WHICH RULES ARE CONSIDERED MANDATORY BY VEGANS FOR THE LABELLING OF FOOD, COSMETICS AND DETERGENTS IN EUROPE?
Vegan and plant-based: they don’t mean the same thing.

These two words are often used interchangeably; however, they describe concepts that only share some common features. The word "plant-based" is not a synonym of "vegan": they are terms linked instead by a relationship of hyperonymy. What does it mean?

All vegan products are plant-based but not all plant-based products are also vegan.

While the term plant-based indicates the mere absence of ingredients of animal origin in the product, the concept of "vegan" goes further.

Products without animal ingredients (meats, dairy products, fish, beekeeping products, etc.), additives (such as E120, E154, E631, the so-called cochineal extracted from insects, shellac), adjuvants such as albumin and casein are considered vegan which are used to preserve the aesthetic appearance of the products and many other little-known ingredients. But there is more.

The word "vegan" provides us with a series of information: it tells us about the need to introduce an ethical basis, a code that underlies precise indications. It is essential to have a "minimum"common reference standard, a threshold below which a product of any kind cannot be defined as "vegan" or "suitable for vegans"
"SUITABLE FOR VEGANS": THE EUROPEAN STANDARD ON VOLUNTARY FOOD LABELLING

The consumption of plant-based products increases and the market becomes increasingly attractive. The brands and certifications related to vegan represent a significant attraction for producers, even for those who are not properly employed in the plant-based sector. Many companies that offer animal products put plant-based lines on the market and it is not uncommon to find problems related to the labelling and information offered.

Consumers have the right to be informed transparently so that they can make choices in line with their lifestyle and their food preferences.

On the issue of the legal definition of "vegan product" there is still legislative incompleteness. Although there is already a common standard written by the major vegan organizations in Europe within the "Working Vegan Group" of the NGO SAFE in Brussels, the European Parliament has not yet transformed this standard into law and this has created a situation of chaos on the part of those who use the term "vegan" outside the respect of the shared standard, arbitrarily exploiting the legislative vacuum and thus going against the indications of the vegans themselves.

We know that a product is 100% plant-based if it does not contain components of animal origin (ingredients, additives or adjuvants). But when is it definable vegan?
Fortunately, in Brussels a minimum standard for the use of the term "vegan" has already been clearly defined through a joint document created by the largest organizations that represent the vegan movement in Europe. It is therefore currently to be considered as the only authoritative definition recognized by vegans.

The working group led by the NGO Safe (Safe Food Advocacy Europe) worked precisely on this aspect: defining a minimum standard valid at European level and establishing a set of rules that constitute the substantial meaning of the term "vegan". A threshold below which it must not be possible for any reason to fall on products labeled as "vegan".

All the organizations participating in the working group are strictly vegan and for this reason they know better than anyone else, every single aspect related to the ethical vegan choice.

The vegan organizations currently involved in the project are:
- Associazione Vegani Italiani Onlus (Italy)
- Förderkreis Biozyklisch - Veganer Anbau (Germany)
- Safe Food Advocacy Europe (Belgium)
- The Vegan Society (UK)
- Vegan France (France)
- VEGANOK (Italy)
- Vegetik (Belgium)
The term "vegan" not only indicates the absence of animal derivatives in a given product but clarifies the PRESENCE of minimum ethical requirements. All the participating organizations worked together to achieve this and the document drawn up as a result of this work was presented to the European Commission.

The document represents a binding proposal for the associations that have signed it and must be considered as the most authoritative tool on the basis of which to write a community implementation regulation.

THE STAGES

The working group met for the first time in Brussels on 10 June 2015.

The summary document drawn up by the working group to define the “Suitable for vegans” standard was officially sent by a group of 6 MEPs to the European Parliament on 22 February 2017.

The document was sent to the European Commission through the work of these 6 Members: Claude Turmes, Cornelia Ernst, Eleonora Evi, Dacina Octavia Sârbu, Marietje Schaake, Sirpa Pietikäinen.
Here are the characteristics present in the document signed by all the organizations.

"VEGAN PRODUCTS": 3 ESSENTIAL RULES

Products suitable for vegans
A food that is suitable for vegans will meet the requirements to be suitable for vegetarians. As a minimum, to be eligible for consideration for labelling as "suitable for vegans" a food needs to:

1. 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.**

2. 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. can be admitted and is compatible with the vegan labelling of the product.

3. 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.
SOME CLARIFICATIONS

a) A food / product suitable for vegans will satisfy the consumption requirements also for vegetarians and omnivores.

b) Definition of Animal: an "animal" is any individual member of the Animal Kingdom (vertebrate or multicellular invertebrate).

As an intermediate step, a standard "No animal-derived ingredients" (for plant-based but non-vegan products) could be considered as indicated in paragraph 1. This would significantly improve the product information and would make the possibility that the consumers may feel misled when purchasing. Not only vegans but also many other consumers such as vegetarians, those who follow religious food precepts and those who follow health-related principles, would benefit from such a preliminary scheme.
FOCUS ON: ANIMAL TESTING

Animal experimentation is a cruel and unscientific practice. **Replacement methods** are ethical and more reliable in the research itself.

