

THE VEGETARIAN SOCIETY
Response to *Putting Consumers First*
Food Standards Agency Draft Strategic Plan, 2005-2010

The Vegetarian Society is an educational charity promoting understanding and respect for vegetarian lifestyles. We aim to represent the UK's approximately three million vegetarians in this response but also recognise that any improvement in provision and labelling of vegetarian products will also assist the estimated one third of the UK population actively reducing their consumption of meat ¹.

Vegetarians are among a rapidly growing number of consumers who wish to use their buying power to support their moral, ethical, religious or environmental beliefs. In order to fulfil this, the consumer needs clear, honest information in an accessible form. In the case of food marked 'suitable for vegetarians' current labelling policies work directly against this objective and we believe that it is the responsibility of the Food Standards Agency to protect consumers from such dishonest and misleading information. It is, therefore, vital that the new Strategic Plan for 2005-2010 includes provision to ensure that the public are consistently given the information they need to make truly informed choices.

The Vegetarian Society welcomes the principle of measures already underway to provide the consumer with more information, such as the recent Amendment to EU Directive 200/12/EC OJL 109 in 2003 which will ensure that compounds of ingredients have to be much more precise with effect from 2005. However, this amendment is limited to possible allergens and therefore will not protect vegetarians from current labelling problems.

The Food Standards Agency is the key agent for improving consumer confidence. As the political agenda for public health broadens, this Strategic Plan must include specific targets to put an end to the sea of confusion and mistrust once and for all. The food industry must be made to take responsibility for providing the consumer with detailed information in order to make truly informed choices. The following pages set out our case in more detail, answering the five questions posed in your consultation documents.

1 Gallup poll for Realeat, August 2001

QUESTION 1 – THREE PRIORITY AREAS

We think that our priority areas for the next 5 years should be Food Safety (foodborne illness and chemical contamination), Eating for Health and Choice. Do you agree?

The Vegetarian Society is not in a position to comment on issues of foodborne illness, but very much welcomes the Agency's plans to focus on Eating for Health. The area of primary concern to The Vegetarian Society, our members and the wider vegetarian community is, however, the matter of consumers' right and need to make informed food choices, based on clear, honest labelling.

'Choice' is the new political buzz word, but The Vegetarian Society has long called for a labelling system that reassures and inspires trust to offer truly meaningful choice.

The first step towards meaningful choice is to agree guidelines for what the word 'vegetarian' should mean on food labels and menus. Clear definition and agreed criteria will be strongly welcomed by vegetarians and the general public as a whole. We are confident that a clear labelling scheme would also provide well deserved protection for the genuine vegetarian manufacturer/producer/caterer and so be good for business.

It is appropriate for the FSA to consider the daily battle many consumers face against misleading claims. With no legal obligation to prove these claims the food industry will continue to mislead – some unscrupulous manufacturers doing so intentionally, the majority through lack of understanding or forethought.

QUESTION 2 – PROPOSED TARGETS

How appropriate and how achievable do you think that the proposed targets are? It would help if you could make it clear which specific target(s) your comments relate to and explain briefly your reasoning

***'we will complete, by 2006, surveys on the uptake of the advice we issued in 2002 on clear labelling...'* (page 23)**

It is unfortunate that guidelines in this area neglected to include the term 'vegetarian' but we recognise that this particular programme is already underway and any attempt to widen its reach part-way through the activity would not facilitate a successful conclusion. We have, therefore, set out suggestions for additional targets covering vegetarian definition below.

"Promoting best practice in providing information to consumers

"in 2006 we will review how far assurance schemes have adopted our guidance. By 2008 we will publish a compendium of information about assurance schemes so that consumers can compare the standards they deliver". (page 24)

This target implies that the preparation and delivery to consumers of information on assurance schemes is a one-off project. Such information needs to be frequently updated and regularly reviewed as well as being made permanently accessible to consumers (with and without access to the internet).

Additionally, emphasis here remains heavily on the consumer and we would like to see the FSA taking a more active role in ensuring that manufacturers' and producers' claims are based on honesty and integrity. Consumers have the right to access information that will make it easier for them to make informed choices. However, it is the responsibility of the manufacturer/producer to ensure that they understand and respect the consumers' choice. It is the responsibility of the FSA to oversee the industry and set examples of good practice.

***"Protecting consumers from food fraud and illegal practices"* (page 24)**

The Vegetarian Society believes that for far too long the consumer has suffered due to a confused labelling system which has led to many misleading product claims, particularly regarding the statement 'suitable for vegetarians' or manufacturers' own symbols intending to signify such suitability.

