several of them, such as pig flesh and sea animals, imports far exceed exports. For processed plant-based alternative products, there is a tremendous opportunity to create a booming export industry using locally produced plant raw materials. The worldwide demand for alternative meat products is growing rapidly and

Australia is well positioned to take advantage by adding value to our already high levels of plant agriculture and exports.

As well as export potential and economic growth, plant-based alternative industries provide opportunities to create more jobs in all areas. Consumers in Australia and internationally are moving towards a more plant-based diet and this high demand is helping grow the plant-based alternative industry, with new production facilities being acquired in regional areas. This growth is in-line with predicted global future consumer trends.

Australian primary producers also recognise the opportunity to benefit from this rapidly expanding industry. NSW Farmers Association CEO Peter Arkle says, in reference to alternative proteins, "We need to ensure that our domestic producers are able to diversify and take advantage of new market opportunities, and that policy and regulatory settings are in place to encourage production and manufacturing in Australia."

An article "Farming and food industry bodies unite to focus on the future of protein" published by the NSW Farmers' Association states "Australia has the potential to become a plant-protein powerhouse, by ramping up production to supply plant proteins into key export markets."

Primary producers benefitting from the boom in plant-based products include growers of grains, pulses, legumes and vegetables. Farmer representative bodies should ensure these farmers are supported.

The major supermarkets also see the benefits of responding to changing consumer preferences by providing a wide range of plant based foods. They would probably not support restrictions in labelling laws that may reduce uptake of these products.

Any restrictions in the use of common terms used to describe animal foods may have unintentional impact on other industries, such as the confectionery industry, that use these terms in their packaging. Examples include "bacon" chips and "chicken" salt, which contain no bacon or chicken.

Even businesses in the animal foods industry are starting to respond to the growing demand for plant-based alternatives by developing their own plant-based products, leading them to reap significant financial benefits. For example, in the US, meat producers Tyson, Smithfield, Perdue and Hormel have all started selling plant-based meat alternatives. Farm Foods Australia, previously known as the meat suppliers Farm Foods Butchers, have now begun making and selling plant-based mince and burgers.

Any government action in this area must be fair and balanced and it must serve consumers and enable a competitive business environment. It should also protect new and expanding industries from attempts to restrict innovation and from anti-competitive behaviour.

# Impact of animal agriculture on the environment

The social and economic damage caused by a declining environment are relevant to this inquiry. A healthy environment is the basis for a healthy society as well as a functioning economy.

The havoc caused to the world environment by the billions of animals we raise and kill for food each year is huge. The U.N. has identified the animal industries as 'one of the most significant contributors to today's most serious environmental problems', including global warming, species extinction, loss of freshwater, rainforest destruction, spreading deserts, air and water pollution, acid rain, soil erosion and loss of habitat. Vast areas of forest are cleared to grow crops to feed farmed animals. The methane produced by these animals is the largest single cause of global warming, larger than all transport worldwide. Large quantities of excrement produced by animal industries leak into rivers and oceans as pollution.

Instead of growing crops to feed animals who we then eat, it would be much more efficient and cause less harm to the environment if we consumed the plants directly. This would feed five times as many people, make available significant amounts of fresh water, help reverse global warming, use less fossil fuels and allow large areas of land to be reforested.

As Australian Professor Ian Lowe says, "Producing meat turns vegetable protein very inefficiently into animal protein, using large amounts of energy and water in the process. Ruminant animals also produce large amounts of methane, a much more potent greenhouse gas than carbon dioxide. Meat production is a serious contribution to greenhouse gas pollution and hence global warming."

The latest Intergovernmental Panel on Climate Change (IPCC) report warns that global average temperature is likely to rise by 1.5 degrees before 2040 and that Australia could face more frequent and extreme bushfire events and other serious consequences. The report says we need urgent action to avoid the most catastrophic impacts of a warming planet. We need to find every way possible to help prevent a climate crisis. In Australia, as in the rest of the world, animal based agriculture is a major source of emissions, through land clearing for grazing, methane produced by cows and sheep, savanna burning for clearing and emissions from manure.

When accounted over a 20-year time frame and including short-lived gases, animal agriculture and its associated land clearing is responsible for about 50% of all greenhouse gases, both in Australia and worldwide. In addition to its contribution to climate change, animal agriculture takes up a staggering 56% of the Australian land mass, much of it through clearing native forests and grasslands. This is a major cause of biodiversity loss in Australia.

