

Ashbury



Avoiding Regulatory Pitfalls in Alternative Protein Product Development

In association with **fdf** food & drink
federation
passionate about food & drink



About Ashbury

Founded in 2002.

Trusted regulatory, technical & training consultancy.

Specialists in:

- ▶ Multi-category labelling and product compliance
- ▶ Multi-country labelling and product compliance



Global Expertise

We understand the unique regulatory landscape of each market we serve.

- ▶ Projects delivered globally
- ▶ Centralised service model

200,000+

approvals without labelling related product withdrawals or recalls



Our Services



Regulatory Consultancy

- Regulatory Advice
- Formulation Check
- Marketing Compliance
- Incident Management



Technical Services

- Specification
- Pack Copy
- Artwork
- Procedure & Policy



International Compliance

- Market-specific Regulatory Advice
- Regulatory Adaptation and Translation



Compliance Training

- Food Regulations & Labelling
- PLM System
- Internal Policy and Procedure

Innovating with Alternative Proteins



What are Alternative Proteins?

Alternative protein offer new and innovative ingredients as substitutes to traditional meat protein sources

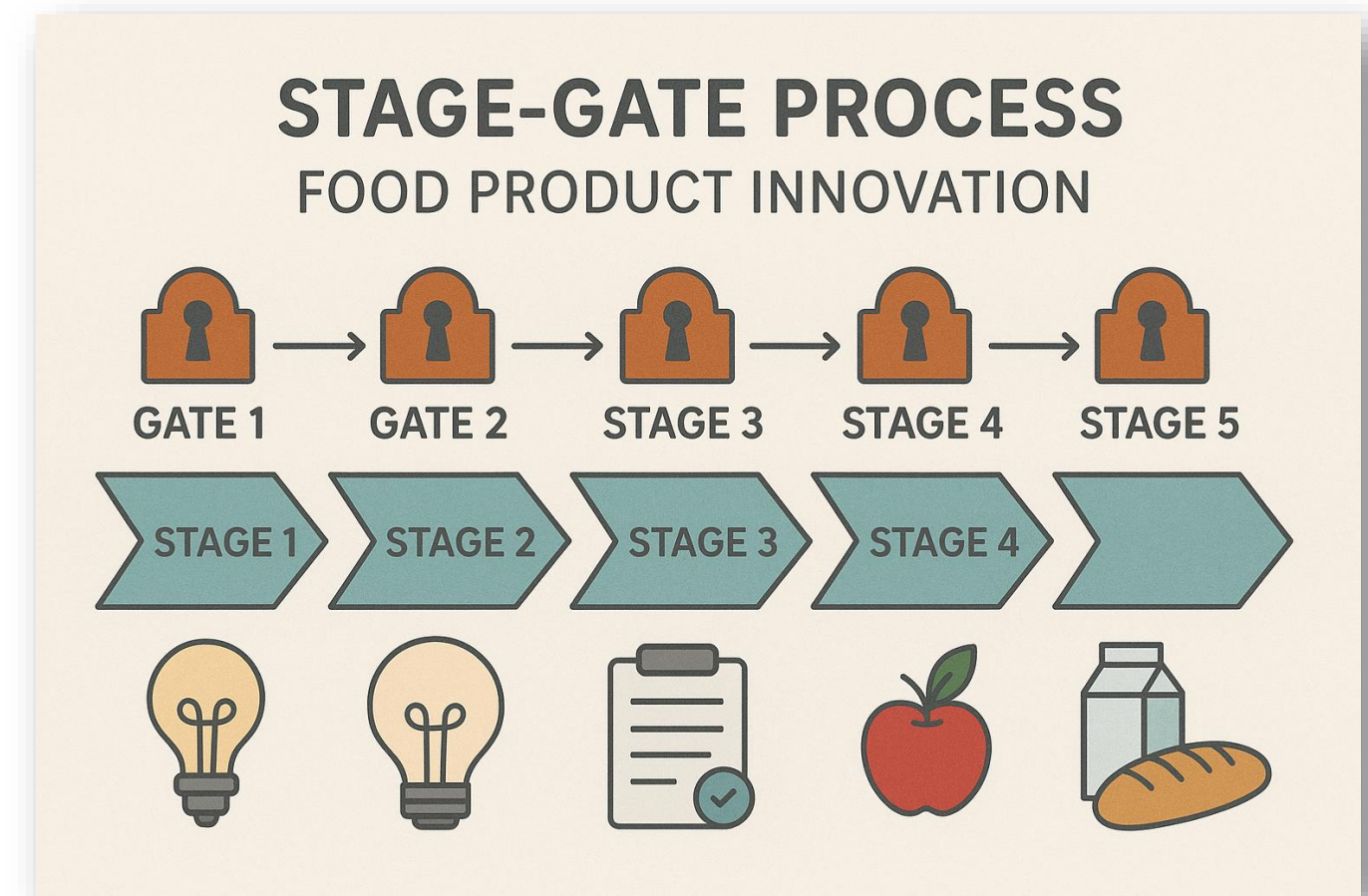
- **Consumers looking for alternative protein sources**
- **Alternative proteins can offer cheaper and healthier options for consumers**
- **They also have the potential to be less environmentally impactful**
- **Can be manufactured from plants, by fermentation, or cultivated from cell lines**



