

Draft Guidance on the Use of the Terms 'Vegetarian' and 'Vegan' in Food Labelling: Consultation Responses

Summary of consultation responses

(Note: A table of responses follows this summary on page 3.)

The consultation began on 5 July 2005 and closed 3 months later on 5 October 2005.

142 Responses were received; broken down as follows:

• Individuals	86
• Industry	10
• Consumer Representatives (Including Vegetarian/Vegan and Religious Groups)	27
• Health	08
• Enforcement	08
• Government	01
• Media	02

There was overall support for the voluntary guidance, 99%, particularly from the consumer organisations. The Vegetarian Society and a number of its regional groups were supportive along with approximately 95% of the individuals who responded. Whilst welcoming the guidance 11% of the replies received wanted the Agency to go further and to introduce the definitions into legislation.

Summary of the main points from responses received

Eggs

The inclusion of eggs within the definition for 'vegetarian' was not universally welcomed. Some respondents felt that only free-range eggs were acceptable to vegetarians. Others felt that because eggs held the potential for life, no matter what their provenance, they would not be acceptable in a vegetarian diet.

Cross-contamination

This was of concern to a large number of individuals, consumer representatives and enforcement, particularly in catering outlets, restaurants and at supermarket counters. Respondents felt that the guidance had not gone far enough and would usefully be expanded by more examples including:

- the same food assembly lines being used for both vegetarian and non-vegetarian products without adequate cleaning;
- shared utensils in kitchens and catering outlets without adequate cleaning;
- the shared use of grills and frying dishes without adequate cleaning;
- the lack of hand washing or changing of gloves when handling both vegetarian and meat products and the possibility of contamination during packing.

It was suggested that the draft Guidance should contain a recommendation that a HACCP approach should be taken to the control of cross-contamination.

Use of the word “slaughter”

In the draft Guidance the vegetarian criteria, uses the phrase ‘derived from the slaughter of animals’. Many replies highlighted that this meant that product made from an animal that had not been slaughtered would be acceptable to vegetarians e.g. if the animal had died of natural causes. It was also highlighted that shellfish etc. are harvested, not slaughtered and that for these reasons the criteria needs to be amended.

Cheese

A number of responses indicated the table attached to the guidance gave the erroneous impression that all cheeses were vegetarian and suggested that this needed redrafting. Concern was also expressed about the practice of wrapping cheeses, that might later be labelled as vegetarian, in lard soaked cheese cloths.

Allergens

It has been recommended that the Guidance expands the section on allergen labelling to make it clearer what is and is not exempted for vegetarian and vegan consumers.

Additives, processing aids and flavourings

Whilst it was recognised that these issues had been dealt with in the covering letter some respondents felt that this information would be useful in the guidance itself. It was also suggested that the guidance on additives, processing aids and flavourings could usefully be expanded to include lists of the most commonly found to aid catering and smaller retail outlets in identifying those foods not acceptable to vegans or vegetarians.

2% Rule

Within the responses received there are a number of consumers who would like the Guidance to make clearer how the rules affects vegetarian and vegan labelling and that the example given “sponge fingers in a trifle”, in paragraph 11, is not relevant and a better example could be given.

Other points raised as a result of the consultation:

- The Guidance could make it clear that fish was not acceptable to vegetarians.
- The Guidance could include a definition of “animal”.
- Supermarkets could provide lists of their vegetarian and vegan products for easier shopping.
- The “vegetarian” criteria could list examples of by-products to make it clearer.
- The Agency should provide and update detailed lists and examples of products and ingredients which are not vegetarian or vegan.

Overall the Draft Guidance has been welcomed and supported by individual consumers, consumer representatives, enforcement and industry. The Agency will now consider the responses and finalise the guidance. A decision on whether the guidance will be issued will be made by spring next year.

**DRAFT GUIDANCE ON THE USE OF THE TERMS 'VEGETARIAN' AND 'VEGAN' IN FOOD LABELLING:
CONSULTATION RESPONSES 2005**

NAMES/COMPANY	COMMENTS
James Button	<p>It should be noted that the guidance proposed is not mandatory or legally binding but contains criteria for the use of the terms 'vegetarian' and 'vegan'. That, to me says that you should not bother wasting the time of members of the public and/or taxpayers money. If you believe that the situation needs clarification, and consequently you intend are going to issue a document, then please make the document legally appropriate and the details within it legally enforceable. The courts should be left to set appropriate penalties for each incident where the specifications are breached.</p> <p>Simply issuing unenforceable guidelines is just another attempt to mislead the public, frustrate the enforcement agencies, and waste budget allocations.</p> <p>Additionally, I would suggest that the penalties imposable by the courts should be sufficiently flexible to appropriately address actions varying from a minor unintentional breach with a single 'sample'/retail sale, and major intentional breaches wholesale, ingredient and multiple, medium to large scale retail sales.</p> <p>Including a minor infringement of labelling such as where goods described as vegan are later discovered to include very small amounts of animal matter that were inadvertently incorporated during the manufacturing process due to deceit by a third party bypassing reasonable checks by the primary marketing organisation.</p> <p>And to be sufficiently severe to ensure that intentional deceivers are not only left with fines covering all 'gross' profits they had made, but also custodial sentences to deter further attempts to repeat that, or similar offences on the basis that one fine is less than the profits from two or more successful actions.</p> <p>Nevertheless, penalties should be sufficiently severe to counter the dismay and upset experienced by a vegan discovering they have consumed animal parts, and a 'Jew', or 'Muslim' discovering that the ice-cream they have just consumed contained pork fat described as 'non-dairy fats'</p>
Plymouth Vegetarian Society	<p>There are over 3 million vegetarians in the United Kingdom, and as one of them, and from my experience of product labelling, yes I do feel this guidance is very necessary. Unfortunately, labelling by individual companies cannot currently be relied on as being accurate, and therefore guidance is necessary for them. In the past, I have bought products from a major supermarket (Safeway) that had ingredients that could be either vegetarian or non-</p>

	<p>vegetarian, but where the company stated that the product was suitable for vegetarians. However, a little while later I happened to see that their own brand tuna was also labelled as being suitable for vegetarians! Clearly this was a fundamental error on their part, but if they could make this kind of basic mistake, then none of their assertions were reliable. There are many ingredients that may be from either vegetarian or non-vegetarian sources, including many E-numbers. Therefore, formal guidance is in everyone's interests, including the food companies, as not every company may want to bother applying for the Vegetarian Society's seedling symbol, but with confusion and doubt over product suitability, a lot of food that may well be vegetarian, is not identified, and therefore is not purchased. Finally, in line with the Government's agenda of encouraging healthy eating, as the British Medical Association state that '<i>Vegetarians have lower rates of obesity, coronary heart disease, high blood pressure, large bowel disorders and cancers and gall stones</i>' *, it is, therefore, surely in everyone's interests to produce this guidance, so that people are able to make fully-informed choices.</p>
Jo Quinn	<p>I am a vegetarian, not vegan, who also suffers from quite acute allergy to eggs and lanolin (wool alcohol), I felt I had to comment on the phrases below:</p> <p>The draft vegetarian criteria excludes processing aids that have been made using animal products (again, whether or not they are present in the final foodstuff) except where they originate from live animals, e.g. albumin would be permitted.</p> <p>Eggs are chicken embryos, often fertilised especially if free range and organic. They should really be referred to as animals themselves. Just because they can be produced without killing the chicken, does not mean that they are vegetarian. Should we go along those lines then human foetuses could also be regarded as a vegetarian food stuff and we are now into the world of the horror movie!! Some people who call themselves vegetarian also eat fish, pretending that too is not an animal, but this is hardly an argument to base food labelling on.</p> <p>Vitamin D is often derived from sheep's wool, which is obtained either from live sheep, or as a slaughter by-product.</p> <p>It is not only extremely important from a vegetarian point of view to know whether an additive is of animal or vegetable origin. However also bear in mind people who choose vegetarian products as safe to use when they have allergic reactions to animal products. I have an extremely severe allergy to lanolin, wool alcohol, when it comes in contact with my skin. It is such a severe allergy and was so difficult to diagnose because of its presence in so many products that I was misdiagnosed for many years as having an autoimmune disease. I do not personally know whether I would react to vitamin d derived from sheep's wool, but if correctly labelled I would</p>

	<p>certainly avoid it at all cost.</p> <p>I am very glad to have read the discussion, but at present I feel that I could only trust products labelled as vegan to be anywhere near vegetarian. In very simple terms Vegans use plant based products only in all walks of life, vegetarians use the same but do include dairy foods, honey and wool for clothing.</p>
Joel	<p>I am just sending you this quick email to express my views on the labelling of vegetarian and vegan food items. I am absolutely in favour of such guidelines, as it would help vegetarian and vegan to make better choice while choosing the food that they want to eat. The key proposals to introduce advisory criteria for the use of the terms 'vegetarian' and 'vegan' in food labelling will without a doubt be an advantage certain for anyone following a vegetarian or vegan diet.</p>
Sarah Richard	<p>I have been a vegetarian for nearly 25 years and a vegan for the past 9 of those years. I am a vegan for ethical and also food allergy reasons (I am allergic to lactose and eggs).</p> <p>In my opinion, anything "vegetarian" must not contain any fish, fowl or animal (I still come across fish dishes that are labelled as vegetarian in bars, restaurants and cafes).</p> <p>Anything "vegan" must not contain anything derived from fish, fowl or animal (e.g. dairy, eggs, lactose, honey etc)</p> <p>Many products are marked as "dairyfree" as they do not containing milk or milk derived products. However, as a vegan I would also not buy a product if it had eggs in (e.g. Quorn, many veggieburgers etc). I would also avoid anything containing honey / beeswax.</p> <p>It should go without saying that any food colouring used in "vegetarian / vegan" foods should be non-animal derived as well, for example, there was a scare put about that Asda used cochineal derived from beetles to colour even their vegetarian food.</p> <p>If I am looking for a certified vegetarian or vegan readymeal or ingredient, I also look for the Vegetarian Society or Vegan Society label; this shows that the product has their endorsement and is therefore "safe" to eat.</p> <p>It is easier to find out which foods are suitable at a glance in many supermarkets as they state whether the products contain "wheat, dairy, soya, eggs" etc.</p> <p>Some supermarkets, such as the Co-op and Sainsburys state whether their products are suitable for vegetarians and vegans - this practise should be encouraged as it makes shopping for suitable products much easier.</p> <p>I'm sure many vegetarians and vegans will say the same as me.</p>

Ameet Bakhai	<p>The above definition does allow a lot of room for interpretation in terms of slaughter. A creature must first have been born alive to be able to be slaughtered. Thus an aborted foetus could be in food labelled legitimately vegetarian. Eggs are in a similar scenario. I appreciate we have to draw the line somewhere so that a single living bacterium does not fail a food of the definition of vegetarian. However a more robust definition is needed since as a vegetarian I expect to be able to eat a product free of any animal content - i.e. contains only fruits, vegetables, lentils or products of these derivatives not modified by the use of animals or their parts directly (the latter allowing for animal transport). Animals should include the definition of animals, poultry, fish, eggs and yeast! I am happy to be involved in a further debate as a member of a focus group etc.</p>
Rohit Solanki	<p>I was brought up in India within the vegetarian extended joint family background and was always led to believe that Egg was not vegetarian as it contained potential full life form although abandoned. I am not vegetarian myself as I later on developed the taste for certain selective non-vegetarian dishes like Cod, Turkey and Chicken but I would not classify Egg as forming part of Vegetarian diet.</p>
Carole Cook	<p>Often when buying food I look for the label to read "Suitable for Vegans". If vegetarians realise that foods marked "Vegan" are obviously vegetarian too this would make things easier for us all. At the moment foods are often marked "Vegetarian" when they are in fact vegan. Flavouring are a problem. Just "Flavouring" on a food label does not help. These flavourings are often animal derived. Vegans would also like to know that any contents are not tested on animals too. I think everyone is capable of reading about calorie content etc. but the disclosure, such as "Suitable for Vegans" - "This product is not and neither are the contents tested on animals" would be helpful to all animal caring buyers. Companies such as the Co-op are very good at labelling their products and I will always go to a Co-op Supermarket in preference until I find other supermarkets become as good with their labelling. Some food products change and labels have to be checked constantly. Bakers using shellac or something similar to make their teacakes shiny when sugar and water have always sufficed for me when baking at home. Thank you for this opportunity to give you my small contribution to assist you with vegan labelling.</p>
Harshad Sanghrajka Hon. Secretary	<p>I have been informed that the proposed definition of vegetarian for food labels does not exclude animal products such as eggs.</p>

Institute of Jainology	I would like to study the definition in detail to confirm the requirements of the Jain community who are pure vegetarians and do not allow use of eggs.
M Harrison	As a vegan clear labelling would be a great help. At present I have to use the vegan society's book, 'animal free shopper' but not all vegans have a copy.
Dr V K Tohani	I agree that the term 'Vegan' is easy to define and thus should not pose any serious difficulty in labelling 'Vegan' food. However, people have a different understanding regarding the term 'vegetarian'. Many strict vegetarians who are Hindus or Buddhists would not accept eggs or fish as a vegetarian product, nor would use any animal products in assisting preparation of vegetarian food i.e., chips fried in animal fat. Perhaps description of ingredients including preparation of ingredients might be helpful in these cases rather than labelling as a vegetarian food. It will help people decide if it is suitable for their requirement.
Darpan Patel	<p>I am a Vegetarian by choice but have been influenced by my religious and spiritual beliefs in making this choice. I'm a Hindu. Here are my thoughts on what my perception of Vegetarian is (and what I think a Vegan is):</p> <p>Vegetarian:</p> <ul style="list-style-type: none"> Nothing which involves the slaughter of a living creature, i.e. Meat, Chicken, Fish. I also extend this to egg, as I believe it is the potential for life. It's production for consumption goes against a natural evolution of animals and man. No animal fats/oils from the above accordingly. <p>Vegan:</p> <ul style="list-style-type: none"> All of the above. No type of product forms any animal from any source, i.e. milk. <p>Hope this is of use, am happy for any follow up questions. Thanks for raising awareness on this.</p>
Heena Shah	<p>I am disgusted with this information. I am vegetarian and I do not abstain from eating meat because it's been Slaughtered BUT because it was once alive. I do not want to eat ANYTHING that was alive with limbs, a face or blood. No white or red meat and no seafood. I do not care whether it was slaughtered or not.</p> <p>Do We Want This Definition of Vegetarianism?</p>

	<p>Food Standards Agency, a government body, has recently proposed the guidance notes on the use of the terms 'Vegetarian' and 'Vegan' in food labelling. The object is to improve labelling practice, in catering, manufacturing and the retail sectors in relation to those foods labelled as suitable for vegetarian and vegan diets and to improve consumer confidence in such labelling. There is at present no definition in law of the terms 'vegetarian' or vegan. The Food Safety Act 1990 and the Trade Description Act 1968 contain general provisions outlawing misleading labelling. To cut the matter short, the Food Standard Agency has sent a document for consultation. The document gives the following definitions:</p> <p>Vegetarian: The term vegetarian should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, insects) or their by-products, or foods made from or with any of these. I want our readers to note the word 'slaughtered'. What if an animal has not slaughtered but dies of a natural death? This clearly means all products from or with the use of living beings would be Considered 'vegetarian'. The Agency has also provided a list which clearly states: Products of living animals is to be termed as 'Vegetarian'.</p> <p>With this definition eggs will be considered 'vegetarian' together with many more items of consumption that may fall into this category. It is widely believed in Hindus and Jains that eggs are not vegetarian food. People following Brahma Kumaris ideology or the followers of Swaminarayan and Hare Krishna people and all Jains strongly reject anything made from eggs. However I cannot find the names of the three Hindu organisations mentioned here in the list of consultation papers issued by the Food Standard Agency.</p> <p>I somehow think that this definition of vegetarianism would not serve a true purpose as far as Hindus and Jains are concerned because anything with the use of or from the 'non-slaughtered' living beings would be considered a vegetarian food. I urge ALL Hindu organisations and (ALL vegetarians regardless of their faith – added by Editor – Heena Shah) to study this and write their views to Food Standard Agency on vegetarianandveganconsult@foodstandards.gsi.gov.uk</p> <p>Heena Shah adds ~ Please note that ANY religious group that believes their follows should not eat products of animals or particular animals; need to contact the FSA as well! For example, Rastafarians do not eat pork, other faiths eat animals products where the animal has been killed in a specific way.</p>
Charles Rowe	<p>As a vegan myself, I just wanted to say that as an ordinary individual I find the guidelines you have drawn up to be absolutely spot on, indeed excellent. I also value the care that has gone into getting all the details right for such a tiny sub-section (alas!) of the population. Many thanks. So my answers to your questions 14, 15, and 16 are "yes",</p>

	"yes", and "yes". To the further question "Is there a need for guidance?" my answer is again "Yes"!
Melissa Gilroy	<p>The guidance notes are definitely required within the Food Industry. Our Internal guidance has been derived from specialist affiliated societies i.e. vegetarian society. It is necessary for us to issue our suppliers with our internal policy to allow them to complete our specifications in full. It would be useful if the FSA were to issue a range of definitions that would result in a consistent understanding of additional terms such as, suitable for coeliacs, hallal, kosher etc.</p> <p>The reference table is useful as a quick reference point for the inclusion and exclusions for vegetarian and vegan. I believe that it is necessary to raise the issue of cross contamination but it may be useful to highlight further examples e.g. production lines producing meat & non-meat lines.</p>
Name & contact details removed for confidentiality.	On the issue of cross-contamination, has/should any consideration been given to the use of the terms 'vegetarian' and 'vegan' on products where manufacturers use the same equipment/filling lines to manufacturer both vegetarian and non-vegetarian products? Not being a vegetarian myself I am speaking from a position of ignorance, but if consumers were aware that products currently marked as 'vegetarian' were actually manufactured using the same equipment that is used to produce non-vegetarian products then would this knowledge have any influence on their purchasing decision?
Kristina Tokarova-Itraj	I would like to react to the paragraph 'Additives' mentioning that the 'additives' originating from products of live animals, e.g. those from milk or eggs, would be suitable for products labelled as 'vegetarian'. Many vegetarians would protest the egg involvement in vegetarian products, as They are believe it is a cell / potential new life. I believe it would be more appropriate to exclude eggs from the list of vegetarian additives.
Binit Shah	Vegetarian: The term vegetarian should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, insects) or their by-products, or foods made from or with any of these. I oppose the word 'slaughtered'. What if an animal has not slaughtered but dies of a natural death? This clearly means all products from or with the use of living beings would be considered 'vegetarian's understand the Agency has also provided a list which clearly states: Products of living animals is to be termed as 'vegetarian'. With this definition eggs will be considered 'vegetarian' together with many more items of consumption that may fall into this category. As a practising Jain, we strongly believe that eggs are not vegetarian.

