

FDA Releases Draft Guidance on Plant-Based Food Labeling

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- On January 6, 2025, the U.S. Food and Drug Administration (FDA) released [“Labeling of Plant-Based Alternatives to Animal-Derived Foods: Draft Guidance for Industry”](#), which provides recommendations on best practices for naming and labeling plant-based foods marketed as alternatives to animal-derived products.
- The guidance covers plant-based alternatives to eggs, seafood, poultry, meat, and dairy products, excluding plant-based milk alternatives, which have their own [draft guidance](#).
- When labeling plant-based alternatives, the product name must be prominently displayed on the principal display panel ([21 CFR 101.3](#)). The name can be a Standard of Identity (SOI) established by law or regulation, or in the absence thereof, a common or usual name, or an appropriately descriptive statement. FDA has not established specific Standards of Identity for plant-based alternatives by law or regulation. Further, many plant-based products use novel food ingredients without a common or usual name, and so are required to use a descriptive statement.
- FDA recommends that plant-based products should (1) identify the plant source (e.g., soy, almond) and (2) clearly state that the product is not animal-based. The source of the plant-based ingredients should be part of the name, rather than just stating “plant-based.” Omitting a predominant ingredient may be considered misleading.
- The Draft Guidance includes several examples of best practices for labeling. Some examples include the following:
 - If a plant-based alternative food includes the name of a standardized food, such as “cheddar cheese,” the SOI should be qualified by the plant source, such as “soy-based cheddar cheese.”
 - “Pork-less bacon” is insufficient as it does not distinguish between other plant-based alternative products. “Plant-Based Soy-Bacon” would be a more appropriate name.
 - If a product has multiple plant sources, the predominant sources by weight should be included. For example, a veggie patty containing black beans, mushrooms, and other vegetables with black beans as the predominant ingredient should be labeled as “Black Bean Mushroom Veggie Patties.”
- To ensure the FDA considers them, comments on the Draft Guidance must be submitted within 120 days of its publication in the Federal Register, by May 7, 2025.

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