

APA - Autumn Statement Representation

About the Alternative Proteins Association (APA)

The Alternative Proteins Association (APA) is the largest association of its kind in Europe, promoting the value of alternative proteins in the UK alongside our membership network of businesses, scientists, investment groups, retailers, NGOs, and farmers. This ranges from the household-name meat substitutes already seen on the market, such as Quorn, to innovative technologies such as precision fermentation and cultivated meats developed from cells. APA's mission is not about telling people what to eat, but rather about offering more options to consumers — while also addressing food insecurity, climate change, and the cost of living crisis.

Even under the least optimistic scenario, the global alternative proteins market is expected to be worth £226bn by 2035 — twice the value of the UK construction sector. The UK is already the second largest consumer of alternative proteins in Europe, with demand only expected to grow. With the right combination of regulation and Government support, the UK alternative proteins industry could be worth up to £6.8bn annually and create 25,000 jobs by 2035. The Government has a prime opportunity to make the UK a world leader in the sector, supporting the innovative British SMEs that are already developing these products.

Unlocking growth through the alternative proteins sector

To unlock these opportunities, there are three key policy reforms that we are keen to see progressed in the Autumn Statement, all of which require either no or a relatively small budget commitment, but that we believe will support the Government's objectives for generating economic growth by supporting small businesses.

1. Streamline novel foods regulations

- **The UK's alternative protein industry is currently being held back from its potential to be a true global leader by laws inherited from the European Union.**
 - Whilst the Government's June 2022 Food Strategy rightly committed to using the UK's new, post-Brexit freedoms to cut this unnecessary EU red tape facing industry, this objective has yet to be fully realised.
 - The current situation is the 'worst of both worlds' with respect to UK/EU regulations. Not only has the UK inherited the EU's notoriously cumbersome and opaque Novel Foods Regulation, we no longer recognise new EU approvals — even though it is the same process.

- This places an unnecessary burden on alternative protein companies, but also on the Food Standards Agency (FSA), which now has more regulatory responsibility and has simultaneously lost access to EU resources such as the Rapid Alert System for Food.
- **Our three recommendations for novel foods reform** can be implemented quickly without an overhaul of the current system, and will reduce the burden on the FSA.
 - **Establish a formal process for pre-application consultations** to allow novel food companies to get guidance on specific points without requiring the risk and resources to submit an entire dossier. This is an approach already taken by Singapore.
 - **Set guidelines for prioritising novel food applications** according to their alignment with national goals, e.g. giving preference to innovations which can help us reach net zero, improve food security, and enhance public health.
 - **Create an expedited approval process for products already approved overseas** to prevent unnecessary duplication of work, both for novel food companies and for the regulators. This is an approach already taken by Israel and Australia.

2. Make labelling requirements fair and transparent

- **UK alternative protein companies face unnecessary labelling restrictions, which may become even more restrictive.**
 - The current situation is, again, a bizarre inheritance of the EU: companies can label their products 'plant-based chicken', but not 'oat milk'.
 - Rather than cutting this red tape, the UK's Trading Standards Agency (TSA) is currently considering imposing further restrictions on businesses by banning abundantly clear product names such as Alpro's 'Not Milk', which would entail significant costs for British businesses in this nascent industry.
 - Current regulations already require food packaging not to mislead consumers, and to disclose all ingredients.
 - There is ample evidence that further labelling restrictions are not necessary nor wanted by the public: a vast majority of consumers can correctly identify products using existing labels, while only a minority support further restrictions.
- **The Government is failing to inform consumers about animal welfare standards, which harms small British farmers.**
 - DEFRA abandoned consultations on the proposal to mandate animal welfare labelling on animal products due to concerns that it would add costs to suppliers. However, if done correctly, introducing animal welfare standards could benefit both industry and consumers alike.
 - British farmers — who typically follow high standards for animal welfare — would be protected from competition with imported, low-welfare, and low-cost animal products, by driving consumers to buy British products that better reflect their own priorities.

- This would particularly benefit small, high-welfare farms over industrialised factory farms, allowing these farmers to add value and be rewarded for best practice, ultimately creating more jobs in farming by building greater demand for products made to higher standards.
- **Our two recommendations for food labelling** will benefit small businesses, both in alternative proteins and in livestock production, while providing clarity to consumers.
 - **Permit the use of common-sense labels for alternative protein products**, allowing producers to use well-understood terms such as ‘oat milk’ and ‘vegan cheese’. This includes halting proposed TSA enforcements.
 - **Implement mandatory animal welfare labelling on animal products**, allowing small British farmers to add value to their high-welfare products over low-welfare imported meat, and providing transparency to consumers.

3. Develop a pro-innovation regulatory environment

- **The UK is in a strong position on alternative proteins, but regulation must support innovation to unlock real opportunities to be a global leader.**
 - The UK is home to some of the largest alternative protein companies, such as Quorn, and some of the most cutting-edge alternative proteins research groups at universities, including Newcastle, Bath, and Oxford.
 - The UK has one of the largest consumer markets for alternative proteins in Europe, and this is projected to grow significantly in the years to come.
 - There is great potential for investment and growth — despite a worldwide decline in investments in 2022, investments in alternative proteins in Europe increased 24%.
 - However, due to an unfriendly regulatory environment, many innovative British companies are already making plans to move their operations abroad.
 - In order to unlock the true potential for the UK to be a world leader in alternative proteins, we must develop a pro-innovation regulatory environment.
- **Our two recommendations for a pro-innovation regulatory environment** will allow the UK to capitalise on its strong position in alternative proteins and become a world leader.
 - **Create a regulatory ‘sandbox’ to allow taste tests of novel foods** to allow companies to safely evaluate and improve their products pre-approval. This draws on the successful implementation of a regulatory sandbox by the FCA.
 - **Consider an open, modularised ingredient approval process** whereby companies can use a shorter process to approve specific ingredients or processes, which can then be shared publicly to reduce the duplicated work by other companies, as well as the FSA.

Delivering the Government’s Priorities

Implementing these recommendations will help to deliver on key Government priorities, including:

- **Delivering economic growth** through the UK's thriving alternative proteins industry
- **Creating thousands of new jobs** across key regions of the UK
- **Protecting small British farmers** from low-welfare imported animal products
- **Driving progress towards net zero** by decarbonising our food supply
- **Improving food security** by reducing our reliance on imports
- **Supporting future exports** by helping UK alternative proteins companies to thrive
- **Establishing the UK as a global superpower** in scientific innovation by 2030

Contact details

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