all trade, enforcement, and consumer interests, it is difficult to put forward a convincing argument against it. Products which are given a traditional meat name, or which have a name which persuades most of us that they are based substantially on meat, would be expected to contain a reasonable proportion of meat. The use of vegetable protein as replacement of part of the meat could have certain advantages. It might be a little cheaper in the long run and could also have certain effects on the texture and general nature of the product. This sort of provision, provided that the consumer is told what is going on, seems a sound proposal for specific legislation.

It seems, therefore, that we may well have a case for specific legislation covering safety, nutrition, labeling and partial replacement of meat. Is there anything else? I have left until the end what may be regarded as a more doubtful area. It is the question whether the use of more than a small "functional" amount of vegetable protein in a product should call for a change in the description. The argument is put that the use of vegetable protein can give the impression of an enhanced meat content and that this could be misleading without a change of name. But what are the problems? First, other substances can probably be used to match, to some extent, the effect of small quantities of vegetable protein so that any control based on vegetable protein alone may well be pointless. Second, provided a required minimum meat content is present, it seems inequitable to pick out vegetable protein alone from the other ingredients for special control.

Perhaps, as is often the case, a compromise would provide the best solution. I doubt if the consumer can really be upset about meat which may be meatier - or may appear so. However, if among discrete pieces of meat could be found something which the consumer could think was meat, when it was really made from something like vegetable protein, then maybe the consumer ought to know. My view would be that any specific legislation in this area should endeavor solely to cover this kind of example.

Current Developments in Protein Food Regulations – Labeling

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Panelists were Jim Hutchinson, Gene Lambert, John Vanderveen, Leonard Roberts, Anne Brincker, Frank Anderson, and Chairman Allen Ward, all of whom had been introduced earlier in connection with participation in Plenary Session C or Round Table Discussion C-1.

Professor Ward opened the session with a review of the salient points from C-1 as a background for dealing with questions left over from this earlier discussion. One of these questions presented an interesting different perspective. In the Plenary talks and C-1 Discussion, most attention had been given to regulatory problems pertaining to extending meat with vegetable proteins. How about the other way around? How about products consisting mainly of textured vegetable protein with some meat added? This question inevitably led to further discussion of the product categories in the EEC Study Group Report (cf. C-1). It was suggested that categories B and C in this report, which differ in the amount of added nonmeat protein allowed, might be merged. However, this would be objectionable if it should mislead the consumer by implying products are meat that in fact are predominantly vegetable protein. "Turkey ham" was cited as a name with useful features. The first word tells the source and the second gives the consumer an indication of the type of product and how to prepare and serve it.

Another question took note of the very thorough multi-input approach to a new regulation covering uses of vegetable protein products outlined by Frank Anderson's presentation in C-1 and asked if this UK approach is not more prudent than "rushing into print." Lest the inference be that this is what the U.S. is doing, it was pointed out that the FDA's current proposal is a culmination of eight years of study and deliberation. Even so, protein efficiency ratio (PER) is a key criterion in the proposal, and attention was called to the hot scientific controversy over the validity and relevance to human nutrition of PERs. This elicited a succinct statement of the classical conflict between science and law in regulatory matters: there is never a current, final, scientific answer, but there must always be a current, final, regulatory decision. Must there really? In view of the intensity of the PER debate, we should not have to wait too many years for a replacement or a scientific consensus. Factored into the "wait or act now" equation should be the greater difficulty of "rushing out of print" once a regulation is adopted.

Next the discussion moved to the subtopic originally billed as the main subject of C-2, namely labeling. Opening statements were made by Frank Anderson and Gene Lambert. A printed version of the Anderson statement is included in these proceedings. Mr. Lambert's remarks are not printed, but many of the points he raised were included in his earlier paper reproduced under C-1.

Much discussion followed on the extent to which labeling requirements should accommodate special interest and special risk groups. For instance, an intense lobbying effort is underway to require a symbol indicating the absence of artificial color and flavor additives. If this effort succeeds, it will set a precedent, and other groups have an equally legitimate basis for demanding similar identifying marks for products meeting their unique needs, e.g., individuals susceptible to celiac disease and those having specific food alergies. Of course, there is only so much space on a label, and each addition pushes something else off or necessitates making everything smaller. Most regulatory agencies are reluctant to impose on everyone complicated and expensive requirements relevant to only minute fractions of the population. On the other hand, essential information should be given to enable people to avoid foods to which they are allergic by carefully reading labels. Another approach is to encourage marketing of special foods like the familiar products for diabetics. In any event, generic names may not provide sufficient information, so "soy protein" should be favored over "vegetable protein" (which could include wheat gluten, the etiologic agent in celiac disease).

Finally, a note sounded in C-1 was again brought up. This pertained to the lack of emphasis given to needs of developing nations. If the 1973 Munich and 1978 Amsterdam Conferences on vegetable proteins have established a tradition, perhaps the next such meeting might focus more forcefully on concerns important to developing nations. Hopefully, by then the new Codex Committee on Vegetable Proteins will be in fairly active operation and can assist with identification of issues and delineation of regulatory options.