

[REDACTED] SANTE/E1 "Food Information and Composition"
European Commission
Rue de la Loi 200
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By email: [REDACTED]@ec.europa.eu
SANTE-E1@ec.europa.eu

01.02.21

Re: Consultation "Food labelling – revision of rules on information provided to consumers"

Dear [REDACTED],

The European vegetarian movement, represented by its umbrella organisation European Vegetarian Union (EVU), welcomes the opportunity to provide feedback on the revision of rules on information provided to consumers as part of the EU's 'farm-to-fork' strategy. Plant-based diets and their regulatory representation are an often overlooked aspect on the road to more sustainability within the food system.

The consultation to which we contribute, opens for discussion the measures to implement action points 16, 20, 21, 23 and 27 of Farm to Fork-strategy and amendments to Regulation (EU) No 1169/2011 and Regulation (EC) No 1924/2006. As part of the Green Deal policy for the food chain, it may be allowed to raise issues that go beyond the narrow topical list of the Inception Impact Assessment and discuss other aspects of food information law.

To date, there is no legally binding definition of the terms 'food suitable for vegans' and 'food suitable for vegetarians' for food labelling purposes – neither at EU nor at Member States level. As a result, manufacturers develop their own criteria and might indicate their products with their own respective labels, which can vary from company to company and country to country. Only official certifications, such as the EVU's own V-Label or the recently developed ISO Standard (ISO DIS 23662 (ISO-TC034 N2118)) provide transparent and accessible information for consumers and traders. However, since there is no obligation to use such licenses, binding criteria in the form of an EU-wide minimum regulatory framework for all labels remain relevant.

The absence of legally binding definitions for the terms 'vegan' and 'vegetarian' in food labelling has also been identified as a problem by the European legislator. Thus, the EU Food Information Regulation stipulates that the European Commission is to issue an implementing act defining requirements for "information related to suitability of a food for vegetarians or vegans" (Article 36(3)(b) Regulation (EU) No 1169/2011). This signifies an obligation to decree a legal definition of the terms 'vegan' and 'vegetarian' for the labelling of foods. Unfortunately, the Commission has failed to act upon this responsibility since 2011.

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Plant-based foods generally compare favourably when it comes to greenhouse gas emissions. Therefore, the Commission acknowledges in its 'farm-to-fork' strategy: "Moving to a more plant-based diet [...] will reduce not only risks of life-threatening diseases, but also the environmental impact of the food system." By definition, vegan and vegetarian diets and foods contribute to this goal.

The plant-based food sector is continuously expanding and providing innovations and solutions to the demand for more sustainable and at the same time appealing foodstuffs. In order to provide a European harmonised solution for the labelling of such products and to guarantee the functioning of the Single Market for foodstuffs as well as empowering consumers "to choose sustainable food" and to make "it easier to choose healthy and sustainable diets", EVU stresses the importance of the implementing act for vegan and vegetarian food labelling.

Yours sincerely,

European Vegetarian Union
[@euroveg.eu](mailto:info@euroveg.eu)

About EVU: The European Vegetarian Union (www.euroveg.eu) represents the growing number of Europeans choosing vegetarian and vegan products over animal-based nutrition. Its aim is to make vegetarian and meat-reduced lifestyles appealing, available, and safe for consumers, producers, and traders, and to provide adequate information on related health issues, as well as on animal health and welfare and environmental protection, in relation to a vegetarian lifestyle. EVU also acts as an umbrella organisation for the 'V-Label' (www.v-label.eu), a voluntary certified labelling scheme. EVU is registered in the Register of Interest Representatives (No. 109356110578-03).

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