New Product Development

Consumers are continually expecting new and exciting products that are both affordable and sustainable

- **Developing a new product is costly both financially and environmentally**
- **Consumer behaviour and expectation is changing to be more receptive to alternative proteins**
- **Alternative proteins provide their own regulatory challenges**
- **Alternative proteins can also offer beneficial marketing opportunities, if done compliantly**



Overview of Novel Food Regulations

Alternative proteins could be novel foods, but UK and EU divergence provides challenges

- **Assimilated Regulation (EU) 2015/2283 for GB**
- **EU decisions prior to 1st January 2021 are valid in GB & NI**
- **EU decision after 1st January 2021 only valid in NI**
- **GB specific decision can be found [The Register of Novel Foods Authorisations](#)**
- **Will be included in UK-EU SPS agreement**

Considerations for Alternative Proteins

Understanding the regulatory framework makes innovation more likely to succeed

- **Divergence between the EU and UK Novel food process and approvals**
- **Ingredient processing is key for ensuring novel food compliance**
- **Novel food applications must be specific to the product, not general and publicly available**
- **What impact does the alternative protein source have on other nutrient absorption**
- **Patchwork global legislation makes global product formulations challenging**

Future Regulatory Considerations



Regulatory Outlook

Cell Cultivated Meat Globally

- **Singapore**
 - Collaborative approach to review and approval
 - Approved Chicken & Quail
- **United Kingdom (FSA & DEFRA)**
 - Launched an evidence-based sandbox program
 - Approved cell cultured meat for pet food in 2024
- **Australia**
 - Approved cell-cultured quail in 2025
- **Europe**
 - The most stringent requirements
 - Tasting permitted in Netherlands but no approvals



Cell Cultivated Meat

An opportunity for providing alternative protein sources with reduced environmental impact

- **An innovative alternative to traditional farming methods, as a source of protein**
- **Complex regulatory environment, challenging any cohesive regulatory strategy**
- **FSA launched a regulatory sandbox in March 2025**
- **Potentially in-scope of SPS deal between UK and EU**
- **Won't be permitted to carry "meat" names in EU**

EU “Plant-based” Naming Ban

Consumer recognition and association plays an important role in reducing meat consumption

- **European Parliament provisional agreement on establishing rules for protection of “meat” terms**
- **Covers different cuts from various animals within the supply chain**
- **Scope to include cell-cultured meat in ban**
- **Published as part of a wider agreement related to supporting farmers voice within the agrifood supply chain**
- **Timeline for implementation unclear but expect reasonable transition period**

Ultra-Processed Foods

Consumer understanding of ultra-processed foods may impact acceptability

- **Alternative proteins are typically highly processed, particularly plant-based sources**
- **Consumer association deems UPF unhealthy by default**
- **Processing can improve nutritional benefits and remove food safety risks**
- **Considering the regulatory requirements associated nutrition and health claims is key for consumer communication**

Precautionary Allergen Labelling

Identifying allergen cross-contamination risks across the supply chain maintains food safety

