



AUSTRALIAN FOOD SOVEREIGNTY ALLIANCE

Submission on the Definitions of Meat and Other Animal Products

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About the Australian Food Sovereignty Alliance (AFSA)

The Australian Food Sovereignty Alliance (AFSA) is a farmer-led civil society organisation made up of organisations and individuals working together towards a food system in which people can create, manage, and choose their food and agriculture systems. AFSA is an independent organisation not aligned with any political party. We have around 700 farmer, individual, and organisational members.

AFSA provides a balanced voice to represent farmers. We connect small- and medium-scale Australian farmers for farmer-to-farmer knowledge sharing, work with all levels of government for scale-appropriate and consistent regulations and standards for agriculture, and advocate for fair pricing for those selling to the domestic market.

We are part of a robust global network of civil society organisations involved in food sovereignty and food security policy development and advocacy. We are members of the International Planning Committee for Food Sovereignty (IPC), La Via Campesina – the global movement of peasant farmers, and Urgenci: the International Network for Community-Supported Agriculture, and work regularly with Slow Food International and many of its Australian chapters. We also support the Australasian representative on the Civil Society Mechanism (CSM), which relates to the UN Committee on World Food Security (CFS).

Our vision is to enable regenerative and agroecological farming businesses to thrive. Australians care now more than ever about the way their food is produced, including its social and environmental impacts. Food produced on small- and medium-scale regenerative farms is increasingly in demand, and government is bound to heed changing community expectations and facilitate and encourage the growth and viability of regenerative agriculture, thereby protecting the environment and human and animal health.

As a key stakeholder and representative body of small- and medium-scale producers Australia-wide, AFSA is appreciative of the opportunity to submit on the definitions of meat and other animal products.

Context

On 17 June 2021 the Senate Rural and Regional Affairs and Transport Legislation Committee called for submissions on its current inquiry into the definitions of meat and other animal products, with particular reference to:

The management by the Department of Agriculture, Water and the Environment of the legislative and regulatory framework underpinning the compulsory levy investment into meat category brands as declared through the Australian Meat and Live-stock Industry Act 1997, taking specific account of:

- a. *The potential impairment of Australian meat category brand investment from the appropriation of product labelling by manufactured plant-based or synthetic protein brands, including:*
 - i. *the use of manufactured plant-based or synthetic protein descriptors containing reference to animal flesh or products made predominantly from animal flesh, including but not limited to “meat”, “beef”, “lamb”, and “goat”; and*
 - ii. *the use of livestock images on manufactured plant-based or synthetic protein packaging or marketing materials.*
- b. *The health implications of consuming heavily manufactured protein products which are currently being retailed with red meat descriptors or livestock images, including:*
 - i. *consideration of unnatural additives used in the manufacturing process; and*
 - ii. *consideration of chemicals used in the production of these manufactured protein products.*
- c. *The immediate and long-term social and economic impacts of the appropriation of Australian meat category branding on businesses, livestock producers and individuals across regional, rural and remote Australia, including:*
 - i. *the reliance upon imported ingredients;*
 - ii. *the support of regional employment; and*
 - iii. *the state and commonwealth taxation contribution from the Australian red meat and livestock sector.*
- d. *The implications for other Australian animal products impaired from the appropriation of product labelling by manufactured plant-based or synthetic proteins.*
- e. *any related matters.*

AFSA looks forward to active participation in the inquiry process going forward.

Recommendations

Recommendation 1	Thorough investigation is required to assess the public health and safety risks associated with synthetic protein
Recommendation 2	Strict labelling requirements are necessary so that a purchaser is clearly informed that the synthetic protein: <ul style="list-style-type: none">● may contain unnatural additives, genetically modified ingredients and chemicals;● is not actually meat, i.e., edible tissues from an animal consumed

	<p>as food¹; and</p> <ul style="list-style-type: none"> • where applicable, contains imported ingredients.
Recommendation 3	Synthetic protein manufacturers should be subject to the same compositional requirements regime as per those currently imposed on meat manufacturers

Issues

Reported health issues

Ultra-processed foods are a well-documented health risk², and many alternative protein products fit this category. Putting to one side the dubious nutritional value of ultra-processed plant-derived protein³, testing on rats of one of the more well-known sources of synthetic protein, a modified yeast-driven protein soy leghemoglobin which is the key ingredient of the Impossible Burger, has demonstrated unexplained weight gain and signs of toxicity⁴.

