



24 July 2019

The Rt Hon Robert Goodwill MP  
Minister of State for Agriculture, Fisheries and Food  
Department for Environment, Food and Rural Affairs  
Seacole Block  
2 Marsham Street  
London, SW1P 4DF

Dear Robert,

## **European Parliament proposed restrictions on naming vegetarian food**

It has come to our attention that, in April 2019, the European Parliament's Committee on Agriculture and Rural Development (AGRI Committee) agreed an amendment to the Commission's proposal for the reform of the Common Agricultural Policy (COM/2018/0394), which would to restrict the use of descriptions such as "sausage", "burger" and "steak" to apply only to products containing meat and not to vegetarian alternatives.<sup>1</sup> We discussed this amendment with a number of relevant stakeholders on 19 June, and were contacted by several other organisations with an interest in this issue. Arising from this, we wish to bring a number of points to your attention.

The AGRI Committee states that the amendment's aim is to "prohibit certain commercial practices that are misleading for consumers".<sup>2</sup> We, and indeed all of our witnesses, agree that providing clear information for consumers is paramount. However, Dr Geoff Bryant from Quorn Foods told us: "In over 30 years of making meat-free products, not a single person has complained to us that they were misled."<sup>3</sup> Indeed, the only relevant study cited by our witnesses, conducted by the Federation of German Consumer Organisations, found that less than 4% of people had ever unintentionally bought a vegetarian product instead of a meat-based product or vice versa.<sup>4</sup> We therefore challenge the stated justification of the amendment, and contest that without evidence of a problem, legislative action by the EU is unnecessary.

Our witnesses were unanimous in the view that current naming conventions around vegetarian burgers and sausages in particular are clear and easy to understand. As Ruth Edge

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<sup>1</sup> Amendment 165: [http://www.europarl.europa.eu/doceo/document/A-8-2019-0198\\_EN.pdf](http://www.europarl.europa.eu/doceo/document/A-8-2019-0198_EN.pdf)

<sup>2</sup> p79: [http://www.europarl.europa.eu/meetdocs/2014\\_2019/plmrep/COMMITTEES/AGRI/AM/2019/04-01/1171815EN.pdf](http://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/AGRI/AM/2019/04-01/1171815EN.pdf)

<sup>3</sup> Q1

<sup>4</sup> <https://www.vzbv.de/dokument/veggie-bratwurst-und-veganer-kaese-geschmacksinformation-oder-verbrauchertaeuschung>

from the National Farmers' Union stated, "Those are traditional items for the UK market, and consumers are very familiar with those terms anyway."<sup>5</sup> Indeed, Mark Banahan from the Vegan Society argued that the amendment could lead to the use of "a plethora of terms" which would be less clear for consumers,<sup>6</sup> and would "create the same confusion that it seeks to alleviate".<sup>7</sup>

This is not to say that we heard no support for the amendment at all. Ruth Edge supported the protection of terms that relate to specific cuts of meat, such as "steak", to ensure clarity regarding nutritional content;<sup>8</sup> and the British Meat Producers Association were concerned that plant-based foods using the names set out in the amendment should "meet the same high standards as their equivalent meat-based products", and that this was not currently always the case for highly-processed vegetarian products.<sup>9</sup> However, issues of nutrition and quality are already addressed by existing legislation on the labelling of food; if that legislation is not comprehensive in light of the growth of the vegetarian food industry, minor alterations to address specific issues may be more proportionate than this amendment.

We also heard concerns about the implications of the amendment from businesses that produce vegetarian food. The Good Food Institute Europe pointed out that "plant-based meat producers create investment, jobs and tax revenue, and are important, and growing, contributors to the European economy".<sup>10</sup> But Laura Sears from the Vegetarian Society explained the views of their Approved trademark clients regarding the amendment: "It would be very costly and take up a lot of time, and they think it would hinder their profits ... they would have to restart the branding totally, in some cases, if the product was named differently."<sup>11</sup> Dr Geoff Bryant added: "Cost is one thing, but it would also tie up the time of the people in our business, who are working hard to grow the business ... we would be putting in all the work and cost for no overall benefit".<sup>12</sup>

We also note that this amendment comes at a time when internationally-respected research is clear that there are both health and environmental imperatives for reducing the amount of meat we consume. A recent report by the EAT-Lancet Commission concluded that a healthy diet within a sustainable food system would involve little or no consumption of red or processed meat.<sup>13</sup> In addition, the Committee on Climate Change's report on *Net Zero: the UK's contribution to stopping global warming* states that "relying less on carbon-intensive animal products (like lamb, beef and dairy) would bring down emissions from agriculture in the UK. Transitioning from a high-meat diet to a low-meat diet can enable a person to reduce their dietary emissions by 35%."<sup>14</sup> In that context, we are concerned that the amendment may create a barrier for consumers who are trying to reduce their meat intake. Laura Sears told us: "We get a lot of anecdotal evidence from people who say that when they first become vegetarian, or they just want to cut down on eating meat, it is good if they can see something

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<sup>5</sup> [Q 7](#)

<sup>6</sup> [Q 6](#)

<sup>7</sup> [Q 12](#)

<sup>8</sup> [Q 7](#)

<sup>9</sup> Written evidence from the British Meat Producers Association ([VGT0005](#))

<sup>10</sup> Written evidence from The Good Food Institute Europe ([VGT0001](#))

<sup>11</sup> [Q 11](#)

<sup>12</sup> [Q 11](#)

<sup>13</sup> <https://www.thelancet.com/action/showPdf?pii=S0140-6736%2818%2931788-4>

<sup>14</sup> p187-8: <https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

familiar.”<sup>15</sup> Chef Jackie Kearney, drawing on the example of a vegetarian chorizo-style sausage, argued: “If the producer was not allowed to use that description, a customer might not know that they could slice it up, fry it and pop it into an omelette or on their pizza, and that it could replace pepperoni, which is not particularly good for them. We need to support people’s flexible choices towards plant-based eating. I believe that these crowd-pleasing terms are ways to reach such people; it is how we support that behaviour change.”<sup>16</sup> On those grounds, we agree with the argument put forward by The Good Food Institute Europe that this amendment would undermine EU policy objectives on climate change, the environment and public health.<sup>17</sup>

In summary, we are concerned that the amendment would in fact reduce consumer clarity, be a barrier to growth for a burgeoning sector of the food industry, and ultimately make it more challenging for people to reduce the amount of meat in their diet at a time when Government should be seeking to encourage the opposite.

We acknowledge that the amendment is unlikely to apply directly to the UK, as it is part of the Common Agricultural Policy reform negotiations and so is unlikely to take effect until after the UK has left the EU. However, if it were implemented it would have implications for UK food businesses seeking to trade with the EU, and also speaks to the broader issue of ensuring that health and environmental objectives are properly integrated across the policy landscape. We would therefore like to know what your position on this amendment would be if it were to be discussed at Council; whether you are aware of any evidence that the problem it is ostensibly designed to solve does in fact exist; and whether you would consider implementing a similar measure if it were to take effect after the UK leaves the EU.

We look forward to a reply to this letter within 10 working days.

Lord Teverson  
Chair of the European Union Energy and Environment Sub-Committee

Cc Mr Lins MEP (AGRI Committee Chair), Mr Andrieu MEP (former rapporteur)

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<sup>15</sup> [Q 10](#)

<sup>16</sup> [Q 4](#)

<sup>17</sup> Written evidence from The Good Food Institute Europe ([VGT0001](#))