- **Unintended allergen presence (UAP) is a risk across supply chains**
- **Recognised allergens are different across the globe**
- **Global supply chains require global regulatory knowledge**
- **PAL is required for genuine cross-contamination risks**
- **Not all allergens have a globally aligned or defined reference dose (RfD)**

Precautionary Allergen Labelling

Allergens will continue to be a focus of public health policy and scientific research

- **FSA to potentially support and adopt the CODEX standard in July 2026**
- **Voluntary Incidental Trace Allergen Labelling Program (VITAL) will continue to develop and refine RfDs**
- **Governments will consider new and emerging allergens and amend the current recognised list**
 - Research suggests considering other allergens

Green Claim Considerations

Alternative proteins offer green claim opportunities but getting it wrong can be costly

- **Green claims consideration should be built into product development pipelines**
- **Consider DMCCA when making green claims in the UK**
- **Consider EmpCo directive when making green claims in the EU**
- **Collaboration across the supply chain is key for achieving compliant green claims**
- **Consumers will pay a premium price, but business must ensure their claims are compliant and substantiated**

Legal Implications of Green Claims

Regulation is often lagging consumer expectation, exposing companies commercially

- Legal due diligence is required beyond the label
- More than 2,500 active climate litigation lawsuits, in 2024
- Business can no longer stay silent while maintaining consumer trust
- Regulation is requiring more transparent and publicly available sustainability data

Attorney General James Secures \$1.1 Million for Climate-Smart Agriculture from World's Largest Beef Producer

**OAG Investigation Found JBS USA's Public Statements on Company's Efforts to Reduce Climate Change Pollution Emissions Were Unsubstantiated
Settlement Will Support Programs to Help New York Farmers Reduce Greenhouse Gas Emissions**

November 3, 2025

NEW YORK – New York Attorney General Letitia James today announced a [\\$1.1 million settlement with JBS USA Food Company and JBS USA Food Company Holdings \(JBS USA\)](#), the American subsidiary of the JBS Group, the world's largest producer of beef products, for allegedly misleading the public about its commitment to reducing its carbon footprint. Attorney General James sued JBS USA in 2024, after an Office of the Attorney General (OAG) investigation revealed that it was advertising that the JBS Group would reach "net zero" greenhouse gas emissions by 2040, despite having no plan to actually achieve it. Under the settlement, JBS USA will pay \$1.1 million to support climate-smart agriculture programs that help New York farmers adopt best practices to reduce emissions, increase resiliency, and enhance productivity. JBS USA has also agreed to reform its environmental marketing practices and report annually to OAG for three years.

Considerations for Alternative Proteins

New and novel ingredients can introduce new risks or remove them from your supply chain

- **Alternative protein sources, particularly plant-based, offer consumers with healthy alternatives**
- **Alternative proteins offer opportunities for reduced environmental impact**
- **Alternative proteins increase risk for enforcement and legal challenges, if communicated incorrectly**
- **The global regulatory framework is complex and requires careful navigation**

Regulatory Affairs is a Strategic Function

Regulatory Affairs teams provide strategic insight and reduce costly mistakes

- **Often seen as the “No” department**
- **Early engagement = Early warning**
- **Understand the regs to enable navigation to the end goal / grey areas**
- **Sometimes we can be creative**
- **Influence future policy and regulations**

New Product Development

Summary

Novel Food Regulation

Novel food regulation is the main market entry point, with UK and EU divergence increasing complexity.

Naming and Labelling Rules

Naming and labelling rules are tightening, especially in the EU, impacting branding and consumer communication.

Cell-Cultivated Meat Regulation

Cell-cultivated meat regulations vary globally, complicating international launch strategies.

Food Safety and Risk Management

Rising expectations for allergen labelling and scientific risk assessments are critical for market acceptance.

Environmental and Sustainability Claims

Sustainability claims face increased scrutiny and must be accurate and legally compliant.

Strategic Regulatory Engagement

Early proactive regulatory engagement enables risk management and long-term growth in alternative proteins.



Get In Touch

Thank you for your time today. If you have any questions about what you have heard or about Ashbury services in general, please don't hesitate to get in touch.



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