



Industry Compliance Guidelines for Labelling of Meat & Dairy Alternative Products (plant based) in Australia and New Zealand

Version 1: Released on 24 April 2023

1) Purpose

These Compliance Guidelines are designed to complement the [Alternative Proteins Council's](#) (APC) labelling guidelines (refer Section 2) and, in doing so, proactively facilitate compliance by the alternative protein industry.

2) Objective

The overarching objective of these Guidelines is to promote industry's compliance with its product labelling guidelines, namely the:

- Meat Alternative (plant based) Product Labelling Guideline (first published June 2022 and revised April 2023)
- Dairy Alternative (plant based) Product Labelling Guideline (currently draft)

Compliance with the APC's labelling guidelines is a condition of membership, as outlined in the APC Term of Reference.

Whilst the APC is not an enforcement agency, these Guidelines establish industry category standards. They are a resource for industry to promote labelling accuracy, consistency and transparency to facilitate consumer trust and confidence.

Note: As further guidelines are developed, such as for cultivated protein products, the above list will be updated.

3) Reporting non-compliance

Non-compliance issues may be identified by a range of stakeholders, from industry (competitors), consumers or government stakeholders (authorities).

The APC's role is principally to support (coach/educate) and offer guidance to its members to ensure the burgeoning alternative protein industry is acting responsibly and builds a positive reputation in the community. In addition, the APC actions and responsibilities may include:

- i. Logging/monitoring the inquiries and correspondence
- ii. Record actions/undertakings
- iii. Follow up to close

- Report of non-compliance issues by:
 - a) **Industry** (competitor) – individual companies may be approached by other industry players, typically competitors, where a non-compliance is thought to apply. The complainant company should:
 - i. Raise the matter with the target business
 - ii. Seek explanation
 - iii. Provide feedback to complainant
 - iv. Agree action if required
 - v. In the event of an unsatisfactory response, the business may raise the issue with the APC for review

- The company receiving the complaint should:
 - i. Discuss and seek explanation from complainant
 - ii. Review internally
 - iii. Offer feedback to complainant
 - iv. Agree action if required

- b) **Consumer** – consumers may call a company’s consumer information line to report/complain of an alleged non-compliance. The company should:
 - i. Clarify facts
 - ii. Review internally
 - iii. Revert to consumer and explain
 - iv. Agree action if required
 - v. In the event of an unsatisfactory response, eg the consumer takes the matter public, the business may raise the issue with the APC for review

- c) **Authority** – government agencies may identify an alleged non-compliance. The company should:
 - i. Discuss and seek explanation from government agency
 - ii. Review internally
 - iii. Revert to authority with explanation
 - iv. Agree action if required
 - v. In the event of an unsatisfactory response, eg no consumer health and safety issues are compromised, the business may raise the issue with the APC for review

4) Audit

The APC will monitor compliance, with its guidelines, and consider any external evidence-based audits.

The industry will consider the need to formally audit, should there be accepted evidence of market failure, poor compliance or research to underpin change behaviour.

Note: Audits of labelling and marketing communication (includes the internet and social media platforms).