

October 9, 2024

DELIVERED VIA EMAIL: [cfia.labellingconsultation-etiquetage.acia@inspection.gc.ca](mailto:cfia.labellingconsultation-etiquetage.acia@inspection.gc.ca)

**Re: Proposed Guidance on How to Label and Represent Plant-Based Alternatives to Egg Products**

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Thank you for the opportunity to provide our comments on the Proposed Guidance on How to Label and Represent Plant-Based Alternatives to Egg Products. At AEL Advocacy, we strongly support the development of clear labelling guidelines that reflect the growing consumer demand for plant-based products. Our recommendations aim to ensure that the guidelines consider the important intersections between public health, environmental sustainability, and the ethical treatment of animals.

#### **A. About AEL Advocacy**

Animal Environmental Legal Advocacy (“AEL Advocacy”) is a public interest law practice and not-for-profit organization based in Ontario. Our lawyers understand the important interconnection between humans, animals, and the environment. We combine our in-depth knowledge of the legal and political landscape with a commitment to supporting individuals and organizations working to protect animals and the environments where they live.

#### **B. Comments on the Proposed Guidance on How to Label and Represent Plant-Based Alternatives to Egg Products**

AEL Advocacy is strongly in favour of the Canadian Food Inspection Agency’s (the “CFIA”) proposed guidelines for labelling and representing plant-based alternatives to egg products. Furthermore, we emphasize the need for a clear definition of “plant-based foods” and encourage companies to provide criteria used to substantiate such claims, ensuring consistency and transparency across all plant-based products.

With growing consumer interest in plant-based alternatives, particularly as the market for plant-based egg products expands, it is crucial that clear and accessible labelling guidelines are in place to enable informed decision-making.<sup>1</sup> Key drivers of this interest include environmental stewardship and animal welfare.<sup>2</sup> Plant-based protein reduces the environmental impact of food production by lowering greenhouse gas emissions, conserving water, and using less land compared to animal agriculture.<sup>3</sup> Moreover, cruelty-free alternatives appeal to consumers who prioritize ethical treatment of animals.<sup>4</sup> As such, the need for clear guidance is critical to support consumers while promoting sustainability and animal welfare.

### **I. Proposed Guidance Adequately Explains How to Differentiate Plant-Based Alternatives to Egg Products So They Are Not Mistaken for Egg Product Counterparts**

The proposed guidelines effectively outline how to distinguish plant-based alternatives from egg products. Accurate labelling prevents confusion and ensures transparency. Every aspect of a food label (such as font size, ingredient list, and design) contributes to the overall impression of the product. Clear and comprehensible labels foster consumer trust.<sup>5</sup> When poorly executed, labels can diminish confidence in both the product and the brand.<sup>6</sup> The proposed guidelines ensure that all label elements contribute to informed decision-making, enhancing transparency and consumer trust.

### **II. Guidance May be Used for Other Types of Plant-Based Alternatives**

The proposed guidelines for labelling plant-based egg alternatives can serve as a valuable framework for other plant-based products, such as meat, dairy, or seafood substitutes. Similar guidelines already exist for “simulated meat and simulated poultry products”, ensuring consistency across product categories.<sup>7</sup> Consistent labelling across plant-based alternatives allows consumers to make informed choices, regardless of the product.

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<sup>1</sup> [https://nrc.canada.ca/sites/default/files/2019-10/Plant\\_protein\\_industry\\_market\\_analysis\\_summary.pdf](https://nrc.canada.ca/sites/default/files/2019-10/Plant_protein_industry_market_analysis_summary.pdf)

<sup>2</sup> [https://nrc.canada.ca/sites/default/files/2019-10/Plant\\_protein\\_industry\\_market\\_analysis\\_summary.pdf](https://nrc.canada.ca/sites/default/files/2019-10/Plant_protein_industry_market_analysis_summary.pdf)

<sup>3</sup> [https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC\\_AR6\\_SYR\\_LongerReport.pdf](https://www.ipcc.ch/report/ar6/syr/downloads/report/IPCC_AR6_SYR_LongerReport.pdf)

<sup>4</sup> <https://www.asPCA.org/shopwithyourheart/consumer-resources/plant-based-never-tasted-so-good>

<sup>5</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC8156633/>

<sup>6</sup>

<https://openknowledge.fao.org/server/api/core/bitstreams/71b7d4e0-966e-45c5-9f74-da5ebc133f66/content>

<sup>7</sup>

<https://inspection.canada.ca/en/food-labels/labelling/industry/meat-and-poultry-products/simulated-products>

Labels such as “vegan” are well understood and have been shown to increase consumer confidence and purchasing intent.<sup>8</sup> Companies may apply additional criteria to take account of factors in addition to the ingredients of the food, such as the production methods, to encourage transparency.<sup>9</sup> By contrast, the term “plant-based” is not as universally understood and criteria to meet this claim may not be clear to all consumers and producers.<sup>10</sup> Implementing consistent criteria for “plant-based” products across the food industry would improve transparency and potentially encourage more consumers to adopt plant-based options in their diets.

### **III. Current Labels Used on Plant-Based Alternatives to Egg Products Could Be Improved**

While labels on plant-based alternatives to egg products provide some level of clarity, there is room for improvement. When labels are unclear, consumer interest and understanding may suffer. Providing clear definitions of “plant-based”, setting out that plant-based refers to products that are made entirely from ingredients derived from plants and contain no animal-based ingredients, and enforcing consistent labelling practices would help ensure consumers are not misled and producers remain compliant with relevant regulations. For example, the proposed guidelines state that plant-based alternatives could include both vegan and vegetarian products, despite vegetarian products including animal-based ingredients.

The importance of providing sufficient information to consumers so they understand what the product is and, additionally, that the product is not an egg product lends to increasing consumer trust in the food industry overall. By distinguishing plant-based alternatives from egg products through clear guidelines that are easily accessible to consumers, consumers are able to make informed decisions about their food choices.

### **C. Conclusion**

AEL Advocacy is in favour of the Canadian Food Inspection Agency’s proposed guidelines for labelling and representing plant-based alternatives to egg products with some further clarification on the definition of “plant-based” and the inclusion of criteria that can substantiate such claims on labels.

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<sup>8</sup> <https://proveg.org/article/plant-based-labelling/>

<sup>9</sup> <https://inspection.canada.ca/en/food-labels/labelling/industry/composition-and-quality#s5c2>

<sup>10</sup> <https://proveg.org/article/plant-based-labelling/>

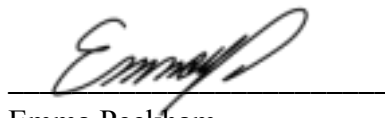
We welcome the opportunity to discuss the above comments and recommendations.

Sincerely,

**ANIMAL ENVIRONMENTAL LEGAL ADVOCACY**

A handwritten signature in blue ink that reads "K Berkeley". The signature is written in a cursive style and is positioned above a horizontal line.

Kira Berkeley  
Co-Director & Counsel

A handwritten signature in blue ink that reads "Emma Peckham". The signature is written in a cursive style and is positioned above a horizontal line.

Emma Peckham  
Student-at-Law