At present such claims on food products are not checked either before or after the product goes on sale, unless a specific complaint is received and taken up by Trading Standards or Environmental Health Officers. This, coupled with the lack of clear definition, has led to a market saturated with misleading claims and consumers who do not get the products that they think they are buying.

The Vegetarian Society strongly believes that food described as 'suitable for vegetarians' must not include any ingredients or processing agents created through the slaughter of an animal and would like to see future legislation to introduce a legal definition for the term vegetarian.

Current practices within the food industry increase public mistrust. Specifically, inconsistent approaches to vegetarian definition and the varying criteria adopted by manufacturers, caterers and producers leave the consumer baffled.

Four hundred different manufacturers choose to follow the Vegetarian Society's strict criteria and carry the 'Vegetarian Society Approved' seedling symbol. The vast majority of those claiming to sell products 'suitable for vegetarians' do not.



Sadly, too many companies either fail to recognise or actively choose to ignore what it really means to create products for a vegetarian diet. The Vegetarian Society regularly receives complaints about manufacturers or caterers promoting fish as 'vegetarian'. Less obvious to consumers is the frequent inclusion of cheese made with animal rennet, wine fined with isinglass or fruit juice clarified with gelatine in products or dishes bearing a green 'v' logo of the manufacturer's own design.

Asking vegetarians to read ingredient labels is not a viable option. Some consumers have difficulty reading small print, but all vegetarian consumers face the dilemma that 51 different e-numbered ingredients are sometimes suitable for vegetarians and sometimes not – it all depends on how they were made.

Even beyond the perceived "details" of animal rennet, gelatine, cochineal and animal fat, vegetarian consumers regularly seek The Vegetarian Society's support in cases of food labelled as suitable for vegetarians but actually containing meat. A single recent example involves a Vegetarian Society member who found meat in a Sainsbury's vegetable chilli during May 2004 and whose friend found chicken in a vegetarian lasagne in 2003. Both felt that their cases were not treated seriously by the supermarket chain and although this is clearly a case of poor quality control rather than misunderstanding about definition, a culture of enforcement around the term 'suitable for vegetarians' would add weight to complaints of this nature.

In order to address food fraud the market requires clear and consistent definitions. The Society welcomes attempts to bring in tighter regulations within the food industry and would urge the FSA to place great emphasis on regulation and consistency backed by enforcement.

Missing Targets

The Food Standards Agency has acknowledged the need for clarity in vegetarian labelling at a number of public and closed meetings this year (Food Labelling Forum 21 January, Interactive Day with Consumer Groups 24 March, Consumer Stakeholder Forum 17 May, Consumer Committee Open Meeting 16 June). The Vegetarian Society now urges you to include this as a key target in the new strategic plan.

Recent media coverage has highlighted a particular enthusiasm for diminishing the position of individuals who, for moral, ethical, religious, environmental, health or other reasons, commit to a vegetarian lifestyle.

More seriously, vegetarians experience daily difficulties in shopping and eating out. A survey of visitors to The Vegetarian Society website (www.vegsoc.org) in May 2003 found that 85% of vegetarians have visited eating establishments that think vegetarians eat fish. Somerfield Magazine's April 2004 issue proudly promoted its new Tuna Nicoise Salad complete with the supermarket chain's own vegetarian (green 'v') logo.

Vegetarians do not eat fish. They do not eat any dead animals, whether as a major component of a meal, a minor ingredient or a processing agent. The Vegetarian Society is an independent educational charity, formed in 1847, making it the oldest vegetarian organisation in the world. We were the first to use the term vegetarian and to advocate a vegetarian lifestyle in the west and our definition of what that means has never changed:

A vegetarian is someone living on a diet of grains, pulses, nuts, seeds, vegetables and fruits with or without the use of dairy products and eggs. A vegetarian does not eat any meat, poultry, fish, shellfish or crustacea, or slaughter by-products.

Whereas a vegan lifestyle excludes all products derived from animals, whether or not their production necessarily involves slaughter, as defined by The Vegan Society:

“The vegan diet is plant-based, dispensing with all animal produce – including meat, fish, poultry, eggs, animal milks, honey and their derivatives “

If caterers and major retailers cannot be trusted to avoid fish in the foods they sell as 'suitable for vegetarians', they certainly cannot be trusted to avoid gelatine, isinglass, animal rennet or cochineal. With fifty-one e-numbered additives being suitable for vegetarians in some formulations and not in others, asking consumers to read the ingredients listing is not an adequate response.



At present, there is only one way for consumers to be sure that a product or menu item is definitely suitable for vegetarians – if it carries The Vegetarian Society's own trademarked seedling symbol, 'Vegetarian Society Approved'.

