

Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Re: Submission to the Senate Committee Enquiry: Definitions of meat and other animal products

The Australian Oilseeds Federation Inc. (AOF) is the peak industry body for the Australian oilseeds industry and was established in 1970 to represent the common interests of all Australian oilseed industry participants and to promote the development, expansion and improvement of Australian oilseed production.

A core part of the Australian oilseeds industry is the production of oilseed meal, the residue remaining after oil has been removed. Oilseed meal is a valuable source of vegetable protein to the livestock sector, providing energy, fibre, carbohydrate, essential fatty acids, essential amino acids and other nutrients.

Oilseed meal, particularly soybean meal, and of growing importance canola meal, is also a valuable plant protein source for human consumption.

This duality of end uses for oilseed meal (i.e. use in human and animal food) enables the AOF to provide an informed and balanced submission into this enquiry.

The AOF response follows each stated question in the Terms of Reference.

- 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.

The AOF does not support the use of specific words or images on plant-based proteins relating to specific species of animal suitable for human consumption. The use of such words or images on plant protein based products has a strong propensity to mislead consumers.

The AOF does, however, support the use of the word ‘meat’ in relation to human destined plant based protein products on the condition that the word is augmented with a descriptor indicating that the product

in question is not of animal origin. Terms such as ‘Fake Meat’, ‘Beyond Meat’, ‘Meat Analogue’, ‘Plant-based Meat’ would be examples of such augmentative descriptors.

This approach is consistent with the nomenclature associated with other analogue products such as plant based beverages (‘Soy Milk’, ‘Almond Milk’, etc); non-dairy cheeses (‘Vegan Cheddar’, ‘Plant-based Mozzarella’, etc)

The AOF also supports the use of terms for plant-based protein often associated with animal-based food for human consumption, such as ‘sausage’, ‘burger’, ‘pattie’, ‘mince’ etc as these terms are generic in nature, and not solely used as descriptors for animal-based human foods.

- 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.

The AOF recognises and supports the robust and science-based Australian food regulatory system as administered through FSANZ, acknowledging that approved additives and chemicals used in the food manufacturing system have undergone extensive assessment for human safety. This includes additives and chemicals used in the processing of animal-based meat products equally with those used in the production and preservation of plant-based meat analogues.

The AOF supports the use of approved additives and processing chemicals in both animal-based meat products and plant-based meat analogue products for the purpose of ensuring food safety, food preservation, textural integrity and organoleptic qualities.

The AOF also acknowledges that Australia has a robust regulatory system ensuring clear labelling of all ingredients, including the inclusion of approved additives, to ensure consumers are able to make informed choices.

- 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

The oilseed protein sector contributes strongly to Australia’s rural and remote economies through the production and processing of canola and soybean crops. ABARES estimates the production value of canola alone in 2021/22 to be \$2.7 billion¹. Approximately 55% of the canola crop volume (not value) is processed into canola meal providing a locally sourced, locally processed nutritious feed for the livestock industry. Over 80% of the canola protein meal is processed in rural and regional communities, supporting significant

¹ ABARES Agricultural Commodities- June 2021

portions of the economy and employment base in a number of smaller regional towns (notably Numurkah, Vic; Manildra, NSW; Bomen, NSW; Cootamundra, NSW; Millicent, SA; Kojunup, WA; Pinjarra, WA.) as well as having a significant presence in the rural city of Newcastle (NSW).

While canola meal is yet to be incorporated as a protein source in plant-based foods in any meaningful way, research underway by CSIRO and also in Canada geared towards canola incorporation in human food is expected to lead to canola meal becoming an important source for human protein consumption.

As plant protein continues to grow as an augmentative protein source in human foods, so too the opportunity for further value creation in regional and rural Australia grows as Australian agriculture is well suited for the production of oilseed crops high in plant protein.

The use of appropriate nomenclature for plant based proteins, particularly as related to meat analogue products (as outlined earlier in this submission) will be essential to aid consumer acceptance and understanding of such products. Through clear, honest and unambiguous labelling of meat analogue products, such as outlined earlier, will serve to continue to grow the social and economic benefits in rural and regional Australia that plant proteins, particularly oilseed proteins, can deliver.

The growth of Australian grown plant proteins will also serve to reduce the need to import plant proteins and plant protein isolates, improving the overall balance of trade and transferring the value creation to the domestic economy.

In relation to taxation contribution, it is important to note that the Australian oilseeds industry is valued at approximately \$3 billion², with taxation receipts collected throughout the value chain, from farm gate to end users, through GST, employee and corporate income tax, payroll, land and other state taxes.

d. The implications for other Australian animal products impaired from the appropriation of product labelling by manufactured plant-based or synthetic proteins.

The AOF does not foresee any 'impairment' to other Australian animal products through the use of clear, honest, legal, descriptive and consumer accepted labelling terms applied to plant protein-based foods.

Accepted regulatory frameworks, such as Food Standards Code labelling requirements and ACCC provisions act to ensure food labelling is compliant with existing legislation.

Yours sincerely,



Nick Goddard
CEO
Australian Oilseeds Federation Inc.

² AOF Strategic Plan, 2020-2025