

SAFE Position Paper on: the need of an EU Vegetarian and Vegan legislation

About SAFE- Safe Food Advocacy Europe

SAFE's mission is to improve the representation of ordinary citizens in the EU debate concerning the future of EU food regulation.

SAFE is a non-profit European independent organization based in Brussels in charge to improve the representation of ordinary citizens in the EU debate concerning the future of EU food legislation. SAFE members are consumer associations, vegan and vegetarian associations based in different EU countries. *SAFE's main mission is to influence the future European Food Legislation in favor of the European consumers' interest.*

In a lifetime, an average 80-years-old consumer ingests 30 to 60 tons of food. We should not deny the dominant effect of nutrition on our health and well-being. Several reputable scientific studies underline how the large-scale industrialization of food and industrial agriculture are among the main causes of the increase of certain diseases, such as obesity, diabetes, cancer, Alzheimer, and many more.

EU food legislation is influenced by lobbyists. The power of the agro food industries lobbying are causing a very uncertain and dangerous situation for EU consumers. There is a need for an independent organization in charge of improving consumer protection in the EU food safety system.

SAFE will strengthen the voice of the consumer interests in civil society and will contribute to reinforce participatory democracies in Europe.

More information is available on www.safefoodadvocacy.eu

Why an EU Vegan and Vegetarian legislation?

With this Position Paper SAFE would like to highlight the need to define the food information requirements for vegans and vegetarians within EU legislation, we believe it is misleading for European consumers not having a clear EU regulation on this issue.

In particular, the art.36.3 of the Regulation (EU) 1169/2011 Food Information to Consumers states that: “Commission **shall adopt** implementing acts on the application of the requirements for food information provided on a voluntary basis to the information related to suitability of a food for vegetarians or vegans”.

The European Commission as of today is not drafting this implementing act.

SAFE with the support of the expert members of the European SAFE Vegan Working Group would like to enlighten why this implementing act is important for consumers.

Here below you can find the comments of SAFE’s National Associations members based in several EU Countries:

Djuren Ratt, Sweden

Without accurate and precise legislation, consumers may be misled by product labelling, as there are currently no consensus around the terms “vegan” and “vegetarian” throughout Europe. **The current situation in Sweden is confusing**, and there is a great risk of consumers being misled. As a NGO campaigning for a vegan diet, we come across many consumers who are confused by the product labelling. Every month, we receive around many emails from people wondering if a certain product is vegan. Social media reinforce the picture of consumers being misled. There is for instance a Swedish Facebook group called “What, is THAT vegan?” which currently has many members. Furthermore, discussions about product ingredients and product labelling are frequently occurring in many of the other vegan social media groups. This clearly shows that there is a need for better labelling: a solid and precise EU-legislation is **needed** to solve the problem.

Clear labelling is also beneficial for companies, as a product is more likely to be bought by vegan consumers if they feel assured that they can trust the product to be vegan.

The Vegan Society, UK

The right to live as a vegan or vegetarian is protected under the right to freedom of conscience set out in **Article 9 of the European Convention on Human Rights**. Exercising our rights requires accurate, clear information about the use of animals - not just in food and drink, but in all areas of life. This information is not currently being consistently gathered and presented between Member States. Also, there are currently no transparent methods of redress consistent across Member States when the use of animals is not accurately reported. In 1990, we established The Vegan Trademark registration scheme and logo mark, which allows companies to voluntarily work with us to clearly, accurately report those products and services which are suitable for vegans.

Vegan Society, Luxembourg

Luxembourg has the **highest consumption rate per head of meat** in Europe, even the Luxemburgish Ministry of Environment made a call to reduce the consumption rate on their homepage.

Most politicians do not broach the issue. A European legislation and/or a promotion of a reduction in consumption of animal-based products/meat products is very important, even if we advance only in small steps. This would have an impact on Luxemburgish consumption of animal-based products / meat. It could also have an impact on the civil society to be aware of the problems of the consumption of animal-based products / meat and lead to a lower consumption rate.

Vegetik, Belgium

First of all, an EU legislation will **recognize the existence of these diets and lifestyles**, this is not yet the case in Europe. Vegetarians and Vegans are not recognized; therefore, they cannot legally exist or be protected.

Vegetarian and vegan are currently vulnerable in society and feel marginalized. Thanks to an EU Vegan-Vegetarian Legislation, vegetarian and vegan people will feel more embedded in society with their new legal status. A legislation about their diet and lifestyle could protect them, in case of problems of non-compliance of their choice, whether at school, in case of discrimination at work for example or with medical staff in hospitals (in meals served in hospitals or schools).