Many major manufacturers and organisations adhere to the Society's definition, including Burger King, Kettle Foods, The Sandwich Factory (Virgin Trains), Cauldron Foods, H J Heinz (Linda Mc Cartney Foods), Gluten Free Foods Marlow Foods (Quorn), Dalepak Foods (vegetarian ranges), Britvic Drinks (Orchid Drinks brands).

Ministry of Defence Catering (ration packs) and some other Government Departments also respect the public's right to truly informed choice. The Vegetarian Society was delighted to work with the NHS as part of their 'Better Food for Hospitals' (BFH) project, developing a range of correctly produced vegetarian options.

But consumers wishing to choose truly vegetarian food should not be restricted to those suppliers willing to take up a voluntary labelling scheme or, indeed, those hospitals which have opted into the BFH scheme. If terminology is open to negotiation, it becomes meaningless. At present, the term 'suitable for vegetarians' on a product or menu is of little value to anyone wishing to avoid the consumption of dead animals.

With no legal definition and little regulation the whole system is open to abuse. Some blatant breaches have been pursued by Trading Standards and Environmental Health Officers but this is a reactive rather than proactive approach that relies on the public to highlight a problem. There is little progress to be made without clearly set definitions, regulations and enforcement.

Establishing best practice is a very good start in tackling the sea of misleading information. However, the Society strongly believes that the main target should be a legal definition of the word 'vegetarian' backed up by monitoring, regulation and enforcement.

The Vegetarian Society urges the FSA to consider introducing a legal definition similar to the 'organic' definition coupled with appropriate regulations and enforcement. The Society is encouraged by the success of the organic scheme and is confident that this model would be easy to apply to vegetarian food. However, we once again place great emphasis on a clear definition and enforcement. In the context of this comparison, it is worth considering that when the organic standard was given European legal definition the organic sector accounted for approximately £93million¹ whereas the total meat-free and vegetarian-specific food market is currently worth £582million.²

1 1992 figure, quoted by Dr Nic Lampkin in evidence to House of Commons Select Committee on Agriculture (published at <http://www.parliament.the-stationery-office.co.uk/pa/cm199900/cmselect/cmagric/681/0070512.htm>, 24/6/04)

2 Taylor Nelson Sofres (February 2003)

The Vegetarian Society's long term aim is to see the introduction of legislation for mandatory labelling control to ensure that consumers receive clear and honest information. We call upon the FSA to ensure that food law enforcement has a significant role in stamping out fraud and misinformation in this area.

Suggested New Targets for Inclusion in the Strategic Plan:

- § Agree **good practice guidelines** for the use of the term 'Suitable for Vegetarians' on food labels and menus; promote such guidelines and set measurable targets for uptake by **2005**.
- § Monitor and publish uptake of good practice guidelines described above by 2007.
- § Explore options for **regulation and enforcement** of a compulsory definition of the term 'Suitable for Vegetarians' and develop a framework for such enforcement by **2010**.

QUESTION 3 – ASPIRATIONAL AND ACHIEVABLE

Some of the targets that we have set are aspirational and we need to do a lot of work to map out how to achieve them. Do you agree with the principle of setting aspirational targets even though this increases the risk that we may not achieve all of them?

The Society believes that targets must be aspirational but also recognises that such targets require a long programme of activity to ensure that they are achieved. The Society can see no problems associated with long term project planning and would suggest that the agency makes public the results of regular monitoring against all targets in the strategic plan.

QUESTION 4 – SUSTAINABILITY

The draft strategic plan contains an interim position on sustainability. The Board will be considering this area in more detail later in 2004. The present consultation is one route through which we are inviting stakeholder comments ahead of the Board's discussions. What issues should the Agency be tackling in this area bearing in mind that the means by which food is produced is not within the Agency's remit unless it affects safety or public health.

The Vegetarian Society is a member of Sustain and shares the view that the Food Standards Agency strategic plan should incorporate sustainable development, in order to provide for the needs of the current generation without compromising the ability to provide adequately for future generations. The Vegetarian Society endorses a holistic approach encompassing social and economic goals alongside environmental imperatives.

QUESTION 5 – DELIVERY PARTNERS

We recongise that we will need to work with a wide range of interests to deliver the proposed targets. Have we overlooked any groups or individuals who will have a key role to play?

The Vegetarian Society welcomes the wide inclusion of consumer groups in this consultation but seeks to remind the FSA that such groups must include those whose food consumption is influenced by ethical, moral and religious choices as well as issues of personal health.

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