
Andoni Monforte, | March 5th, 2015

Chairman of the Petitions Committee, European Parliament, B-1047, Brussels.
Submitted electronically via www.petiport.europarl.europa.eu
Submitted physically via UPS Chairman of the Petitions Committee, European Parliament,
B-1047, Brussels

SUBJECT: Request to the UE to change the Council Regulation (EU) 1309/2013 (Annex VII, part 3) in order to allow the use of the terms “vegetable milk”, “plant milk”, or “non dairy milk”, same as the term “almond milk”, “soy milk”, etc.

Dear Sir or Madam:

ChufaMix, as the main worldwide specialist in natural plant milks (plantmilk.org) and representing over 40.000 home-made plant milk consumers, appreciates the necessity to submit comments to the EU regarding the legal suitability to use the term “plant milk” or “vegetable milk” on commercial labeling, story telling, marketing, etc.

First and most importantly, we’d like to **highlight what the word “milk” means as per European languages** reflecting European social mindset towards this expression over the last 2 millenniums.

Indeed, “father” and inspirer of most English Dictionaries **Samuel Johnson** (1709-1784), author of “A dictionary of the English language”, explains that there are plant based milks that come from certain seeds like almond milk or pistachio milk.

On the same track, prestigious **Noah Webster** (1758-1843) described “milk” word as (*Webster's Revised Unabridged Dictionary, 1913 + 1828; page 923*):

1. A white fluid secreted by the mammary glands of female mammals... **2.** A kind of juice or sap, usually white in color, found in certain plants; latex. **3.** An emulsion made by bruising seeds; as, the milk of almonds.

Nowadays, the Oxford English Dictionary, the Cambridge English Dictionary, Collins, etc... establish that the word “milk” is also referred to *plant based milk*.

In **French, German, Spanish and Italian languages**, among others, “milk” is also described as the “white juice obtained from certain seeds and plants” with small variations that can mention coconut milk, almond milk, etc.

It’s enlightening to check up that in Europe, plant milks have been intensively used the last 2000 years and are always described like “milk” in most important cooking and medicinal manuscripts from the Roman Empire until our age in England, France, Germany, Scandinavia, Italy, Spain, etc. (please check **Attachment I** with perfectly documented study “*Plant Milks in History*” from www.plantmilk.org).

If we cross the Atlantic, in the last 2 centuries in **USA**, the beverages made from almonds were popularly known as “*almond milk*” (among others, please check Almeda Lambert’s “Guide of Nut Cookery” published in 1899).

Even the **USDA** (United States Department of Agriculture) published in 1897 a research named “*Comparison of the composition of Soy-bean milk and cow milk*”.

If we come **back to the XXI century and analyze what people spontaneously type on Google** (Google Trends), we will find out that a vast majority (10 to 1) regardless in which country of the world we are, do type “soy milk”, “almond milk” or “coconut milk” and not “soy drink”, “almond beverage” or “coconut juice”.

Therefore together with official languages and with history, **global mindset** also spots on milk as the “white liquid obtained from certain plants”.

“White liquid” that we don’t get squeezing a mango, an apple, or an orange cause we get “juices”. In fact, “juices” can be of different colors, but hardly “white and creamy” as the ones obtained from seeds, nuts and cereals.

Actually, **both milks (animal and vegetable) are not visually distinguishable**. Thus it would be unfair to artificially set definitions as “almond juice or beverage” when the final product does not even look like a juice but like milk.

This is why traditionally, historically and linguistically, the liquids obtained from seeds, nuts and cereals are known as vegetable or plant milks.

From a nutritional point of view, one of the main arguments to interdict the use of “vegetable milk” of the dairy industry lobbies was that this term confuses consumers because of “the halo effect of the positive nutritional benefits that drinking cow milk involves and which vegetable milks do not deliver”.

With all the respect cause we are not against the consumption of animal milk, we encourage these lobbies to define a neutral prestigious scientific institution to compare side by side the enzymes, minerals, fats, vitamins, amino acids and other nutrients of standard packaged animal milk sold in supermarkets against freshly made plant milks using seeds, cereals or nuts grown in Europe.

Any honest, informed and professional doctor or scientist knows that balancing and complementing animal milk with natural plant milks is great for health, same as it is to balance meat with fish, vegetables, legumes, pasta or fruit, among others.

Indeed, **increasing plant milk consumption will drive local European farmers** of all type of seeds, nuts and cereals to grow their businesses, and most importantly, **will help European citizens to control** obesity, cholesterol, heart diseases, etc...

Finally, please note that if the purpose of Council Regulation 1309/2013 is consumers not to get confused, plant milks do always define its origin by setting the seed where it comes from, as i.e. “coconut milk”, “almond milk”, “soy milk”, etc.. so attending to headland 5, 2nd paragraph of the 3rd part of Annex VII of the Council Regulation 1308/2013 establishes that denominations mentioned on headlands 1, 2 and 3, won't be applied to *“products which exact nature or essence is clearly known because they are of traditional use, or when its denominations are used to describe a characteristic feature of a product”*.

We do humbly but firmly ask to the European Parliament please not to yield to the pressure of the dairy industry because history, tradition, language and global social mindset endorse the use of the term “plant milk”.

Freedom to choice is a key principle and interdicting “plant milk” term stands far away from justice, lying down to dairy industry commercial interests and not allowing consumers to choose among the **2 types of milks that nature provides**: animal milks and vegetable milks.

This is why **we do demand to the European Union ONE MAIN REQUEST**:

1- To change the Council Regulation (CE) 1309/2013 in order to officially establish that the white liquid extracted from seeds, nuts and cereals can be called “milk”, or at least “plant milk” attending to historic, linguistic, and popular mindset reasons.

As secondary objective, we'd also like to ask to the European Union:

2- To request to the cow dairy industry to clearly claim on their front packages the animal origin of their milk as many times they draw a happy cow only claiming “milk” and therefore appropriating of the whole term “milk” just for themselves (note that this does not happen with other animal milk like sheep, goat, camel, etc).

ChufaMix appreciates EU's consideration of these comments and we hope to continue to dialogue with the responsible of this area on this important topic.

Please contact ChufaMix for additional information.

Sincerely,

Andoni Monforte
Orxata Artisan
CEO and Inventor (European Patent)
ChufaMix, veggie drinks maker
www.plantmilk.org