	<p>Furthermore, it is also believed in Hindu religion that eggs are not vegetarian food. People following Brahma Kumaris ideology or the followers of Swaminarayan and Hare Krishna people and all Jains strongly reject anything made from eggs. However we cannot find the names of the three Hindu organisations mentioned nor any Jain organisation in the list of consultation papers issued by the Food Standard Agency. I somehow think that this definition of vegetarianism would not serve a true purpose as far as Hindus and Jains are concerned because anything with the use of or from the 'non-slaughtered' living beings would be considered a vegetarian food. I hope that you take these views into account.</p>
W Kershaw	<p>Please note that honey is not vegan.</p>
Harshad Doshi	<p>I have been informed of your new guidelines in connection with vegetarianism and would like to know why you have not included Jains, Hindus and Brahmakumaris in your list. It is also wrong to say that any thing not slaughtered or eggs or fish are to be considered vegetarians. I understand that those forming policy may not be vegetarians but I believe they should have regard for vegetarians. If they do not know the answer they should consult the afore mentioned communities.</p>
Duncan Egerton, Defra – Food Drink Industry Division	<p>I have some brief comments, which I am making on behalf of FDID. These are as follows:</p> <ul style="list-style-type: none"> i) Whereas the definition of "vegan" seems clear-cut, that for "vegetarian" does seem difficult. It is likely to be a challenge to agree a definition, which is acceptable, yet, straightforward and understandable; ii) the scheme must be genuinely voluntary (paragraph 4.5, page 4). We have had past complaints that the Agency expect guidance to be followed and "name and shame" those who do not comply, giving the impression that guidance is mandatory; iii) costs and benefits (paragraph 4.2, page 4). The Agency believe that the proposals will have little or no cost. However, there is acknowledgement that businesses will need to check for compliance and that there might need to be re-printing of labels and reformulation in some cases. This suggests That there may be more than minimal costs to industry. No doubt the affected sectors will comment; iv) We are pleased to note that the Agency has recognised that there may be second order costs to caterers, arising from avoidance of Cross-contamination (4.3, page 4). We hope that it will be possible to quantify the cost in the RIA, as suggested in paragraph 4.4; v) I agree that there is potential for the guidance to act as a deterrent and actually lessen consumer information

	<p>(7.7, page 6). The risk would be Minimised if the guidance was straightforward. 4. I hope that it will be possible to take these comments into Consideration.</p>
Gill Ward(Mrs)	<p>As I am not a vegetarian or vegan, I decided to interview my son's girlfriend who was initially a vegetarian. She found labelling very helpful and was aware of the specific problems that you have mentioned in your report. I asked her how she found eating out. She again found no problems and had always found a vegetarian dish on the menu.</p> <p>Personally, I found the report very helpful. I intend to keep it in case I have to provide a meal for a vegetarian friend. When I first provided a meal for my son's girlfriend, I asked if she had any particular dietary requirements. I cooked what I thought was a vegetarian meal. However, at that time, I was unaware that the gravy was not vegetarian! It hadn't even occurred to me.</p> <p>Two points that I would like to mention are these:- At our local golf club, no meals are provided for special diets. However, if a person requires a meal with specific dietary needs, it is possible to phone up and order in advance.</p> <p>Secondly, I would like to offer a suggestion. Perhaps supermarkets could do a leaflet with a list of their vegetarian and vegan foods so that people who have to cater for a vegetarian or vegan know what choices are available to them. I am aware that these foods do have a symbol, but for people who do not normally consume these foods, it means searching the store for these items. In addition, we don't always know all the specific dietary needs of a vegetarian or vegan.</p> <p>I hope these comments may be of some help. I do feel that the FSA are doing a great job, and that the improvements in clarifying vegetarian and vegan labelling will be of great assistance to those consumers who choose to follow those particular diets.</p>
Maggie Brown	<p>As a vegan I would expect what you have proposed - that absolutely nothing comes from any creature alive or dead at any stage of the formation of any products. When I was vegetarian I expected to only buy products deemed suitable for vegetarians if the eggs were from truly free-range or organic hens - if this is not so, then that ought to be labelled clearly on the product i.e. the eggs used in this product were from battery or barn hens.</p>
Dr Natubhai Shah	<p>Government 'Vegetarian' Criteria that includes products of living animals including insects (e.g. milk, eggs, honey,</p>

<p>Secretary General World Council of Jain Academies Chairman Jain Sangha of Europe Chairman Ahimsa for Quality of Life London Area Chairman Jain Samaj Europe</p>	<p>bee pollen or waxes); excludes meat, poultry, fish, insects or products made from them is wrong and offensive to the vegetarian in general. The only difference between "Vegetarians" and "Vegans" is that "Vegetarians" take milk and its products, while the "Vegans" do not take milk and its products. We are proposing the criteria for 'vegetarian': Exclusion of meat, poultry, fish, insects, slaughter by-products (e.g. fats and blood) or products or processing agents made from them and eggs, but inclusion of milk and its products Ingredients of vegetarian food should be clearly labelled so that as certain religious groups such as Jains who do not take root vegetables can select food of their choice.</p>
<p>Rt Hon Lord Weatherill DL</p>	<p>As a lifelong vegetarian I write to give my strong support to the Vegetarian society's campaign to ensure that vegetarian and vegan (though I am not a vegan) foods are clearly labelled. I am well aware that many products today are sold as suitable for vegetarian" even though they have animal content. When I became a vegetarian it was rare and considered somewhat eccentric. However, that is no longer the case and this campaign, therefore, has my strong support.</p>
<p>Name & contact details removed for confidentiality.</p>	<p>I consider guidance on this issue to be imperative. <u>Point 4-p1 draft.</u> Although this is a disclaimer, I feel that it is over-emphasised and could undermine the constructive advice, which follows. Perhaps 1st is sufficient. This could be followed by a positive statement reinforcing the practical value of the guidance. <u>Point II. p2 draft line 5-</u> example sponge fingers in a trifle. Since the focus is on vegan/vegetarian labelling, it would be more helpful to use an example where the compound ingredient per se fails to disclose ingredients that cannot be consumed by vegans/vegetarians. A trifle probably contains gelatine, so would be unacceptable regardless of compound ingredient. <u>Point 12 p.3 draft line 7-</u> 'interest' fails to convey the significance of this issue 'concern' would be helpful to suggest to manufacturers that since vegans/vegetarians depend on such information, it is still extremely important to include it somewhere on the label if/as appropriate. <u>Point 13-p.4 draft line.</u> Vegetarian- give examples of by products. <u>Point 14 p4 draft Vegan.</u> – Add 'any' before foods for emphasis with the aid of animals seem somewhat ambiguous</p>

	<p>and needs to be clarified. Examples also need to be stated to ensure there is no misunderstanding.</p> <p><u>Point 16 p.4 Cross contamination</u> – I do not feel that 1 example is enough and suggest a range of examples in bullet points, should be covered, including use of separate utensils and preparation equipment. Although labelling is vital, in practical terms a trusted symbol is immensely helpful, it is often extremely difficult to check ingredient when shopping, especially when the 'small print' is not at all easy to decipher. I should also like to see caterers display a sign indicating their compliance with FSA guidance. Is there scope for including points such as these in the final document?</p>
<p>M. Shine Highland Veggies & Vegans</p>	<p>As vegans and vegetarians we are in full agreement with the Vegetarian Society and Vegan Society's position on labelling.</p> <p>We look to you to implement a requirement for a standard label that addresses the needs of vegans and in a typeface that can be read without a magnifying glass. Ethical considerations are paramount and we hope you will give extra consideration to those of us buying the products. I don't feel we can add anything useful by filling in your questionnaire.</p>
<p>Dr Viren Mehta MBChB</p>	<p>As a lifelong vegetarian (as a follower of the Jain religion) I have often been puzzled by some products that are deemed vegetarian on their food labels when in my opinion they are clearly not. I also am hopeful that the action taken by the FSA will remove the huge variation in quality of food labelling in our current market. As a consumer, I have been especially confused by the various E numbers.</p> <p>Whilst some 'vegetarians' consume fish/seafood, I think a product should only be labelled vegetarian if it would satisfy the criteria of most people within this category.</p> <p>Therefore I would suggest that a product labelled as 'vegetarian' should be free from all meat, poultry, fish/seafood, insects, slaughter by-products (e.g. fats, marrow and blood) or products or processing agents made from all these. I would suggest that 'vegetarian' could include dairy produce (the exclusion of this would be encompassed in the term 'vegan'). The inclusion of eggs is rather more contentious, but there are many vegetarians who do not consume egg products, so this may also be added to the list of exclusions. However, if egg products are eventually labelled as 'vegetarian', then it is important that a similar well-highlighted label of 'contains eggs' being present.</p> <p>Food labelling for vegetarians has been extremely hit and miss to date. I am sure that most vegetarians have unwittingly consumed food that is contrary to their beliefs due to inadequate food labelling. I think it is the FSA's</p>

	responsibility to ensure that this no longer occurs and I look forward to prompt action to rectify this problem.
Dr Justine Butler Vegetarian & Vegan Foundation	<p>I am responding on behalf of the Vegetarian and Vegan Foundation (VVF) and Viva. VVF and Viva! believe there is indeed a need for guidance on the use of the term's 'vegetarian' and 'vegan' for a range of reasons. It is important to clarify both definitions and reach a consensus within the food industry in order to gain the confidence of both vegetarians and vegans. We wish to add the following comments (in italics) to your definitions:</p> <p>'Vegetarian' The term 'vegetarian' should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, crustacea, amphibians, molluscs and insects), or their by-products (such as gelatine and animal fat), or foods made from or with any of these.</p> <p>'Vegan' The term 'vegan' should not be applied to foods made from or with the aid of animals (e.g. products from slaughtered animals such as red meat, poultry, game, fish, shellfish, crustacea, amphibians, molluscs and insects), or their by-products (such as gelatine and animal fat), and foods from living animals (e.g. dairy products, eggs and honey).</p> <p>Cross Contamination- I am concerned that the statement only suggests that manufacturers and retailers 'consider' cross contamination of vegetarian and vegan food. To vegetarians and vegans this is a very real concern and I would suggest stronger wording be used. We would change the statement as follows: This is a very real concern and I would suggest stronger wording be used. We would change the statement as follows: <i>When assessing whether foods meet these criteria, manufacturers, retailers and caterers should take note that vegetarian and vegan foods that have become contaminated with non-vegetarian and non-vegan foods such as animal fat or vegetable fat that has been used to cook animal products in cannot be referred to as vegetarian and vegan respectively.</i></p>
Dr Ramesh Mehta Trustee Jain Samaj Europe	<p>On behalf of the 30,000 Jains of UK, we are proposing the following criteria for the vegetarians. Exclusion of fish, poultry, meat, insects, slaughter by-products (e.g. blood and fats) or products or processing agents made from them and eggs. But inclusion of milk and its products. All vegetarian foods should be clearly labelled to help religious group like the Jains.</p>
Anna Twelves	As a Health Promotion Adviser and a vegan of nearly 17 years, I think there is a need for this guidance and I

	<p>appreciate the fact that it is being produced. I would perhaps however expand on the sentence which contains the definition of vegan as, even now, colleagues and friends often ask me things such as 'do you eat prawns?' - which, clearly I don't. I know that there is a table at the bottom of the guidance but some may not read this - repetition can sometimes be a useful thing. Whilst many may have a notion of what a vegetarian is, many people have no idea what a vegan does or doesn't eat.</p>
Stephanie Bird	<p>Annex A says that vegetarians eat cheese - this is not necessarily true. Vegetarians would typically eat cheese that has no animal rennet included i.e. vegetarian cheese. This is a big issue when purchasing food OR eating out in restaurants.</p> <p>It would also be better if this wasn't just guidance and was legally binding as some companies will not take this on board and vegetarians / vegans still won't be assured that the food they are eating is appropriate - most of us only acknowledge the Vegetarian and Vegan Society symbols.</p>
Ruma Tamuli CMi Technical Services on behalf of Whitbread	<p>We (CMi Technical Service) provide technical data on behalf of Whitbread foodservice. The definitions that we require our raw-material suppliers to comply with when providing their respective product data, are as follows; 'ovo-lacto vegetarian' = product must not contain animal flesh (meat, poultry, game, fish, shellfish or crustacea) or any ingredient derived from the slaughter of animals. The consumption of diary products & eggs is permitted. The manufacture of the product must not utilise any animal/animal-derived ingredients e.g. isinglass. 'Vegan' = product must not contain animal flesh (meat, poultry, game, fish, shellfish or crustacea) or slaughter by-products, diary products or eggs, insects/bee product e.g. honey, beeswax, royal jelly etc., substances derived from hair e.g. keratin, L-cysteine. The manufacture of the product & its ingredients must not have involved testing on animals. The product's manufacturing processing must not utilise any animal/animal-derived ingredients e.g. isinglass.</p>
Paul Appleby Secretary Oxford Vegetarians	<p><i>Is there a need for the guidance at all?</i></p> <p>Undoubted, "yes". I have experienced many cases of uncertainty among caterers as to what vegetarians and vegans can and cannot eat. For example, some years ago I visited a National Trust Café in Dorset at which dishes containing foods such as tuna and prawns were labelled with a 'V' on the menu. When I spoke to the chef he insisted that these dishes were 'suitable' for vegetarians' because he mistakenly believed that vegetarians eat fish and other sea creatures. Another chef that I spoke to believed that 'leaves of gelatine' were suitable for</p>

	<p>vegetarians, presumably on the basis that leaves grow on trees! I have also been asked by a waiter in a restaurant whether vegans can eat mushrooms. Guidance from the FSA would undoubtedly help.</p> <p><i>Are the criteria defining the terms 'vegetarian' and 'vegan' sufficiently unambiguous?</i></p> <p>I would suggest the following definition of the term 'vegan' to mimic the definition of the term 'vegetarian' and to make it clear that foods labelled as 'vegan' must be completely free from animal products:</p> <p>The term 'vegan' should not be applied to foods made from or with the aid of <u>any</u> products derived from animals, irrespective of whether or not those products required the slaughter of animals.</p> <p><i>Is the table in Annex A useful?</i></p> <p>Yes. It would also be useful to add a list of common foods that are unsuitable for (a) both vegetarians and vegans, and (b) vegans alone, in order that the user does not miss the examples given in the table.</p> <p><i>Is the cross-contamination issue covered adequately?</i></p> <p>The words "or storage" could be added at the end of the first sentence to remind caterers that, for example, salads should be stored in containers so that the contents of one containing animal products cannot spill into one that does not do so. Otherwise, the main point to stress is that dishes for vegetarian and vegans should ideally be prepared separately from dishes containing meat, fish, etc.</p>
Hina Shah	<p>The use of any animal products to manufacture any food whether the animal is slaughtered, living or dies a natural death cannot be termed as vegetarian. Even the use of animal by-products is prohibited in our religion Jainism and hence we would not class any such food or objects as vegetarian.</p>
Paresh Shah	<p>Being a life long vegetarian, I was quite surprised to see your definition of vegetarian food.</p> <p>As far as I am concerned, I would prefer the following definition(s)....(and I would strongly urge you to reconsider the definitions that you have proposed)</p> <p>Vegetarian food consists of grains, pulses, nuts, seeds, vegetables and fruits with or without the use of dairy products and eggs (preferably free-range).</p> <p>Types of Vegetarian Food</p> <p>Lacto-ovo-vegetarian. Both dairy products and eggs. This is the most common type of vegetarian diet.</p> <p>Lacto-vegetarian. Dairy products but not eggs.</p> <p>Vegan. No dairy products, eggs, or any other animal product.</p>

	<p>Fruitarian. A type of vegan diet where very few processed or cooked foods are eaten. Consists mainly of raw fruit, grains and nuts. Fruitarians believe only plant foods that can be harvested without killing the plant should be eaten.</p> <p>Macrobiotic. A diet followed for spiritual and philosophical reasons. Aims to maintain a balance between foods seen as ying (positive) or yang (negative). The diet progresses through ten levels, becoming increasingly restrictive. Not all levels are vegetarian, though each level gradually eliminates animal products. The highest levels eliminate fruit and vegetables, eventually reaching the level of a brown rice diet.</p>
<p>Simon Lembas Ltd Vegetarian & Speciality Wholefood Wholesaler</p>	<p>My admiration for grasping this nettle. Can't think of any group that'll argue more for the sake of it more than vegans or veggies [or Lacto-scum, as we affectionately know them].</p> <p>Think you might have trouble with your definition of veggie cos there's an argument that no suffering should be caused rather than just loss of life so the issue of things like free range eggs becomes relevant. There's also gonna be a problem with the issue of cross contamination cos even the Wholefood trade hasn't agreed on this. For instance Green & Blacks Dark Chocolate contains no ingredients that aren't vegan, the product is labelled as being suitable for Vegans but it's packed in an Environment where there are milk products present. A similar product from another supplier does not make the claim that it's suitable for vegans.</p>
<p>Vikas Kalra</p>	<p>I do strongly recommend that you consult organisations such as the Ayurvedic Company of Great Britain, the Hare Krsna Movement, the Brahma Kumaris, Swaminarayana, Jain organisations and Hindu organisations with regards to formulating an appropriate definition of the term 'vegetarian'.</p> <p>The definition currently proposed :</p> <p>'The term vegetarian should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, insects) or their by-products, or foods made from or with any of these' would be totally unacceptable, most probably cause additional workload, dissatisfaction and unacceptability amongst consumers and upheaval in the future.</p> <p>The reason being is that the label vegetarian may then be applied to products of animals that die by natural death.</p>
<p>Nemish Mehta</p>	<p>Sometimes, I stop to consider that most of the people I interact with on a daily basis are like aliens in their</p>

Minmar (291) Ltd	<p>understanding of the word 'food' and yet seem so like-minded in terms of compassion to animals and the environment.</p> <p>As a Jain brought up in the UK, it has been interesting to see the changes in veggie consciousness and the increasing awareness of the harm that the meat and dairy industry is causing to other life and to the environment. Also, it has been amazing to see the accommodation of 'halal' and 'kosher' diets and requirements. Thus, I would like to see a definition of an Indian 'veggie' diet, which is the 'gold standard' veggie. The airlines already offer this option as 'ASIAN VEGETARIAN'.</p> <p>Broadly speaking, vegetarian diets come from the belief that all life (consciousness or soul) is equal although the incarnation (physical form) may differing capacities for action and thought), thus it is as wrong to take anything from any life as it would be to take a human life. Possibly through cultural developments, this has led to the avoidance of all-animal produce or by-produce except milk and honey. Jains actually extend this principle of minimum harm to other life in order to sustain the self to extraordinary lengths, avoiding certain types of plants and vegetables during religious periods. Vegans, of course, have a much clearer definition - no animal derived produce. The Vegetarian Society defines lacto and ovo-lacto veggies as well but this is not a satisfactory classification in my view. Life as Indian people understand it resides in everything. Jains interpret this somewhat more strictly than Hindus but in practice, plants are the minimum level of harm necessary to live our life.</p> <p>Thus I would like to put forward the following amendments based on a simple principle which allows a clear set of guidelines that are robust and applicable as society changes. The use of animal and human materials in foods, medicines and even clothing made of leather etc. should be covered by such a principle.</p> <ol style="list-style-type: none"> 1) Remove the word 'slaughter' - it creates categorisation resulting in an incomplete definition and is not relevant to the principle. A minefield of possibilities open - colouring, additives in particular. 2) make clear that humans (inc. embryo), insects and fish are as much alive as cows and so not acceptable to vegetarian food 3) make clear the standing of milk, honey, eggs, roe, and leather 4) Gold standard Vegetarian (no eggs, only organic milk and honey, no leather).
Pankaj Shah	<p>Being strict vegetarian and not eating eggs/fish/meat/milk would help us enormously to our community (Jain (one branch of Hindu)) .</p> <p>Currently we having no choice but to accept that vegetarian means – no meat/egg/fish products or anything even collected from dead animals. However, identifying even further means makes our lives much more harmonious</p>

	and pain free to other living beings.
P.L.Modgil	As a Hindu I am most disturbed to read your definition of the word vegetarian as it's vague. It uses the word 'slaughtered' but someone could supply food containing meat but not from an animal which has not been slaughtered e.g. fish is not slaughtered. The products could easily include eggs and yet Hindus do not consider eggs as vegetarian.
Karen Bamford Local govt food inspector. Swindon	<p>I am a vegetarian local government food inspector! who welcomes this document whole heartedly. I do believe though that it is important to state that in addition to preventing cross contamination at the preparation stage from non vegetarian/vegan onto vegetarian/vegan foodstuffs we should also consider prevention during storage/cooking e.g. during storage in refrigerator ensure suitably covered/store vegetarian separately or not adjacent or in direct contact with non vegetarian foods or in cooking do not allow non vegetarian foods to drip or spill over onto vegetarian foods beneath the non vegetarian dish in the oven. This could also be extended to further storage/display etc.</p> <p>The preparation stages could be expanded to include provision for separate/frequently cleaned utensils/chopping boards/equipment and definite hand washing after handling non vege etc. I noticed in sandwich shops all over UK that they quite happily place gloved hands into sandwich fillings of say meat/chicken then have an order for a veggie filling don't change gloves and make my so called veggie cheese sandwich (advertised as vegetarian)! No thanks!</p> <p>Hope this helps as I feel strongly about this issue and often raise it with caterers during my food standards visits (particularly at the fat fryer as the oil is often not separate from fish cooking oil as they believe!)</p>
N. Mehte The Young Indian Vegetarian	The Vegetarian Definition should 'exclude' eggs, honey, and bee pollen. This is the view of the entire Jain, Hindu community, as well as ours.
Mrs Sheetal Shah Secretary PC, Shree Digamber Jain Temple UK	It is very difficult for some of us strict vegetarians to shop these days in the supermarket, and though food products are sometimes labelled vegetarian or vegan, more often than not, these are lacking in many everyday items such as soft drinks or chocolates. For those who do not consider eggs to be vegetarian, the job is even more difficult. Please take our views on when re - writing your definition of vegetarian or vegan.

Joe Hague	<p>The guidance regarding the use of the term vegan seems comprehensive enough. In Annex A however, it is rather loosely stated that cheese is permitted to be labelled as vegetarian. This is of course only the case if non-animal rennet is used, otherwise the cheese should not be labelled as Vegetarian. I believe that this common misconception needs to be more definitively debunked within the guidance document; as it stands the document could lead to confusion and a perpetuation of the 'all cheese is Vegetarian' myth.</p>
Miss K. Walsh	<p>I would like to express my view regarding the food labelling proposals. It is something I feel very strongly about and feel it is a necessity for all food to be labelled correctly. I agree with your outline definitions and believe it should be implement them as soon as possible. Even the more "ethically conscious" chains have such contradictory labelling that you can't trust their own branded "v" products e.g. marks and Spencer and Tesco. The only supermarket chain with adequate labelling is the co-op listing, vegan, vegetarian, non-animal rennet cheese, veggie cheese, milk whey etc. They are very thorough. The main problems I face as a vegetarian are:</p> <p>Cheese:</p> <p>Supermarkets: A product is often labelled vegetarian, yet when you look at the ingredients some of the cheese are labelled vegetarian and some not! It is therefore unclear as to whether animal rennet is present in the cheese.</p> <p>Restaurants: this is a big problem as the chefs I have spoke to are unaware that there is non-vegetarian cheese. It is impossible to trust the v sign on their menus. It really leaves people with an ethical dilemma - whether to "risk it" and assume the v does mean veggie or not even eat out or buy and cheese products from the supermarket - turning you into a virtual vegan.</p> <p>So it isn't just a case of fussy eaters - people need to know what is present in the food they are eating so they can make an informed choice.</p> <p>I hope this is the kind of response you require, if you need anything else, let me know. If products don't comply to your guidelines, they shouldn't be allowed to label a product vegetarian or vegan.</p>
John Lawrence	<ol style="list-style-type: none"> 1) Definition of term vegetarian – should be the criteria used by VegSoc to award its logo to a product 2) It must be illegal to use the terms “suitable for vegetarian” if the undisclosed 2% include non-vegetarian ingredients. 3) The same as 2 in the ingredients of ingredient issue not mentioned in the consultation. 4) Perhaps FSA could publish a list of products containing ingredients that don't need to be disclosed.