Without an EU Vegetarian-Vegan Legislation, vegetarians and vegans are very vulnerable.

A first step to protect someone is to recognize him, (as people of any religious, ethnical group, nationality, or food intolerance such as for lactose, gluten, diabetes). In this context, it is essential to create an EU Vegan-Vegetarian Legislation.

Asso Vegan, Italy

An EU Vegan Legislation could represent **a useful tool to defend vegan consumer rights and animal lives as well**. It could provide basic concepts about what vegans' needs and each country would then develop those concepts according to local needs and situations. It would also be appropriate to provide, in such legislation, a definition of vegan food.

Why is the situation misleading for consumers in several EU Countries?

Djuren Ratt, Sweden

In Sweden, consensus around the terminology and definitions used are lacking. Furthermore, there is no legislation regulating what vegetarian and vegan foodstuffs may include. According to the Swedish National Food Agency, which is the competent authority for issues concerning food labelling, there are different types of vegetarian diets: Vegan food, that consist entirely of vegetable foodstuffs, without any items from the animal kingdom. Lacto-vegetarian, that include animal ingredients in the form of dairy. Lacto-ovo-vegetarian, that include animal ingredients in the form of eggs and dairy.

If foodstuff are denominated as vegetable, vegetarian or similar, the consumer may perceive this as if no ingredient of animal origin – including additives of animal origin – is included in the foodstuff. Labelling with terms like vegetable, vegetarian or similar can hence be considered as misleading if an animal ingredient or an additive of animal origin is included in the foodstuff.

Different definition in restaurants

In National Food Agency's guidance for interpretation of Regulation 1169/2011 they add to this interpretation:

Vegetable, vegetarian

[...] The term vegetarian needn't be considered as misleading when a pizza with cheese is denominated as vegetarian, as it is well-recognized in Sweden that lacto-vegetarian pizzas in restaurants are sold without reference to the presence of cheese.

In summary, different rules and different interpretations are applied for labelling, marketing and presentation of food, depending on the situation. For consumers, clear and straightforward labeling would decrease the risk of consumers being misled.

The Vegan Society, UK

Food businesses are not consistently reporting all use of animals to consumers.

For example, the use of animals to produce fining agents - used to create clear beers, wines, ciders, fruit juices and other beverages - does not have to be declared on packaging under EU regulations.

In addition, for instance, the use of animals in food safety testing (e.g. for novel foods) does not have to be declared on packaging.

We have seen examples of food businesses wrongly labelling as 'suitable for vegans' foods which have been tested on animals, or which contain ingredients from animals such as honey, shellac or beeswax.

Clear, accurate information on-pack at the point of sale is the only way to avoid misleading consumers.

Vegan Society, Luxembourg

There is no legislation for vegetarians / vegans in Luxembourg. The “definition” / “description” of vegetarian is misleading for consumers. Some restaurants offer fish as a “vegetarian” dish. In this context, it seems that it is important to define correctly the words vegan and vegetarian.

Vegetik, Belgium

The majority of people do not really know the differences between vegetarian, plant-based diet and vegan. An EU Vegan-Vegetarian Legislation will allow people to know there are differences between these terms, since the logos and legislation will be different.

There are more and more products labeled “Halal”, “Gluten-free”, “Sugar-free” which allows Muslims, intolerant to gluten, or people with diabetes, to find the best products for them. Vegetarian and vegan logo labels allow people who wish to follow these diets to be able to shop more easily and to be sure about what they are going to consume.

In respect of vegan and vegetarian people, it is important that there is a legislation, which defines specific criteria for vegetarians and vegans foods.

AssoVegan, Italy

Italians are still very confused about the two terms “vegetarian” and “vegan”. It is very important to bring a clear message to consumers to help them understanding the huge difference between vegetarians and vegans.

An EU Vegan Legislation and a well planned vegan labelling shared among European countries could help to establish some basic definitions about what vegans eat, buy, defend, need in a hospital or from doctors. We believe that this could help to clarify what vegan means from the ethical, ecological and health point of views. It could be useful to include in an EU vegan legislation the possibility of offering one balanced vegan choice in any public restaurant or canteen.

This could be easily supported by many important scientific evidences about the healthy aspects of a plant-based diet. In other words this could be considered as a way to promote an healthy lifestyle and to actively contribute to decrease the public health expenditure.

Conclusion

Based on what is mentioned above, SAFE calls to action to the European Commission to adopt an implementing act on the application of requirements for food information for vegans and vegetarians,

as stated on art..36.3 of the Regulation EU 1169/2011 Food Information to Consumers.