



c/o Janet McKenzie
Food Standards Agency
Food Labelling & Marketing Terms Branch
Consumer Choice, Food Standards & Special Project Division
Room 115 b, Aviation House
125 Kingsway
London
WC2B 6NH

5 October 2005

Dear Sirs

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criteria for the use of the terms "vegetarian" and "vegan" in food labelling as laid out in paragraphs 13 and 14 of the draft guidance document, supported by the comments and information contained in the covering letter Ref: LRM 23.

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.

Definitions

We feel that the descriptions 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.

Clearly it would be useful for further guidance to be made available to interested parties and we would suggest this being produced at 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 would 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.

We would like to take this 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 provisions in 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 displaying 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 vegetarians' 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 to 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 purchaser 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 suppliers of bulk ingredients, through the chefs and cooks, employees marking up menus, down to the serving staff. The simple and unambiguous statements in the Guidance should go some way to ensure that individual employees do not use their own interpretation of the terms, and give them 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:

- 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 “vegetarian” 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.

Conclusion

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 vegetarians 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.

Yours sincerely

Chris Olivant
On behalf of The Vegetarian Society of the United Kingdom Limited