	<p>The problem is the lack of consistency and I think this is because quite a few producers and wholesalers don't sufficiently understand the difficulty for vegetarians where what may be a perfectly innocent looking product could in fact be disqualified by residues of production processes. Bread and wine are the notorious example of this. So a perfectly innocent looking bag of rice or lentils also much to be labelled "suitable for vegan" just in case. There are for example water filtration process that involves bone meal. People like Infinity Foods don't seem to understand this. FSA could maybe quietly begin to educate some traders about the need to reassure vegetarians.</p>
John Lawrence(2)	<p>Further to my earlier response to your survey: I enclose a label, which illustrates the point I was making about claiming vegetarian states the product, which in fact may contain 2% disqualifying ingredients. In this case a judicious phrase is used to indicate compliance whilst a claim of vegetarian states ins maintained. This product does claim to be 100% veg. I don't know whether there are undisclosed ingredients in this case or not. I repeat it must be illegal to claim vegetarian states where there are 2% ingredient which disqualify. It is one thing to omit ingredients within the law: it is another to make a claim that implies that the 2% do not exist.</p>
Ramesh Patel Food Safety Manager Geest	<ol style="list-style-type: none"> 1. A good summary of the legislative aspects on the use of these terms 2. A very succinct explanation of the Food Labelling (Amendment) (England) (No.2) Regulations putting the whole issue of ingredient labelling into context. 3. Answer to Question at Item 14 is "YES, used in conjunction with the table and hence 4. Answer to Question at Item 15 is also "YES". 5. Under "Cross Contamination" suggest the following is added: "A HACCP approach should be used to identify and control all cross-contamination issues. Where adequate controls cannot be demonstrably exercised, vegetarian/vegan claims should not be used."
Rosalyn Spencer Chair of the Louth Vegetarian Group	<p>Here are the main concerns:</p> <ol style="list-style-type: none"> 1. Eggs - Most vegetarians are against animal cruelty and in accordance with the national Vegetarian Society's definition of vegetarianism will only eat free range eggs. This can cause problems for us with sauces, and especially mayonnaise coated salad items such as coleslaw, potato salad etc. Can it be stressed that an item should only be labelled as suitable for vegetarians if eggs contained within it are free range.

	<p>2. Wines are a problem for strict vegetarians. Tesco and the Co-op label their own wines with "Vegetarian or Vegan suitable". Most restaurants are not aware that some wines are unsuitable for vegetarians and the wines they generally use are not labelled. Wine can be an ingredient within their "Vegetarian" meals but if they are unsure of the refining process, they should not really be used. It would be helpful if wines on restaurant wine lists were suitably marked.</p> <p>3. Most restaurants now mark their first courses as "suitable for vegetarians" (although this is always doubtful due to their lack of knowledge). However, desserts are rarely marked. Desserts are frequently offered to vegetarians without a thought, yet many of them are unsuitable because they contain gelatine, animal suet, insect derived food colouring etc.</p> <p>4. Tablets and medication are a great concern. Many anti-biotics, for example, are gelatine coated and doctors don't seem to know what you are talking about when you request medication suitable for vegetarians.</p> <p>5. We are concerned that some ingredients do not need to be listed. However, if Vegetarian / Vegan labelling is controlled more strictly we could just avoid foods not labelled as suitable.</p> <p>6. Cross contamination is a very great issue even in restaurants and shops with high reputations. Many delicatessen counters serve items marked as "suitable for Vegetarians" but these are next to and sometimes touching items that are unsuitable. Some staff are not aware of the need to use separate serving utensils. Another great problem in restaurants is that once you are served your vegetarian meal a bowl of vegetables is supplied for the table. Meat eaters help themselves to vegetables unaware that once the utensils have touched the meat on their plate, the vegetables are no longer suitable for the vegetarians on their table. This could easily be overcome if vegetarians had a separate supply of vegetables. Also, at many buffets sandwiches deemed suitable for vegetarians are served on the same plate as meat sandwiches.</p> <p>7. A common misconception is that some vegetarians eat fish. The national Vegetarian Society have been running a campaign stressing that true vegetarians do not eat fish. Perhaps another name should be created for people who do not eat red meat but are happy to have dead animal by-products in their food. The Louth Vegetarian Group refers to these people as Demi-vegetarians. Also, we greatly appreciate the time you are spending on this consultation document.</p>
Samir Shah	<p>Please get practical and apply common sense in the application of vegetarianism.</p> <p>A huge proportion of the vegetarians in the UK is Hindu. Therefore any products made from animals e.g. gelatine in Polos are not vegetarian. Eggs are NOT considered vegetarian so most ice creams and cakes are not consumed.</p>

	Please ensure therefore that the term Vegetarian complies with the Hindu definition of Vegetarian and NOT some British version made up by your agency having asked a few converted British people who do not really understand the Historic reasons behind vegetarianism in the first place. All they think vegetarian means is that animals should not be slaughtered which is NOT the whole story.
Smita Shah	Please note that in the definition offered the slaughtered animals should be all animal and related products - period!
R.N. Sharma	I and my family are strict vegetarians. We feel that the term "slaughter" in the definition of vegetarianism is not only irrelevant but also misleading. The vegetarians abstain from eating all kinds of meat (obtained by slaughtering animals or by any other means), fish and even eggs. The definition should, therefore, contain simple, straightforward and unambiguous words.
Tracey Lean	<p>I would like to comment on the proposed guidance on food labelling for vegetarian and vegan food products in the retail sector and catering establishments. I welcome this guidance. As a vegetarian of 22 years and a vegan of 19 years the availability of vegetarian and vegan foods has become progressively easier, but accurate labelling and full awareness is still lacking. The only way we can guarantee that foods adhere to our requirements is by looking for those products which subscribe to the labelling schemes of the Vegetarian or Vegan Societies, but only a small percentage of companies wish to do this.</p> <p>To have a legally binding labelling requirement in place would be the ideal solution. If that is not possible then there should be a labelling criteria that manufacturers could follow. If this labelling criteria was put in place then it would clear up the issue of whether vegetarians eat fish! Several years ago whilst helping to run the vegetarian society of a major city, I visited all of the city's food establishments in order to up-date a guide on eating out for vegetarians; the number of caterers that had fish on their vegetarian menus was frustrating. The minefield of E numbers would also be easier with correct labelling requirements, as many E numbers may or may not be of animal origin.</p>
Mr Narendra Mehta	<p>As a Jain, I feel strongly that :</p> <p>Vegetarian: The term vegetarian should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, insects) or their by-products, or foods made from or with any of these.</p> <p>The reason for this is that as a human being we have to live with minimum violence.</p>

Kalpana Mehta	As a Jain I strongly believe that "Eggs" of any live body is not eatable by Jains. This is mentioned in all Jain scriptures. Therefore can you please consider our request for vegetarian food labelling not to include "Eggs" as vegetarian food or ingredients?
Emma Overton	<p>I am delighted to see that the FSA is trying to introduce some clarity into the difficult area of vegetarian/ vegan food labelling. There is most definitely a need for this guidance.</p> <p>I have been a vegetarian for 20 years. Whilst labelling of foods in supermarkets appears to have improved, my main concerns continue to be the lack of understanding of the vegetarian diet in catering establishments. I am continually offered fish when this is clearly not a vegetarian option, and when I ask whether the cheese used is vegetarian, I am often looked at as if I am a moron (many catering staff apparently do not know that cheese may contain slaughterhouse derived rennet).</p> <p>I welcome the clarity of FSA's proposed definitions. I do hope they will help to raise the currently very low levels of awareness of what is actually vegetarian/ vegan. I wonder if there is space to include further pointers towards the problems with those ingredients that may or may not be vegetarian, depending on the way they have been produced. These are often not easy to spot. Similarly, there are many e numbers that are not vegetarian, and it might be worth pointing this out too, and stating that manufacturers/ caterers are also required to ensure that these ingredients are vegetarian.</p> <p>Cross contamination is an issue worthy of more mention than it is currently given. Whilst all good caterers should know to use separate chopping boards, utensils etc to prepare food, I often see staff serving vegetarian food with the same utensils that they are using to serve meat. It would be useful if FSA guidelines spelt out that this is not acceptable. I am pleased to see the guidelines recognise the issue with regard to vegetarian and non-vegetarian foods being cooked in the same oils – clearly use of the same fats is unacceptable. I didn't think the table included in the guidelines was very easy to use. A table is a good idea but this format isn't as accessible as it might be.</p> <p>In summary, I welcome the FSA's proposals in this area. They are much needed and long overdue. I would like to see mandatory labelling so that manufacturers/ caterers have to let customers know whether their products are vegetarian or not. I would also like the definitions you outline to become legally binding. In the absence of a legally binding definition, these guidelines are a welcome second best, and certainly an improvement on the current unsatisfactory situation.</p>

<p>Manish Nahata, MBA Branch Manager, Eastern Financiers Ltd</p>	<p>Government 'Vegetarian' Criteria that includes products of living animals including insects (e.g. milk, eggs, honey, bee pollen or waxes); excludes meat, poultry, fish, insects or products made from them is wrong and offensive to the vegetarian in general.</p> <p>The only difference between "Vegetarians" and "Vegans" is that "Vegetarians" take milk and its products, while the "Vegans" do not take milk and its products.</p> <p>We are proposing the criteria for 'vegetarian': exclusion of meat, poultry, fish, insects, slaughter by-products (e.g. fats and blood) or products or processing agents made from them and eggs, but inclusion of milk and its products. Ingredients of vegetarian food should be clearly labelled so that as certain religious groups such as Jains who do not take root vegetables can select food of their choice.</p>
<p>Sheilla Tolia</p>	<p>In response to the consultation regarding the labelling of foods as vegetarian or vegan, I would like to make a few points for you to take note of:</p> <p>Vegetarians do not consume meat, fish, poultry or eggs. True vegetarians do not eat eggs, as they are a potential new chicken.</p> <p>Lecithin is not vegetarian, unless of plant origin, e.g. Soya.</p> <p>Caviar too is not vegetarian, as it is fish eggs.</p> <p>Gelatine is not vegetarian and neither is shellac. No animal products of live or dead creatures are allowed.</p> <p>If whey is included in a product, it should be from a vegetarian cheese manufacturing process. Animal rennet should not have been used. Most vegetarians have milk and milk products unless they are vegans.</p> <p>Vegans are the same as vegetarians, except that they do not have milk or its products in their diet.</p> <p>I hope you get the labelling correct, as it is quite a strain to read all the ingredients for a product. A 'V' symbol that we could have confidence in would be much appreciated.</p>
<p>Clare Bone Assistant Scientific Adviser Co- operative Group</p>	<p>We would like to offer these comments, they include responses to the specific questions posed by the FSA and also some general observations.</p> <p><u>Reponses to Specific Questions</u></p> <p>Q1 Is there a need for the guidance at all?</p> <p>A1 We believe that guidance would be useful, so that everyone follows the same criteria and consumers can be</p>

	<p>confident that products indicating vegetarian or vegan will be consistent across all retailers and manufacturers.</p> <p>Q2 Are the criteria sufficiently clear and unambiguous?</p> <p>A2 Our view would be that the guidance is not sufficiently clear and would benefit from the provision of more detailed lists and examples of products and ingredients which are not vegetarian or vegan. Most businesses will be able to identify the major non-vegan/vegetarian ingredients. It is the minority ingredients, those derived from animal sources which are most likely to be overlooked from ignorance rather than any intention to deliberately mislead.</p> <p>Q3 Is the table useful?</p> <p>A3 The table as included in the draft guidance is not sufficiently detailed. A tabular format could be a useful way of providing the information in A2 above. One option would be to provide four separate tables:</p> <p>Examples of products and ingredients suitable for vegetarians</p> <p>Examples of products and ingredients suitable for vegans</p> <p>Examples of products and ingredients NOT suitable for vegetarians</p> <p>Examples of products and ingredients NOT suitable for vegans</p> <p>Q4 Does the section on cross-contamination cover the issue adequately?</p> <p>A4 No, we believe it would be helpful, particularly from the enforcement viewpoint, to be more explicit. Clearly the consequences of cross contamination are not life threatening, as in the case of allergens. Never the less they are of concern to those who have deliberately chosen to avoid certain ingredients. Some indication of the degree to which manufacturers, retailers and caterers should segregate products, ingredients and processes as well as the obvious avoidance of deliberate contamination as described would be useful.</p> <p><u>General Comments</u></p> <p>It might also be helpful if the guidance indicated that satisfying the criteria represented a minimum requirement. Certain groups such as the Vegetarian Society include other parameters in their definitions such as non-GM, free-range eggs, etc. Indicating that these are outside the basic criteria for the terms would be helpful and avoid confusion.</p>
Ketan Varia	I strongly oppose to Eggs being labelled as Vegetarian. As a Jain, I consider eggs as meat products, as they could be/have the potential fertilised and are effectively embryos of a living being.

<p>Ajay Shah, Tilotma Shah, Arpita Shah, Avni Shah, Rohan Shah, Rahul Shah.</p>	<p>Government 'Vegetarian' Criteria that includes products of living animals including insects (e.g. milk, eggs, honey, bee pollen or waxes); excludes meat, poultry, fish, insects or products made from them is wrong and offensive to the vegetarian in general. The only difference between "Vegetarians" and "Vegans" is that "Vegetarians" take milk and its products, while the "Vegans" do not take milk and its products. We are proposing the criteria for 'vegetarian'</p>
<p>Seema Khajuria Diet & Health Advisory Services.</p>	<p>The guidance notes on the use of the terms 'vegetarian' and 'vegan' in food labelling in catering, manufacturing and the retail sectors in relation to those foods labelled or prepared as suitable for vegetarian and vegan diets needs to be more specific to the sources of ingredients used. I agree with the recommendations made by both the BNF and NCC not only to improve labelling but also to change the criteria in deciding the definition for both these terms. To permit foods that are produced by, from, or with the use of live animals, for example, eggs will not be suitable for practising Hindu or Jain vegetarians who would NOT agree to the rationale for the proposed criteria for what is vegetarian and would find it offensive on religious ground. Consuming eggs will make them Lacto-Ovo-vegetarians which they are not. Vegetarians do not consume red meat, poultry, game, fish, insects or eggs and any products or by –products made with these foods. Except the Vegetarian Society in UK (which has shocked both these communities) approves such foods and allows using their logo for foods to be recognised as suitable for vegetarians, but vegetarians do not buy/eat such products. Vegetarian Society's criteria must be for Western-Vegetarians, many of whom consume eggs, or fish or both. The term vegetarian should not be applied to foods made from or with the aid of such products.</p> <p>The difference between "Vegetarians" and "Vegans" is that "Vegetarians" consume milk and its products, provided the milk products are made using ingredients of vegetarian sources, such as vegetarian sources of rennet to make cheese. Thus vegetarians are in actual fact Lacto-vegetarians. Some vegetarians use honey, some Jains do not.</p> <p>While the "Vegans" do not consume milk and milk products, honey, bee pollen or waxes. 'Vegan' foods are prepared with the exclusion of any foods that were made from or with the use of animals or animal products of any kind.</p> <p>My proposal for the criteria for preparation of 'vegetarian products' is as below: Foods or food products suitable for vegetarians should be prepared with:</p> <ul style="list-style-type: none"> • Exclusion of foods made from or with the aid of products derived from meat, poultry, game, fish, insects, eggs

	<p>and its products or by-products, whether from slaughtered animals or from dead animals by natural death or death by other causes. And exclusion as processing agents (e.g. fats and blood, rennet, bones, albumin, isinglass, gelatine, anchovies etc.). The products should be prepared without cross contamination of such above mentioned products. Exclusion of all types of eggs whether from organic/free-range or battery farmed eggs and egg products.</p> <ul style="list-style-type: none"> • The criteria for Processing aids and Additives for Vegetarians should be same as for Vegans except for the use of milk and milk products should be allowed to use in manufacturing vegetarian foods. Vitamin D derived from sheep's wool, either from live sheep, or as a slaughter by-product would NOT be suitable for vegetarians. • The list of all the ingredients on vegetarian products should be clearly labelled in simple language, mentioning the sources of ingredients used in all manufactured products to make well informed choices. • I recommend the use of stricter standards as appropriate.
Moi Ali	<p>I am responding as an ordinary member of the public and a vegetarian.</p> <p>I think the guidance on cross-contamination needs to be extended. Many caterers serve vegetarian and non-veg sandwiches and other buffet food on the same plate. This results in cross-contamination and is unacceptable to vegetarians. There is also the issue of the same serving tongs being used for meat and non-meat produce, again resulting in cross-contamination.</p> <p>I hope this is helpful. I fully support the need for consistency of labelling, as shopping as a vegetarian is a nightmare – reading smallprints lists of ingredients. Knowing that producers'/retailers' labelling if foods as vegetarian is reliable will be a big bonus.</p>
Sean Atkinson	<p>I think this is a great idea and much needed. Too often I am offered food that is most definitely not vegetarian (in my mind at least). I hope that by there being a set of guidelines more people will have a greater understanding. Certainly as a consumer clear guidelines would make me feel safer. There is most definitely a need for this guidance.</p> <p>The guidelines I have read seems to cover most points but I am not sure that they are worded in the clearest of ways. I think there is need of a jargon and legal worded document (useful for lawyers and professionals) and then a translated version for people who do not have such a grasp of language.</p> <p>I am concerned by some of the small print of existing legislation with regard to ingredients making up under 2% of</p>

	<p>the content and there appears to be loophole where animal by-products could be included but not listed.... or am I just reading this incorrectly?</p> <p>I think that particular attention should be made to catering establishment as I have had several bad experiences. The guideline need to be explicit and include the mention of cooking oils and the cooking or food preparation processes. For example I have heard of a gelatine product being used as a release agent in certain food moulds, obviously there needs to be some thing to cover this as well.</p> <p>Cross contamination is another issue and I think there should be mention of this.</p> <p>In summary I am supportive of the proposals but I feel they are not worded strongly enough. I want to see mandatory labelling of products, we should know what we are eating! I would also like to see vegetarian labelling to become a legal issue and as such be enforceable by the law.</p>
Anna Watson	<p>As a food safety professional and vegetarian, I welcome this guidance being provided. Both professionally and personally, I find there is much confusion as to what can be termed vegetarian. As you state, the term vegan is easier to define, but vegetarian appears less easy to understand. To your questions, I make the following comments -</p> <p>The definitions/ criteria for veg/vegan are acceptable, but I feel that additional examples would be beneficial. The table goes some way towards this by giving some examples e.g. stocks, gelatine, but a more comprehensive list of examples could be provided. This table is also open to misinterpretation.</p> <p>The table does not address the issue of animal rennet used in cheese, since it purely states cheese would be accepted as vegetarian but not vegan. Since, in my experience cheese appears in a wide range of vegetarian dishes, and chefs do not appreciate it often contains animal rennet, it should be made clear that only certain types of cheese would be acceptable. The same can be said of yoghurt, many of which contain gelatine. The table could therefore be misinterpreted should someone purely read the examples in column H. Contamination is definitely an issue when it comes to frying oil and this is something that we, as caterers have been trying to address by encouraging our kitchens to have separate, labelled fryers. Contamination during preparation should be controlled as long as utensils, surfaces etc had been adequate cleaned between different uses. In some cases, however, this will not be practical and separate colour coded / labelled utensils, boards etc should be encouraged for preparation. I have seen this used well in both pizza restaurants and a chain that specialises in chicken, but also cooks veggie burgers. As caterers, we would also appreciate some guidance as to manner of marking. Vegetarian is usually accepted as being marked with a 'V', but is there an accepted manner of marking of vegan products?</p>

