



Dear Italian Prime Minister
Dear Italian Health Minister,
Dear Agriculture and Food Sovereignty Minister

The law proposal “Provisions on the naming of food products containing plant proteins” presented in the Agriculture Commission aims to ban the use of names typical of meat products, such as burger, sausage, steak, ham, on their plant-based counterparts.

The organizations signing this letter call on the Italian government to issue a negative opinion on this bill and that it should not be discussed in Parliament, for the following reasons:

- **It does not take into account the opinions of consumers**

Demand for plant-based foods is continuously growing, as consumers opt for meat alternatives due to ethical, environmental, and/or health reasons. Commonly used denominations, when labels make it clear that products are plant-based, are therefore essential to give information on the use and flavour of a product and thus to enable informed food choices. And as a proof, according to a survey published by Beuc¹ (the European consumers organization) 88% of Italians see no problems in the use of such denominations.

A consumer choosing a plant-based product knows well that the name of the product indi-

cates the use and texture of the product, and that there can be nutritional differences with its meat counterparts. For example, some plant-based products tend to be good sources of nutrients, such as fiber, folate and iron, but also higher in sodium².

- **The proposal is misaligned with current EU rules and developments on food denominations**

In October 2020, in the context of the Proposal for a Regulation amending Regulation (EU) No 1308/2013 establishing a common organisation of the markets in agricultural products (“CMO Regulation”), the European Parliament rejected a ban on the use of meat denominations for plant-based products (e.g. “vegetarian burger”)³. The vote unequivocally clarified that the use of meat denominations for plant-based products do not mislead consumers but help make informed purchase decisions. To fulfil Europe’s ambitions for a more sustainable food system, the plant-based food sector needs a consistent EU framework that does not hinder innovation and consumer information through disproportionate restrictions.

Moreover, if adopted, the proposal would contribute to a regulatory fragmentation which could constitute a potential trade barrier for the EU Single Market, impacting consumers’ information and access to plant-based foods.

- **It jeopardizes EU plans for a more sustainable food system**

The Farm to Fork strategy has the goal to reduce the impact of our food system, promoting the transition towards a higher consumption of plant proteins. As the European Commission writes in the “Drivers of Food Security”⁴ report in January 2023:

“Food contributes to around 45% of the environmental impacts of EU consumers; for example, the food system contributes to around one third of the greenhouse gas (GHG) emissions. (...) Adding the emissions related to the production, transport and processing of feed, the livestock sector is responsible for 81-86% of total agricultural GHG emissions. (EC, 2020). Food choices and dietary patterns can influence the efficiency of energy and resources use in our current food system. In an overstrained world, including the EU, switching to more plant-based diets would contribute to food security as a considerable proportion of agricultural land is used to produce feed rather than food for direct human consumption.”

To bolster this transition, that also the latest IPCC report⁵ defines necessary, it is vital to make plant-based foods more accessible and affordable for consumers. Denominations and communication play an important role in this.

- **It does not promote healthy eating**

An increased uptake of plant-based foods has been associated with a lower risk of heart diseases, stroke, and high blood pressure, as well as a lower risk of chronic diseases such as diabetes.

Analyzing more than 800 studies the World Health Organisation (WHO)⁶ has already declared in 2015 that processed red meat is carcinogenic and that red meat is possibly carcinogenic, and the transition towards a more plant-based diet is also considered a pillar in cancer prevention as part of Europe’s Beating Cancer Plan.

This law proposal favours animal based products above plant-based ones, although the latter have many additional benefits such as zero cholesterol, lower fats, healthy fibre (beef, chicken, pork, and seafood have no fibre at all), and no antibiotic residues.

- **It will have a negative economic impact on many Italian companies**

This bill talks about “respecting the work of our companies,” aiming to protect Italian businesses, however ignoring the fact that numerous companies of the plant-based sector in the country will suffer serious economic damage by having to invest large sums in communication, marketing and complete packaging renewal.

Therefore we call on the Italian Government to align its activities with the EU sustainability goals and start by rejecting this law proposal. We remind you that in 2020 with the Farm to Fork Strategy the European Commission committed to set a new, green, sustainable direction for the transition of the food system and agriculture, and that plant-based foods are an integral part of this transition.

Yours sincerely,

A Better Future AB
 ACU – Associazione Consumatori Utenti
 Alternative Protein International
 Anima International
 Animal Equality Italia
 Animal Friends Croatia
 Animal Law Italia
 Associazione Terra!
 CiWF Italia
 ENPA
 Essere Animali
 Eurogroup for Animals
 European Alliance for Plant-based Foods

European Vegetarian Union
 Fórum Nacional de Proteção e Defesa Animal
 Future Food 4 Climate
 Green REV Institute
 Grønn Framtid
 Gyvi Gali
 Humane Society International/Europe
 LAV
 LNDC Animal Protection
 OIPA Italia
 Plant Based Cities Movement

Plant Based Foods Association (PBFA)
 Plant Based Foods Institute (PBFi)
 Plantebranchen
 ProVeg International
 Swissveg
 The Good Lobby Italia
 The Jeremy Coller Foundation
 Tutmonda Esperantista Vegetarana Asocio
 Unión Vegetariana Española
 Vegan France Interpro

¹ https://www.beuc.eu/sites/default/files/publications/beuc-x-2020-042_consumers_and_the_transition_to_sustainable_food.pdf#page=35

² <https://www.sciencedirect.com/science/article/pii/S2666833522000612#bib0085>

³ <https://www.theguardian.com/world/2020/oct/23/european-farmers-lose-attempt-to-ban-terms-such-veggie-burger>

⁴ https://futurefood4climate.eu/wp-content/uploads/2023/01/ui883g-SWD_2023_4_1_EN_document_travail_service_part1_v2.pdf

⁵ <https://www.ipcc.ch/report/sixth-assessment-report-working-group-ii/>

⁶ https://www.iarc.who.int/wp-content/uploads/2018/07/pr240_E.pdf