



Industry Guidelines for Labelling of Plant-Based Dairy Alternative Products in Australia and New Zealand

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1) Purpose of Industry Guidelines

Plant-based dairy alternative products (ie animal-free, plant-based) are a growing category in Australia and New Zealand, with products available in retail and food service/out-of-home settings.

The *Industry Guidelines for Labelling of Plant-Based Dairy Alternative Products in Australia and New Zealand (the Guidelines)* developed by the Alternative Protein Council (APC) help ensure labelling of these products provides consumers with clear, factual and consistent information at point-of-purchase and support fair practices in food trade.

These voluntary guidelines, which include labelling nomenclature, reflect international norms for on-pack product labelling, successfully implemented across large markets, to promote international consistency.

The [Alternative Proteins Council \(APC\)](#) is the peak industry representative group for Australia and New Zealand's alternative proteins sector. The APC provides a collective voice for the sector, including plant-based meat alternatives, plant-based dairy alternatives, precision-fermentation and cellular agricultural sectors, and a platform to discuss shared issues and opportunities. The Council works to ensure the voice of the sector remains unified and represented on key industry issues with the purpose of building a strong and innovative alternative proteins industry.

The objectives of labelling guidance for *plant-based dairy alternative products* is 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.

This guidance is intended to assist businesses to comply with the above laws, but it does not replace or override these laws.

Intended use of these Guidelines

These guidelines are intended to support industry to provide clarity to consumers and refer to information for the whole of the product packaging, websites and other extended marketing practices/advertising, promotions and social media.

They provide relevant points for businesses and individuals to consider when labelling plant-based dairy alternative products.

Any terms or images used should have regard to the totality of the messaging, including to the requirements of the consumer law.

2) Descriptor/Terminology for 'Plant-Based Dairy Alternative Products'

Typical Product Descriptors

Plant-based dairy alternative products are food products produced:

- *mainly or entirely from plant-based ingredients (eg nuts, grains, legumes, seeds, coconut); or*
- *plant-based ingredients, with water and/or other optional non-animal ingredients*

that may have any combination of the texture, flavour, appearance, format or other characteristics typically associated with dairy products.

Misspelt product descriptors are often used as an alternative in a product name (see Section 3(a) (i)).

Typical Non-Animal Origin Qualifiers

The following terms are acceptable common qualifiers used on a product label (in addition to the product descriptor) to indicate plant-based dairy alternative products/ingredients being of non-animal origin.

- Plant-based*
- Dairy-free^(#)
- Animal-free
- Vegetarian*
- Vegan*
- Vegan* friendly
- Made from plants*
- Cows' milk-free
- Free from X
- Not-X
- No-X

Where 'X' could be a common dairy term, eg no dairy, not milk or other similar terms.

A product is **dairy-free** if it does not contain any dairy (milk or milk-based components) such as milk, yoghurt, cheese, butter or cream (including compound ingredients, food additives and processing aids) derived from milking animals, such as cows, goats, sheep and should be aligned to the provisions and principles of the consumer law.

* When using terms such as **vegetarian, vegan, plant-based** or **made from plants**, care should be taken to be consistent with any established definitions of these terms, should be consistent with ordinary consumer understanding and should be aligned to the provisions and principles of the consumer law.

Further Guidance

The relevant international standards that provide further guidance when considering qualifying terms are:

- a) International Organisation of Standards (ISO) [23662:2021 Definitions and technical criteria for foods and food ingredients suitable for vegetarians or vegans and for labelling and other claims.](#)
- b) Publicly Available Specifications (PAS) [224:2020 100% Plant based foods characteristics and composition.](#)
- c) ISO WD [8700 Plant based food terms and definitions](#) (under development).

3) Guidelines for Labelling of Plant-Based Dairy Alternative Products Sold in Retail and Food Service/Out-of-Home

a) *Use of common dairy product descriptor*

Plant-based dairy alternative products are often labelled with common dairy product descriptors that describe use and attributes, such as product type/format (eg **milk, yoghurt, cheese, ice cream**). These type/format descriptors must be co-located with other qualifiers.

For example: Oat **Milk**, Almond **Milk Ice cream**

(i) *Use of deliberately misspelt common dairy terms*

Deliberately misspelt common dairy terms (eg **M_lk, Mylk, M!!k**) may be used as a substitute for the common dairy product descriptor and should be qualified in the same way the correct spelling of milk would be, ie with terminology of 3(b) and 3(c) co-located with terms of 3(a).

For example: Soy **M_ilk**

(ii) *Use of taste, texture, flavour, appearance, mouthfeel terms*

Terms describing taste, texture, flavour, appearance, mouthfeel that encompass dairy terms (eg **milky, creamy**) may be used as part of product names or descriptions. Dairy alternative products labelled with these terms should also include qualifier terms as outlined in 3(b) and/or 3(c).

b) Use of characterising ingredient/component qualifiers

The nut, grain, legume, seed, coconut or other plant-based ingredient used in the product and declared in the ingredient list will likely be a characterising ingredient/component and should be used in the name of the food to qualify the non-animal origin (see Food Standards Code, [Standard 1.2.10 – Information requirements – characterising ingredients and components of food](#)).

For example: **Soy Ice Cream**

There may be more than one characterising ingredient.