<p>Dr Harshad N Sanghrajka</p> <p>Hon Secretary Institute of Jainology</p>	<p>I would like to make the following observations from the perspective of the Jain religion:</p> <ol style="list-style-type: none"> 1. The list of Attendees at the Stakeholder Meeting on Vegetarian and vegan Labelling held on 12th October 2004 does not show any representation from Jain organisations. The Institute of Jainology does not appear to have been informed in the future. 2. The document listing regulations, in item number 10 refers to Regulation 17, which, as suggested gives exemption to certain ingredients. It is important to know what these ingredients are to ascertain that an item does not pass as vegetarian, even if it is not, due to this exemption. However, Regulation 17 is not listed in the document. 3. Exemption is also granted if ‘composition of the compound ingredient is defined in EU law (e.g. jam and chocolate).’ I believe that the general public is not aware of such definition and unless the ingredients are listed, the public will be misguided to buy products which may be generally accepted to be vegetarian (such as jam and chocolate) but could contain non-vegetarian ingredients such as additives and flavourings. 4. The criterion for the use of the term ‘vegetarian’ is expressed as under: “Vegetarian 13. <i>The term ‘vegetarian’ should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, crustacea, amphibians, molluscs an insects), or their by-products, or foods made from or with any of these.</i>” Use of the term ‘slaughter of animals’ negates the purpose of this criterion as certain animal products, even if available without slaughter, such as eggs in any form, should be excluded. This term could also be misused where products obtained from naturally dead animals could be termed as ‘not slaughtered’. Milk and products developed from milk, such as cream, yoghurt, ice cream, cheese made with vegetable rennet, etc., are the only products which can be classified as vegetarian although derived from animals. The use of any other animal products such as eggs, animal rennet, beef extract, gelatine, fish oils and extract, colouring and flavouring obtained from insects, and others, or their by-products if used in the final milk product or its derivative products, in any form, either as a part of the production process, or as an ingredient in the product renders that product as not eligible for the ‘vegetarian’ label. Eggs, although obtained without slaughtering the hen, are not considered to be ‘vegetarian’ ingredient or product. Logically, and without entering into a debate on ‘free range’ or ‘battery’ , egg is considered to be a form of potential life and is not acceptable in any form as vegetarian. I have had a debate on this subject with the Vegetarian Society and was surprised to learn that free
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	<p>range eggs qualify for their 'V' mark, whilst battery do not! In terms of animal life, free range should be excluded for excluded for cruelty to hens in the process.</p> <p>Honey and other bee product present a further complication. If obtained by a process, in which only honey is obtained without any bodily parts of the bee, then it may be accepted as 'vegetarian'. If the honeycomb is captured with bees and then the honey is separated from the dead bees, this cannot be accepted as 'vegetarian'. The same would apply to all other bee products.</p> <p>5. Vegetarian Criterion in ANNEX A, Columns G and H</p> <p>From above, it is quite clear that these two columns need to be reworded to qualify for a tick in the Vegetarian row. Column G should only include products of living bees and milk of living animals.</p> <p>Columns H should read: Products made from G, without the use of any other products of animals, living or dead. This will exclude eggs, cheese made with animal rennet, yoghurt and ice cream containing gelatine, or any additives, flavourings or carriers such as albumin.</p> <p>As a matter of importance, the first tenet of Jainism is non-violence and therefore most Jains are vegetarians. Jains and Hindus constitute the maximum practitioners of vegetarianism and I would appreciate it if you could circulate the above and poll the opinion of all such organisations which have registered their interest in the matter.</p>
Kevin Wardle	I think the guidance is both needed and useful. My only other comment is that paragraphs 5 repeats information present in paragraph 2. I am replying in a personal capacity.
Carol Mee	<p>My comments on the consultation are as follows:</p> <p>There is a great need for labelling of this nature as there are currently many products wrongly labelled either through ignorance, lack of care or a more cynical desire for profit at the expense of the consumer.</p> <p>I strongly believe it should be legally binding otherwise, for the reasons given above, it will be largely ignored, particularly by independent and small manufacturers. In addition, the UK Government should strongly urge the EU to introduce similar legislation.</p> <p>I think your definitions are a good start, but need to be much more detailed as many manufacturers already wrongly labelling their products will believe, or claim, that they are already meeting these definitions. The definitions should be exactly those of the Vegetarian and Vegan Societies and should include full lists of unsuitable additives etc as supplied by these organisations.</p>

	<p>The same comments apply to your table. The same comments apply to your definition of cross-contamination. I believe the most straightforward solution, and certainly the best for consumers, would be to totally ban all products and catering services from making these claims except those approved by the Vegetarian and Vegan Societies.</p>
Philippa Lennox	<p>I'm very much in support of guidance for the use of the words vegetarian and vegan in labelling. It's very disappointing and frustrating when something is labelled incorrectly and cannot be eaten. I'm vegan now so no longer have the problem of finding out that a cafe's veggie option is fish but there are still cafes out there who think fish are plants.</p> <p>There are many reasons for being veggie or vegan, not just ethical but health reasons such as allergies, intolerance, wanting to avoid the main killers like cancer, heart disease and stroke and avoiding saturated fat or cholesterol. There are also environmental reasons such as the meat and milk industries polluting water, usually with sewage and polluting the air with methane emitted from cows as wind (methane is one of the main greenhouse gases and cows are a main source) and of wanting to help starving areas of the world since around 8 times as many people can be fed if plant crops are eaten directly by people rather than indirectly by being fed to livestock first. So, it's not just fussy eaters who are veggie or vegan plus the demand will only grow as more people become aware of the health benefits of the diets or take on board the ethical and environmental reasons.</p>
Rohit Thakrar	<p>My comments are:</p> <ol style="list-style-type: none"> a. Excellent idea of having standardisations, I am surprised that there is no EU plans for these therefore UK should take the lead, action and drive. b. Disagree that Eggs should be included as Vegetarian I still see these as life producing (taking life) therefore a potential animal. You may be interested to know that in the East, eggs are not considered vegetarian (India, China etc...). Plus to practising Hindu's /Buddhists Eggs are not allowed.. Apparently when booking flights you can ask for Vegetarian food as Asian (excluding Eggs). c. I also assume that any product e.g. products with E numbers, which are derived from animals, are NOT vegetarian. Again well done on initiating this discussion and would appreciate any feedback.
Sue Davies	INTRODUCTION

<p>Chief Policy Adviser Which?</p>	<p>Thank you for offering Which? the opportunity to comment on draft guidance on the use of the terms ‘vegetarian’ and ‘vegan’ in food labelling.</p> <p>THE NEED FOR GUIDANCE</p> <p>We believe that there is a strong need for guidance in this area and welcome this initiative. It is important that consumers can trust these claims and have confidence that they mean the same thing wherever they are used.</p> <p>SPECIFIC QUESTIONS</p> <p>We consider that the criteria set out in the guidance are sufficiently clear and unambiguous, i.e., that: <i>the term vegetarian should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, crustacea, amphibians, molluscs and insects) or their by-products, or foods made from or with any of these; and the term ‘vegan’ should not be applied to foods made from or with the aid of animals or animal products.</i></p> <p>We believe that the table set out in Annex A of the guidance is useful for explaining how these criteria would apply in practice.</p> <p>The issue of cross-contamination is very important. We believe that the guidance is useful, but that it would be helpful to expand this by providing more examples.</p> <p>We hope that these brief comments are helpful and would be happy to discuss them in more detail.</p>
<p>Dr & Mrs Jayanthi Vasudevan Naiker</p>	<p>I have read your documents on the concept of Vegetarian and Vegan that you wish the public to comment upon. I am pleased to note that most of it is acceptable but for one point.</p> <ol style="list-style-type: none"> 1. Secretory products such as milk, honey, wax, lanolin may be considered Vegetarian. Eggs are NOT considered vegetarian as it has the ingredients to make life and is not a secretory product. Please note that the concept of vegetarian eggs (unfertilised) and non-vegetarian eggs (fertilised) is not correct. Eggs are NOT vegetarian. Thus the table in Annexe A, column G should exclude Eggs and that in Column H should exclude Albumin and other egg related product. 2. Yes, there is a tendency for a lot of people to call themselves vegetarian when they actually eat all seafood including fish, prawns etc. This is not correct. They would have to call themselves by a different name! Perhaps England could coin new words such as Sea-eatarian and Egg-eatarian! This implies that they eat these additional items to vegetarians but not meat! <p>I do hope that the understanding of vegetarian and vegan improves. Over the years the values have eroded the system and people have included a lot of items to their gastronomical agenda that would have turned our</p>

	<p>forefathers in their grave! I sincerely hope my views along with all those true Vegetarians in the world are incorporated in the Guidelines.</p>
Diviash Thkarar	<p>I a GP in Northwood with a lot of Asian patients The definition for most Hindus is no meat, fish or eggs - this includes any products with this in. They will all take milk, cheese (vegetarian) and dairy. This is a half way house between the traditional definition of Vegan & Vegetarian. U may want to consider this definition for Asian vegetarian. Some Hindus will not take mushrooms or fungi also.</p>
Name & contact details removed for confidentiality.	<p>Although properly legally binding definitions of the terms vegetarian and vegan remain a priority, the guidelines are indeed welcomed.</p>
John Porter Pub Food Editor The Publican United Business Media	<p>The Publican is a weekly newspaper, widely read throughout the licensed trade, with a weekly circulation of 33,215 (Audit Bureau of Circulation). 75 per cent of readers of The Publican describe food as 'very important' to their business, with a further 17 per cent describing it as 'quite important' (The Publican Food Report 2004) The Publican was invited to comment on the FSA's draft guidance on the use of the term's 'vegetarian' and 'vegan' in food labelling. The views of readers were sought through The Publican and via the website www.thepublican.com. A range of responses was received from licensees, as well from pub companies. These have been collated and summarised into the points below, which we believe is a fair reflection of the pub trade's view. Response Overall, pubs would welcome any measures, which would genuinely improve clarity and consumer confidence in the area of vegetarian foods and the way they are described on menus. However, the pub trade believes that any such guidance should fully reflect the diverse and varied consumer lifestyles which fall within the term 'vegetarian', rather than meet the narrower demands of special interest and lobby groups which only speak for a minority of consumers. Specifically, a number of respondents made the point that the Vegetarian Society did not create, and does not have sole ownership of, the terms 'vegetarian' and 'vegan'. Those consumers who define themselves as 'vegetarian' actually follow a wide range of dietary regimes. These broadly, but not exclusively, include:</p>

	<ul style="list-style-type: none"> • those who eat fish and seafood but not meat and poultry • those who eat animal and dairy products but not meat or seafood • those who eat no meat, seafood or animal products <p>In addition, pubs serve a range of customers who for dietary, health, lifestyle or ethical reasons are reducing or removing meat, and particularly red meat, from their diets. At the same time, many customers are increasing the amount of fresh fruit and vegetables in their diet.</p> <p>Any guidelines covering the use of the term 'vegetarian' on pub menus should ensure that pubs are able to identify menu items suitable for full range of consumers identified above.</p> <p>In practice, The Publican is not aware of any pub, which would use the term 'vegetarian' to describe dishes, which contained meat, meat products, fish or seafood. It is not uncommon for customers to order a meat dish such as a roast dinner or similar menu item, but without the meat element. In this instance, accompaniments such as roast vegetables may have been cooked in meat juices. However, since there has been no attempt by the pub to represent the overall dish as suitable for vegetarians, this is something that should be left to consumer choice. Any guidelines should not place an onus on the pub to categorise every item on the menu, only those which are specifically described as vegetarian.</p> <p>Those who define themselves as 'vegan' tend to be clearer about the meaning of the term. In practice most are unlikely to be regular pub customers, due to the fact that most pub food and drink will use some animal products in the preparation process, e.g. isinglass in beer.</p> <p>In summary, the pub trade would broadly welcome the guidelines proposed by the FSA, that the term 'vegetarian' should not be applied to foods made from meat or with the aid of products derived from the slaughter of animals, provided these do unnecessarily restrict consumer choice.</p> <p>The pub trade would also broadly welcome the guidelines proposed by the FSA, that the term 'vegan' should not be applied to foods made from or with the aid of animals or animal products.</p> <p>The Publican September 2005</p>
Debbie Jones	Thank you for sending me the proposed guidelines. I think the proposals are a step in the right direction, but they are not quite comprehensive enough.

	<p>Consumers want to pick up a pack with a big "V" sign on it and sling it in the shopping trolley. At present, unless I am shopping at Marks and Spencer or a health food shop, I need my magnifying glass to hand and a lot of time to spare to be able to read through the small print on the packs to see if I can eat the product. The proposals will not prevent me from doing this in future because there are two omissions:</p> <ol style="list-style-type: none"> 1. Free range eggs and battery eggs. At present, manufacturers do not have to declare the provenance of their eggs, so with the exception of Marks and Spencer, who never use battery eggs, many suppliers choose to use those eggs. Some use them always (Asda) some use them sometimes (Waitrose). This labelling is very confusing for the consumer. As a strict vegetarian, I find it unacceptable to find food labelled "vegetarian" that contains eggs from batteries. 2. Cheese. Cheese made using animal rennet is unacceptable to vegetarians. Most mass produced cheddar in this country is vegetarian, but some Manufacturers using upmarket recipes, with say Gruyere or Parmesan, could claim that the product is suitable for vegetarians under these guidelines. If the idea of food labelling is to make things simpler and easier for consumers, I think these guidelines, whilst moving in the right direction, do not go far enough.
<p>George D. Rodger The Vegan Society</p>	<p>We are pleased that the Food Standards Agency has taken up this subject, and hope that this will lead to a reduction in the level of confusion and misunderstanding in this area.</p> <p>It would be presumptuous of us, as The Vegan Society, to comment on your criteria for the use of the term "vegetarian", but our friends in The Vegetarian Society are well able to do so. We consider your criteria for the use of the term "vegan" to be clear and unambiguous, although we would prefer the statement to be made in positive rather than negative form, i.e. "The term "vegan" should only be applied to foods not made from or with the aid of animals or animal products."</p> <p>By the way, we consider the frequently used labelling "suitable for vegetarians and vegans" to be superfluous. Anything which is suitable for vegans must automatically be suitable for other vegetarians according to the criteria in your draft guidance, so "suitable for vegans" is all that is required. We are pleased that you address the issue of cross-contamination, and consider the example given, veg*n and non-veg*n food being cooked in the same oil, to be a relevant and useful example. Further examples would be welcome, such as the use of the same production line for producing veg*n and non-veg*n products. We consider the table (Annex A to the Draft Guidance) to be useful, but more so with reference to the definition of "vegetarian" than "vegan". We have studied your draft partial regulatory impact assessment, and offer the following comments. 2.7 Re "... The motives for individuals choosing</p>

	<p>a vegetarian or vegan diet are important, ...”, we agree that this applies in the case of vegetarian diets, because of different attitudes to eggs and dairy products, e.g. Hindu vegetarians exclude eggs from their diet, most Western vegetarians regard eggs as acceptable in their diet. The statement does not apply in the case of vegans, as the criteria for what is and what is not acceptable as food are the same for all vegans regardless of their underlying motives for being vegan. 11.1 and 11.2 – Summary and Recommendation. We note these with approval, although we regret that there is no immediate intention of giving legal status to definitions of “vegetarian” and “vegan”. It could be helpful to food manufacturers and traders to point out that both The Vegetarian Society and The Vegan Society operate long-established trademark schemes, licensing their trademarks to companies or products which meet their criteria. The use of one of these trademarks allows the consumer to see immediately whether a product is vegetarian or vegan, without having to read through a list of ingredients, and the licensor is able to advise prospective licensees as to what ingredients are and are not, acceptable. However both of these schemes apply stricter criteria than those in your draft guidance; e.g. The Vegetarian Society requires that, if eggs are used in a product, they must be from a free-range source, and if cheese is used, it must be made with non-animal “rennet”; The Vegan Society requires no animal testing of a product or its ingredients as well as no animal-derived ingredients, and has a bar on GMOs containing animal genes. In annex 2 to the draft regulatory impact assessment, we note that two recent surveys estimate similar percentages of the UK population to be vegan, 0.3% – 0.4% in 2001. It is to be expected that the percentage of vegetarians in the UK population will continue to increase in future years and that the percentage of vegans is likely also to grow, following the growth in the numbers of vegetarians. The desirability of appropriate labelling will increase accordingly. We would be pleased to see these recommendations, or something like them, becoming legally recognised and enforceable in the fullness of time. This could be much easier to implement in the case of “vegan”, as it is so much easier to define than “vegetarian”, as agreed in these consultative documents.</p> <p>Council of Management The Vegan Society 10 September 2005</p> <p>We have used “veg*n” as an abbreviation for “vegetarian or vegan”, which is a fairly standard practice within the vegetarian/vegan movement.</p>
Dr L.M. Singhvi President	World Jain Confederation has received with dismay the proposed guidelines on the use of the terms 'vegetarian' and 'vegan' on food labels. The term vegetarian should not be applied to foods made from or with the aid of

World Jain Confederation	<p>products derived from slaughter or of dead animals (e.g. red meat, poultry, game, fish, shellfish, birds, insects) or their by-products or foods from any of these. The term 'vegetarian' should also not include food made with eggs and egg products.</p> <p>The 'vegan' definition should be the same as above items but also shall not include any products with milk and milk products such as milk, yoghurt and cheese etc.</p>
Stephen Collins	<p>I've just read through your draft guidance on use of the terms vegan/vegetarian, and wanted to express my support for this activity. As a vegetarian it has been obvious to me for some time that there is a need for guidance to improve consistency of use and consumer confidence in this area. I look forward to these proposals being rolled out.</p>
Chris Drew Sales & Marketing Manager Britannia Health Products Ltd	<p>The generally accepted definitions seem to be: Vegetarian: A diet that does not permit consumption of “dead animals”, i.e. excludes meat / fish / shellfish and all derivatives thereof, but permits food products from living animals not harmed by production, e.g. eggs, dairy products and honey. Vegan: An exclusively vegetarian diet that excludes all animal products, i.e. no eggs, dairy products or honey.</p>
Mr D C	<p>There is a massive need for this guidance, I am sure that vegetarians and vegans would welcome the move. Once again I cannot emphasise how crucial this would be to the vegetarian and vegan world.</p>
Attracta Walsh, Nutrition Dietetic Dept, Causeway H&SST	<p>Responses from Nutrition & Dietetic Department, Causeway H&SST Re Page 4 Q.14. Are these criteria sufficiently clear and unambiguous? Points 1-6 are very clear and easy to understand. Points 7-12 is quite wordy and in some cases could be misinterpreted though this could be due to the nature of the topics being explained i.e. legislation. Perhaps a few more examples in this section would improve the level of understanding. Q.15. Is this table useful? Yes the table is extremely useful. It lets you identify at a glance the criteria in an easy to understand format. Very clear.</p>

	<p>Q.16. Does this cover the cross-contamination issue adequately? Cross contamination is well explained here though perhaps the use of a few more practical examples would help e.g. re packaging of foods etc.</p>
<p>Name & contact details removed for confidentiality.</p>	<p>Is there a need for this guidance at all? The effects of each of the four options identified in section 3 and assessed in section 4 of the partial Regulatory Impact Assessment may be analysed in terms of three parameters:-</p> <ol style="list-style-type: none"> 1. Harmonising the definitions of the relevant terms, to reduce market complexity by standardisation; 2. Increasing market transparency through better disclosure, so that consumers may make better informed decisions; 3. Increasing the obligation (legal or otherwise) to comply. <p>I address each of the above parameters in turn below and draw the conclusion that the guidance is indeed required.</p> <p>1. <u>Harmonising the definitions of the relevant terms.</u> Food labelling in the UK, whether as foodservice menus or retail packaging, has no single definition of vegetarian or vegan with which to work, outside of specific schemes such as the Vegetarian Society's seedling symbol. Establishing clear definitions for both these terms would present a better framework within which each stage of the food supply chain could operate from ingredient specification to final labelling. Experience with organic food suggests that consumers also respond well to the clarity offered by bundling a package of attributes together into specific designators: it eliminates the effort required in scrutinising ingredients lists.</p> <p>It should be recognised that a range of subjective definitions exist for both terms and so any final (purportedly objective) versions may be seen as compromises. This is inevitable and was also experienced in the early days of the organic movement. However, apart from the issue of eggs, there seems sufficient harmony amongst the various consumer group stakeholders to entail support for the definitions put forward. This consultation will, no doubt, inform further on this matter.</p> <p>For the above reasons I believe there are significant advantages to moving beyond the status quo represented by option 1 or the pluralistic approach represented by option 2.</p> <p>2. <u>Increasing market transparency through better disclosure.</u> At present, in those situations where vegetarian or vegan designators are absent, consumers may consider ingredients lists. This has several drawbacks. Firstly, not all ingredients need be listed (given, for example, the 2% compound ingredient de minimis and the proposed</p>

allergen exemptions). Secondly, terminology is sometimes unfamiliar to the consumer. Thirdly, ingredients listings carry no information on preparation related issues, such as cross-contamination.

Economic decision-making by consumers under conditions of imperfect information reflects, inter alia, their risk preferences: in general, a risk-averse consumer will require a higher level of convincing to consume a product that may offend. Lack of comprehensive / comprehensible disclosure regarding ingredients or contamination risk will necessarily reduce consumption where risk aversion exists. The economic benefits of better disclosure should therefore be clear in encouraging greater consumption as well as increasing consumer welfare through greater choice.

To the extent that the degree of risk aversion is important, the diverse motives for vegetarian or vegan dietary choices must be considered. Religious or moral vegetarians and vegans (who might breach their religious or moral codes by any accidental mis- consumption whatsoever, however small the quantum of ingestion) may be seen on average to adhere to their dietary choices more strictly than, say, those motivated by health (who may not be so offended). Better disclosure may therefore be seen as promoting the ability of religious groups to pursue their chosen faiths better, which is consistent with broader government policy objectives and obligations. It would also go some way to satisfying demand for more specific faith based labelling.

For the above reasons I believe there are strong arguments to improve disclosure, irrespective of any standardisation of definitions.