Alternative methods include: computer models, chemical analyzes, statistical surveys (such as epidemiology and meta-analysis), bioartificial organs, microcircuits with human cells.

Let’s take the case of a company that directly or indirectly commissions animal testing and decides to put a plant-based product on the market. Will that product be vegan? No. That product will be plant based if it does not contain ingredients of animal origin but it **CANNOT** be called vegan.

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FOCUS ON: CROSS CONTAMINATION

Cross contamination with allergens is a food safety issue. What we find on the product packaging are indications of a possible cross-contamination. Are products containing "traces of ..." vegan? Absolutely yes. This denomination exists because it makes more sense to protect the allergic consumer than the vegan who makes an ethical choice and can accept, with a rare possibility, cross contamination. In the production of wines, oil, flours, fruit juices, jams and other plant-based products, there may be a remote possibility that allergens or even insects or fragments of animals may come into contact during production: it is almost inevitable, for example, to find animal DNA in the oil and wine. These are contaminations that can affect 0.001% of production, so it is always useful to protect the allergic person, but it certainly cannot be said that there are evident traces of animal products, because it is a mere possibility. The "trace" is not an ingredient.
VEGAN STANDARD: "SUITABLE FOR VEGANS"

On the next pages, the original documents.

1. The original document presented to the European Commission by the organizations involved.

2. The feedback from the European Commissioner Vytenis Andriukaitis
The consumption of plant-based products is increasing and the market is becoming more and more attractive. Vegan trademarks and certifications are highly valued by producers and manufacturers, even those who do not produce exclusively plant-based food. Many companies which sell meat and dairy products are introducing plant-based product lines to the market, and we are seeing inaccuracies in product information and labelling on packaging. Consumers have the right to be informed in a transparent way in order to enable them to make choices that reflect their lifestyle or diet.

There is a legislative gap at the European level as far as the legal definition of a "vegan product" is concerned. There is no single clear and unequivocal definition. We know that a product is 100% vegetable if it does not contain components of animal origin (ingredients, additives or adjuvants).

But what does "vegan" exactly mean?

The working group led by Safe (Safe Food Advocacy Europe) has worked to define a minimum European standard to clarify the underlying concept of "vegan": a set of rules that together constitute the substantial meaning of the term "vegan". The participating organisations in the working group are all strictly vegan which ensures that the recommendation has come from a credible, reliable source and accurately reflects the needs of ethical vegans.
THE VEGAN ORGANIZATIONS CURRENTLY INVOLVED IN THE PROJECT ARE:

Associazione Vegani Italiani Onlus
Förderkreis Biozyklisch-Veganer Anbau
Safe Food Advocacy Europe
The Vegan Society
Vegan France
VEGANOK
Vegetik

The term "vegan" not only indicates the absence of animal derivatives in a given product but clarifies the PRESENCE of minimum ethical requirements. All the participating organisations have worked together to achieve this goal and the official document was presented to the European Commission.

The working group first met in Bruxelles on 10th June 2015. The position paper drafted by the Working Group to define food 'suitable for vegans' was sent by a group of 6 MEPs on 22nd February 2017.

The document was sent to the European Commission through the work of these 6 MEPs: Claude Turmes, Cornelia Ernst, Eleonora Evi, Dacina Octavia Sârbu, Marietje Schaak, Sirpa Pietikäinen.

Here are the contents of the document signed by all organisations:
PRODUCTS SUITABLE FOR VEGANS: 3 BASIC RULES

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

1. 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.

2. 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. can be admitted and is compatible with the vegan labelling of the product.

3. 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.
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 an intermediate step, a “No Ingredients from Animals” Standard could be considered, as set out in paragraph 1. 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.
Mr Claude Turmes (Greens/EFA)
Ms Cornelia Ernst (GUE/NGL)
Ms Eleonora Evi (EFDD)
Ms Daciana Octavia Sârbu (S&D)
Ms Marietje Schaake (ALDE)
Ms Sirpa Pietikäinen (EPP)

Members of the European Parliament
European Parliament
60, rue Wiertz
B-1047 Bruxelles

Honourable Members of the European Parliament,

Thank you for your letter of 22 February 2017 on the labelling of vegan and vegetarian food.

I share your views that food information to consumers should not be misleading or confusing and be provided in a clear manner.

When EU legislation on food labelling was last revised, the legislators recognised the importance that information given on a voluntary basis on the suitability of foods for vegetarians and vegans comply with such requirements.

The Council and the European Parliament have thus requested¹ the Commission to adopt an implementing act to ensure that such voluntary information related to the suitability of foods to vegetarians or vegans is not ambiguous or confusing for the consumer. The Commission cannot however commit at this stage to a specific date or content of such a measure.

¹ Article 36(3)(b) of Regulation (EU) No 1169/2011, OJ L 304, 22.11.2011
Under Regulation (EU) No 1169/2011 on the provision of food information to consumers, the Commission has to adopt certain implementing acts/reports within certain specific deadlines. The Commission is therefore tackling these actions as a priority; for example it is currently working on an implementing act related to the provision of information on the origin of the primary ingredient, as foreseen by Article 26 of the Regulation.

Yours sincerely,

Cc: Commissioner Vella, Commissioner Jourová, Commissioner Hogan