This paper summarises the expectations of the European vegetarian and vegan movement for the evolving regulatory framework related to novel food. It serves as a position paper for the commencing legislative debate on the Commission proposal for a Regulation on novel foods (COM(2013) 894 final of 18.12.2013).

The European Vegetarian Union (www.euroveg.eu) is the voice of the growing number of Europeans choosing vegetarian and vegan products over animal-based nutrition. Its aim is to make vegetarian and meat-reduced lifestyles safe for consumers, producers and traders and provide adequate information on related health issues, as well as on plant health, animal health and welfare and environmental protection, with reference to a vegetarian lifestyle. The EVU is also the organisation backing the ‘V-Label’ (www.v-label.eu), a voluntary certified labelling scheme.

The EVU is registered in the Register of Interest Representatives (No. 109356110578-03).

NOVEL PLANT-BASED FOODS
Producers of vegetarian and vegan foods are among the most innovative food enterprises. They are challenged to provide new varieties of tasty and healthy foods for consumers eager to enrich their diets with new, plant-based products. They are successful: every year new products reach the market and the market share of vegetarian products has been increasing significantly over recent years. One example is Quorn, a fungus-based meat replacement product which is widely available in many countries today. However, raw materials and production methods not used to date offer massive potential for the food industry to develop new kinds of products with advantages for consumers in nutritional value as well as flavour, texture and other characteristics.

It is to be welcomed, therefore, that the Commission proposal allows for centralised, shortened and simplified authorisation procedures for plant-based foods. The Commission proposal also provides a welcome level of standardisation, as the procedure foreseen is consistent with that put in place by the Food Improvement Agents Package (FIAP) Regulations that establish the authorisation procedures for additives, flavourings and enzymes.

However, concern has to be expressed regarding the scope of the proposed Novel Food Regulation. The Commission draft suggests a very wide range of products falling within the novel food categorisation. As a consequence many new plant-based products risk being deemed novel and requiring a safety assessment costing time and money beyond the general safety requirement of

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1 The current system is clearly dysfunctional and hampers innovation in the food market given the high cost and low number of successful applications.
Article 14 of Regulation 178/2002. Readjustments of the novel food formula used in the Commission proposal are necessary in order to avoid imposing unnecessary regulatory burden for the market entry of new plant foods, especially by SME FBOs.

**EASY MARKET-ACCESS FOR EDIBLE PLANTS**
An estimated number of at least 250,000 plants worldwide are suitable for human consumption. Only a small fraction of these is actually cultivated and enters the conventional food chain. Western staple diets rely on a mere handful of crops. This lack of variety makes the food system vulnerable and deprives the consumer of tasting the vast variety of the earth’s plant life and of benefitting from the various nutritional potential of plant-based foods.

The EVU, therefore, welcomes the fact that the Commission proposal provides for fast-track admission of traditional plant-based foods from a third country with a history of safe use.

→ However, concern has to be expressed regarding the effectiveness of the three-tiered regulatory processes envisaged for the drawing up of the Union list of novel foods. While reasonable timeframes are set, it is likely that EFSA and/or Member States will often question the safety of many new products, triggering delays and probably costs for the market entry of new plant foods. The Comitology procedure involves the Standing Committee (SCoFCAH) in the process preceding the adoption of implementing acts for extending the Union list: this carries the risk of prolonged processes beyond the influence of stakeholders keen to launch innovative products.

**SUSTAINABILITY IN NOVEL FOOD**
Article 11 TFEU requires all Union policies to take into account environmental concerns. That includes food policy that increasingly looks at the sustainability of the food chain. Vegetarianism and the promotion of plant-based diets replacing meat is part of a multi-pronged approach towards more sustainability in the food chain.

It is to be welcomed, therefore, that the Commission proposal would allow new plant-based foods and food plants to be admitted to the EU market swiftly and will broaden the range of plant-based foods available.

→ However, concern has to be expressed regarding the absence of any reference to the environmental impact of novel food in the Commission proposal. Commitments similar to the language used in the Food Improvement Agents Package (FIAP) would be appropriate.

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2 According to the FAO (2004), “of the 250,000 to 300,000 known edible plant species, only 150 to 200 are used by humans. Only three - rice, maize and wheat - contribute nearly 60 percent of calories and proteins obtained by humans from plants.”