3. Increasing the obligation to comply. It is estimated that regular meat-free consumers form 10% of the market, with two-thirds of these being vegetarian, as per the proposed definition. Vegetarians are also veto holders in terms of foodservice destination group decisions. Given that the food industry stands to gain in terms of both public relations as well as extra sales amongst a significant consumer class, it is not clear why, to date, more has not been done to fully empower informed dietary choices by vegetarians and vegans. It may be because a common standard was lacking, in which case the proposed guidance will facilitate improvements.

The food industry has the resources to ensure compliance in terms of both ingredients themselves and the risk of cross-contamination during processing. The corporate systems that were put in place to cope with nut and genetic modification labelling requirements and are currently being tested on broader allergen labelling could effectively be deployed to maintain the integrity of vegetarian and vegan labelling. Early debates on whether sesame was a nut are mirrored in the current debate over the vegetarian status of eggs: it is only once such issues are resolved that vegetarian and vegan policies will become as established in food industry quality manuals as nut policies are today.

To that extent, the current guidance on standard definitions should be welcomed as promoting the implementation of such systems.

If the current guidance were adopted by even a few major foodservice distributors and multiple retailers it will soon become a de facto standard, obviating the need for legislation. Existing supply chain systems would then monitor and verify compliance across much of the food supply chain, reducing the burden on enforcement authorities. Supply chain pressure can be more effective than legislation and should be encouraged in the first instance.

The current proposal is that the guidance should remain extrinsic evidence to be adduced in legal proceedings, without itself having statutory status. I would suggest that the effectiveness of this approach be reviewed in due course to establish if further legislation is actually required. However, at this stage, option 4 is not necessary.

From what has been said above, I would agree with the partial RIA position of option 3: that the guidance is necessary, but need not be legally binding at the moment.

Are the criteria sufficiently clear and unambiguous?

Yes.

If vegans are a logical subsection of vegetarians in terms of dietary options, then it would be ideal if the difference between the two were self-evident from the definition.

The definitions should be sufficiently robust to novel foods, such as the tissue engineering “meat” being developed by the University of Maryland, which is cultured from animal cells in laboratory vats. Manufactured without slaughtering animals, it would be vegetarian by the proposed definition.

Is the table in Annex A useful?

Yes.

Other devices (e.g. diagrams) might better represent the relationships between some of the categories, but the table is a useful contribution.

Does paragraph 16 cover the cross-contamination issue adequately?

Yes.

Cross contamination is often overlooked and yet is a cause of great concern to many vegetarians and vegans as there is little labelling help currently offered in this area.

For consistency as well as simplicity, it may be possible to address the issue of cross contamination within the definitions of vegetarian and vegan, rather than separately. An additional column I in the table in Annex A might then read “Products that have been in contact with A-F (A-H for vegans) or in contact with materials which have themselves been in contact therewith”.

<p>Martyn Evans, Director, Scottish Consumer Council</p>	<p>The Scottish Consumer Council (SCC) welcomes the opportunity to comment on this Draft Guidance and feel that much progress has been made since the last consultation. The Guidelines are needed and help to clarify the situation, which is important in gaining the trust of the consumer in the labelling. The criteria for vegan and vegetarian are now clear and the simplified table helpful. We also welcome the fact that the Guidelines are applicable to caterers. It is important that consumers have an informed choice when eating out. Our specific points are as follows:</p> <ul style="list-style-type: none"> • The paragraph on cross contamination is a necessary addition and we feel that this must be emphasised, as this is an area where potentially problems could arise. It is important that machinery is cleaned before running a vegetarian/vegan product if other foods use the same line. • Consideration should also be given to information at point of sale for foods sold loose. For example, many consumers have concerns about bread sold loose that may contain milk butter or egg products. Fruit and vegetables may also be covered in shellac, which is unacceptable to many vegan consumers. • Other additional labelling should also be mentioned. For examples for eggs many vegetarians will be concerned about the feed for chickens and whether it is animal derived. Also, as many vegetarians follow their diet because they are concerned about animal welfare, information on this can be included on the label as well.
<p>Julie Holt Food Strategy Co- ordinator, Bolton NHS PCT</p>	<p>I am replying on behalf of NHS employees of Bolton PCT and Royal Bolton Hospital. We include dietitians and nutritionists who advise individuals and groups about suitable foods for their individual or family needs, staff who work in conjunction with local authority staff to advise caterers about healthy menus as well as the hospital catering manager who provides around 3000 meals per day. In addition, some contributors are themselves vegetarian or vegan. Either personally, or through our work, we encounter confusion and misunderstanding about the terms 'vegetarian' and 'vegan'. We feel there is a need for consistent use of the terms 'vegetarian' and 'vegan' throughout the food chain and therefore feel there is a need for this guidance. We welcome the opportunity to comment on this aspect of food labelling and welcome the proposed issuing of guidance on the terms 'vegetarian' and 'vegan'. We feel this will be of benefit to all relevant parties (manufacturers, retailers, caterers, consumers and enforcement</p>

	<p>officers). Comments Point 13. We agree with the definition of the term ‘vegetarian’. Point 14. We generally agree with the definition of the term ‘vegan’ although we feel it could be clarified further by including ‘living or dead’ in front of ‘animals’. Point 15. The provision of supporting information such as this table is welcomed. We particularly feel the clarification around processing aids and additives will be helpful. Additional examples may be useful. Point 16. We would like to see this strengthened – ‘must not’ rather than ‘should not’.</p>
Chris, Anne, Todd, Erin & Rowen Harper	<p>Totally welcome these ideas. It is often difficult enough to tell if a product is okay to eat on moral and/or religious grounds. These guidelines should help massively. Please pass on my family’s support to the FSA.</p>
Peter Davidson Packaging Technology Manager. Dailycer Ltd	<p>The criteria appear as clear as possible. The table is clear. The Cross Contamination issue is not particularly clear, but there again it is a subject on which absolutes are difficult or impossibly expensive – e.g. can you allow operators packing a "vegetarian" product to be non-vegetarians as even with thorough hand-washing when they return to work after lunch there is a degree of risk of transferring non-vegetarian items? I believe on these issues we cannot take an absolute view, but must take a reasoned approach of minimising risk of cross-contamination.</p>
Dominic Dyer Executive Secretary Food and Drink Federation,	<p>The Food and Drink Federation has consulted its vegetarian and meat free industry group and its wider membership on the above proposals and we have no objections to the draft guidance you have put forward The only area where one or two of our members have raised concerns is on the issue of rennet in food products. Some of our manufacturers specify that this should be from non-animal sources when used in products such as</p>

Vegetarian and Meat Free Industry Group	cheese, (which are labelled as suitable for vegetarians). In Annex A (Column H) you seem to indicate that cheese is acceptable to vegetarians without taking account of the source of rennet in the product.
Steven Allen (PTSO) Trading Standards Division, on behalf of EMCOTS	<p>Comments on the Guidance</p> <p>I would agree that guidance on the use of the terms is necessary as many people in the food industry are not clear on the respective terms. For instance most people would be of the opinion that cheese is a vegetarian product and wouldn't consider the use of rennet etc in designating cheese or a food containing it.</p> <p>In response to the specific questions in the document –</p> <p>Are the criteria in 13. And 14. Clear and unambiguous?</p> <p>In 13. It refers to the slaughter of animals – but it may be useful to broaden this as most people do not consider that fish/shellfish/crustaceans/molluscs etc are slaughtered – rather 'harvested'.</p> <p>The criterion for 'Vegan' in 14. is very brief and perhaps should refer to the 'Vegetarian' criteria. One could then add to that the concept of the meaning of 'animal product' to help explain that 'vegans' object to the use of milk/cheese etc.</p> <p>Some examples of the practical application would be useful – for example a pub meal of pasta with a cheese sauce might be noted as vegetarian on a menu - but could contain cheese made using rennet. It is likely that this guidance may be used by the whole range of food businesses – from large manufacturers to small caterers and retail food outlets. In the latter case some examples would help explain the coverage of this document.</p> <p>Is the table in Annex A useful?</p> <p>Yes.</p> <p>Is cross-contamination issue covered adequately?</p> <p>It might be worth going further – for instance covering the use of utensils and the placing of items in sales counters etc. Many 'vegetarians/vegans' will object to the use of implements that have contact both with animal/animal products and with those that might prepare 'vegetarian /vegan' products. It is possible that amounts of animal material may then transfer with the result that a 'vegetarian/vegan' product was contaminated – even at a low level.</p>
Les Bailey Policy Officer	LACORS welcomes the intention to produce guidance notes and is of the view that there is a need for such guidance for the reasons set out in the covering letter.

	<p>With regard to paragraph 13 it might be worthwhile including a few examples of practices to be aware of when describing foods as “vegetarian”. The following example arose in Somerset where a cheese-maker made “traditional” cheddar made with non-animal rennet. This was wrapped in a cloth, which was soaked in lard during the maturation period. After maturation the cloth was removed and any adhering lard was scraped off. The business asked if the term “vegetarian” could be applied to this product.</p> <p>Somerset TSD (supported by advice from the Vegetarian Society) advised that it could that the use of an animal product in the production process was against the fundamental principles of vegetarianism.</p> <p>As far as cross – contamination issues in paragraph 16 are concerned it would be useful to expand the guidance to include an explicit reference to burgers and similar products being cooked on hotplates, particularly with regard to mobile catering operations such as burger vans etc. Although the hotplates may be scraped to remove fat and meat juices it is very unlikely that all residues would be removed and hence contaminate any veggie burgers subsequently cooked on the same hotplate.</p>
<p>Name & contact details removed for confidentiality.</p>	<p>In my opinion the table and the criteria (question 13,14, &15) are clear and unambiguous and will give good guidance to producers.</p> <p>This guidance would however lead me to be concerned about compliance and enforcement procedures so that consumer can have confidence in the labelling scheme.</p> <p>Regarding cross-contamination (question para.16) this might not give adequate assurance that cross-contamination has not occurred in preparation and production, for example, with the use of inadequately cleaned equipment. Perhaps this should be added to the note?</p> <p>This is however very good progress overall.</p>
<p>Dr Bhavesh Kataria</p>	<p>First of all, many thanks for considering this long awaited guidance. Hopefully this may lead to mandatory food labelling in the future. Please regard my comments about the draft guidance below:</p> <p><i>'Are these criteria sufficiently clear and unambiguous?'</i></p> <p>A proportion of vegetarians do not consume eggs as they consider this in the same light as 'slaughter of an (unborn) animal'. The current draft does not take this into account when considering the definition of 'vegetarian'. This section of society however would consume milk and other products such as honey and so they cannot be classed as 'vegan'.</p>

	<p>One way around this is either to make a separate category of 'lactovegetarian' (i.e. a vegetarian who would consume milk and milk-products but not other foods derived from animals) and label foods accordingly, or to make it quite clear on the label that the product contains eggs or egg-derived products (e.g. lecithin and albumen etc).</p> <p>There remains a lot of ambiguity on food labels with regards to the presence of egg derived products. Labelling this as 'suitable for vegetarians' will clearly not be suitable for and exclude this sub-group of vegetarians. The latter option is in some cases already prevalent with some food manufacturers and should therefore not be very difficult to include in the guidance.</p> <p>'Re cross-contamination'</p> <p>I was not very clear about the issue of cross-contamination. It appears that this applies only to the preparation of food. Does this guidance also extend to the potential of contamination during the packaging (e.g. the use of contaminated conveyer belts etc) i.e. AFTER the preparation? Clearly this would be as important as avoiding contamination during the preparation phase.</p>
<p>Iffat Momon Food Policy Executive British Retail Consortium</p>	<p>As you are aware the British Retail Consortium (BRC) represents the whole range of retailers including large multiples, department stores and independent shops, selling a wide selection of products through centre of town, out of town, rural and virtual stores. In December 2004, the retail sector employed some 3.1 million people (12% of the workforce) and retail sales were £246.3 billion in 2004. The retail sector consists of 291,000 enterprises, contributing an estimated 6% to national Gross Value Added (GVA). Grocery retailing is significant in macro economic terms and was valued at end 2003 at £113 billion.</p> <p>We understand that the draft FSA guidance on the use of the terms 'vegetarian' and 'vegan' in food labelling seeks to improve clarity and consumer confidence in this area. The BRC has been instrumental in pushing the Agency to develop such guidance hence we welcome this move by the Agency. We believe the guidance will help consumers make informed choices and improve confidence and consistency when purchasing products indicated as being vegetarian or vegan across all retailers and manufacturers.</p> <p>We are also pleased to note that the guidance is limited to those issues that are fundamental to a vegetarian or vegan diet and excludes peripheral elements.</p> <p>However, the guidance is not sufficiently clear and would benefit from the provision of more detailed lists and examples of products and ingredients which are not vegetarian and vegan. Most businesses will be able to identify</p>

	the major non-vegan/vegetarian ingredient. It is the minority ingredients, those derived from animal sources that are most likely to be overlooked from ignorance rather than any intention to deliberately mislead.
Sue Daniels, Chairman, Leicestershire Vegetarian/Vegan Group	On behalf of our Vegetarian/Vegan group we would like to see all foods that are vegetarian or vegan labelled correctly. Unless you know the product it takes ages going through the list of ingredients every time you want buy something. Also some of our group are allergic to dairy and its very important that they do not have foods with whey etc in them. How much easier to have a symbol that everyone can see clearly.
John Langley Isle of Wight Vegetarians & Vegans	We at the Isle of Wight Vegetarians and Vegans consider that labelling of our food as to being Vegetarian or Vegan is essential. There is a lot of information regarding vegetarian acceptable foods but the vegan side is very sparse indeed. More information would be most welcome.
Gretel Hallett	<p>As a vegetarian for over 20 years, I have been pleased with increased awareness of the needs of vegetarians over that period and the greater quantities of vegetarian products in the shops.</p> <p>Most shops now have labels (which are in the main trustworthy) identifying foods that are suitable for vegetarians. The only remaining 'problem' for me, and one which I think could be addressed by legislation, is a legal definition of 'vegetarian' to stop people who eat fish from claiming to be vegetarian and confusing retailers and restauranteurs. The Vegetarian Society ran a campaign pointing out that fish are not vegetables in an effort to stop this misleading information - but I have seen people who eat fish (but not meat) called 'Pesco-vegetarians' and that is where the problems start.</p> <p>As a vegetarian (dairy but no meat, fish or poultry) I have been offered fish on the assumption that is what vegetarians eat. This is distressing for me and embarrassing for the person who has made the incorrect assumption.</p> <p>I would encourage the Food Standards Agency to put a stop to confusion over vegetarians and help establish a legal definition, which is clearly understood by all.</p> <p>That definition would make it clear for once and for all that vegetarians don't eat fish and that those people who do eat fish are not vegetarians.</p>
Jacqueline van de	There is most definitely a need for this guidance.

<p>Poll Arun & Worthing Vegetarian Info Centre</p>	<p>There is also a need for caterers to be given some legal guidance. In, probably, 8 out of 10 eating establishments, fish is offered as a vegetarian option - and some of them become quite hostile when you point out that fish is not vegetarian. I've even been told that I don't know what I'm talking about because vegetarians do eat fish. In general the definitions are adequate, though for anybody who doesn't already appreciate what is a vegetarian vs a vegan, I think they may have difficulty comprehending that there is any difference between the two. However, the table is a good idea as this does make this difference clearer.</p>
<p>Steven Gorman</p>	<p>I welcome strongly welcome legislation regarding labelling of vegetarian and vegan food.</p>
<p>Samantha Calvert</p>	<p>I have been a vegetarian for over 21 years, since the age of 17, and a member of The Vegetarian Society for 20 years.</p> <p>I am pleased that the FSA is addressing this matter as I do feel that guidance on these issues would be helpful to retailers and caterers but I am concerned that the definition of 'vegetarian' that you suggest in the guidelines does not exclude eggs from battery or intensively reared birds. I feel that this is a mistake. The Vegetarian Society has for many years given the definition of vegetarianism on its 'definitions' information sheet as 'eggs, preferably free range'. Had intensive farming, as we know it today, existed in 1847 you can be sure that the founding members of The Vegetarian Society would have excluded such items from their diet and from the definition of vegetarianism. Vegetarians, in common with all groups, respond to changes in Society and it is for this reason that so many vegetarians today exclude eggs from their diet or at least those eggs from intensively reared birds. The Vegetarian Society also does not allow its trademark to be used on products that include eggs from intensively reared sources. Many manufacturers and retailers have already taken this message on board. Marks & Spencer started to use free range eggs in their vegetarian dishes before they made this a store wide policy, I believe. Marlowe Foods (manufacturers of Quorn) have recently switched all their products to free range eggs in an acknowledgement that this is what the predominantly vegetarian and meat reducing purchasers of their products wish to happen. These are but two examples from many and, of course, they are voluntary decisions but then, that would be the case with the FSA's guidelines too, as I understand things. It is important, however, that caterers and retailers appreciate that the source of eggs is a very real issue for the UK's more than 3 million vegetarians. I appreciate that you may feel that this small matter of the source of eggs complicates the situation and makes it 'untidy' but I can assure you that it is a matter of concern for the vegetarian community in the UK. These guidelines are a unique opportunity in</p>

	<p>our history to convey to retailers and caterers what it means to be vegetarian. I know that vegetarians would want that continuing message of compassion and commitment to a natural diet to be conveyed in the guidelines. I hope that my comments will have some influence upon the final guidelines.</p>
<p>Bimal Krishna das General Secretary National Council of Hindu Temples (UK)</p>	<p>I am happy with the criteria for Vegetarian. I am also happy with the table (Annex A), which sets out how these criteria apply in practice. I am also happy with cross contamination paragraph.</p>
<p>Jay Dave</p>	<p>I am a life long (since birth) Hindu Vegetarian. My response counts for many hundreds of concerned (lacto) vegetarians in the Hindu community that I personally know. It is also valid for many vegetarians and vegans that I also know. I have read the draft and my responses are as follows:</p> <p>14. The term 'vegan' should not be applied to foods made from or with the aid of animals or animal products. Question: Are these criteria sufficiently clear and unambiguous? Answer: Yes - I believe the criteria are sufficiently clear for Vegans. For Vegetarians, maybe it should be made clear that "whey" (derivative of cheese must be from vegetarian cheeses, using non-animal rennet).</p> <p>15. The table (Annex A) sets out how these criteria apply in practice. Question: Is this table useful? Answer: The table is useful. Again, a clear indication of the "origin" of the whey must be clear. I recall an issue with Walkers Crisps and them using whey (from animal origin) and not declaring it. This did cause upset with Vegetarians and also religious Vegetarians such as Hindu's.</p> <p>16. When assessing whether foods meet these criteria, manufacturers, retailers and caterers should also consider whether foods might have been contaminated with non-vegetarian or non-vegan foods during preparation. For example, vegetarian or vegan foods cooked in animal fat or in the same non-animal fat as used for non-vegetarian or non-vegan foods should not be presented as 'vegetarian' or 'vegan'. Question: Does this cover the cross-contamination issue adequately? Answer: Yes it does - but can this be extended to the cross-contamination using utensils. For example, re-using using knives, spoons, ladles, chopping boards, pans etc that were used to prepare non-vegetarian or non-vegan foods immediately prior to using them to prepare vegetarian or Vegan foods. All items such as these should be washed before. Used again to make vegetarian or vegan foods.</p>

	<p>I would presume this would affect health and safety issues of cross contamination and also Possible Allergy issues?</p> <p>Sadly, I have seen in kitchens, the re-use of utensils such as this. It would be good if places that produce and serve food use a clean system where vegetarian and vegan foods are produced with separate utensils - or at least the utensils washed before re-use.</p> <p>When I was in travelling in India, I saw a clear example of this is the "Subway" chain of sandwich shops. They had one side for vegetarian and other for non-vegetarian. Each area used it's own set of utensils.</p>
Mathew Godsebki	<p>I just want to say I'm glad to see that we may finally get a legal definition of the terms vegan and vegetarian...Both in terms of protection of the vegan and vegetarian consumer and improvement of public knowledge. And of course I know it would make life easier for a lot of vegans and vegetarians. I hope this proposal comes to fruition.</p>
Darryl Moloney	<p>I would like to whole-heartedly support the draft guidelines for the legal definition on veggie/vegan foods. I look forward to their full implementation as soon as possible. I have a right not to be deliberately misled about the content of the foods I purchase.</p>
John and Angela Nelson	<p>We have been vegetarians for many years and are now in our late fifties. Although it's becoming a lot easier for vegetarians to enjoy a meal in a restaurant or pub, there are times when we are faced with an option of Battered Cod and Fries on the Specials Board! Also, there is the concern always that pastry is made with lard, soup has a meat stock base, and there is gelatine in the dessert or that the cheese is rennet based. What we would like to see on every menu is a vegan or vegetarian meal on the general menu, i.e. no separate list for non meat eaters, which is indicated with an appropriate symbol, with the assurance that the meal conforms to the standards you are considering. At the moment, we feel fairly confident that the supermarkets are labelling their products honestly but are not so sure about our local outlets.</p> <p>We hope are comments will be helpful in your deliberations and look forward to greater improvements in the future with regard to vegan and vegetarian fayre, which is either purchased in an eatery or bought over the counter.</p>
Cathy Bryant	<p>As a vegan I just want to add my full support to the proposed guidelines to define the terms 'vegetarian' and 'vegan'. It would be so very useful and is badly needed. It would be so nice if people knew that we vegetarians don't</p>

	eat fish and that we vegans don't eat honey!
Julia Carman	I have read the Draft Guidance on labelling foods vegetarian and vegan with great interest. I think this is a huge step forward in ensuring that vegetarians and vegans are no longer misled by food manufacturers, caterers and restaurants. I think that the wording is very clear and unambiguous and am particularly pleased that a fish has been specified as an animal (you'd be surprised at how many people argue that it isn't!)
Steve Daly	I would like to thank you for the proposals on labelling. I have been vegetarian for 25 years and vegan for 17 years. During this time I have been offered fish, and even sausages, when I've asked for vegetarian food. I've been offered crab soup with the advice that I can "fish" the crab out if I don't want to eat it. In the past 25 years, I have seen the product range "suitable for vegetarians" expand greatly but have often found myself distrusting the sincerity of the labellers. Thanks again, and I look forward to trusting labels.
Lindsay Jackson	Yes there is.
SWERCOTS Gareth Mellors, TLSO (Food) North Somerset Council	SWERCOTS response to the FSA consultation on the use of the terms 'vegetarian' and 'vegan' in food labelling In general, the guidance is to be greatly welcomed. Although food processors, retailers, caterers and consumers share much common ground as to what constitutes a 'vegetarian' food, there has always been a degree of confusion, not always assisted by the way that the term is misused by some of the consumers themselves. (For example, some self-professed 'vegetarians' eat fish, some eat poultry and some would not routinely scrutinise a label to ensure that meat or fish-derived ingredients were not present.) Clearly, the most 'extreme' interpretation of the term should be adopted by food businesses to ensure that consumers are never misled as to the nature of foods which they purchase. It is important that the guidance as published gives enforcement authorities the backing to deal with the most common issues raised by way of consumer complaints, such as the cross-contamination of food due to the use of a cooking medium which is also used for non-vegetarian products. To that end, we suggest that the draft guidance be amended as outlined under the following headings. In the interests of consumer choice, the Agency may wish to take this opportunity to make a recommendation that,

whenever possible, food businesses actively denote which of their foods are suitable for vegetarians or vegans. Whilst this may seem burdensome on business, since the propriety of such claims would need to be continually monitored, such a stance would be greatly appreciated by consumers, many of whom otherwise assume that it is 'better safe than sorry' and therefore avoid foods which they could, in fact, consume. (Scrutiny of a product's ingredient list (as described at paragraph 9 of the guidance) is indeed a common approach adopted by vegetarians in deciding whether or not they wish to purchase a food. It can, however, cause a perfectly acceptable product to be left on the shelf if there is even the slightest doubt as to the nature or origin of any particular ingredient).

