

CAP Regulation on the Common Organisation of the Markets: Calling on your support against compromise amendment 41

Dear Members of the Committee on Agriculture and Rural Development,

On 1st April, you will vote on the proposal for a CAP Regulation establishing a common organisation of the markets in agricultural products (2018/0218 COD). **In an attempt to undermine the growing success of plant-based alternatives to animal products, an amendment seeks to preclude businesses from naming their products with names that are typically used for meat products and preparations**, such as “steak,” “sausage,” and “burger.” The amendment also proposes to further restrict the naming of dairy alternatives by prohibiting terms such as “yoghurt style”, “cheese imitation”, or “butter substitute.”

This measure would disproportionately restrict commercial speech: there is no evidence of consumer confusion about the labelling of plant-based alternatives to animal products. On the contrary, consumers purchase these items because they do not contain meat or dairy. Additionally, there already exists a regulation establishing restrictive standards for the use of certain terms for dairy products – as clarified by a 2017 ruling by the European Court of Justice, which prohibits the use of “milk” for beverages other than milk obtained from animals for instance. The EU regulation also already requires that the plant-based nature of a product be unequivocally displayed to consumers.

On the other hand, many other practices actually mislead EU consumers. In the absence of proper regulatory definitions, terms such as “natural” or “farm fresh” and packaging suggestive of an outdoor environment are widespread. Such marketing practices mislead the consumer into believing that these products originate from pasture farms when the animals are actually raised in highly intensive production systems. Yet, it is the naming of plant-based products that most concerns the AGRI Committee.

This amendment also goes against consumers’ choices for more sustainable food. In a 2018 report, the Commission recognised the growing popularity of plant-based alternatives to animal products reporting that this trend is overwhelmingly driven by consumers who eat meat and dairy, to the extent that “retailers often promote [these] products on the same shelves as traditional meat and dairy products.” The CAP should not discourage food choices that align with the need to cut greenhouse gas emissions, as mandated by the UN’s Sustainable Development Goals. Indeed, plant-based products will be instrumental in achieving a reduced level of production in animal agriculture, a heavily industrialised sector with significant adverse impacts on the environment.

In the absence of demonstrated consumer confusion, and given the inconsistencies of the arguments put forward to support a stricter regulation on the naming of plant-based food

products, Compromise Amendment 41 is, in our opinion, a mere attempt to restrict consumers' access to products they have demonstrably show an interest in. In the interest of safeguarding the level-playing field on the EU market and to ensure consistency with climate goals by reducing meat and dairy consumption, we respectfully call on you to **reject Compromise Amendment 41**.

We thank you for your support and consideration,

Respectfully,

Humane Society International/Europe
FOUR PAWS
Compassion in World Farming EU
European Vegetarian Union

ProVeg International
Greenpeace EU
BirdLife Europe and Central Asia
Eurogroup for Animals



**HUMANE SOCIETY
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