

Modernizing Food Labeling: The Narratives of Food Innovation and Deciphering Mixed Messages

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This year marks the mainstreaming of alternative proteins. The “bleeding” plant-based Impossible Burger is now available at fast food restaurants across the country, plant-based meat company Beyond Meat had a record IPO offering in May, and plant-based milks are currently being sold in 100 percent of U.S. grocery stores. Meanwhile, the field of cellular agriculture—production of meat, dairy, and eggs from cells instead of livestock—is advancing rapidly. The replacement of conventional animal products with plant-based and cell-cultured alternatives signifies, for their producers and advocates, a turning point toward a more sustainable, humane, and healthy food system. Yet, for the livestock industry, some consumer protection and environmental groups, and “natural” food advocates, these “Frankenfoods” or “fake foods” represent a flawed techno-fix. These politicized narratives have brought regulatory and legal issues of naming and labeling to the forefront of the FDA’s and USDA’s agenda, have received Congressional attention, and are also being addressed by state legislatures proposing and passing laws to define foods, such as “meat.” The fight for control over publicly accepted and utilized terminology also extends to the broader narrative about conventional and alternative foods’ credence attributes, including sustainability, animal welfare, and healthfulness.

Apart from fundamental questions of naming, how will plant-based and cell-cultured meat, dairy, and eggs attempt to compete directly with conventional animal products and distinguish themselves to justify their higher price point? And in turn, how will producers of conventional animal products respond to maintain their market shares? The public health benefits and risks of both the conventional and alternative products are a key component of the narratives on both sides playing out in the media and advertising campaigns. From plant-based and emerging cell-cultured food producers, the public receives information about the harmful environmental impacts of animal products, and their negative health impacts due to high levels of saturated fat or the use of hormones or antibiotics. From a variety of other food system stakeholders, consumers are warned of the dangers and unintended consequences of biotechnology in food production and nutritional inferiority of animal product “substitutes.” As the narrative debates and claims of product superiority move from the forum of social media and onto the products themselves, how will labeling guidance and regulations need to adapt and be modernized? How will these food producers be able to communicate the credence attributes of their products most effectively and truthfully? This paper delves into these questions by exploring how consumers can make sense of these competing narratives and evaluates the appropriate role of government in clarifying, and not further obfuscating, the issues. It will analyze the FDA’s and USDA’s, existing labeling guidance and regulations, with particular emphasis on the FDA’s efforts to modernize standards of identity, health claims, definitions of “natural” and “healthy,” and front-of-pack claims. It also draws lessons from the history of the National Bioengineered Food Disclosure Standard. The paper proposes science-based mandatory and voluntary labeling approaches that can accurately and effectively communicate the attributes, functionality, benefits, and potential health risks of animal-product alternatives.