

Written Testimony on Ohio H.B. 10

Submitted by Erica Davidson, Columbus Animal Advocates
Before the Ohio Senate Agriculture and Natural Resources Committee
Tuesday, October 14, 2025

Chairman Schaffer, Vice-Chair Koehler, Ranking Member Hicks-Hudson, and distinguished members of the Senate Agriculture and Natural Resources Committee: I am Erica Davidson, a resident of Columbus, Ohio, clinical pharmacist at The Ohio State University Wexner Medical Center, and co-founder of the local grassroots organization Columbus Animal Advocates (CAA). On behalf of CAA and our many collective members and constituents in Ohio, we respectfully ask that your committee oppose Ohio H.B. 10.

H.B. 10's stated goal is to regulate "imitation meat and egg products" by amending existing sections of the Ohio Revised Code and enacting new sections related to labeling, definitions, and oversight [1]. While the intent may be to ensure transparency for consumers, the bill as written raises serious concerns and unintended consequences. Below, I outline my objections and urge you to reject or substantially amend this proposal.

1. Chilling Innovation & Investment in Emerging Foods

- Ohio should be a place that supports food innovation, biotechnology, and alternative proteins, which have the potential to reduce environmental impact, improve food security, and offer new markets. A heavy-handed regulatory scheme could deter startups and researchers from operating here. Central Ohio specifically has prided itself on being a leader in food and beverage manufacturing [2]; this legislation may risk disrupting that industry for our state and the dollars it brings in.
- If regulatory uncertainty or penal consequences loom, investors may shy away from innovative food ventures in Ohio, reducing job growth in the food-technology sector.

2. Enforcement, Cost, and Burden on Small Businesses

- Enforcement demands may require new staff, oversight structures, testing, labeling audits, and compliance infrastructure. These costs will inevitably fall on businesses (many of them small or medium-sized), which may struggle with compliance. These increased costs could also ultimately raise prices for Ohio consumers
- The bill does not appear to provide sufficient flexibility for small producers or exemptions based on scale. This could disproportionately burden small Ohio food businesses and startups.
- Previous analyses and reports from plant-based companies have estimated costs related to relabeling to be in the thousands to as much as \$1 million. This could be devastating for smaller companies and new startups [3].

3. Conflict with Federal and Interstate Law / Commerce Implications

- Many imitation or alternative-protein products are distributed across state lines. Ohio's law must carefully avoid conflict with federal statutes (USDA, FDA) and avoid creating barriers to interstate commerce.
- If Ohio enacts stricter or divergent labeling requirements, food companies may relocate or cease distribution in Ohio rather than comply with multiple regimes.

4. Risk to Producers & Farmers

- Some makers of hybrid or blended protein products (using both plant and animal ingredients) may be caught in ambiguous territory, leading to uncertainty for producers who wish to market new products or diversify.

5. Limiting Consumer Choices and Disregarding Dietary Requirements

- An increasing number of consumers make purchasing decisions based on sustainability and ethical considerations. Based on a recent survey, 81% of respondents said that purchasing ethically sourced and/or produced products matters to them [4]. This is expected to continue to increase. By passing legislation that may decrease options available to consumers, Ohio would be going against current consumer preferences.
- Additionally, intolerances and allergies to meat products are increasing significantly with the presence and spread of the Lone star tick and alpha-gal syndrome, which has increased from around a dozen cases in 2009 to up to 450,000 today [5]. In addition to requiring alternative protein options, these consumers may benefit from cultivated-protein food products as it is a possibility that these products may be engineered to exclude alpha-gal, though more research is needed [6]. This legislation could have unintended consequences in preventing children allergic to meat from getting the protein options they need in schools.
- By prohibiting the purchase of cultivated-protein food products in schools and from SNAP and WIC programs, Ohio consumers would be unnecessarily limited in making educated choices based on their nutritional needs, ethical, and environmental concerns.

6. Consumer Confusion & Unintended Labeling Effects

- Ironically, a restrictive law could lead to consumer confusion, either by discouraging clear, informative descriptions or by pushing manufacturers to less transparent labeling to avoid regulatory scrutiny.
- Consumers deserve clarity but also innovation. A regulatory regime that stifles product variety or forces convoluted naming schemes does not serve them.
- Research has shown that consumers are not currently confused by the current labeling of plant-based food products [7]. Additionally, the use of terms like "butter" for peanut

butter and “milk” for coconut milk have been used for much longer than many of today’s plant-based products, indicating that consumers are not confused by the use of these terms. Therefore, updated labeling requirements is an unnecessary step that would be detrimental to business and consumers without the supposed benefits.

HB 10, while perhaps well-intentioned, poses serious risks to innovation, business viability, regulatory clarity, and consumer choice in Ohio. The state should be cautious about overregulating a nascent sector of the food industry before fully understanding the consequences, especially when it comes to the health of our State’s children. I urge the Committee to **reject HB 10 in its current form**.

Thank you for considering these remarks. I am happy to answer any questions or provide additional data if helpful.

Respectfully submitted,
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