

Where's the meat?

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In October, the Canadian Food Inspection Agency (CFIA) updated its guidance for simulated meat and poultry products after more than 40 years. The rules governing simulated meat and poultry products are found in Division 14 and 22 of the *Food and Drug Regulations* (*FDR*). They were last amended in 1982.

While Health Canada has not formally amended simulated meat and poultry rules, they have altered their course on how protein ratings may be determined. The current rules governing simulated meat and poultry are not food standards, but they lay out nutritional requirements involving a protein rating and the content of fat, vitamins, and minerals. A protein rating is to be determined by Official Method #1 (FO-1), which was last updated on October 15, 1981. A protein rating is based on the protein efficiency ratio (PER) of the protein source. Unless there are published and representative PER values for a protein source, which are not so common these days, the only remedy is to determine PER by FO-1. This is based on an animal study, measuring growth (grams gain per gram of protein) in contrast to a standard protein diet based on casein. If a manufacturer is developing a vegan simulated meat or poultry product, it raises some interesting questions!

In late 2020, Health Canada and CFIA announced that they will accept either a PER method based on FO-1 or a PDCAAS (protein digestibility corrected amino acid score) method, with the intention to eventually update *FDR*. The PDCAAS method is used to calculate an estimated PER value, which is then used to calculate the protein rating based on the amount of protein per reasonable daily intake of food. The PDCAAS method considers the fecal true digestibility percentage of the protein source, which can be based on published values. Those values are derived from animal studies. The PDCAAS method offer some advantages over FO-1, as it is more adaptable, particularly when the protein content is based on multiple sources.

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Challenging definition

In the past, one of the biggest concerns with simulated meat and poultry was the definition—"has the appearance of a meat/poultry product". Tempeh by its nature could resemble meat and tofu strips could look like chicken. The question was who decides the product 'has the appearance of meat/poultry'. CFIA's updated guidance attempts to provide a more predicable approach to this question. The revised guidelines make it clear as to which food products must meet comprehensive nutritional and labelling requirements (*i.e.* include the word, "simulated," in the name as well as the statement, "contains no meat/poultry.").

In the updated guidance, CFIA acknowledges that while some foods may have certain visual characteristics (*e.g.* colour, texture, shape) that are similar to meat/poultry products, that alone is not a factor for them to be called simulated meat/poultry. As unstandardized foods, these products would be identified by a common name meeting the new definition in B.01.001, *FDR*,, and also CFIA's new rules on the true nature of food.

Appearance, however, is still a factor. If a product is made to look like pork ribs, it is likely going to be classified as simulated meat. Terms like 'burger', 'loaf,' 'patty,' 'jerky,' and 'sausage' can, however, be used to describe a non-simulated meat/poultry product as long as it is not mistaken for a meat/poultry product. If the label of such products implies it has a relationship to meat/poultry products, it will likely be considered as simulated meat. However, it would be ok to label non-simulated foods as 'chicken flavoured.' For clarity, non-simulated meat/poultry products are not expected to contain products of slaughter but may contain other animal products such as eggs or milk.

Having simulated meat/poultry rules is a good thing, as it establishes nutritional equivalency. Similar rules, however, do not apply to other commodities such as simulated fish, eggs and dairy foods. If such foods are represented as being nutritionally equivalent to their counterparts, it could be considered as a misrepresentation.

One drawback of these kind of simulated foods is that there are no provisions for fortification. Health Canada is, however, considering further amendments to *FDR* to provide a broader range of discretionary fortification for conventional foods. For now, at least the old simulated meat/poultry rules provide manufacturers options and CFIA's guidance provides relief for those foods, which were not intended to be captured as simulated meat/poultry products.

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