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Submitted Electronically

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Dockets Management Staff  
Food and Drug Administration  
5630 Fishers Lane, Rm. 1061  
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**RE: FDA-2022-D-1102: Labeling of Plant-Based Alternatives to Animal-Derived Foods  
Draft Guidance for Industry**

The Good Food Institute (GFI) appreciates the opportunity to comment on the important issue of labeling plant-based foods. GFI is a nonprofit think tank and open-access resource hub working to accelerate food innovation, including in the category of plant-based proteins. GFI's team of scientists, analysts, and policy experts catalyze research, innovation, and public support for plant-based proteins to help meet consumer demand and feed a growing world.

FDA's draft guidance has the potential to substantially impact the availability of healthful plant-based foods at the grocery store. The draft guidance recognizes that consumers understand existing labels for plant-based products. It helpfully assures plant-based food producers that they may continue the longstanding practice of using nomenclature that combines common terms for animal-based products alongside qualifiers that clearly indicate the product is made from plant ingredients (e.g., "plant-based burger"). However, the draft guidance also includes some nomenclature guidelines that are likely to introduce consumer confusion by adding lengthy plant-source statements to product names. GFI urges FDA to avoid implementing a labeling scheme that may confuse shoppers or burden plant-based products in the marketplace, and thereby diminish consumer choice.

We provide more information on plant-based proteins, consumer understanding, and the likely impacts of the draft guidance below.

## **Consumers choose plant-based foods for a variety of reasons**

The draft guidance acknowledges that Americans are increasingly choosing plant-based foods as alternatives to, or in addition to, animal-based products for a variety of reasons. Consumers may choose these foods due to dietary restrictions, allergies, intolerances, religious practices, or ethical concerns. The majority of Americans who purchase plant-based alternatives also purchase animal-based products,<sup>1</sup> and seek out plant-based foods to add healthful variety to their diets. Any guidance for labeling these products should align with existing consumer understanding and expectations to avoid misconceptions and ensure Americans have plentiful choices at the grocery store.

## **Plant-based meat can offer nutritional benefits and help Americans avoid chronic disease**

Americans often consume plant-based meat products as a substitute for animal-based meat. Even those who regularly consume animal-based meat may choose plant-based options as an alternative for some meals. Plant-based meat can offer nutritional benefits for such consumers. Fully plant-based foods are free from dietary cholesterol. Many plant-based meats are also low in saturated fat, a nutrient strongly linked to LDL cholesterol.<sup>2</sup> Plant-based meat products can also be a good source of dietary fiber, an important nutrient for cardiovascular and gut health, and one that is under-consumed by the vast majority of Americans.<sup>3</sup>

Many plant-based meats fall into the category of “ultra-processed foods” (UPFs) under the NOVA classification system. Despite this categorization, plant-based meat products differ significantly from other categories of UPFs that are high in added sugars, sodium, and saturated fat.<sup>4</sup> Consuming plant-based meat is not associated with the same adverse health outcomes as consuming other categories of UPFs.<sup>5</sup> On the contrary, the intake of plant-based meats can help

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<sup>1</sup> The Good Food Institute, Analyzing plant-based meat & seafood sales, 2024. Available: <https://gfi.org/resource/analyzing-plant-based-meat-and-seafood-sales/>.

<sup>2</sup> World Health Organization, “Saturated fatty acid and trans-fatty acid intake for adults and children: WHO guideline,” World Health Organization, Geneva, 2023. Available: <https://iris.who.int/bitstream/handle/10665/370419/9789240073630-eng.pdf?sequence=1>.

<sup>3</sup> J. W. Anderson et al, “Health benefits of dietary fiber,” *Nutr Rev*, vol. 67, (4), pp. 188–205, 2009. Available: <https://pubmed.ncbi.nlm.nih.gov/19335713/>. DOI: 10.1111/j.1753-4887.2009.00189.x.

<sup>4</sup> E. Cole et al, “Examination of the nutritional composition of alternative beef burgers available in the United States,” *International Journal of Food Sciences and Nutrition*, vol. 73, (4), pp. 425–432, 2022. Available: <https://www.tandfonline.com/doi/full/10.1080/09637486.2021.2010035>. DOI: 10.1080/09637486.2021.2010035;

D. Martini et al, “Ultra-Processed Foods and Nutritional Dietary Profile: A Meta-Analysis of Nationally Representative Samples,” *Nutrients*, vol. 13, (10), pp. 3390, 2021. Available: <https://pubmed.ncbi.nlm.nih.gov/34684391/>. DOI: 10.3390/nu13103390.