General

Unfortunately, the document which accompanied the draft guidance explains the position with regard to food additives far more clearly than does the guidance itself. For example, whilst the accompanying text provides an explicit comment that care needs to be taken in the use of certain additives, for example because they are on a gelatine base, the guidance itself is far less clear. The key point to be made is that, when making a claim, food processors and retailers need to be sure that they have taken into account such issues. In our opinion, the guidance should make direct reference to such a consideration.

We believe that there are examples of foods and food production processes, which may merit special consideration in the guidance. For example, certain traditional cheeses are wrapped in lard during the maturation process: although this is then removed prior to cutting and packing (and no residue would theoretically remain in the food as sold), can such cheese be considered vegetarian?

Annex A

The table is overly complicated and is not helped by the terms used for the 'key'. Perhaps 'x = claim may not be made' and 'v = claim permitted' would be clearer?

Could the text for heading 'F' also include a reference to animal-derived rennet in cheese?

Cross contamination

We would suggest the addition of the words '*... or storage ...*' to the end of the first sentence.

Whilst the paragraph is good as far as it goes, it would be preferable to make it clear that, to qualify as 'vegetarian' or 'vegan', the food as delivered to the consumer should comply with the guidelines and must not be contaminated with **any** animal-derived extraneous matter, be this transferred from a cooking medium or simply from a handling utensil. The more clearly this concept is expressed, the easier it will be for enforcement authorities to adopt a strictly analytical method to determine whether or not a 'vegetarian' or 'vegan' claim was appropriate.

The key audience here comprises catering establishments, where little thought often seems to be given to the

	<p>appropriateness of the arrangements made for vegetarian food (e.g. plates of sandwiches where the ‘vegetarian’ selection is actually in contact with ham sandwiches, buffet serveries where the utensils are shared between the vegetarian and non-vegetarian selections and fast food restaurants where the meat/meat-free burgers are cooked on the same griddle). Whilst these matters may seem trivial to others, for a vegetarian or vegan it is fundamental that these issues should be considered.</p>
<p>Professor Martin Wiseman Honorary External Relations Officer The Nutrition Society</p>	<p>The Nutrition Society is pleased to have the opportunity to comment on the Agency’s proposal for guidance on the use of the terms ‘Vegetarian’ and ‘Vegan’ in food labelling.</p> <p>In relation to the first specific question relating to the necessity of such guidance, the Society considers that it would be valuable in regulating the use of these terms across the board. The guidance should lay down minimum standards to which manufacturers and caterers etc must adhere to in order to state that a product is ‘Vegetarian’ or ‘Vegan’. Beyond which, it should be each individual company’s choice as to whether more stringent standards are observed. The Society believes that one of the most important outcomes of the introduction of such guidance would be to increase consumer confidence, and if the definitions stated in the guide aid the prosecution of companies under the Trade Descriptions Act (1968) when the terms are incorrectly used, then the guidance should succeed in this.</p> <p>Whether the use of the terms should be voluntarily regulated or legislation be introduced is highly debatable. The Society’s main concern about it simply being voluntary is that ingredients present in very small amounts do not have to be listed, nor does the possibility of cross-contamination need to be mentioned. This means products, from their stated list of ingredients, may appear vegetarian or vegan, when this is not actually the case. If the consumer is aware of this, they may be dissuaded from products that are acceptable thus limiting their choice. Alternatively, of course, they may consume products that contain ingredients they wish to avoid.</p> <p>The Society feels that a vegan diet universally follows the same criteria, and is therefore happy with the criteria laid down in the consultation for the use of the term. However, foods that Vegetarians claim are acceptable vary, largely due to their personal reasoning for consuming the diet. The Society is of the opinion that this makes the term more difficult to define. Cheese being a particularly grey area: although many Vegetarians find cheese to be acceptable, the majority of varieties are produced using rennet that is obtained from the stomach of calves, unless commercially produced chymosine is used. The Society feels it is important that cheeses produced using animal rennet are not classified as vegetarian, hence section H of the table would need to be divided into subsections. The Society concurs with the statement regarding cross-contamination. If details of the preparation conditions</p>

	were mentioned on food labelling, the consumer would be able to decide whether they deem the product acceptable. However, this method is much easier for the consumer: the manufacturer has to have met the standards in order to use state that the product is 'Suitable for Vegetarians/Vegans'.
Paul Dove	<p>I DO think that it's ok to use "vegetarian" or "vegan" on products that may be subject to accidental contamination but I feel there should be a warning in the same way as currently is done for nut allergies, etc. By that I mean that in these cases the word "vegetarian" or "vegan" should be qualified with a statement to the effect that "this product may contain trace amounts of...".</p> <p>As to the specifics of the definitions of the terms Vegetarian and Vegan, I think that those currently in use by the Vegetarian Society and the Vegan Society should be used in all cases.</p>
Jim Lakey	<p>In regard to the initiative to define the terms 'vegetarian' and 'vegan' correctly for restaurants and foodstuffs, I think this would be of massive benefit to those who are, and those who want to become, veggie or vegan. Firstly, I remember turning vegan as a teenager and the amount of research I had to do to ascertain whether a seemingly harmless product in fact contained a small trace of dairy produce was ridiculous. A clear understanding AND labelling by manufacturers would really help those currently follow these diets, and give a big boost to those facing the potentially daunting task of becoming a veggie / vegan. The current labelling in most supermarkets on their own brand food is fantastic, but it is still not wide reaching enough.</p> <p>Secondly, I work as a waiter in the restaurant business, and I have been consistently disgusted with the lack of knowledge and care most chefs have regarding vegetarianism. The restaurant I currently work in puts chicken stock in the bechamel sauce which goes on most of the vegetarian pasta dishes. After having eaten a few, I found out by seeing it prepared in the kitchen and was upset to think that I had been eating chicken unknowingly and that the chefs did not care. The head chef said he tried it with veggie stock once but no one liked it! Nonsense, I'm sure and indicative of nothing but the chef's inability to cook properly. It is a disgrace when chefs wittingly or unwittingly falsely claim a dish is vegetarian.</p> <p>I really think the proposals set out by the FSA are a much needed initiative and would protect vegetarians in the supermarket by making clear what is and isn't OK, and in the restaurant, where vegetarianism is too often treated as a joke.</p> <p>I would be extremely pleased and grateful for a legal definition of these terms and an obligation put upon the producers of foodstuffs to follow them.</p>

Kev Maher LL.B(Hons)	I support the proposed guidelines regarding food labelling.
Katie Wise, Co-ordinator, Cornwall Veggies	<p>There is a great need for Vegetarian and Vegan Food Labelling. Approximately 7% of the population are vegetarian, many more people choose not to eat particular meats, such as beef, and others have an intolerance to certain animal products, i.e. lactose intolerance. At present we cannot make an informed choice when buying food, especially when eating out. Many restaurants, and some shops think that if there's no chunks of meat or fish in a dish then it is vegetarian. However vegetarians want to be able to avoid animal rennet, animal gelatine and other animal by-products. Currently many products marked suitable for vegetarian have these 'hidden' animal ingredients. If there was guidance then I would feel more confident in eating out and buying a greater range of products.</p> <p>I like your table in Annex A and think it is useful. It will encourage chefs to check for the whole range of ingredients which vegetarians and vegans don't want to eat, rather than just Meat and Fish.</p> <p>You cover the issue of cross contamination well.</p> <p>I would ideally like legislation to cover vegetarian and vegan food labelling. However I would accept Option 3 as a reasonable solution.</p>
Brian Rogers	<p>As a vegetarian for 22 years, and a vegan for the last 10 years, I've encountered numerous situations where products were mis-labelled as suitable for vegetarians or vegans, when clearly they were not. And when eating out, and after explaining that I am vegetarian or vegan, I have often been offered food that was unsuitable. Sometimes the mistake is grossly obvious, such as fish being offered as suitable for vegetarians (when of course it isn't). However, perhaps more often the mistake is subtle and harder to spot, such as gelatine in a dessert. This is a problem for me, and the rest of my family who are vegetarian. Indeed I know it is a common problem for all my vegetarian and vegan friends.</p> <p>So, as to the question of whether or not there is a need for the guidance, then I reply with an overwhelming 'yes'. And I know I'm speaking for my vegetarian family and friends as well. Not to mention my Jewish, Muslim and Hindu friends, who may or may not be vegetarian, but would certainly welcome this guidance.</p> <p>As to the questions contained within the draft document, then the definitions ('vegetarian', 'vegan' and 'cross contamination') appear to be very reasonable to me, and the explanatory table is very useful. However, I would hope that if these guidelines are to be changed in any way before adoption, then you would work with the</p>

	<p>Vegetarian Society (www.vegsoc.org) and the Vegan Society (www.vegansociety.com) on any such changes. Most vegetarians and vegans would be happy for these two organisations to be arbiters, seeing how they invented the terms.</p>
<p>Norman Michie, President Association of Public Analyst</p>	<p>On behalf of the Association of Public Analyst I would make the following comments on the draft proposals to provide guidance on the use of the terms “vegetarian” and “vegan”.</p> <ol style="list-style-type: none"> 1. The Association welcomes the proposal to offer guidance as it will benefit the food industry by providing greater clarity on how these terms should be used, consumers by improving confidence in the information provided and enforcement by setting standards that should be followed. 2. The Association supports the definitions of “vegetarian” and “vegan” that are proposed although we recognise that the former may be more restrictive than some producers and consumers consider appropriate at the moment. However, any dilution in the definition would allow the current confusion to continue. 3. Although the ingredient list may be an important source of information for deciding whether a product is suitable or not for vegetarians or vegans it is not always obvious. Many of the additives and processing aids which are of concern to vegetarians and vegans are either not required to be listed at all or may not make clear their source. The use of a positive statement is already common practice but the use of a negative statement, “ Not suitable for vegetarians / vegans”, should also be encouraged. Without either a positive or a negative statement then for many products a consumer will not know whether it is suitable or not as they will not know whether the manufacturer provides vegetarian / vegan information or not. 4. There are likely to be substantial education and training requirements in catering establishments if cross-contamination by sharing of chopping boards, deep fat friers etc. is to be avoided. This is the area of food provision that generally causes the most concern to vegetarians and vegans as there is often insufficient information provided on menus and there is no control over procedures used in the kitchen. Furthermore, when out for a meal, consumers are often reluctant to cross-examine waiters and chefs on what is in various dishes. A mechanism to make detailed information readily available requires to be found; I understand that in some European countries a detailed dossier of recipes can be made available on request. 5. Consideration needs to be given to amending slightly the manner in which food additives are required or permitted to be named in ingredient lists. For example Vitamin D can be present either as Vitamin D3 which is not suitable for vegetarians or Vitamin D2 which is; an amendment to the Food Labelling Regulations would be required to permit labelling in an amended form.

	<p>6. One source of confusion and irritation to vegans is the prohibition on the use of food names which have been defined in law and which have been deemed not to be appropriate for vegan equivalents. This is a particular problem with replacement dairy products and results in products which have complex and hard to understand names which, although they satisfy legal requirements by being a true indication of the nature of the food, are not readily understood by consumers. If adoption of the Guidance and the definitions contained in it are successful then consideration should be given to allowing names such as “Vegan Ice Cream” instead of “Iced Non-Dairy Dessert” and “Vegan Cheese” instead of “A blend of soya, starch and non-hydrogenated vegetable fats” to be used without confusion.</p> <p>7. There appears to be a minor error in the heading of column F in Annex A of the Guidance. Of the four options presented in the RIA the Association recognises that Option 4 is not practicable and probably unnecessary at this time therefore supports the adoption of Option 3.</p> <p>In preparing this guidance I have been assisted by Elaine Miller, Deputy Public Analyst in Dundee City Council who has been a vegan for several years. She is in the advantageous position of being able to understand both the legislative restrictions behind the production of the Guidance but also the day-to-day difficulties of following a vegan lifestyle. Should any further discussion take place on the implementation and operation of the Guidance then I commend her to you as someone who would be of great assistance.</p>
<p>Mike Simpkin, Public health Strategy Manager on behalf of Leeds Food Network</p>	<p>This response is on behalf of the Leeds Food Network which is a loose grouping of specialist food workers from statutory and voluntary agencies in the city. It is not a response from Leeds City Council.</p> <p>The Leeds Food Network welcomes the FSA's proposal to introduce guidance on labelling for vegetarians and vegans.</p> <p>We agreed that there is a need for guidance (your Option 3), and from our point of view the proposed definitions are clear enough although we had no vegans amongst us. We were not sure why just red meat was mentioned instead of red or white meat.</p> <p>We were not sure the table was particularly helpful as it stood. Unless it needs to be in a table for presentational purposes, the exclusions are clearer in a plain statement.</p> <p>We think the cross contamination issue is particularly important. We feel that at present many vegetarians may inadvertently eat manufactured foods which may have been prepared with non-vegetarian products. Non vegetarians had particular difficulty in buying for vegetarians. We thought the recommendation could possibly make this clearer and perhaps emphasise the expectation, following this guidance, that food which is not labelled</p>

	as vegetarian will not be taken to be vegetarian.
Row Wallace	I just wanted to let you know that I support the current draft guidelines for vegetarian and vegan labelling. As a vegan it would make shopping and eating out so much easier for me and countless others. Only a few months ago a restaurant assured me that a dish was suitable for vegans but when it arrived it was covered in a cheese sauce which might not even have been vegetarian. It would make shopping for food so much easier too. At the moment, just checking ingredients isn't always enough as animal ingredients can sometimes be used in processing. If there were explicit guidelines perhaps more companies would label their products as vegan. This could mean that I would be less restricted in what I buy in future as there are probably lots of things that I don't buy at the moment as they are not labelled vegan but which are, in fact, ok. These guidelines would therefore make an enormous difference in my day to day life and that of many others.
Helen C Pownall	I am just writing to indicate my strong support of the proposed draft guidelines for legally defined criteria for the terms "vegetarian" and "vegan" on food labels. As vegetarians, my family and I often have difficulties in supermarkets when foods labelled as vegetarian turn out to contain fish sauce or restaurants offer tuna bake as a "vegetarian option". Currently, I find it extremely difficult and time-consuming to understand the food labels to work out whether a food is vegetarian or vegan or not. Introducing the proposed guidelines would help the huge number of vegetarians and vegans in this country be confident about what they are eating just from an "at a glance" label check, and I imagine that food manufacturers, retailers and caterers (that often find this whole area very confusing!) would also welcome clarity on this issue.
Stephen and Sophie Fenwick-Paul Thames Valley Vegans & Vegetarians	Here are the comments from our large local vegetarian group on the FSA's draft vegetarian/vegan guidance. Thank you very much for drafting these guidelines and consulting on them. * whether or not there is a need for this guidance at all * Yes, very much so! This is an essential task, as current labelling is highly suspect and affects a huge amount of people. It not only affects vegetarians and vegans, but and the even greater numbers of people with animal product intolerances or belonging to religious groups, and all the people who shop and cook for them. Vegetarians and vegans are currently not helped by labeling of "vegetarian" and "vegan" by manufacturers as it is highly unreliable. So we still have to read the ingredients, and even then we cannot be sure, due to many

ingredients being possible to derive from both animals and plants, and some ingredients and processing agents not having to be listed at all. This insecurity stops us buying such products.

Only labeling with the Vegetarian Society or Vegan Society Trademarks is reliably of a suitable standard.

Thus we believe the terms vegetarian and vegan should only be used when they meet Vegetarian and Vegan Society criteria respectively, and that the FSA guidelines should stick to these.

Any people whose standards happen to be more lax than this will not mind higher standards being met. Many have more lax criteria not because they wish to, but because current labeling standards make it a big effort to be any more specific. The millions of people who follow the Vegetarian and Vegan Societies' criteria would have their lives made easier if the guidelines met these standards, and we would be able to buy more food from retailers and caterers.

* Cases of malpractice *

We have come across many many cases of false vegetarian labeling. By far the most common are menu items in nearly every catering establishment, which frequently call dishes containing some of the following "vegetarian":

- cheese with unknown or animal rennet (Pizza Express is the only non-vegetarian outlet we know of which does not do this)
- eggs that are not free range (again Pizza Express is an exception)
- fish and sea food, and sauces (e.g. Thai) containing these wine of unknown / non-vegetarian origin lard and margarines containing animal fat (e.g. in a local school).

This not only can cause illness in many who are intolerant to or unused to such substances, but also insults and disrespects religious and ethical consumers.

Thus we believe it is essential that the guidelines cover restaurants, cafes, take-aways, institutional catering, school catering, meal delivery services (e.g. Meals on Wheels), event caterers, etc. as well as manufacturers and vintners.

* the questions indicated in the draft guidance itself: *

*is this table useful? *

yes, a good idea in as far as it goes (see next answer)

* Are the criteria suitably clear and unambiguous? *

As far as they go, yes, but they are not complete. Please refer to the "are guidelines needed" answer. Additionally:

Lists of animal-containing substances need to be provided to companies so they know what to look out for, as so many are cryptic. If this is not possible they must be directly referred to the Vegetarian and Vegan Societies for help, particularly in suggesting suitable substitute items.