The government should be encouraging a move away from animal agriculture, allowing the land to revegetate and so draw down carbon dioxide from the atmosphere and increase biodiversity.

## Health implications

The inquiry's terms of reference include "the health implications of consuming heavily manufactured protein products". Vegan Australia recommends that health warning labels be required for processed meat products, such as bacon, ham and sausages, as according to the World Health Organisation, processed meat is "carcinogenic to humans". In particular, evidence shows that eating processed meat increases the risk of bowel cancer. We also recommend similar warnings on red meat as, according to the Cancer Council, "red meat, such as beef, lamb and pork, has been classified as a Group 2A carcinogen which means it probably causes cancer."

As for the "unnatural additives" and "chemicals" mentioned in the terms of reference, these ingredients are more likely to occur in processed meats than plant-based products. Food producers often add nitrates and nitrites to processed meats to help prevent the growth of bacteria. Some meat products are treated with preservatives and colourants. In some cases, particularly for fish, pollutants can concentrate up the food chain to dangerous levels.

Australian food standard guidelines permit synthetic hormones to be fed to cattle to make them grow faster and this is a common practice in Australia. The European Union has banned the use of hormones in cattle.

Antibiotics are another chemical used frequently in the animal agriculture industries, with more than half of the antibiotics imported into Australia going into stock-feed. Worldwide, this figure is estimated to be 50-80% in most developed nations. The risk of this practice causing bacteria to become resistant to antibiotics is a very serious threat to human health.

In contrast, many plant-based alternatives available in supermarkets are made of vegetable protein, vegetables, legumes, grains and spices as well as plant derived ingredients such as oils, flavours, fibre, vitamins and yeast extract.

Looking at diet in general, most national health guidelines, including the Australian Dietary Guidelines, recommend that people reduce their meat consumption, particularly red meat, and avoid processed meat, both due to health concerns. In fact, such guidelines clearly state that humans have no need to consume any animal products. Please see the next section for more information on this.

## Evidence that animal products are not necessary for health

Nutritional science shows that humans have no need for farmed animal food products. There is a solid body of peer-reviewed scientific evidence to confirm that it actually benefits human health to consume a primarily plant-based diet. Changing to a plant-based diet can help people live a longer, healthier life, and significantly reduce risk of falling victim to many of the serious health threats facing Australians today.

Australia's peak health body, the National Health and Medical Research Council, recognises that a plant-based (vegan) diet is a viable option for all Australians. Australia's top health experts agree with those in other parts of the world that well-planned vegan diets are safe and healthy for all age groups. The Australian Dietary Guidelines state that alternatives to animal foods, such as nuts, seeds, legumes, beans and tofu, can "increase dietary variety and provide a valuable and affordable source of protein and other nutrients found in meats."

According to the US Academy of Nutrition and Dietetics, "Appropriately planned ... vegan diets are healthful, nutritionally adequate, and may provide health benefits for the prevention and treatment of certain diseases. These diets are appropriate for all stages of the life cycle, including pregnancy, lactation, infancy, childhood, adolescence, older adulthood and for athletes."

Not only are animal products unnecessary for optimal health, an increasing number of nutritionists and health professionals are acknowledging animal products are harmful to our health. This is supported by decades of good research. A healthy vegan diet helps reduce the risk of heart disease, stroke, cancer, obesity, and diabetes, some of Australia's top killers. The World Health Organisation has stated that processed meats such as bacon cause cancer and that red meat is a probable cause of cancer.

A recent issue of the Medical Journal of Australia, dedicated to the question "Is a Vegetarian [including vegan] Diet Adequate?", included the following statements. "A varied and balanced plant-based diet can provide all of the nutrients needed for good health." "Most vegans meet the recommended daily intake for protein." "Vegan diets generally contain just as much or more iron than mixed diets containing meat." "BMI and obesity was lowest for vegans."

The China Study by T Colin Campbell is one of the most comprehensive studies on nutrition ever done. Campbell provides compelling evidence linking animal products to disease, including cancer, heart disease, osteoporosis, diabetes, etc.

