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### **TFGA Submission: Parliamentary Inquiry into Definition of Meat and Other Animal Products**

The Tasmanian Farmers and Graziers Association (TFGA) is the leading representative body for Tasmanian primary producers. TFGA members are responsible for generating approximately 80% of the value created by the Tasmanian agricultural sector.

Agriculture is one of the key pillars of the economy and, with the current level of support from government, are well positioned to further capitalise on the stature of Tasmania agriculture.

The TFGA appreciates the opportunity to make comment on the Parliamentary Inquiry into Definition of Meat Products and other animal products.

The TFGA consulted with TFGA members to ensure all points of view were considered and meaningful information was gathered to secure broad representation for this submission. All feedback has been collated and a summary, addressing parts of the Terms of Reference, have been detailed below:

**Under Standing Order 25 (2)(a)(v), the Senate Rural and Regional Affairs and Transport Legislation Committee will inquire into and report on the current state of meat category branding in Australia, with particular reference to:**

- 1. *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 Livestock 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 predominately 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.***

### **TFGA Response:**

Our members who provided feedback have unanimously agreed that the use of animal images and reference to animal flesh is deceptive because it infers that plant-based products are equivalent alternatives. There is zero animal content in plant-based products. Animal imagery on plant-based products could be used as a ploy to evoke an emotive response from the consumer and used as a marketing technique to distract and confuse consumers.

TFGA members gave similar feedback regarding the use of the terms 'bacon', 'sausage', 'burger' and 'mince'. Some thought the use of the terms 'sausage', 'burger' and 'mince' used by the plant-based food industry (alternative food industry) was acceptable due to products existing on the market now such as fruit mince pies and vegetable burgers.

However, it is unanimous among the TFGA members who provided feedback that the term 'bacon' should not be used to describe anything but a meat product, as this is a well-known meat term. Our members questioned why vegetarian and vegan consumers want products available that depict and even look like bacon rashers, when they morally and ethically choose not to eat meat?

Interestingly, the Oxford Dictionary's definitions of these products back up this Parliamentary Inquiry into Definition of Meat and Other Animal Products, with clear definitions depicting the differences between meat and plant-based meanings:

- **Bacon:** *is salted or smoked meat which comes from the back or sides of a pig.*
- **Mince:** *is meat which has been cut into very small pieces using a machine.*
- **Sausage:** *A sausage consists of minced meat, usually pork, mixed with other ingredients and is contained in a tube made of skin or a similar material.*

The word 'burger' is a shared term used for both meat and plant-based products:

- **Burger:** *A burger is a flat round mass of minced meat or vegetables, which is fried and often eaten in a bread roll.*

Our members have also questioned why the plant-based food industry (alternative food industry) needs to display images of an animal to sell its products. Is the product and/or brand of plant-based, meat free not as strong in the food market as meat products? There should be no need for plant-based meat free products to piggyback off the meat industry, especially when 'meat free' is at the absolute core of their product proposition.

The use of terms such as 'guilt-free' or 'clean-meat' is a direct criticism of the meat industry however plant-based food manufacturers still choose to associate their products with that industry through the use of meat related terms and imagery.

- 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.**

**TFGA Response:**

There are significant differences within the meat and plant-based food industries (alternative food industry) regarding synthetic additives used in the manufacturing process and chemicals used in production.

In Tasmania, the meat industry does not use hormones at any stage of production or manufacturing. Quality assurance programs are used to ensure meat is produced to an exceptionally high level, which enables our products to be marketed and exported at a premium. Some examples of the quality assurance programs which Tasmanian processors use are Halal Certification, AUSMEAT, Australian Government Export Licensing, Certified Humane, Codex HACCP, Department of Agriculture Certificate of Registration and Export Systems, Global Food Safety and Quality Certification and National standards for organic and bio-dynamic produce.

The Australian meat industry has invested significantly over the decades to build the trust of consumers who can now purchase Australian meat knowing that it is safe for them and their families to eat. Plant-based products do not have to adhere to these strict regulatory requirements, yet they are taking advantage of that trust that consumers have in meat products to imply that their products are manufactured to the same standard.

- 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.***

**TFGA Response:**

Soybeans are one of the staples of a vegetarian and vegan diet. In Tasmania we do not grow soybeans; at this stage they are only grown in certain areas of mainland Australia, and they are usually genetically modified. This means, as the plant-based food industry (alternative food industry) grows, more soybeans would need to be imported into Australia. This could cause some displacement of locally grown and produced products and regional employment opportunities.

Another risk associated with the reliance of imported foods is the uncertainty of continual supply because of international political relations, food standards, biosecurity risks, shipping disruptions, COVID-19, and other possible future pandemics.

Australian meat producers pay significant levies to fund a plethora of activities such as research, development and adoption initiatives, marketing, education, scholarships, and much more. The plant-based food industry (alternative food industry) does not contribute financially to the meat industry, therefore, should not be permitted to use any imagery and terms associated with meat products. Some of the alternative food industries even invest substantial efforts and money into negative marketing against meat products and the industry, which is counterproductive to any industry.

