

24/11/2023

**AVEC contribution as regards the TRIS NOTIFICATION 2023/0510/FR (France)**

**'Decree on the use of certain designations used to describe foods containing vegetable proteins'**

**Summary**

AVEC would like to support the French Decree on the 'the use of certain denominations used to designate foodstuffs containing plant proteins'. This Decree aligns with the concerns of EU poultry producers, who see a growing number of abuses of names associated with meat for non-meat products, creating consumer confusion, using the reputation of well-known products without bringing the same elements of taste, texture, tradition as well as nutritional elements. We call on EU authorities to replicate this approach and promptly propose legislation to protect the denominations of animal-origin products.

**Policy options**

AVEC is the association representing the EU poultry meat sector; Our members are national organisations representing poultry processors and the poultry trade in 16 EU countries and the UK. AVEC's members represent 95% of European poultry meat production.

We welcome the opportunity to give feedback on the French Decree concerning provisions related to the use of designations for food items containing plant proteins.

AVEC strongly support the latest version of the Decree, aiming to regulate the use of designations traditionally associated with animal-origin food items in the description, marketing, or promotion of foods based on vegetable proteins or non-animal-origin ingredients containing proteins produced and marketed in France.

From our perspective, the Decree will effectively address the following primary concerns:

- Providing consumers with truthful and transparent information on the origin and composition of products
- Addressing potential health concerns
- Preventing marketing detached from reality and the appropriation of culinary heritage

**1. Making sure that consumers are well informed on the origin and composition of the products**

By presenting alternative to meat as substitutes to the original product, there is a risk of creating confusion in consumer's mind. Even though consumer understands that these products are not of animal origin, the underlying imitation of the meat products does not guarantee a similar nutritional value of the products.

Although several scientific studies have brought evidence on the fact that alternatives to animal products would not provide similar nutritional content, one in two French consumers believes that plant-based drinks provide the same nutrients as milk and one in every three thinks that plant-based drinks are suitable for babies<sup>1</sup>, which can have health consequences. This underlines the fundamental confusion in French consumers' mind and justifies such measure.

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<sup>1</sup> <https://www.agra.fr/agra-presse/lait-et-boissons-vegetales-le-cniel-alerte-sur-les-risques-de-confusion>

## **2. Addressing Health Concerns:**

The proposed Decree aims to address health concerns associated with the consumption of plant-based products imitating animal-based counterparts. While meat serves as a comprehensive source of high-quality protein and essential micro-nutrients, plant-based imitation products seek to replicate these nutritional properties. The 2023 FAO report indicates that these products, despite efforts, cannot match the nutritional composition of terrestrial animal source food. They have been found deficient in essential nutrients and often contain elevated levels of saturated fat, sodium, and sugar. Misleadingly marketed as perfect alternatives, these products may misinform consumers about their nutritional value, potentially leading to adverse effects such as dietary deficiencies if left unmonitored.

## **3. Safeguarding Culinary Heritage and Reputation:**

The Decree also seeks to protect our culinary heritage and the reputation of animal-based products. Imitation products exploit established names, packaging, imagery, and references associated with meat and fish foods, potentially usurping existing culinary legacies. By presenting themselves as equivalents to animal products while highlighting their non-animal origin, imitation products avoid scrutiny regarding their own composition and origin. This not only misleads consumers but also constitutes an unfair trading practice, capitalizing on decades of efforts to enhance production methods, taste, nutritional value, reputation, and sustainability. Allowing such marketing practices poses the risk of complete disconnection from reality, where consumers may be unaware of the contents of their plates. This permission would also regress from providing consumers with the full and transparent information they have shown a keen interest in regarding the origin and composition of the products they consume. It is important to acknowledge the substantial efforts made by food chain actors and primary producers to meet this consumer demand.

### **Conclusion:**

While recognizing the market diversity for all types of products, it is essential that they maintain distinct names, marketing approaches, and transparency about their composition and origin. Labeling a product as a substitute for an animal-based product when it is not or using ambiguous names suggestive of another product is a deliberate and misleading practice. Margarine is not butter; chicory is not coffee; horchata is not milk, and they do not claim to be. Yet, they coexist peacefully, each finding its place in people's diets. The proposed rules should establish the recognition of plant-based imitation products and animal origin foods as entirely different products, considering their respective denominations, compositions, and forms. Additionally, rules should be put in place to prevent the marketing of these products as substitutes.