Currently the meat substitute products made by Impossible Foods are only available in the United States, Canada, Macau, Hong Kong and Singapore. The limited adoption at this stage means that there has not been enough of a pool of eaters from which to draw evidence of the health effects of the soy leghemoglobin. Anecdotal evidence from consumers in the United States suggests that people are having reactions to the product such as nausea, stomach pain, palpitations and anxiety.⁵

The nutritional qualities of the product are questionable, as evidenced by many reference articles, a small sample of which is below:

<https://www.health.harvard.edu/blog/impossible-and-beyond-how-healthy-are-these-meatless-burgers-2019081517448>

<https://www.healthline.com/nutrition/impossible-burger>

<https://www.vox.com/future-perfect/2019/10/7/20880318/meatless-meat-mainstream-backlash-impossible-burger>

[An Acute Comparison of the Change of Serum Lipids, Glucose, and hs-CRP levels After Consumption of a Beef Burger Versus a Vegetarian Burger in Healthy Adults](#)

¹ "What is meat? A perspective from the American Meat Science Association"

<https://academic.oup.com/af/article/7/4/8/4775089>

² Ultra-processed food and adverse health outcomes: Fresh evidence links popular processed foods with a range of health risks https://academic.oup.com/cdn/article/4/Supplement_2/136/5845471?login=true

³ <https://www.health.harvard.edu/blog/impossible-and-beyond-how-healthy-are-these-meatless-burgers-2019081517448>

⁴ "Rat Feeding Study Suggests the Impossible Burger May Not Be Safe to Eat"

<https://www.gmoscience.org/rat-feeding-studies-suggest-the-impossible-burger-may-not-be-safe-to-eat/>

⁵ https://www.reddit.com/r/vegan/comments/8l4357/impossible_burger_making_me_sick/

AFSA submits that these health concerns should be investigated more thoroughly as there are clear emerging health and safety concerns. Being one of the world's "early adopters" for substitute meat products is not a safe or rational path for Australian consumers.

Genetically modified ingredients

The key ingredient in Impossible Foods' protein product is known as "heme" or soy leghemoglobin. This heme is genetically engineered by adding soy protein to genetically engineered yeast.

Genetically modified food has been around for decades now. Toxicity arising from the consumption of genetically modified food is now a well-known and much debated malady⁶. Given the health risks associated with genetically modified foods, we would argue that the synthetic protein products need to be clearly labelled as genetically modified, including in the retail fastfood context.

Strict labelling requirements must be imposed so that a purchaser is clearly informed that the synthetic protein contains genetically modified ingredients.

Truth in food labelling – misleading and deceptive "meat" claims

Whilst we note that companies like Impossible Foods and Beyond Meat do include qualifying statements on their packaging, labelling their product as, for instance, "**Burger** Made from Plants" the reality is that most consumers buying meat look past the labelling to the actual product behind the plastic wrapping. And therein lies the problem – the product truly does look like minced meat:



⁶ "Will GMOs Hurt my Body? The Public's Concerns and How Scientists have Addressed Them"
<http://sitn.hms.harvard.edu/flash/2015/will-gmos-hurt-my-body/>



The location that such produce is placed in stores is also significant as the context adds to the deception – if they appear in the traditional meat section then people are often misled into believing they are actually meat, which has occurred in relation to the Beyond Meat burger⁷.