## Vested interests vs public interest

Almost all groups calling for any change to labelling regulations for plant-based meat alternatives are those with vested interests in the animal agriculture industries. We urge this inquiry to not bow to these pressure groups, but do what is right for the people and the environment.

It appears that the motivations behind this inquiry is to bolster businesses profiting from the use of animals by restricting the growth of the plant-based alternative industry and to ensure market dominance. While this may benefit the animal industries in the short term, it will only damage the Australian economy in the long term.



In addition, some members of this committee appear to have serious conflicts of interest, being closely tied with the animal agriculture industry. We urge these members to declare their conflicts of interest and step down from this committee.

As Allen Zelden told Inside FMCG and quoted in Vegconomist, "Given the explosive growth trajectory for the Australian plant-based food category, the meat, seafood, and poultry sectors are undoubtedly motivated to stifle this growth so as to protect their commercial interests before that of the consumer."

To indicate the level of vested interest in this inquiry, at the time this submission was made about 40 submissions on the inquiry's APH website supported changes to labelling regulations to restrict the use of animal terms. Of these, 37 were from organisations and individuals who are part of the animal agriculture industry. In contrast, all independent contributors did not support such restrictions. These included organisations such as Food Standards Australia New Zealand, the George Institute for Global Health at UNSW, CSIRO and the Australian Competition and Consumer Commission.

The government's role is to create a level playing field and it should not favour one business sector over another. What it should be doing is ensuring the information necessary for healthy choices is available to consumers.

Greg McFarlane  
Vegan Australia

## References

[https://www.nswfarmers.org.au/NSWFA/Posts/Media\\_Releases/mr.078.20.aspx](https://www.nswfarmers.org.au/NSWFA/Posts/Media_Releases/mr.078.20.aspx)  
Farming and food industry bodies unite to focus on the future of protein  
NSW Farmers' Association

<https://ssrn.com/abstract=3727710>  
Are Consumers Really Confused by Plant-Based Food Labels? An Empirical Study  
Jareb A. Gleckel, Cornell University Law School

<https://www.businessinsider.com.au/australia-climate-investors>  
After a brutal climate report, Australian investors fear 'falling behind' without a net zero target  
Business Insider Australia

<https://www.businessinsider.com.au/fake-meat-labelling-confusion-senate-inqui>  
Fake meat labelling fools 6 in 10 Australian shoppers, industry groups claim. The ACCC says that's bull.  
Business Insider Australia

<https://www.farmfoods.com.au/>

Leading Food Manufacturers of Meat & Plant-Based Products  
Farm Foods Australia

<https://www.raisedandrooted.com/products/>  
Raised & Rooted plant-based products  
Tyson Foods

<https://www.foodfrontier.org/reports/>  
Hungry for Plant-Based: Australian Consumer Insights  
Food Frontier

<https://rmac.com.au/wp-content/uploads/2021/08/Pollinate-National-Consumer-Research.pdf>  
Consumer Attitudes around Plant-based Meat  
Pollinate

<https://www.foodstandards.gov.au/consumer/generalissues/hormonalgrowth/Pages/default.aspx>  
Hormonal growth promotants in beef  
Food Standards Australia

<https://www.abc.net.au/science/slab/antibiotics/agriculture.htm>  
Antibiotics use in agriculture  
ABC

<https://www.sciencedirect.com/science/article/pii/S2213716519301985>  
Antibiotic use in food animals worldwide, with a focus on Africa: Pluses and minuses  
RMIT University, Kintampo Health Research Centre

<https://plantbasednews.org/news/environment/climate-crisis-devastating-report/>  
We Must Act Now To Fight Climate Crisis, 'Devastating' Report Finds  
Plant Based News

<https://vegconomist.com/studies-and-numbers/australian-meat-lobby-says-alt-meat-labelling-misleads-consumers-is-it-right/>  
Australian Meat Lobby Says Alt-Meat Labelling Misleads Consumers - Is It Right?  
Vegconomist

[https://www.veganaustralia.org.au/certified\\_humane\\_label\\_should\\_be\\_rejected](https://www.veganaustralia.org.au/certified_humane_label_should_be_rejected)  
"Certified Humane" label should be rejected  
Submission by Vegan Australia

