



Industry Guidelines for the Labelling of Meat Alternative Products in Australia and New Zealand

Version 2: Released on 24 April 2023

1) Purpose of Industry Guidelines

Meat Alternative Products represent a growing category in Australia and New Zealand, with hundreds of products now available in national grocery chains across the region. It is important that all Australians and New Zealanders have access to simple, clear, and factual information describing these products' content and purpose at point-of-purchase.

The [Alternative Proteins Council](#) (APC), founded in March 2021, is the representative group for Australia and New Zealand's alternative proteins sector. The APC provides a collective voice for the sector, and a platform to discuss shared issues and opportunities. The Council works to ensure the voice of the sector remains unified and impactful on key issues.

The Alternative Proteins Council has developed suggested labelling nomenclature for the wide range of "Meat Alternative Products" (described in section 2) in the Australian and New Zealand marketplaces. These voluntary guidelines reflect emerging international norms for on-pack product labelling successfully implemented across large markets including the US and UK, to promote consistency in labelling across the category both domestically and for international exports.

The objectives of labelling *meat alternative products* are to provide clear information to consumers and for the industry to operate in a manner that is consistent with the:

- [Australia New Zealand Food Standards Code](#) (ANZFSC) and aligned to the provisions and principles of Consumer Law:
 - o [Australian Consumer Law](#) under the: The Competition and Consumer Act 2010
 - o [Commerce Commission New Zealand](#) under the: Fair Trading Act 1986 (together the Consumer Law).

These voluntary labelling guidelines highlight some relevant points to consider when labelling *meat alternative products*.

2) Descriptor/Terminology for “Meat Alternative Products” and “Ingredient Qualifiers”

“**Meat Alternative Products**”: a food product produced mainly or entirely with plant-based ingredients that may have any combination of the textural, flavour, appearance or other characteristics typically associated with animal, including seafood, meat-based products.

Typical “Ingredient Qualifiers”

The following words or phrases are common qualifiers used as prefixes or suffixes on a product label (in addition to the product name) to indicate *meat alternative products*:

- Plant-based, Meatless, Meat-free, Vegetarian*, Vegan*, Veggie, Vegie, Made from Plants, Free from X, Not-X, No-X. (Where X could be a common meat term e.g., chicken, or other similar terms.)
- Note: * When using terms such as vegetarian, vegan, or plant-based, care should be taken to be consistent with any established definitions of these terms and it should be aligned to the provisions and principles of the Consumer Law.
- The relevant international standards that may provide further guidance when considering qualifying terms are:
 - a) ISO 23662:2021 Definitions and technical Criteria for foods and food ingredients suitable for vegetarians or vegans and for labelling and other claims.
 - b) PAS 224:2020 100% Plant based foods’ characteristics and composition.

3) Recommended Guidelines for Labelling of Meat Alternative Products Sold in Retail

Any terms used should have regard to the totality of the messaging and regard to the requirements of the Consumer Law. These Guidelines are intended to provide clarity to consumers and refer to the whole of the product packaging, including on websites and in other extended marketing practices, not just the front-of-pack label.

Please refer to Appendix 1 of this document for labelling examples not considered to be aligned to these Guidelines.

Meat Alternative Products labelled with terminology as described in a) and/or b) and/or c) should also include a qualifier term as outlined in d):

a) Use of common meat terms

Meat Alternative Products are often labelled with common meat terms that describe characteristics such as flavour and texture, including, but not limited to, words such as “meat,” “chicken,” “pork,” “beef,” “prawn”, etc., and if used should include at least one of the following:

- i. A suffix, such as -less, -style, -free, -y, -flavour (e.g. beef-style, beef-free, beefless)
AND/OR
- ii. A prefix/qualifier, as outlined in section 2 (e.g. Free from X, Not-X, No-X). (Where X could be a common meat term e.g., chicken, or other similar terms.)

Suffixes, prefixes and/or qualifiers serve to ensure meat alternative *products* are clearly of non-animal origin.

