

Brussels 09 September 2024

Compassion In World Farming's response to TRIS Notification 2024/0394/HU

Compassion in World Farming respectfully submits our concerns regarding Hungary's notification of the 'Draft act prohibiting the production and placing on the market of laboratory-grown meat'. We believe that this legislation presents an unjustifiable barrier to the EU internal Market and undermines the principles of fair competition and innovation within the European Union.

We would like to highlight the following main points:

Incompatibility with EU Regulatory Framework

The draft law does not align with the established EU regulatory framework for novel foods, which includes cultivated meat under Regulation (EU) 2015/ 2283. The European Food Safety Authority (EFSA), rigorously assesses these products, ensuring they meet high safety standards before entering the market. Therefore, the Hungarian proposal is unnecessary for consumer protection and disrupts the harmonization of food safety regulations across the EU.

Misapplication of the Precautionary Principle

The precautionary principle cited in the draft act is misapplied in this context. According to Article 7 of Regulation 178/2002, this principle allows for provisional measures only in the presence of scientific uncertainty and potential harm. However, no such risk has been identified concerning cultivated meat, and these products have not yet been thoroughly evaluated by EFSA. The blanket ban proposed by Hungary lacks proportionality and scientific justification, as required by EU law. Moreover, the emphasis on preserving the traditional rural way of life does not constitute a valid reason for imposing such restrictive measures on a novel and potentially beneficial technology. For example, in 2023, the United States Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS) approved companies to produce cell-cultivated meat products to be sold in the United States. The FDA ensures substances leaving the culturing process are safe and not adulterated, and USDA FSIS regulators ensure products are unadulterated, wholesome, and properly labelled. The US livestock sector

representatives are keen to ensure consumers are aware of the difference between cultivated and conventional products through clear labelling.

Impact on Innovation and Economic Growth

The draft law means Hungary will miss out on the economic and environmental benefits of innovation in cultivated meat.

The draft law could hinder the development of innovative agricultural and food technologies in Hungary, thereby depriving local farmers and entrepreneurs of opportunities to diversify and expand their businesses. The production and sale of cultivated meat can offer new avenues for farmers to diversify their production and create opportunities in rural areas, while helping to reduce the environmental footprint associated with traditional livestock farming. Newer technologies like that of cultivated meat can also coexist with traditional farming methods by reducing the load off them, so that farmers raising animals for meat can do so in more humane and environment friendly ways. Other member states, like the Netherlands and countries around the world like USA, UK and Singapore are ramping up investments in cultivated meat. Denying these opportunities not only limits economic growth but also positions Hungary as a less favourable environment for innovation and investment in the burgeoning alternative protein sector.

Cultivated meat could help the EU meet certain environmental objectives

Research shows that cultivated meat is projected to be almost three times more efficient in turning crops into meat than chicken, the most efficient animal, and therefore agricultural land use is low.ⁱ Nitrogen-related and air pollution emissions of cultivated meat are also expected to be lower because of this efficiency and because cultivated meat is produced in a contained system without manure.ⁱⁱ Cultivated meat production is energy-intensive, and therefore the energy mix used for production and in its supply chain is important. Using renewable energy, the carbon footprint is lower than beef and pork and comparable to the ambitious benchmark of chicken.

In light of these environmental benefits, it is regrettable for a Member State to prohibit the production and placing on the market of cultivated meat. Indeed, to do so appears to be inconsistent with TEU Article 3.3 which requires the Union to work for “a high level of protection and improvement of the quality of the environment. It shall promote scientific and technological advance.”

In conclusion, Compassion in World Farming urges for reconsideration of this draft act in light of the EU's commitment to fostering innovation and maintaining a unified internal market. The current EU regulatory framework already provides robust mechanisms to ensure the safety and proper labelling of novel foods, including cultivated meat. A ban on these products is both premature and disproportionate, potentially stifling technological

advancements that could benefit both the environment and animal welfare. We advocate for a balanced approach that supports innovation while ensuring food safety and consumer transparency.

ⁱ Sinke et al, 2022. Ex-ante life cycle assessment of commercial-scale cultivated meat production in 2030. *The International Journal of Life Cycle Assessment* (2023) 28:234–254 <https://doi.org/10.1007/s11367-022-02128-8>

ⁱⁱ Ibid