[https://www.veganaustralia.org.au/senate\\_dairy\\_inquiry\\_told\\_to\\_phase\\_out\\_dairy\\_farming](https://www.veganaustralia.org.au/senate_dairy_inquiry_told_to_phase_out_dairy_farming)  
Senate dairy inquiry told to phase out dairy farming  
Submission by Vegan Australia

[https://www.veganaustralia.org.au/inquiry\\_told\\_animal\\_agriculture\\_is\\_major\\_driver\\_of\\_australia\\_s\\_faunal\\_extinction\\_crisis](https://www.veganaustralia.org.au/inquiry_told_animal_agriculture_is_major_driver_of_australia_s_faunal_extinction_crisis)

Inquiry told animal agriculture is major driver of Australia's faunal extinction crisis

Submission by Vegan Australia

[https://www.veganaustralia.org.au/animal\\_farming\\_is\\_major\\_cause\\_of\\_climate\\_change\\_victorian\\_government\\_told](https://www.veganaustralia.org.au/animal_farming_is_major_cause_of_climate_change_victorian_government_told)

Animal farming is major cause of climate change, Victorian government told

Submission by Vegan Australia

[https://www.veganaustralia.org.au/inquiry\\_told\\_animal\\_farming\\_is\\_major\\_cause\\_of\\_climate\\_change](https://www.veganaustralia.org.au/inquiry_told_animal_farming_is_major_cause_of_climate_change)

Inquiry told animal farming is major cause of climate change

Submission by Vegan Australia

[https://www.veganaustralia.org.au/\\_free\\_range\\_not\\_worth\\_the\\_label\\_it\\_is\\_written\\_on](https://www.veganaustralia.org.au/_free_range_not_worth_the_label_it_is_written_on)

Submission on the Free Range Egg Labelling Information Standard

Submission by Vegan Australia

[https://www.veganaustralia.org.au/government\\_organisation\\_shows\\_support\\_for\\_vegan\\_diets](https://www.veganaustralia.org.au/government_organisation_shows_support_for_vegan_diets)

Government-funded health service states benefits of vegan diets

Vegan Australia

[https://www.veganaustralia.org.au/\\_milk\\_wars\\_and\\_truth\\_in\\_labelling](https://www.veganaustralia.org.au/_milk_wars_and_truth_in_labelling)

'Milk' wars and truth in labelling

Vegan Australia

[https://www.veganaustralia.org.au/dairy\\_farmers\\_dont\\_know\\_which\\_way\\_to\\_go\\_on\\_labels](https://www.veganaustralia.org.au/dairy_farmers_dont_know_which_way_to_go_on_labels)

Dairy farmers don't know which way to go on labels

Vegan Australia

<https://www.veganaustralia.org.au/processedmeat>

Cancer warning labels for bacon, ham

Vegan Australia

[https://www.veganaustralia.org.au/abc\\_reports\\_vegan\\_call\\_for\\_suffering\\_label](https://www.veganaustralia.org.au/abc_reports_vegan_call_for_suffering_label)

ABC reports vegan call for 'suffering' label

Vegan Australia

[https://www.veganaustralia.org.au/in\\_depth\\_reports\\_on\\_australian\\_animal\\_exploitation\\_industries](https://www.veganaustralia.org.au/in_depth_reports_on_australian_animal_exploitation_industries)

In depth reports on Australian animal exploitation industries

Vegan Australia

[https://www.veganaustralia.org.au/dairy\\_industry\\_label\\_your\\_products\\_honestly](https://www.veganaustralia.org.au/dairy_industry_label_your_products_honestly)  
Dairy industry: label your products honestly  
Vegan Australia

[https://www.veganaustralia.org.au/animal\\_agriculture\\_is\\_major\\_threat\\_to\\_koalas](https://www.veganaustralia.org.au/animal_agriculture_is_major_threat_to_koalas)  
Animal agriculture is major threat to koalas  
Vegan Australia

[https://www.veganaustralia.org.au/animal\\_agriculture\\_and\\_global\\_warming](https://www.veganaustralia.org.au/animal_agriculture_and_global_warming)  
Animal agriculture and global warming  
Vegan Australia

[https://www.veganaustralia.org.au/animal\\_agriculture\\_causes\\_biodiversity\\_loss\\_un\\_report](https://www.veganaustralia.org.au/animal_agriculture_causes_biodiversity_loss_un_report)  
Animal agriculture causes biodiversity loss: UN report  
Vegan Australia