

Vegan definitions and standards

The Vegan Working Group (hereinafter mentioned as VWG) has been launched in June 2015. This group gathered Safe Food Advocacy Europe members working on Vegan and Vegetarian issues. Those members are coming from various European Union countries such as Belgium, Italy, Luxembourg, France, United Kingdom and Sweden. The objectives of the **VGW** are the following:

- Setting up a legal definition of vegetarians and vegans at the European level
- Making sure consumers are not misled about nature and characteristics of what they eat and drink by the food information to consumers, especially concerning the use of animals
- Establish a unique European logo whether it is vegan, vegetarian or animal free

Those objectives could be achievable by amending the Regulation (EU) 1169/2011 on Food Information to Consumers.

The following propositions and definitions are based on the different national opinion of SAFE members which aimed at proposing a European definition in agreement with each of them positions. But first of all, it seems important to remind the current context and why setting up clear definition about what is “suitable for vegan and/or vegetarians” would be beneficial both for companies and especially for consumers.

1. Current situation

The absence of clear labeling laws for vegan and vegetarian food currently makes it difficult to distinguish whether the nature and characteristics of foods suit vegetarian and vegan consumers, potentially misleading and confusing them when making food choices.

Art. 36 (3) (b) of Regulation (EU) No 1169/2011 for Food Information to Consumers stipulates that the ‘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’. Yet although the above Regulation dates back to 2011, an implementing act has yet to be adopted.

Without explicit and accurate legislation, consumers may be misled by product labeling, as presently there is no consensus around the terms “vegan” and “vegetarian” throughout Europe. The current lack of definitions and standards is preventing consumers from making informed food choices. Discussions about product ingredients and product labeling frequently occur on vegan and vegetarian social media groups for instance, illustrating the need for a clear and precise EU - legislation on labeling for vegetarian and vegan foods.

Such regulation would provide basic concepts of Vegans and Vegetarians' needs, as well as definitions and standards which would then be developed by Member States according to country - specific contexts and the requirements of their vegan and vegetarian populations. Introducing an EU Vegan and Vegetarian legislation would further benefit companies, as a product is more likely to be bought by vegan and vegetarian consumers if they can trust the product to cater to their needs.

2. Definitions

First of all, to improve the protection of vegan and vegetarian consumers, those terms must be defined in the legislation, in order to allow food industry to properly understand the consumer's minimum expectations:

- **Veganism** is defined by the Vegan Society – the world first and older vegan organisation - as *“a way of living which seeks to exclude, as far as possible and practicable all forms of exploitations of, and cruelty to, animals for food, clothing and other purposes”*. As **Veganism** is a lifestyle and takes into consideration various elements beyond food, the products which are consistent with this definition should be labelled as “suitable for vegans”, as the products are not vegans in themselves.

A product “suitable for vegans” of “free of animal ingredients” needs to fulfil several conditions in order to be designated as such. With the aim of completely fulfil those conditions the definition of several terms must be either changed or introduced:

- The word *“animal”* as to be understood as the whole animal kingdom, which means all vertebrates and multi-cellular invertebrates. Actually the European Union law defines the word “animal” as vertebrate only, which is misleading. This change is fundamental in order to restore the original meaning of the word “animal”.
- Considering the European law definition of “ingredients”: *“any substance, including additives, used in the manufacture or preparation of a foodstuff and still present in the finished product, even in altered form”*. The new concept of *“ambiguous ingredient”* should be defined by the legislation; it refers to *“ingredients which can be obtained either from animal or non-animal sources”*. As an example the “Mono- and diglycerides of fatty acids » (E471), for the moment manufacturers do not have to declares if it comes from animal or not.

3. Standards

Therefore, the conditions to fulfil to claim that a food product is “suitable for vegan” would be the following:

- Obligated companies to declare which of their ambiguous ingredients are derived from any animal... Each has to clarify who supplies the ambiguous ingredient and if animals are used. A written declaration has to be disclosed, if not the company can't obtain the vegan logo. The origin of the ingredient isn't detailed on the package, but consumers know that, if there is the vegan logo, the food is animal free.
- Prohibit companies to market product as “*suitable for vegans*”, or “*vegan*”, or “*vegan-friendly*” or any similar declaration, if it contains ingredients derived from animals.
- The *development and/or manufacture* of the product, and where applicable its ingredients, must not involve, or have involved, testing of any sort on animals conducted at the initiative of the manufacturer or on its behalf, or by parties over whom the manufacturer has effective control.
- The *development and/or production* of genetically modified organisms (GMO) must not have involved animal genes or animal-derived substances. Products put forward for registration which contain or may contain any GMOs must be labelled as such.
- Dishes which will be labelled as “suitable for vegans” must be prepared separately from non-vegan dishes. As minimum, surfaces and set of utensils must be thoroughly washed prior to being used for vegan cooking; using different surfaces and set of utensils would be preferable.