The use of breed specific terms such as “Angus” or “Wagyu” should be avoided as these terms are related to specific production and meat grading standards.

b) The use of deliberately misspelt common meat terms (e.g. Chick’n) should also be appropriately qualified with an ingredient qualifier term outlined in 3(d).

c) *Use of product formats and utility terms*

Meat Alternative Products are often described by the utility or format they take such as “nuggets,” “tenders,” “mince,” “fillet,” “burger,” “patties,” “sausage,” “bacon,” “schnitzel,” “slices,” “pies,” “pepperoni,” “chunks,” “rolls,” “loaf,” “roast” etc. and should be qualified with a term as outlined in 3(d).

d) *Ingredient qualifiers*

Whether using terms from a) and/or b) and/or c), the packaging should also clearly indicate to the extent that the *meat alternative product* is made without the use of animal ingredients and/or without the use of animal meat (including seafood), extrapolated for all inclusions.

[This could be achieved, for example, by including one or more of the words or phrases defined in section 2, or a comparable qualifier, as:

i. a prefix/qualifier within the product name

AND/OR

ii. a qualifier indicated in a prominent position and format on the front-of-pack**

AND/OR

iii. the brand name.]

Note: **A prominent position and format means that the legibility of the text (e.g. density of font) of the ingredient qualifier wording should be similar to the common meat term and/or format term being used, and it should be in a position on pack where a reasonable consumer will read the qualifier in conjunction with the common meat term and/or format term being used.

e) *Location of ingredient qualifiers (as described in 3d)*

This is not only for the front-of-pack where the main product title is located but also wherever on-pack terms described in 3 (a), (b) or (c) are used.

As the ingredient qualifiers (e.g. “meat free”, “plant-based”) are a significant selling feature of these products, it is likely that brands will choose to use them several times on the packaging. This communication reinforces to the consumer the accurate nature of the contents of the pack.

4) Animal Depictions

Depictions of animals should not be used in a manner likely to give a reasonable consumer the impression that the product contains ingredients derived from the animal, including seafood.

Care should be taken if animal depictions are used, and they should only make up an insignificant proportion of the label – no more than 15% of the available space on the front-of-pack. This includes animal depictions in brand logos.

5) Nutrition, Health & Related Claims

All nutrition, health and related claims must have regard to the relevant Standards within the ANZSCC and the Consumer Law. For example, when making claims regarding the content of the nutrients in the food, including any comparative claims, the requirements of the ANZSCC must be followed to declare the nutrient content in the Nutrition Information Panel on the product label.

6) Adoption of the Guidelines

Recommended for adoption by all companies with retail products in Australia and New Zealand within 24 months of the release of the original document (24 June 2022). This timeline acknowledges the need to balance uptake of the guidelines in a timely manner, and the need for companies to, for example, update designs and graphics, utilise existing packaging inventory, and adjust marketing.

During the 24-month recommended adoption period, appropriate processes will be developed to manage ongoing compliance of labelling and marketing. If there are any questions or potential non-compliances with these guidelines, please contact the APC Secretariat secretariat@alternativeproteinscouncil.org or via the website [Alternative Proteins Council \(APC\)](https://www.alternativeproteinscouncil.org).

7) Consistent, Clear Labelling is Helpful for Consumers

The category of *meat alternative products* is still relatively new in the Australian and New Zealand markets. Some consumers may need assistance in understanding how to prepare and consume these products. The use of common terms outlined in Sections 3 are important to ensure the labelling of these products is clear and unambiguous.

The common meat terms in 3(a) and misspelt common meat terms in 3(b) help consumers to understand the flavour, texture and/or functionality that can be expected from the product.

The common format and utility terms Section 3 (c) help consumers to understand how and when to prepare and serve the product, what recipe to use it in and what other ingredients to serve it with.

8) Other Considerations

These guidelines are provided for information purposes only. If you intend to rely on any information provided in this document, you should obtain your own appropriate professional advice. You should also exercise your own skill, care and judgement with respect to use of any material provided.

When a regulatory framework for other Meat Alternative Products such as cell-based products has been developed, we may consider releasing additional guidance.

Appendix 1: Label Examples Considered to Not be Aligned to the Guidelines

It is important that all elements of the label explaining the product are clear, transparent and balanced, and aligned to these Guidelines.

Example 1. Use of Animal Depictions

- The animal depicted (pig) is significant and greater than 15% of the available space on the front-of-pack.



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Example 2. Qualifying Terms - Prominence

- The word 'chicken' is too prominent. The qualifier 'meat free' is insufficiently prominent compared to the word 'Chicken'.



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