⁷ “Shoppers Outraged over “Misleading” Vegan “Meat” Product Labelling”
<https://7news.com.au/lifestyle/food/shoppers-outraged-over-misleading-vegan-meat-product-labelling-c-171612>



AFSA suggests also that many of the meat alternatives and their labelling and product claims could be deemed misleading under the Trade Practices Act 1974. This was indeed the case in relation to Cottee’s cordial labelling in a case brought against Cadbury Schweppes by the ACCC in 2004⁸. In this case Cottee’s banana mango flavoured cordial and its apple kiwi flavoured cordial had pictures of fruit on the labelling, none of which were actually ingredients in the cordial. The ACCC won the case as the High Court deemed Cadbury Schweppes had engaged in false and misleading and deceptive conduct. AFSA would argue that in comparison to both the labelling and product placement of many of these meat alternatives, their conduct is far more misleading and deceptive.

AFSA believes that consumers deserve the opportunity and indeed have the basic human right to make informed choices about their food purchases. The labelling must clearly indicate that the plant-based protein simply is not meat.⁹

Compositional Requirements

The meat manufacturing industry is highly regulated in relation to the composition of its products. For instance, in order to label your product as a “sausage”, it must actually be a sausage (yes, that’s what the standard says) and “contain no less than 500g/kg of fat free meat flesh”. Similarly, a meat pie must be a meat pie and contain no less than 250g/kg of meat flesh, and processed meat must contain no less than 660g/kg of meat.¹⁰

“Meat flesh” is defined in the standard as per the below:

⁸ Australian Competition & Consumer Commission v Cadbury Schweppes Pty Ltd [2004] FCA 516

⁹ “Will the Australian Regulator Change its Tuna?” <https://www.allens.com.au/insights-news/insights/2019/08/will-the-australian-food-regulator-change-its-tuna/>

¹⁰ [Australia New Zealand Food Standards Code - Standard 2.2.1 - Meat and Meat Products \(legislation.gov.au\)](http://www.legislation.gov.au/australia-new-zealand-food-standards-code-standard-2.2.1-meat-and-meat-products)

meat flesh means meat that consists of skeletal muscle and any attached:

- (a) animal rind; or
- (b) fat; or
- (c) connective tissue; or
- (d) nerve; or
- (e) blood; or
- (f) blood vessels; or
- (g) skin, in the case of poultry.

AFSA would argue that any plant-based protein using the word “meat” anywhere on their packaging (even in their name – Beyond Meat for instance) needs to be subject to the same strict compositional requirements under the Food Standards Code. Naturally, these products would fail the standard as it is currently drafted, therefore these products should not be able to use the word “meat” at all.



In this example from a plant-based chicken meat substitute available at Coles supermarkets, the standout word is CHICKEN (despite above it in smaller font saying it is “chicken free”). Given this is housed in the meat section of Coles supermarkets, this is already misleading. The use of the words “wild meaty chunks” would arguably breach Standard 2.2.1 of the Food Standards Code given there is zero meat flesh in this product.

In summary, it is AFSA’s position that it is confusing and misleading for the consumer, and unfair to the traditional meat industry, to hold plant-based protein producers to lesser standards than apply to the wider food market.

AFSA has appreciated the opportunity to submit on this issue and would welcome further discussion.

About Food Sovereignty

“Food sovereignty asserts the right of peoples to nourishing and culturally-appropriate food produced and distributed in ecologically-sound and ethical ways, and their right to collectively determine their own food and agriculture systems.”¹¹

The core of food sovereignty lies in the following principles:

- Food is a human need and a basic right, rather than a commodity.
- Food systems should be democratically constructed, responding to diverse social, cultural and environmental conditions.
- Food systems should be based on a strong commitment to social justice: for farmers, food system workers, and the most vulnerable members of our society who experience food insecurity.
- Resilient food systems require long-term environmental sustainability, transitioning away from dependence on fossil fuels and chemical inputs.
- Resilient and sustainable food systems will be more localised and regionalised.
- Trade in food and agricultural products can enhance economic and social well-being but should be conducted on the basis of international solidarity, respecting and not undermining the food sovereignty ambitions of other peoples and countries.¹²

¹¹ The Australian Food Sovereignty Alliance, <<https://afsa.org.au/?s=food+sovereignty+>>.

¹² Patel, R. (2009). What does food sovereignty look like? *Journal of Peasant Studies*, 36(3), 663-671.