<sup>5</sup> R. Cordova et al, “Consumption of ultra-processed foods and risk of multimorbidity of cancer and cardiometabolic diseases: a multinational cohort study,” *The Lancet Regional Health – Europe*, vol. 35, 2023. Available: [https://www.thelancet.com/journals/lanep/article/PIIS2666-7762\(23\)00190-4/fulltext](https://www.thelancet.com/journals/lanep/article/PIIS2666-7762(23)00190-4/fulltext). DOI: 10.1016/j.lanep.2023.100771.

Americans prevent chronic disease. The consumption of plant-based meat is associated with improvements in body weight, cardiovascular disease indicators, and the gut microbiome.<sup>6</sup>

Given the potential health benefits of plant-based meat, FDA should avoid implementing labeling criteria that would discourage consumers from adding these products to their diets.

### **Consumers understand existing plant-based meat labels**

The draft guidance states that plant-based food labels can use standardized terms, including the names of animal-derived foods, accompanied by appropriate qualifiers, so long as the resulting labels are not misleading. In doing so, the draft guidance recognizes the common practice of referring to plant-based meat products using meat terms that consumers understand (such as “burger” or “nuggets”) alongside qualifiers that indicate the food is plant-based, not animal-derived (such as “plant-based” or “meat-free”). FDA has allowed this type of compound nomenclature for decades. Plant-based meat products referred to as “veggie burgers,” for example, have been on the market in the United States since the early 1980s.

Furthermore, the draft guidance recognizes that “‘plant-based’ or ‘plant’ are terms that convey to the consumer that the food is derived from plants rather than animals.” Accordingly, a product that uses a term like “plant-based sausage” sufficiently conveys to consumers that the product is a sausage-style product made only from plant-based ingredients and not from animal meat.

A recent survey of over 3,000 American adults confirms that consumers understand plant-based meat labels that use this type of nomenclature.<sup>7</sup> For example, 84% of Americans surveyed, who were shown packages of plant-based meat products currently on the market, correctly identified that the products they viewed did not “contain meat from an animal.” This was almost as many as correctly identified a package of tofu as not “containing meat from an animal.” The survey

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<sup>6</sup> R. Fernández-Rodríguez et al, “Plant-based meat alternatives and cardiometabolic health: a systematic review and meta-analysis,” *Am J Clin Nutr*, vol. 121, (2), pp. 274–283, 2025. Available: <https://pubmed.ncbi.nlm.nih.gov/39653176/>. DOI: 10.1016/j.ajcnut.2024.12.002;

M. Nagra et al, “Animal vs Plant-Based Meat: A Hearty Debate,” *Canadian Journal of Cardiology*, vol. 40, (7), pp. 1198–1209, 2024. Available: [https://onlinecjc.ca/article/S0828-282X\(23\)01882-2/abstract](https://onlinecjc.ca/article/S0828-282X(23)01882-2/abstract). DOI: 10.1016/j.cjca.2023.11.005;

J. Gibbs and G. Leung, “The Effect of Plant-Based and Mycoprotein-Based Meat Substitute Consumption on Cardiometabolic Risk Factors: A Systematic Review and Meta-Analysis of Controlled Intervention Trials,” *Dietetics*, vol. 2, (1), pp. 104–122, 2023. Available: <https://www.mdpi.com/2674-0311/2/1/9>. DOI: 10.3390/dietetics2010009;

M. A. Toribio-Mateas, A. Bester and N. Klimenko, “Impact of Plant-Based Meat Alternatives on the Gut Microbiota of Consumers: A Real-World Study,” *Foods*, vol. 10, (9), pp. 2040, 2021. Available: <https://www.mdpi.com/2304-8158/10/9/2040>. DOI: 10.3390/foods10092040.

