

As ProVeg Germany, an organization dedicated to advancing sustainable food systems and part of ProVeg International which is active in six EU countries, we welcome the opportunity to share our insights on Hungary's draft law prohibiting the production and marketing of cultivated meat (TRIS Notification 2024/0394/HU)¹. Our response is rooted in a commitment to constructive dialogue and collaboration, emphasizing several key points that we believe warrant careful consideration:

Trade and Market Competition

The draft law raises significant concerns regarding potential trade barriers that could disrupt fair competition within the EU's Internal Market. By unilaterally prohibiting a product that may be approved for sale in other member states, Hungary risks undermining the principles of free movement of goods. This action could lead to market distortions that negatively impact both local producers and consumers, ultimately hindering Hungary's competitiveness on the European stage.

The EU's Internal Market thrives on the principle of fair competition, which fosters innovation and economic growth. By imposing a ban on cultivated meat, Hungary may inadvertently protect certain national producers at the expense of others, creating an uneven playing field that could stifle innovation and limit consumer choices.

Consumer Choice and Freedom

The draft law restricts consumer choice by preemptively banning a product that has not yet undergone safety evaluation by EU experts. Recent surveys indicate that a significant majority of consumers across Europe, including Hungary, support the sale of cultivated meat if deemed safe by food authorities.² This sentiment underscores the importance of allowing consumers the autonomy to choose innovative food products that align with their values and preferences.

By limiting access to cultivated meat, the Hungarian government risks alienating consumers who are eager for diverse and sustainable food options. Empowering consumers to make informed choices is essential in today's food landscape, where transparency and innovation are increasingly valued.

Proportionality and Evidence-Based Decision Making

The draft law invokes the precautionary principle without providing sufficient scientific evidence to justify its claims. Effective application of this principle requires a comprehensive scientific assessment, which the proposed legislation lacks. The existing EU framework

¹ <https://technical-regulation-information-system.ec.europa.eu/en/notification/26066>

² <https://gfieurope.org/wp-content/uploads/2024/07/YouGov-survey-of-attitudes-to-cultivated-meat-in-15-countries.pdf>

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Gesetzliche Vertretung

ProVeg e.V. wird vertreten durch den Vorstand, dieser wiederum wird vertreten durch den Geschäftsführer als besonderer Vertreter.

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already includes thorough safety evaluations, making the draft law's approach appear disproportionate and unwarranted.

It is essential for any regulatory measure to be based on solid scientific evidence. The absence of such evidence in the Hungarian draft law raises questions about its justification and alignment with established EU principles.

Environmental and Economic Opportunities

Cultivated meat presents a promising opportunity to address environmental challenges associated with traditional animal agriculture. According to first studies, it appears to have a lower environmental footprint, requiring less land and producing fewer greenhouse gas emissions.^{3 4} By embracing this innovation, Hungary can position itself as a leader in sustainable food production, creating new economic opportunities for farmers and businesses alike.

Moreover, studies have shown that a higher demand for alternative proteins, such as cultivated meat, could empower European farmers to adopt more sustainable agricultural practices.⁵ This shift could enhance local food production and strengthen supply chains, benefiting both the economy and the environment.

Existing EU Food Safety Framework

The European Union has established a robust regulatory framework for the safety assessment of novel foods, particularly through Regulation (EU) 2015/2283.⁶ This regulation mandates thorough evaluations by the European Food Safety Authority (EFSA) before any cultivated meat product can be marketed. This ensures that only products scientifically proven to be safe for consumption reach consumers. Therefore, the proposed draft law seems unnecessary and could inadvertently undermine the established expertise of EU food safety authorities.

By adhering to this existing framework, Hungary can ensure that consumer safety is prioritized while allowing innovation to flourish. It is crucial to recognize that cultivated meat cannot enter the market until it has been rigorously assessed for safety, which aligns with the EU's commitment to high food safety standards.

Encouraging Collaboration and Dialogue

We encourage the Hungarian government to engage in constructive dialogue with stakeholders, including industry experts and consumer representatives. By fostering collaboration within the existing EU regulatory framework, Hungary can ensure a balanced

³ <https://www.unep.org/resources/whats-cooking-assessment-potential-impacts-selected-novel-alternatives-conventional>

⁴ <https://cedelft.eu/publications/rapport-lca-of-cultivated-meat-future-projections-for-different-scenarios/>

⁵ <https://green-alliance.org.uk/publication/a-new-land-dividend-the-opportunity-of-alternative-proteins-in-europe/>

⁶ <https://eur-lex.europa.eu/eli/reg/2015/2283/oj>

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assessment of cultivated meat products, taking into account safety, consumer preferences, and potential societal benefits.

A collaborative approach can lead to a more informed and nuanced understanding of cultivated meat's role in the food system, paving the way for policies that support innovation while safeguarding public health, and without threatening EU's culinary traditions.

In conclusion, ProVeg Germany believes that a constructive and evidence-based approach will lead to better outcomes for consumers, the environment, and the economy. We look forward to the opportunity to work together towards a sustainable food future in Hungary and across Europe, ensuring that consumers have access to safe, innovative, and environmentally friendly food options.

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