	<p>Vegetarian criteria must only include vegetable rennet and free-range eggs in particular. Vegan criteria are much more straight forward, but advice on animal-containing substances is still crucial. Many people with food intolerances are particularly keen on vegan labeling we find, whether they are vegan or not. A large part of the responsibility here is to make it easy and straight forward for companies to check whether their ingredients are okay. An Internet-based database of ingredients would be ideal, and they could support this by adding their final products to a sister database, which potential customers could then use. Clear grounds for consumers to raise complaints to manufacturers, caterers and governing bodies is also crucial. Companies should be encouraged to state publically they are aware of and use these amended guidelines, as it would do themselves and potential customers a big favour. Let the fittest for the burgeoning vegetarian and vegan market do the best!</p> <p><i>We also feel it would be of great benefit to have a "contains animal ingredients" warning on such foods as might be assumed to be animal-free but are sometimes not, such as dairy-free cheeses, soya infant formula milk, vegetable soups, fake meats, fried goods, food supplements, sweets, etc.</i></p>
Emily Thurrell	<p>I have been vegetarian for almost 13 years now but still find the issue of adequate labelling a worrisome problem. For example, there have been numerous times when I have seen meals marked as vegetarian yet they contain fish! This particular point was highlighted last year in the Vegetarian Society's 'fishconceptions campaign'. There was huge support for this and the FSA could help tremendously by making the suggested guidelines official. This is only fair in a society of equal rights, where vegetarians and vegans should be included, not excluded.</p>
Paul L Todd Principial Officer (EHL&CS) East Ayrshire	<p>On behalf of East Ayrshire Council and in consultation with members I would offer the undernoted comments.</p> <ul style="list-style-type: none"> • We would agree that the definitions criteria for 'vegetarian' and 'vegan' are clear and unambiguous. • The table (Annex A) which sets out how the criteria apply in practice are fairly simple and we would agree is indeed useful. • In terms of cross-contamination issues the definition and explanation assessment is adequate. <p>It is noted that the key proposals are to introduce advisory criteria for the use of the terms 'vegetarian' and 'vegan' in food labelling which we fully support.</p>
Barbara Saunders,	<p>I am pleased to attach the response from Foodaware to the above consultation and hope that it will help to inform</p>

Foodaware	<p>the FSA's final decision.</p> <p>Foodaware, the Consumer's Food Group, co-ordinates the broad UK consumer movement's work on food safety, nutrition and standards. Our mission is to give UK consumers a strong voice on food policy by bringing together the organisations that represent them. We also consult and support the UK consumer representatives on food-related committees, and further the public understanding of science. Foodaware developed from the Food and Agriculture Working Party of Consumers in Europe Group. Our members are consumer, women's, family, ethnic minority and enforcement organisations, who also contribute time and expertise to our representations.</p> <p>Foodaware recognises that accurate information on food labels is essential for consumers to be able to make informed choices about the foods they eat. Our members have expressed concerns for some time about the lack of precision and clarity about vegetarian foods, and those from particular faith communities have found existing labelling too imprecise to meet their needs. To answer the first question raised by the consultative document – there is certainly a need for improved guidance and for it to be applied.</p> <p>We support the FSA draft guidance which establishes common criteria for the use of the terms 'vegetarian' and 'vegan'. This is a move in the right direction, albeit that it is not mandatory. Standardisation of the application of the terms will be helpful, but for the current public mistrust to be overcome, it will require significant industry support. The FSA will need to carry out monitoring activity to expose those firms that do not comply with the voluntary guidance and should make public those which support their initiative. Unless it is clear to the public which companies are following this guidance, the position for consumers will remain uncertain. There will also continue to be a problem with imported produce unless some progress on the use of the terms can be achieved in the EU and internationally. We would expect the FSA to initiate and contribute to such policy development.</p> <p>The guidance is also intended to apply to the catering sector and that is also welcome. Increasing numbers of consumers purchase products in bulk from wholesale outlets such as Costco and Makro and some of these may follow catering rather than retail standards. Apparently, some airlines have made progress in distinguishing between European and Asian vegetarian diets and there may be good practice in that sector which could be relevant to catering foods and establishments. We suggest that the FSA identify where best practice in vegetarian catering exists so that it may give further guidance for the that sector in due course.</p> <p>Problems are likely to remain from the use of additives and processing aids, the origins of which are not known by the public. Some of these may be from animal or vegetable sources and may not be specified on the labels either because they are processing aids or because they fall within the limited exemptions from labelling for certain compound ingredients which form less than 2% of the final product. However, at least where a vegetarian or vegan</p>
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	<p>claim or symbol is on the label, there should be more consistency as a result of the guidance. The FSA's work in this area should continue, so that it can better inform consumers of how the market is developing, and particularly, through its monitoring activity demonstrate whether the food industry and manufacturers are complying. Only if a significant proportion of the food industry support the initiative will there be less confusion and public mistrust.</p>
<p>Pamla Walker</p>	<p>I would like to offer my support for Labelling foods suitable for vegetarians/vegans. I have been veggie for 37 years and vegan for 6 and a half. This would be so much easier for me to live my life as I get sick of people asking do you eat chicken/fish etc...Etc..Etc... Also, it would be useful to raise awareness for people who prepare food and to give them a definition of what a vegan really is.</p>
<p>Chris Olivant, Information & Customer Services Manager, The Vegetarian Society.</p>	<p>The Vegetarian Society welcomes the Food Standards Agency's draft criteria for the use of the terms "vegetarian" and "vegan" in food labelling as laid out in paragraphs 13 and 14 of the draft guidance document, supported by the comments and information contained in the covering letter Ref: LRM 23.</p> <p>We are particularly pleased to see the UK taking the lead in becoming one of the first countries to take up the recommendations of the United Nations Food and Agriculture Organisation's Codex Alimentarius Committee on Food Labelling by progressing this guidance.</p> <p>Defintions</p> <p>We feel that the description of the terms as laid out in paragraphs 13 and 14 form a reasonably easily understood standard that can be used across all sectors and at all levels of responsibility.</p> <p>Clearly it would be useful for further guidance to be made available to interested parties and we would suggest this being produced at least two levels of detail. Level one would simply be based on much of the information regarding specific examples as described in the covering letter, to give the supplier more of an insight into things to take into consideration when applying the terms, and level two be more in the form of a service offered by the FSA, or a suitably experienced subcontractor, whereby a manufacturer, retailer or caterer can actually ask specific queries about specific ingredients or methods of production which would otherwise be unclear.</p> <p>We would like to take the opportunity to reiterate the fact that any vegetarian wishing to avoid eggs in their diet, but continuing to consume dairy products, would be supported in that choice through the new allergen labelling legislation embodied in the Food Labelling (Amendment)(England)(No.2) Regulations 2004, and similar provision in</p>

Scotland, Wales and Northern Ireland.

Table

The table in Annex A is useful but we would suggest the simple addition to box H of the phrase “without the use of E or F”

Cross-contamination

Paragraph 16 forms a good basis for addressing cross contamination issues, but we would suggest a further sentence addressing the unacceptable use of the same serving implements or production equipment for both vegetarian and non-vegetarian products. Again supporting documentation with further examples of possible pitfalls would be useful.

Need for the guidance

The Vegetarian Society feels strongly that there is a need for such Guidance, since we have many reports of manufacturers wrongly claiming that non vegetarian foods are vegetarian, a few recent examples of which include the following:

- A large supermarket’s consumer magazine proudly promoting its new tuna nicoise salad complete with the chain’s own vegetarian (green ‘v’) logo.
- A jelly made with gelatine (as its first ingredient, by weight) clearly display the manufacturer’s own ‘suitable for vegetarians’ logo.
- A rival large supermarket recently selling a noodle stir-fry dish in its produce section. The pack features the supermarket’s own ‘suitable for vegetarian’ logo but the accompanying sauce sachet contains fish. When a vegetarian customer complained to the supermarket’s customer services she received a written response stating that some vegetarians eat fish,
- Labelling on a leading brand of infant milk stating that it ‘may not be suitable for some vegetarians’ as it contains fish oil.

And doubtless there are many, many other examples that never come light since there are such a large number of ingredients that can be made from both vegetarian and non-vegetarian (or vegan) sources and the purchases can only take the manufacturer’s, possibly ill-informed, word regarding the provenance of those ingredients.

An area of even greater concern is in the catering industry where mistakes can be made all along the production chain, from the supplier of bulk ingredients, through the chefs and cooks, employees marking up menus, down to the serving way to ensure that individual employees do not use their own interpretation of the terms, and give them

	<p>a clearer understanding of the issues when questions are asked of them regarding the suitability of items. The society has logged hundreds of complaints from individuals regarding cross contamination and the use of non vegetarian ingredients in dishes described as vegetarian in catering outlets. Extremely common problems include:</p> <ul style="list-style-type: none"> • Cooking of meat and “vegetarian” burgers on the same griddle, flame grill or in the same deep fat fryer. • Using the same implement used to serve bacon and pork/beef sausages to serve elements of a “vegetarian” breakfast. • Using the same pizza cutting wheel to cut a “vegetable” pizza after cutting a meat pizza without cleaning in between, thus causing significant ingredient transfer. • Using non vegetarian stocks in vegetable soups which are described, when asked, by serving staff as suitable for vegetarians. <p>Conclusion</p> <p>As the oldest vegetarian organisation in the world (est 1847), and the first to officially take up the term vegetarian, The Vegetarian Society of the United Kingdom welcomes the Food Standards Agency’s initiative as a timely and worthwhile one, which will hopefully prove a significant aid to the UK’s three million vegetarian and vegans. We remain more than happy to assist the Agency in any way they see fit to help progress their commitment to providing informed choice.</p>
Kari Manovitch	<p>I think the guidelines proposed for accurate labelling of foods are excellent and long overdue. It amazes me that there is still so much confusion in the food and catering industry about what does and what does not constitute vegetarian and vegan. Please progress with the implementation of these guidelines: it should help to make buying food a far more straightforward process and ensure more respect for the choice of those who want to eat animal-free.</p>

<p>Micheal, Margaret, Sarah & Kathryn Collier</p>	<p>Sorry for the late response to your work in this area but I have been away for several days on a school residential trip with a small number of 8/9 year olds which has opened my eyes even more to the problems that vegetarians have (including children away from home). Today, myself and a vegetarian child were offered just a small cheese pastry roll for lunch at a Residential School in Cheshire - the other options were chicken soup, ham rolls, chicken rolls or tuna rolls. The staff obviously thought that tuna was OK for us! They provided other options after I discussed it with them but it shows the problems that vegetarians of all ages face. I and my family (four of whom are vegetarians) fully support your work to develop a definition/guidelines for vegetarianism. This would be so important to us and many others. On a number of occasions we have been offered fish as a vegetarian option and find it very frustrating to have to tell restaurant/shop staff (including occasionally some of the major supermarkets) that vegetarians do not eat fish (or even chicken). Please continue your good work in this area.</p>
<p>Sue Payne National Consumer Federation</p>	<p>The National Consumer Federation Food Policy Group welcomes the opportunity to comment on this draft Our members support full ingredient listing, which enables them to make decisions for themselves and their families. We welcome the criteria for the use of the terms 'Vegetarian' and 'Vegan' which we believe would aid those wishing to make choices on allergy, ethical or other grounds. As individuals and as members of our Consumer Groups we have been in the position of offering a choice of foods at events which we hope will serve all personal requirements. We see this guidance as helping with our shopping and serving.</p>
<p>Julie Marsden Peak Feast, Derbyshire</p>	<p>As a small scale food producer I would recommend clarification of vegetarian and vegan food. We are totally vegetarian and do supply vegan food too. Our customers would appreciate this too, I feel, as they themselves are not always clear when supplying their own customers. Our direct customers would appreciate the labelling as they would be able to buy in confidence. This is one area of labelling that would be immediately helpful to consumer and seller alike.</p>
<p>Cecila Brich</p>	<p>Could I please add my voice in support of your proposed guidelines for vegetarian and vegan food standards? They sound very good, and it would be Wonderful if they were implemented.</p>

Mike Casslden(DR) VegNE Organiser	I want to make the point on behalf of our veggie group affiliated to The Vegetarian Society that there is a common assumption out there, especially in cafes and restaurants, that fish is vegetarian! An enforceable labelling standard for all vegetarian food (and doubtless vegan food) sold to the public for consumption is long overdue. People should be assured that what they purchase, whether in a shop for consumption off the premises, or to eat on the premises, meets their vegetarian expectation. And we had the recent fiasco where Asda strongly claimed that foods coloured with the dye from a beetle was veggie... I rest my case!
Pietro Simone	I would just like to add my support for the vegetarian and vegan food guidelines. Whilst life has got better gradually over the years led predominantly by the big supermarkets, it is still incredible how many shops and restaurants still don't understand the vegetarian definition. Indeed, my place of work has a canteen run by a large national catering firm. The local manager has a friend who claims to be a vegetarian but eats fish. Therefore she thinks all vegetarians eat fish and labels all the menu as such. What else (non - veggie cheeses, cross contamination) is wrongly labelled, heaven knows. There is nowhere I can point her to for best advice other than try and find something with fish in Tescos labelled as veggie. Please adopt your proposed guidelines. It will be a massive help and step forward for the future.
Philippa Lennox	I have read the proposed draft guidelines for the labelling of vegetarian and vegan food and the meaning of cross contamination with respect to these foods. As an ex-veggie and current vegan, I welcome these definitions as they are very clear and will help promote understanding and acceptance within the catering and food retail businesses. I hope they will enable me and others to buy with confidence and not have to take up alot of time asking many questions of serving staff about ingredients and how they are cooked. It would be nice not to feel a "nuisance" and to feel welcomed in all cafes etc. I'm sure more cafes and restaurants would serve more veggie and vegan food if they had guidelines such as these to follow.
Nicola Radford, Nutritionist Waitrose	Waitrose welcomes the opportunity to respond. There is one that we feel require further clarification: The table (Annex A) is useful but raises the question as to why processing aids that are not present in the end product should be excluded from a vegan/vegetarian diet. For example, this would rule out a number of 'vegetarian' products, which contain alcohol such as deserts, savoury products, and of course alcohol per se. We ask the question whether most vegetarians/vegan would be in agreement with your definition.

	We trust you find these comments useful.
Jay Ashra	<p>I would like to offer my support for labelling foods suitable for vegetarians/vegans. I have been veggie for 37 years and vegan for 6 and a half. This would be so much easier for me to live my life as I get sick of people asking do you eat chicken/fish etc...etc...etc...</p> <p>Also, it would be useful to raise awareness for people who prepare food and to give them a definition of what a vegan really is.</p>
Francis Williams	Your suggestions are sensible. It is surprising how many restaurants have fish on the vegetarian menu, and how many supposedly "vegetarian" dishes, especially pasta in buffets, turn out to contain fish.
K. Saxby	<p>I am glad you are looking into vegan labelling, it is my hope that everything vegan could be labelled as vegan, as my son and I become extremely ill if we accidentally eat non-vegan food, as do many other vegans and allergy sufferers. Vegan labelling can also be used for dairy and egg allergy sufferers too to know that the products do not include dairy and egg. Please can you ensure that suitable for vegan products include cosmetic and toiletries and medicines as well as food products. Please ensure they include the list of E numbers and additives, colouring etc that are not vegan. The animal shopper from the vegan society has a full list of these.</p> <p>Any product arising from an animal should not be included in a product suitable for vegans, honey, shellac, silk etc shouldn't be included for example. Thank you for your time. Apologies for the lateness, but I have only found out about this consultation about 5 minutes ago.</p> <p>With 25-50% less chance of getting various cancers, less chance of obesity, high cholesterol plus many more, the vegan diet is definitely in general, the healthiest diet around, and I hope you can support it in any way you can. I sincerely hope that you are in consultation with the Vegan Society about this, as they are among the most expert in this field.</p>
Martin Byrne	I wish to say that I am glad that the FSA proposals for defining the "vegetarian" and "vegan" labels on foods and menus have been drawn up and hope they will be implemented in their present form ASAP.
Jo-Ann Brown	Our organisation welcomes the opportunity to express our views and comments on the draft Food Standards

<p>Vegan Prisoners Support Group Tel/Fax 0208 363 5729</p>	<p>Agency Guidance [Annex A] on the use of the terms ‘vegetarian and vegan’ in food labelling in order to improve clarity for the purchaser. However, regarding the definition used of vegan, i.e. <i>“the exclusion of any foods that were made from or with the use of animals or animal products...”</i> We would feel possibly the addition of <i>“...or their by-products or derivatives”</i> could be considered. Re: Processing Aids Your definition appears to be quite clear. Re: Additives We agree that the vegan criteria would require such additives to be derived from non-animal sources. Re: Vitamins and Colour We agree that any vitamins or colours on a gelatine base could not be classed as vegan, however small the particle. Similarly any item containing even a particle below 1% e.g. whey, egg albumen etc. would not be suitable for vegans. In addition we agree that where Vitamin D is derived from any animal source whether the animal was alive or not it would not be suitable for vegans. Comments on the Guidance Q: <i>Whether there is a need for this Guidance at all</i> A: Definitely - such guidance would simplify the life of vegans Re: Annex A Comments: The true definition of ‘vegetarian’ and ‘vegan’, although not defined in law, does need to be very clear and ambiguities eliminated. We feel it is possibly necessary therefore to label all products accordingly – by labelling products as ‘non-vegetarian’ and ‘vegetarian/non-vegan’ when not indicating whether suitable for ‘vegetarians’ or ‘vegans’. At the moment relying on the ingredients list to determine whether an item is vegan or not isn’t possible. This is due to the fact that often the smaller ingredients [lactose, egg albumen etc] are normally not listed, meaning each item has to be researched on a one to one basis to determine whether it is vegan or not. Our research and investigations, continuously being carried out on behalf of the Prison Service, shows that many products deemed vegan by their ingredients and provided to their customers, are in fact not vegan as again not all the ingredients are listed. Therefore, this information has to be obtained item by item from the manufacturer in order to receive their written response to confirm whether the item is suitable for vegans or not.</p>
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	<p>This process takes considerable time and resources and often, although an item at first appears to be vegan from the ingredients list this is often not the case, due to the fact that the product may have been glazed with egg or contain egg albumen.</p> <p>Likewise on occasions when a specific ingredient of a product is obtained from a new source, this again may change the suitability of a product making it unsuitable for vegans. Similarly a brand new ingredient maybe added, making the same product sometimes suitable and sometimes not depending on which date it was produced.</p> <p>Cross-Contamination</p> <p>Cross contamination is an issue we are most concerned about, even with regard to vegetarian food being prepared on the same equipment/machinery as a vegan product i.e. dairy, eggs, etc.</p> <p>Separate equipment/machinery would be ideal, or alternatively that the product indicates it has been done on a milk run, etc. even though the product may have been thoroughly cleaned before the vegan item is produced.</p> <p>Re: ANNEX B</p> <p>We do not support Options 1 or 2.</p> <p>We support Option 3 or 4.</p> <p>Option 3: Develop and Publish FSA Guidance</p> <p>Option 4: Introduce legislation</p> <p>Hopefully then these would ensure vegans would be able to differentiate which products are suitable and which are not.</p> <p>We feel there is an additional health concern to consider, where for example a person is allergic to items such as milk or egg products. A full ingredients list, however small the particle/ingredient, would also be beneficial to people with such allergies.</p>
<p>Dr Alan Long Honorary Research Advisor VEGA</p>	<p>Our comments follow.</p> <ol style="list-style-type: none"> 1. The words vegetarian, vegan, vegetalian, fruitarian, and even freegan are used loosely at present in common parlance. They do not promise the customer the pleasure of, say, “going Indian”, or even as an advertisement in a recent vegetarian magazine claimed, “pure Indian vegetarian”. Single words are inadequate, like the unmodified word Christian, to describe the broad church in the vegetarian purview. An expression of modern scientifically-based vegetarianism would run something like this: <i>A vegetarian strives to avoid any exploitation of animals in the production of food, drink, or feed stuffs or for any purpose (e.g. for household goods, clothing, footwear, recreation, pharmaceuticals, supplements,</i>

toiletries, and cosmetics, and requisites for the purposes of gardening and allotments). Respect for wildlife and the environment and for the use of natural resources and for the dignity of human labor is implicit in such expressions of kindness and companionship and freedom from cruelty. The quest for the common good for inoffensive alternatives must be fostered appropriately.

2. Caution should be taken in vegetarian-style labelling and claims to avoid clashes when words such as suitable for vegetarians appear near health warnings and criticisms. We have examples of claims, approbations, symbols, and listings on products such as veggieburgers and black chocolate that carry adjacent warnings that they contain milk; or they attract contempt from reviews in the press or consumer magazines. Products made in dedicated or uncontaminated factories avoid these difficulties. We have found truly vegetarian Marmite sold in Jewish areas, while the “approved” Marmite was being manufactured in factories also making beef-extracts. Jews and vegetarians share many interests and facilities in the service industries. The word parve is a useful guide in this context for dairy-free. However, kosher (and halal) meats are especially offensive to vegetarians: they have invited calls from the FAWC for banning. It follows that meat, dairy-products, and eggs should be rigorously labelled, as the FAWC has requested, with information for potential vegetarians – or backsliders.
3. Restoring the unequivocal definition of vegetarianism obviates the need for separations and neologisms with, if anything, a forbidding impression on the customer, and it creates barriers hampering enterprise and competition by manufacturers and retailers. Use of modern IT, labelling, and marketing, as Body Shop has done with beauty-without-cruelty cosmetics and toiletries, asserting a cruelty-free status, must be achieved in other markets. In our debates with manufacturers the trend to “free from” or “wheat free” styles seem popular, particularly in a discriminating population of meat reducers and dairy-frees edging in a well-informed way to cruelty-free food. Some definition of, say, cruelty-free would be required. In discussions with producers, retailers, and animal welfarists, and with health warnings on cigarets and the FSA’s threatened identification of “junk” foods in mind, we have mooted with little demur from the industry application of welfare warnings (“Production of these eggs entails cruelty to the birds”) or, in the manner of Meat Hygiene Service’s HAS scores and scoring of filth on animals on farms or presented for slaughter, grades based on the Farm Animals Welfare Council’s Five Freedoms.
4. Longstanding difficulties arise in shortcomings in general labelling that fail vegetarians and other interests (we note that vegetarians are a group who scrutinize labels with the greatest curiosity). Beverages such as beers, wines, spirits, fruit drinks, juices, and cordials etc. are still inadequately labelled and illustrate the

omission of processing aids, such as finings, from descriptions on containers. Further, there are examples here where water is used in the process (as in brewing and for bakery products) or as a diluent (e.g. for fruit concentrates and, possibly, some beers). Some consumers, not necessarily vegetarian-minded, take a keen interest in fluoridation and the use of other halides. We urge the FSA to reinforce our efforts at achieving greater cooperation from manufacturers and retailers. Similar disclosures apply also in the use of disinfectants and their residues in foods and beverages and in animal-derived milks: use of iodine-containing washes and dips to clean the muck on cows' teats must be monitored to ensure that consumers do not unwittingly receive excessive doses of this element. We would welcome help from the FSA to persuade manufacturers to clarify both the beverages and the consumers' general interests. Unrefined and cloudy beers are now on sale widely and some brewers, e.g. Samuel Smiths, sell bottled beers fined with alginates derived from seaweeds (and therefore unexceptionable for vegetarians).