<sup>7</sup> The Good Food Institute & Morning Consult, “Americans understand what plant-based meat is, what it’s made from, and how it’s labeled,” The Good Food Institute, 2024. Available: <https://gfi.org/resource/americans-understand-plant-based-meat-labeling/>.

also showed that “plant-based meat” is the term Americans are most familiar with to describe these products, with 92% reporting they were familiar with this term to describe meat alternatives made from plant ingredients. When asked what nomenclature best describes these products, respondents were most likely to say “plant-based” followed by a conventional meat term such as beef, chicken, or bacon (i.e., “plant-based chicken” or “plant-based beef”). Prior research bolsters these findings. A 2021 empirical study, for example, found that consumers understand the use of descriptors like “burger,” “beef,” or “butter,” on products that also state they are “plant-based.”<sup>8</sup>

Given these findings, FDA should encourage plant-based meat producers to continue labeling their products with terms like “plant-based beef,” which consumers both understand and prefer.

### **FDA’s draft guidance may inadvertently diminish consumer choice**

The draft guidance would, for the first time, have plant-based meat, egg, and dairy producers include a list of plant sources in their product names. This information is readily available to consumers on the mandatory ingredient list, and any allergens must be clearly declared under existing regulations. Consumers know to turn to the information panel for these details, and are well equipped to choose the foods that are best for themselves and their families based on this information. Changing where some ingredients appear on the label is unlikely to aid consumers and could make labels more difficult to understand.

American consumers are already familiar with the common nomenclature used for plant-based meat, egg, and dairy products: a qualifying term like “plant-based” or “vegan” followed by an identifying term like “burger” or “cream cheese.” Changing these well-understood product names to something less concise and less recognizable will not aid in consumer understanding. To the contrary, changes to this long-standing nomenclature pattern could lead shoppers to mistakenly believe that the products they have purchased for years have suddenly changed.

Furthermore, including the names of some plant sources in the product name while leaving other ingredients off the front of pack could mislead consumers as to a product’s contents, including allergens (e.g., where an allergen is listed in the allergen declaration but is not a primary plant source and therefore is not included in the product name). Consumers are accustomed to finding ingredient and allergen information in one place. Further complicating food labels and adding

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<sup>8</sup> J.A. Gleckel, “Are Consumers Really Confused by Plant-Based Food Labels? An Empirical Study,” *J. of Animal & Env’tl. Law*, Vol. 12, No. 2, pp. 22-24, Spring 2021. Available:

[https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3727710](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3727710).

See also S. Feltz & A. Feltz, “Consumer accuracy at identifying plant-based and animal-based milk items,” *Food Ethics* Vol. 4 pp. 85–112, 2019. Available: <https://doi.org/10.1007/s41055-019-00051-7>. DOI: 10.1007/s41055-019-00051-7.

lengthy ingredient statements to product names may lead shoppers to rely solely on front-of-pack information, to the detriment of consumer understanding and safety.

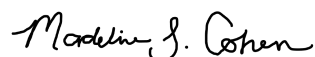
Finally, lengthy and convoluted nomenclature would put plant-based meat, eggs, and dairy at a disadvantage in the grocery store, which would likely discourage companies from creating new plant-based products. This would, in turn, reduce consumer choice, as many plant-based protein products have been created specifically to meet the ever-diversifying preferences, diets, and nutritional needs of consumers. To encourage companies to create more nutritious plant-based products that meet Americans' dietary needs, FDA should consider guidance that will foster innovation and will not discourage the production of healthy new foods.

### **FDA's draft guidance confusingly singles out plant-based meat, egg, and dairy products**

The draft guidance urges companies making plant-based meat, eggs, and dairy to include the primary plant source(s) in their product names on the basis that these products should distinguish themselves from one another *within* the plant-based food category (the draft guidance concedes that terms like "plant-based" are sufficient to differentiate these foods from animal products). Such intra-category differentiation is not required for many other packaged food categories. Cookies, crackers, and meal bars, for example, do not have to specify in the product name the plant(s) they're made from, despite the many primary plant ingredients that might be used: wheat, rice, spelt, almonds, peanuts, chickpeas, cassava, arrowroot, tapioca, and more. Likewise, salad dressings need not use nomenclature that indicates their primary plant source, whether oil from olives, sunflower seeds, soybeans, or other plants. If consumers want to purchase products made from certain plant sources, they know they can turn to the mandatory ingredient statement to find this information.

Requiring a certain sub-class of packaged foods to include a laundry list of primary ingredients in the product name could easily confuse shoppers and could mistakenly lead consumers to believe that other packaged foods *do not* contain those same ingredients because they are not included in the names of those other products. We encourage FDA to consider current consumer comprehension, practices, and needs when formulating final guidance for industry. By ensuring that commonly understood labeling practices are not upended, FDA can help prevent further confusion and protect American consumers.

Sincerely,



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