

VOLUNTARY LABELLING OF FOODS

“SUITABLE FOR VEGANS” AND “SUITABLE FOR VEGETARIANS”

The labelling of food products as “suitable for vegans” and/or “suitable for vegetarians” facilitates conscious decision-making by consumers. Accurate food labelling also supports the rights of people with religious or philosophical beliefs about food to properly practice their protected beliefs. The EU has not yet determined what precisely the terms “suitable for vegans” and “suitable for vegetarians” stand for when dealing with food products marketed using those claims.

The E.U. Regulation 1169/2011 requires the European Commission to set out rules for the voluntary labelling of foods as “suitable for vegans” and/or “suitable for vegetarians.” Note that all foods that are suitable for vegans will meet the requirements to also be suitable for vegetarians. Defining the requirements for the suitability of foods for vegans and/or vegetarians is an ethical as well as a practical decision, and so regards consumers as well as industry interests.

The purpose of this work is to provide a list of the fundamental requirements that vegans and vegetarians expect to be associated with food that is suitable for vegans, and/or suitable for vegetarians. In other words, what are the essential characteristics that make a product suitable to be labelled as suitable for vegans and/or suitable for vegetarians.

1. Products suitable for vegans

A food that is suitable for vegans will meet the requirements to be suitable for vegetarians.

Definition of Animal: an “animal” is any individual member of the Animal Kingdom that is any vertebrate or multicellular invertebrate.

As a minimum, to be eligible for consideration for labelling as 'suitable for vegans' a food needs to:

a. NOT contain ingredients of animal origin. Foods suitable for vegans DO NOT contain any ingredients of animal origin (including food additives, carriers, flavourings, enzymes) NOR any processing aids of animal origin that have been added or used during the manufacturing process, preparation, treatment or placing on the market of foods.

AND

b. During manufacturing, preparation, treatment or placing on the market, involuntary cross contamination with products that do not comply with the requirements of the paragraph 1.a can be admitted and is compatible with the vegan labelling of the product.

AND

c. The operator under whose name or business name the food is marketed (or, if that operator is not established in the Union, the importer into the Union market) MUST NEITHER conduct NOR commission vivisection or testing on any animal of the food, nor of the ingredients or processing aids used. If the operator ceases such practices, their foods MAY then be eligible for consideration. The claim that a food is 'suitable for vegans' implies that, as far as possible and practicable, animals have not been used at any stage of the preparation of that food. As an intermediate step, a “No Ingredients from Animals” Standard could be considered, as set out in paragraph 1a. This would significantly improve the provision of information, and would make it far less likely that consumers would be misled about the foods they are buying. Not only vegans, but also many other consumers such as vegetarians, those with religious beliefs around foods, and those with health conditions relating to food, would benefit from such a preliminary scheme.

2. Products Suitable for Vegetarians

a. Foods suitable for vegetarians meet the requirements of paragraph 1.a (the No Ingredients from Animals provision) with the difference that they admit the use of: milk and derivatives including casein, colostrum, eggs, honey and any other bee products, wool grease and lanoline any other kind of added ingredient of animal origin without the killing of the animal itself.

b. As for products suitable for vegans, involuntary cross-contamination with products that do not comply with the requirements of the paragraph 2.a, during the manufacturing, preparation, treatment or placing on the market of food is compatible with the potential eligibility for suitable for vegetarians labelling of the product.