For example: **Almond-Cashew Milk**

Plant-based non-dairy products are often consumed by people with food allergies, food intolerances or consumers who want to avoid dairy products for a broad variety of reasons. However, the term “Plant-based milk” or “Dairy-free milk” lacks suitable information for consumers with other non-dairy allergies. While plant-based foods are a great alternative for people with allergies to milk, the ingredients commonly found in plant-based dairy alternative products may also contain other allergens, eg almond, soy. For information on food allergens and labelling requirements see Food Standards Code, [Standard 1.2.3–4 – Information requirements – warning statements, advisory statements and declarations](#) that specifies allergen labelling requirements.

c) Use of non-animal origin qualifiers

Qualifiers (used as prefixes or suffixes) serve to ensure the non-animal origin, plant-based dairy alternative products are clearly communicated, such as plant-based, dairy-free, non-dairy, animal-free-dairy alternative, vegan, free from X, no-X, non-X, not-X.

For example: **plant-based** cheese, **dairy-free** ice cream, **non-dairy** plant-based milk, cows' milk-**free**, **free from** cows' milk, **free from** animal products

Plant-based dairy alternative products labelled with terminology described in 3(a) must include qualifier terms as outlined in 3(b) and/or 3(c).

4) Placement of qualifiers

Packaging (other advertising or communications) should clearly indicate that the plant-based dairy alternative product is made without the use of animal ingredients and/or without the use of dairy. This could be achieved by including one or more of the words or phrases outlined in Section 3, or a comparable qualifier, as:

- i. a prefix/suffix qualifier within the product name (product descriptor)
AND/OR
- ii. a qualifier indicated in a prominent position** and layout on the front-of-pack
AND/OR
- iii. the brand name (ie sufficiently qualified in the brand name OR the brand name is qualified by one or more of the options outlined in Section 3)

**** A prominent position and layout** means that the non-animal origin and ingredient qualifier should be at least as prominent as the common dairy term and/or format term being used. Other considerations might include font size, density, contrast, the legibility of the text and positioning on the pack/advertisement, for example.

It should be in a position on pack where a reasonable consumer will read the qualifier(s) in conjunction with the common dairy term.

This applies to the front-of-pack where the main product title is located, and wherever on-pack (or off-pack) terms described in Section 3 are used.

As the non-animal origin (eg dairy-free, plant-based, vegan) and ingredient qualifiers (eg oat, almond, soy) are a significant selling feature of these products, eg **Vegan Cashew Cheese**, it is likely that brands will choose to use such terms several times on the packaging. This communication reinforces to the consumer the true nature of the contents of the pack making such products readily distinguishable.

5) Animal depictions

Imagery of animals should be avoided. However, if used, they should not be used in a manner likely to give a reasonable consumer the impression that the product contains ingredients derived from an animal.

Depictions should be a small proportion of the label only – recommended to be no more than 15% of the available space on the front-of-pack. This includes, but is not limited to, animal depictions in brand logos and claims.

6) Claims

All nutrition, health and related claims (see Food Standards Code [Food standard 1.2.7 – Nutrition health and related claims](#)) must be compliant with the Food Standards Code and relevant consumer law.

Consumer law applies to any claim or representation, including nutrition, environmental, sustainability or any other claim.

Consumers seeking dairy alternative products may assume that they are free from any animal dairy, both as an ingredient in the product or as part of the precautionary allergen label.

All reasonable steps must be taken when processing plant-based dairy alternatives on the same equipment where animal dairy is processed, to ensure that any cross contamination is managed and minimised, in line with Good Manufacturing Practices (**GMP**).

Care is required in considering how to label these products in line with the consumer law.

Further resources to support allergy/consumer value related issues may be found in the:

- Vegan Australia [cross contamination statement](#) and/or [New Zealand Vegan Society](#) website
- [Allergen Bureau website](#), including the [Food Industry Guide to Allergen Management and Labelling](#)

7) Adoption of the Guidelines

These guidelines are recommended for adoption by all companies with retail products in Australia and New Zealand within 24 months of the release of this document.

This timeline acknowledges the need to balance uptake of the guidelines in a timely manner and the need for companies to update designs and graphics, utilise existing packaging inventory and adjust marketing.

Compliance with the *Industry Guidelines for Labelling of Plant-Based Dairy Alternative Products in Australia and New Zealand* is a condition of APC membership, as outlined in the [APC Term of Reference](#).

The *Plant-Based Dairy Alternative Products Labelling Guideline in Australia and New Zealand* establishes a voluntary industry category standard. It is a resource for industry to promote labelling accuracy, consistency and transparency to facilitate consumer trust and confidence.

If there are any questions with regard to the ongoing compliance of labelling and marketing or potential non-compliance with these guidelines, please refer to the *Industry Compliance Guidelines for Labelling of Plant-Based Meat & Dairy Alternative Products in Australia and New Zealand*, which is available on the APC website [Alternative Proteins Council](#), and/or contact the APC Secretariat by email secretariat@alternativeproteinscouncil.org or by email via the website [Alternative Proteins Council \(APC\)](#).

Imported products must also comply with local regulatory requirements.

8) Other Considerations

These guidelines are provided for information purposes only. Additional independent professional advice is recommended to ensure care and judgement with respect to use of any material provided and to ensure compliance with relevant laws.

As the number and variety of plant-based dairy alternative products continue to grow in the Australian and New Zealand markets, consumers may need assistance in understanding how to use and consume these products. The use of common terms outlined in Sections 2 and 3 are important to ensure the labelling of these products is clear and unambiguous.

This *Industry Guidelines for Labelling of Plant-Based Dairy Alternative Products in Australia and New Zealand* complements the *Industry Guidelines for the Labelling of Plant Based Meat Alternative Product in Australia and New Zealand*, released in June 2022 (updated April 2023).