



EC Register for Interest Representatives No 109356110578-03

July 2019

## EVU Position

### **Traces of animal substances in vegan/vegetarian food**

Sporadically, the existence of traces of animal substances in food products labelled as vegan or vegetarian is considered to be problematic. Representatives of this position act on false assumptions in their assessment. For vegans, vegetarians and the large number of people who consume vegetarian and vegan products situationally, the (possible) presence of animal traces is no problem. Moreover, strictly speaking, there are no foods that are definitely without animal traces.

#### **Background: A special question**

The question of whether a food is vegan or vegetarian differs from other questions regarding labelling. It is not just the presence or the absence of certain substances. It is not just about the use of substances in the production process. It is also about the impacts of the cultivation and production of a food in areas other than the food itself, in particular on animals.

A completely “animal free” life is not possible. There must be pragmatic limits to make vegetarianism/veganism liveable. This is reflected in the daily lives of millions of vegetarians and vegans. The Vegan Society, whose founders in the 1940s created the term “vegan”, also take this thought into account in the definition of veganism:

*A philosophy and way of living which seeks to exclude – as far as possible and practicable– all forms of exploitation of, and cruelty to, animals for food, clothing or any other purpose [...].*

The discussion should not revolve around a world that is totally void of animal influences in food, clothing or other areas – which is technically not possible – but about an approximation to the desired goal. With regards to traces of animal substances, this concept was also implemented in the definition of the terms “vegan” and “vegetarian”, which has been applied in Germany by the food monitoring authorities since 2016 and is supported by the Federal Government and the German food industry. It states in paragraph 3:

A claim that a food is vegan or vegetarian is not precluded by unintended presence in the food of [animal-based] products [...], if and to the extent that this is unavoidable at any stage of production, processing and distribution, despite appropriate precautions being taken in compliance with good manufacturing practices.

At the European level, the umbrella organisation of vegan and vegetarian associations in Europe, the European Vegetarian Union (EVU), collaborated with the European food industry, represented by its umbrella organisation FoodDrinkEurope (FDE), and agreed on a joint proposal for a definition. The content regarding traces corresponds to the German position.

### **Traces and vegan/vegetarian property**

If one really follows the line of thought that products (theoretically) contaminated with traces cannot be labelled as vegan/vegetarian, then only products whose manufacturers can guarantee absolute absence of traces of animal substances are to be labelled as vegan/vegetarian. This would mean that there would be no more vegan/vegetarian labelled products, since any food could be contaminated accidentally with animal substances. This is most likely the case for the majority of agricultural products, because the absence of, e. g., insects in fruits, vegetables and cereals cannot be guaranteed even by the most advanced cleaning practices. It can therefore be assumed that there are traces of animal substances in all foods on the market which are vegan/vegetarian, based on the recipe and the production process. This does not mean that these products are not perceived as vegan/vegetarian anymore by interested consumers, nor has this ever been criticised by food monitoring or other bodies.

Furthermore, the requirement of a zero tolerance would imply an unequal treatment of vegan/vegetarian products compared to products of other categories where this is not required. For example, organic product guidelines do not even require that 100 % of the ingredients come from organic farming, apart from impurities. Food must be declared as genetically modified, only where GMOs exceed a certain proportion. A fundamentally different treatment of vegan/vegetarian products cannot be justified.

The claim of the vegan or vegetarian characteristic of a product is not an indication that a product is intended or suitable for the corresponding group of allergic consumers. For Germany, the “Food hygiene and food of animal origin working group” (ALTS) confirmed this assessment in November 2016 together with the “Working group of food chemistry experts from the federal states and the Federal Office of Consumer Protection and Food Safety” (ALS). According to this decision, unintentional presence of animal substances in vegan or vegetarian products in technically unavoidable quantities are not to be regarded as misleading even from an allergic person’s point of view.

### **Traces and motives**

People opt for vegan/vegetarian products for different reasons. The most important motives are listed below and have been analysed with regard to the evaluation of traces. It is found that, irrespective of the background of the decision to consume vegan/vegetarian products, a possible contamination with animal substances (or their labelling) is not perceived as problematic.

Are people who consume vegan/vegetarian foods for reasons of animal welfare/animal rights bothered by potential traces of animal substances?

✓ No, because traces are not part of the recipe, but get involuntarily into a food in the production process. The animal substances are thus not procured for the

production of the food. The purchase of the food thus does not contribute to the use or killing of animals. Therefore, it does not controvert animal ethically motivated dietary decisions.

Are people who consume vegan/vegetarian food for health reasons bothered by possible traces of animal substances?

✓ No, because traces are only contained in a product in very small quantities, if the production, as prescribed, is carried out carefully and according to applicable hygienic standards. Such small amounts of animal substances have no relevant effect on the nutritional values of a food and also do not have negative effects on the general health. The current legislation on the allergen labelling is intended to help people who suffer from allergies and food intolerance with product selection. The claim of a food as vegan or vegetarian, as described above, does not replace the allergen labelling and is not an addition of the same. EVU is not aware of indications that a vegan/vegetarian claim is widely used as a reference to the complete and guaranteed absence of certain allergens.

Are people who consume vegan/vegetarian food for reasons of environmental and climate protection bothered by possible traces of animal substances?

✓ No, because only vegan or vegetarian ingredients are procured for the food production. Traces of substances produced under major environmental impacts are only involuntarily entering the food. Purchasing such a food does not lead to the procurement of environmentally problematic raw materials.

Are people who consume vegan/vegetarian food for reasons of dietary justice bothered by possible traces of animal substances?

✓ No, because the animal substances are only involuntarily entering the food. They are not procured specifically for the production. Consequently, the purchase of the food does not encourage the production of additional animal products for which feed has to be grown. Feeding for animals wastes large amounts of edible resources and is partly competing with the cultivation of food for humans.

Are people who consume vegan/vegetarian food for reasons of taste/enjoyment bothered by possible traces of animal substances?

✓ No. The traces contained have very small quantities. They have no influence on the sensory properties of a food.