As the last 2 years has highlighted, the more self sufficient a country is, the more sustainable our economy will be, ensuring a more secure economic, social, and sustainable future.

- 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.***

### TFGA Response:

Some other points that our members would like this Inquiry to consider are as follows:

- “People should associate meat as a derivative of an animal. We don’t call it banana meat or meat of an apple or soybean. Livestock industries are the life blood of many districts around the world, not just Australia. Where we graze cattle is often not suitable for cropping. Livestock can endure hardship. A lettuce can be dead within hours. Soybeans, pulses, and grains while good in a whole of life concept, can be susceptible to drought, flood, or disaster. Crops are not self-supporting, but livestock can endure many extremes and provide base load protein to a growing population. Livestock are efficient converters of food and water and will always be of great value to an economy. With Australia having many extremes of geography and climate, would we want to rely on having a source of other protein from overseas countries in a time of need?”
- “Any plant-based product that uses animal imagery or meat product terms is used by food manufacturers to confuse consumers. Consumers will know what real meat is and what is fake meat, but this doesn’t take away from the fact that manufacturers of plant-based products are playing a misleading premise to sell their products. They would be quite willing to use the terms relating to meats yet refuse to contribute anything to the red meat sector. As far as employment and tax contributions from the livestock sector is concerned, one could argue that these would be countered by an increase in plant-based agriculture to provide plant protein for the manufacturers. I believe there would be a massive impact on the long-term social and economics of the Australian meat industry. Not all areas are suitable for plant-based agriculture and the communities in these regions would be devastated by any move to zero animal agriculture.”
- “No, I don’t believe the current labelling of plant-based products with wording such as bacon, mince, sausages etc should be permitted as imagine the uproar if meat labels claimed to be ‘meat free’ or depict the product with a picture of a corn cob?”
- “There is so much confusion and misconception around the use of hormones in animal production. The advertisements of ‘hormone free’ seen on labels are there for marketing purposes and Tasmania has never used hormones in meat production.” Another example is ‘Sow Stall Free’ seen on pork products in Tasmania. This makes the consumer believe that the supermarkets have enforced this ‘new’ standard and that it is a new and improved product, whereas this practise was banned in 2017 in Tasmania.
- “We need to accept there will be change and competition and become creative and innovative about what makes meat a great natural food source. We need to focus on animal welfare, ethical and environmentally sustainable meat production. I believe there is enough market space for both products, but each should be labelled correctly and not falsely labelled.
- “The plant based ‘meat’ industry advise that their products are closely equivalent nutritionally or more nutritious than real meat products. This always appears to be based on macronutrients including fats (saturated and unsaturated), protein, energy sodium etc. However, it is being ignored that there is a plethora and density of micronutrients that is found in meat and unique fatty acid profiles such as conjugated linoleic acid (CLA), which is a naturally occurring ruminant of milk fat and meat with potent cancer fighting properties, omega 3’s which have a wide range of disease prevention properties for health implications such as cardiovascular, macular degeneration, blood pressure, neurodevelopment in infant health, cancer prevention and much more. It is impossible to copy these health benefits in plant-based alternatives.”

**Summary:**

Everyone has the choice of what they choose to eat, whether it be plant-based or meat products. We all have our own beliefs regarding what our bodies need to be sustained and feel satisfied, and our health needs are all different.

What does need to stop, is the rubbishing of each other's industries, and cease picking apart which food is more nutritious. All industries need to promote a healthy and balanced diet and let consumers decide based on truth, openness and transparency.

With this in mind, there are opportunities for regulatory change and consistency with labelling and nutritional education of all products.

The TFGA ask for the following to be considered to enable the food industry to be more compliant:

- Plant protein descriptors that contain any reference to animal flesh or products made predominantly from animal flesh, including but not limited to 'meat', 'chicken', 'beef', 'goat', 'lamb' and 'fish/seafood' be prohibited.
- Meat protein descriptors that contain any reference to plant products instead of any known meat, fish, seafood descriptors be prohibited.
- The use of livestock imagery on plant protein packaging or marketing be prohibited.
- The use of plant images on meat protein packaging or marketing be prohibited unless they are used in the product or being consumed by the animal from which the meat protein is derived.
- Amend the Food Standards Code to specify the context in which referenced descriptors and images can be used under the *Food Standards Australia and New Zealand Act 1991*.
- Establish a new Australian Consumer Law information standard under section 134 of Schedule 2 to the *Competition and Consumer Act 2010*.<sup>1</sup>
- Testing existing FSANZ standards through favourable state or territory jurisdiction enforcement agency (i.e argument that the 2015 changes were specific to Dairy).

Thank you for the opportunity to provide feedback to the proposed Bill. We would welcome further consultation on this matter to discuss our issues and concerns, enabling the TFGA to consult with our members and stakeholders appropriately.

If you have any questions regarding this submission, please feel free to contact me.

Yours sincerely,



**John McKew**

TFGA CEO

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<sup>1</sup> The development of a national standard for labelling has previously been used for free range eggs by the Hon Michael McCormack in 2017. The implementation of this standard has resolved misleading and deceptive conduct in egg marketing, supporting a level playing field of competing products.