5. Further difficulties have been imposed on us by European requirements, favouring the dairy industry, on descriptions of dairy products on origin rather than form or purpose. We and a maker of vegetarian foods (Plamil) overcame MAFF's objections by proving that terms such as peanut butter, and nut creams and milks were established commercial comestibles in the UK from before WW2. However, MAFF subsequently capitulated to the EU and the insistence that milk should be a single word to imply the mammary secretion in emulsion form of an animal (mainly a cow in commercial contexts) and be applied generically to the range of derivatives (however, peanut butter remained an exception) was applied. Trying to impose on a single short word such significance has been ridiculous: in nutritional and medical contexts the restricted meaning should surely apply to the most important food that is underused but at least has a defining adjunct: breast milk. Manufacturers have overcome some of these obstacles by resorting to brand names, well advertised (if they have the resources) for plant milks.
6. Vegetarian cheese is another bad description. Any self-respecting vegetarian cannot approve of any derivative of cow's milk snatched from a probably colostrum-deficient frail calf particularly susceptible to disease and therefore likely to be heavily dosed with drugs and treated with vaccines. Is this a free-range cow or a zero-grazed herbivore? The Vegetarian Society's approvals for vegetarian cheese pleased the supporters of GM, relieved manufacturers of enterprise in developing unexceptionable alternatives, and flouted animal welfarists' reforms in the evil but heavily-subsidized live/deadstock industry and its tally of products, co-products, and by-products, which have needed all the value adding they can get. Vegetarian cheese and whey represent a great betrayal of animal welfare.

7. Serious observance of animal welfare also attends the use of colourings in foods for cosmetic purposes or for tinting to achieve uniformity of products (e.g. of spirits sold in plain glass bottles, cola and other drinks and beer and many foods and meals served in restaurants). While vegetarians have to regret the use of the animal experimentation on which nutrition and food technology depend, expression of the 3Rs (reproduction, refinement, and replacement) must be applied on items rated suitable for vegetarians, which means banning the use of these cosmetic ingredients. Some are coal tar derivatives and chemicalized caramels with other objection, of Sudan Red. Vegetarian researchers are also taking a hard look at the EU's REACH initiative (Registration, Evaluation, and Authorization of Chemicals), which has a wide purview and involves experiments and test on animals in dubious assessments of human safety. If we had more opportunity for discussion, we could inform the FSA more fully on these matters in policies and authenticity of foodstuffs and other commodities suitable for well-informed vegetarians.
8. We take regard to responsible labelling of foods and supplements in the interests of consumers on restrictive diets in food and catering that is unsympathetic and unsupportive. Vegetarians are among groups such as diabetics, celiacs, and people with aversions due to allergies or religious observances. For vegetarians vigilance is needed over some B-vitamins, vitamin D (D2 or D3), iron, and iodine and the bioavailability of these essentials. At the moment there is special concern over certain long chain fatty acids and fish oils – and of eggs, milk etc. from animals fed on artificial diets, which would probably include fish meal. We are involved with the European Lipgene project in this and can discuss it further with the FSA, if required. These considerations apply in other respects, e.g. to GM feedstuffs routinely fed to cows producing organic milk and milk “suitable” for opponents of GM (which may include vegetarian-style people). Further embarrassments arise over vegetables such as mushrooms grown on chicken manure from units and systems that animal welfarists and veggie-style consumers abhor. The Vegetarian Society is so rash as to include free-range eggs in its approvals. The British Veterinary Association's Animal Welfare Foundation has to publish special guidance to vets on the compromised situation to which the birds are subjected in these ridiculously-named systems. And what now, as avian flu threatens seriously?
9. Your list includes many dubious products in the vegetarian cupboard. At a glance we note some omissions: lactose, lactic acid, lanolin (and thus vitamin D, for instance), and citric acid (which may or may not be GM). Lactic acid may be of animal, mineral, or vegetable provenance. We have recommended the industry to append AMV descriptors appropriately. Support from the FSA – or other advice – would be welcome.

Nigel Wood,
Co-Chair, Trading
Standards South
East (A partnership
between 19 Local
Authority Trading
Standards Services)

Are these criteria sufficiently clear and unambiguous?

It is felt that the definitions used in the guidance could be made more comprehensive by reference to definitions used in the Animal Health legislation. For example, the Animal By Products Regulations 2003 define poultry as 'including birds of all species including wild birds'. They also define what an 'animal by product' is.

Is this table useful?

The partnership considered the table to be useful, clear and easy to understand. It was felt, however, that it may be useful to produce an extended annexed list of examples of ingredients and additives etc. which can be derived from animal origin since this knowledge is not wide spread even when talking to qualified chefs.

Does this cover the cross-contamination issue adequately?

The partnership feels that the guidance does not cover cross contamination issues adequately. Although the guidance is simplified to make it easy to understand amongst the trade, it would be beneficial to identify the need to wash grills and pans etc between use for vegetarian, vegan and other foods. Storage of foods in different areas especially when being selected for preparation to prevent cross contamination could also be suggested.

Other Issues

One area which the partnership felt was important was that of description of meals at catering establishments, where the vegan or vegetarian person does not have the benefit of a label. Some examples include dishes which are described as vegetable curry, vegetable samosa etc.

The implication for a consumer is that this type of dish is suitable for vegetarians and frequently consumers are offered these dishes if they ask for a vegetarian option. In some instances these options are not prepared with vegetarians/vegans in mind and cross contamination or use of non vegetarian ingredients occurs. This information is not always imparted upon waitressing staff etc. and in some circumstances is not given a thought by chefs preparing the food.

It would be advantageous to suggest that such food is clearly identified as either suitable or unsuitable for vegetarians/vegans to prevent consumers being misled.

<p>Hindu Forum of Britain</p>	<p>The following give a summary of the recommendations that the Hindu Forum of Britain would like to make to the FSA regarding its consultation on “Guidance on the use of the terms ‘Vegetarian’ and ‘Vegan’”. For ease of correlation, each paragraph in italics is the text from the numbered paragraph in the Draft Guidance, followed by HFB comments that are directly beneath.</p> <p>Introduction</p> <p>Point 1 <i>“The Food Standards Agency is committed to promoting informed choice. Improving food labelling is one of our priority objectives.”</i> We wholeheartedly endorse and support this objective and believe that this will benefit Hindus considerably.</p> <p>Point 2 <i>“There is no definition in law of the terms ‘vegetarian’ or ‘vegan’ either at the UK or European level. This document identifies the legislation relevant to the use of these terms, other legislation relevant to ingredient listing of animal products and also provides guidance on labelling foods as ‘suitable for vegetarians’/ ‘vegetarian’ or ‘suitable for vegans’/‘vegan’ in the form of advisory criteria.”</i> Please see our comments in the Forward. HFB hope that in the future there will be a legal definition of the terms ‘vegetarian’ and ‘vegan’.</p> <p>Point 3 <i>“The purpose of this guidance is to assist:</i></p> <ul style="list-style-type: none"> • <i>manufacturers, retailers and caterers to use these terms in a consistent way,</i> • <i>enforcement authorities to identify misleading labelling, and</i> • <i>consumers, by encouraging industry to use these terms consistently.”</i> <p>The HFB feel that the Guidance should clearly help manufacturers, retailers and caterers on how they can best keep in line with the Guidance. Clearer and stronger language would aid them.</p> <p>The HFB would amend as follows: <i>“...manufacturers, retailers and caterers to use the descriptions ‘vegetarian’ and ‘vegan’ in a consistent way. With respect to these terms, it is vital to understand that they apply to the preparation of the product (work surfaces, cutlery...etc), the ingredients in the product and the final description of the product”.</i></p> <p>Point 4 <i>“This Guidance should not be taken as an authoritative statement or interpretation of the law. The opinion</i></p>
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of a company's Home Authority or local enforcing authority may differ. Only the courts can decide whether, in particular circumstances, an offence has been committed."

Although recognising that the Guidance will bring about some improvement of labelling in the sector, the HFB feel that the fact that the Guidance is merely guidance and not legally binding substantially weakens the impact it could have on manufacturers, retailers and caterers. It considers it to be essential that the Guide is used as an opportunity to establish clear standards. Upon issuing the resultant Guidance, the HFB would like to urge the FSA to emphasise the implications to the manufacturers, retailers and caterers in an effort to encourage such parties to address deceptive labelling. The HFB feel that such action is necessary as it will prove difficult to seek out all of the manufacturers and caterers that are guilty of labelling food in a misleading way that the FSA wish to address with such guidance.

The HFB would amend as follows:

"This Guidance has been drafted with input and full consultation with relevant stakeholders as listed in Annexe 1 of the Partial Regulatory Impact Assessment. It is not an interpretation of the law and such interpretation is the province of the local enforcing authority and the Courts. However, ALL manufacturers, retailers and caterers should note that these guidelines may be referred to by any prosecuting authority or Court of law"

Comments on the 'Legislation relevant to the use of the terms 'vegetarian' and 'vegan' in food labelling'

Point 5

"There are no legal definitions of the terms 'vegetarian' or 'vegan'."

The HFB would amend as follows:

"Currently there are no legal definitions of the terms 'vegetarian' or 'vegan' "

Misleading labelling

Point 6

"Claims such as, 'suitable for vegetarians' or 'suitable for vegans' are subject to the general controls in sections 1 to 4 of the Trade Descriptions Act 1968 (prohibition of false or misleading trade descriptions)."

No comment.

Point 7

"Claims such as, 'suitable for vegetarians' or 'suitable for vegans' are subject to the general controls in sections 14 and 15 of the of Food Safety Act 1990 (prohibition on selling food not of the nature, substance or quality demanded and falsely describing or presenting food). The 1990 Act extends to Great Britain."

There is parallel legislation in Northern Ireland. Article 16 of EC Regulation 178/2002”

No comment.

Point 8

“Article 16 of EC Regulation 178/2002 prohibits labelling or other presentation, which misleads consumers. This is enforced by means of the General Food Regulations 2004 in Great Britain and parallel legislation in Northern Ireland.”

No comment.

Point 9

“The terms ‘vegetarian’ and ‘vegan’ in food labelling are used voluntarily by industry. Where these terms are absent, consumers rely on the list of ingredients” The HFB would add at the end of paragraph 9 and so amend as follows:

“It is therefore important that ingredient lists are as comprehensive as possible. From a Principle, Ethical or Religious point of view, the importance and relevance that manufacturers, retailers and caterers are asked to appreciate here is not the AMOUNT of the offending product included, but simply ITS PRESENCE OR INCLUSION. Even the slightest inclusion of an animal product will cause, for example, Hindus to break the dietary principles of Hinduism (the same will apply to Muslims and Jews depending on whether the included product is of a non-halal or non-kosher nature).”

Point 10

“The Food Labelling Regulations 1996 (as amended) require that ingredients be listed in descending order of weight. There are certain ingredients, details of which are given in Regulation 17, which need not be named. The 1996 Regulations extend to Great Britain; there is similar legislation in Northern Ireland.”

No comment.

Point 11

The Food Labelling (Amendment) (England) (No.2) Regulations 2004 and similar provisions in Scotland, Wales and Northern Ireland removed a previous exemption from ingredient listing for compound ingredients that made up less than 25% of the final product. All ingredients of compound ingredients used in another product (e.g. sponge fingers in a trifle) are required to be listed except for very limited exemptions for some compound ingredients constituting less than 2% of the finished product (Regulation 7(b) and (c)). [Note: This requirement does not come into force for existing products until 26 November 2005 because of transitional provision.] The exemptions are,

- *Where the composition of the compound ingredient is defined in EU law (e.g. jam and chocolate), the ingredients need not be listed.*
- *Where the compound ingredient is a food for which an ingredient list is not required, the ingredients need not be listed.*
 - *A mixture of herbs or spices or both need not be listed individually.*
 - *Ingredients constituting less than 2% of the finished product may be listed in a different order after the other ingredients.*
 - *The presence of similar or mutually substitutable ingredients could be indicated by use of "contains....and/or..." in certain circumstances. These exemptions do not override the allergen labelling requirements.*

The HFB are aware of the law as it stands and urge the FSA to focus on the spirit of the law rather than the letter; especially with regards to food labelled as vegetarian or vegan which clearly would not be regarded as such no matter what percentage of non vegetarian products were included in the item. For example, if beef extract constituted less than 2% of a compound food, the manufacturer does not have to include it in the ingredient list nor say that the food is not suitable for vegetarians. Such silence can lead, and often does lead, to Hindus breaking their religion. This situation must be avoided.

The HFB would add at the end of the Paragraph 11 and so amend as follows:

“The law as it stands does not require compound ingredients constituting less than 2% of the finished product to be listed as per Regulation 7(b) and 7(c) of the Food Labelling (Amendment) (England) (No.2) Regulations 2004. Manufacturers, retailers and caterers are urged to consider and remember that a vegetarian or vegan would not consider as vegetarian or vegan any food or drink that included in it ANY trace of a non-vegetarian product. This similarly applies to any person who follows a religious principle or edict regarding diet. If a product does contain less than 2% of a non-vegetarian item, manufacturers, retailers and caterers are advised NOT to label it as vegetarian or vegan AND to clearly bring to the notice of the consumer that the product would not be suitable for a vegetarian or a vegan. It would be helpful to list the item in the ingredient list. In conjunction with this Paragraph, the guidance given at Paragraph 9 is relevant with regards to the spirit in which manufacturers, retailers and caterers prepare, make and label their products.”

Other concerns that HFB would like to raise relevant to this section

The HFB feel that it is important that ingredient lists are as comprehensive as possible. From a principle, ethical or religious point of view, the importance and relevance that manufacturers, retailers and caterers are asked to appreciate here is not the amount of the offending product included, but simply its presence or inclusion. Even the slightest inclusion of an animal product may cause Hindus to break the dietary principles that they follow. Even when ingredients of an animal source are listed, it is often not obvious. This is particularly true with the use of E numbers. The HFB feel that it should not be necessary for vegetarians to know which E numbers are in fact unsuitable for their consumption. When such additives of an animal source are included, it should be made known to the consumer through the labelling of the food item. A common example of such an additive is E120 ('cochineal')³. This is a red dye derived from crushing insects called known as cochineal found in Central and South America⁴. Many vegetarians will not be able to ascertain that the consumption of foods containing this additive will result in a perversion of their beliefs merely from seeing E120 stated in the ingredients listing. Often ingredients from an animal source stated in the ingredients listing do not give the indication that they are from an animal source even if that ingredient is always of an animal origin. An example of this is 'shellac'. This ingredient involves crushing insects known as 'lac'. Shellac is used as a glaze for fruit, coffee beans and nuts as well as a coating for tablets⁵. Furthermore, HFB feel that often, ingredients are stated in the ingredients listing which can be of an animal or non-animal source. Often such items are listed in unsuspecting products. One such example is Beta Carotene, for which a fish source is often used to stabilise it. There are several popular products which contain such Beta Carotene including Fanta Orange and Lilt Pineapple and Grapefruit. It is crucial that greater clarification is made to prevent vegetarians consuming foods which give the impression that they are suitable for vegetarians (although not stating so on the labelling) but in fact are unsuitable. Some companies, such as Co-op supermarkets explicitly state on their products "not suitable for vegetarians/vegans". More labelling of this style is ideally what vegetarians and vegans would like to see with more manufacturers, retailers and caterers. It would be useful to highlight the animal species from which a particular non-vegetarian ingredient is sourced (as some Hindus eat meat but refrain from foods that necessitate the slaughtering of cows). For such Hindus, it will be useful to highlight the animal species from which a particular nonvegetarian ingredient is sourced. For example, gelatine is usually either sourced from cows or pigs. In the instances where it is taken from cows, it will be unfit for consumption by such Hindus.

³ <http://www.vegsoc.org/info/enumbers.html>

⁴ <http://en.wikipedia.org/wiki/Cochineal>

5 <http://www.vegansociety.com/html/animals/exploitation/shellac.php>

Allergen Labelling

Point 12

The Food Labelling (Amendment) (England) (No.2) Regulations 2004 and similar provisions in Scotland, Wales and Northern Ireland require (from 26 November 2005) foods to be labelled with an indication of the presence of 12 specific ingredients (or their derivatives) that are known to cause allergies and intolerances. There are provisional exemptions to this where derived products are no longer allergenic. Those exemptions of interest to vegetarian and vegan consumers are:

- ***Lysozym (produced from egg) used in wine***
- ***Albumin (produced from egg) used as a fining agent in wine and cider***
- ***Fish gelatine used as a carrier for vitamins and flavours***
- ***Fish gelatine and isinglass used as fining agents in beer, cider and wine.***
- ***Whey (from milk) used in distillates for spirits***
- ***Lactitol (from milk)***
- ***Milk (casein) products used as fining agents in cider and wine.***

HFB note that under current legislation, there are certain exemptions to the listing of products where the derivatives of such items are not considered as allergens. An example, as outlined in the document “Draft guidance of the use of the terms ‘vegetarian’ and ‘vegan’ in food labelling” is that of eggs. Under current legislation, Lysozym and Albumin are both derived from eggs. However, foods containing these ingredients but no derivatives that are considered as allergens are not considered to need to be clearly labelled as containing eggs. HFB urges the FSA to prevent the exemptions highlighted in the stated document to continue as exceptions. This is especially significant if the definition of ‘vegetarian’ is stated to include eggs and the inclusion of eggs can be clearly highlighted through the allergen listing for those vegetarians that refrain from the consumption of eggs.

Criteria for the use of the terms ‘Vegetarian’ and ‘Vegan’ in food labelling

‘Vegetarian’

Point 13

“The term ‘vegetarian’ should not be applied to foods made from or with the aid of products derived from the slaughter of animals (e.g. red meat, poultry, game, fish, shellfish, crustacea, amphibians, molluscs and insects), or their by-products, or foods made from or with any of these.”

With the exception of one caveat, the HFB commends such a description of vegetarian and regards this description as comprehensive. Hindus generally **do not** regard eggs as vegetarian and would therefore urge that eggs or any of their by-products not be included in any definition or guidance of the use of the description vegetarian. The HFB are aware of the debates and differing views regarding the inclusion or exclusion of eggs. It is aware that generally manufacturers and the Vegetarian Society **do** include eggs, the latter only allowing free range eggs to be described as vegetarian. Hindus in the UK are heavily reliant on clear labelling and clear descriptions to determine whether the foods are fit for their consumption. At the very least, without detracting from the views set out above, if there is any egg ingredient in the product, of whatever amount, it should be included in the ingredients list.

'Vegan'

Point 14

"The term 'vegan' should not be applied to foods made from or with the aid of animals or animal products."

HFB feels that this is an accurate definition of the term 'vegan'.

Table outlining definition of vegetarian and vegan

HFB note that the table given in Annex A of the FSA document "Guidance on the use of the terms 'Vegetarian' and 'Vegan'", contains specific information on items which are not considered to be vegetarian or vegan. In light of and with regard to the HFB position and the Hindu perspective, it asks that the table be amended not to include eggs as vegetarian. HFB would like to emphasise that the use of such a table in literature to be made available to manufacturers, retailers and caterers will be of great use for the further clarification of the terms vegetarian and vegan.

Cross contamination

Point 16

"When assessing whether foods meet these criteria, manufacturers, retailers and caterers should also consider whether foods may have been contaminated with nonvegetarian or non-vegan foods during preparation. For example, vegetarian or vegan foods cooked in animal fat or in the same non-animal fat as used for non-vegetarian or non-vegan foods should not be presented as 'vegetarian' or 'vegan'."

"Question: Does this cover the cross-contamination issue adequately?"

HFB feels that greater clarification is required as to where cross contamination may occur. The following list, though not exhaustive, gives some guidance into areas where it could occur:-

- Vegetarian or vegan foods cooked in animal fat
- Vegetarian or vegan foods cooked in the same non animal fat or oil as non-vegetarian or non-vegan products
- Using the same work surfaces for vegetarian or vegan foods and non-vegetarian or nonvegan products, especially cutting boards or work surfaces which are not thoroughly cleaned
- Using the same cutlery for preparation without thoroughly cleaning, e.g. knives and spoons.
- Using the same cooking implements without thoroughly cleaning, e.g. bowls, plates, pans, mixers and baking dishes.

Conclusion

The HFB would like to thank the Food Standards Agency for a comprehensive document and for allowing the HFB to input on behalf of Hindus in the UK. We urge the FSA to acknowledge that the Guidance is of vital importance to many different groups of people and that this Guidance will probably be the most important document for thousands of vegetarians and vegans across the UK, affecting their rights regarding clear labelling and so being able to consume food and drink with confidence and a clear conscience. The HFB asks the FSA to adopt our recommendations and to note that we are keen to attend any further meetings regarding the drafting of these and other relevant Guidelines.