

To: Members of the ISO Technical Committee on food products (ISO/TC 34)

CC: sandrine.espeillac@afnor.org, bourquin@iso.org

Subject: International Standard ISO/DIS 23662 on the definitions and technical criteria for foods and food ingredients suitable for vegetarians or vegans and for labelling and claims

Tuesday 24th November 2020

Dear members of the ISO Technical Committee on food products,

In anticipation of the upcoming closure of the vote regarding the text of the International Standard ISO/DIS 23662 on the definitions and technical criteria for foods and food ingredients suitable for vegetarians or vegans and for labelling and claims, **the undersigned organisations urge you to consider the following joint letter and amend the draft ISO/DIS 23662 Standard.**

Nowadays, food products containing no ingredient of animal origin are booming on the European market, as supply and demand are steadily growing. Marketing claims and labelling of such food products are however not specifically addressed in EU regulations yet, despite chapter V (regarding Voluntary Food Information) of the [Regulation \(EU\) No 1169/2011 on the provision of food information to consumers](#) ('INCO' regulation) stating in its article 36 (3) that the European Commission (EC) *"shall adopt implementing acts on the application of the requirements referred to in [article 36(2)] to [...] information related to the suitability of a food for vegetarians or vegans.*

Launched in January 2019, the voluntary [ISO 23662 standard project](#) which you coordinate aims at providing definitions and technical criteria for vegetarian and vegan food products and ingredients. It is to be applied in the framework of Business-to-Business communication, in shops selling food products, and in the definition of vegetarian and vegan claims and labelling of food. As a voluntary international standard, the ISO/DIS 23662 standard is likely to have an influence on the future EC implementing act as regards the definition of food products suitable for vegan consumers.

However, this standard (which is soon to be approved in your committee) is incompatible with the common vision of the undersigned. Particularly, the ISO 23662 standard does not address the following issues:

- Animal labour;
- GMO using animal genes or animal by-products;
- Animal testing of ingredients when required by regulatory framework, when not conducted by a Food Business Operator (FBO), or when conducted through a third party;
- No compliance requirement: as no compliance criteria is defined, no independent assessment of compliance can thus be possible.

It is of the uttermost importance to have independent expert groups without any conflict of interests when it comes to drafting standards for vegan consumers. In this regard, the undersigned consumers' and vegan organisations have described a [Vegan Standard](#) (attached to this letter). In particular, we would like to underline three recommendations.

In order to be eligible for consideration for labelling as 'suitable for vegans' a food product should not, among other things:

- **Contain ingredients of animal origin.** Foods suitable for vegans do not contain any ingredients of animal origin (including in food additives, carriers, flavourings, enzymes) nor any processing aids of animal origin that have been added or used during the manufacturing process, preparation, treatment or placing on the market of foods.
- **Be linked with animal testing.** An operator marketing a food product must neither conduct nor commission vivisection or animal testing of a food product nor of the ingredients or processing aids used.

Vegan consumers deserve clear information on their food labels. We therefore urge you to consider our arguments and documents to amend the draft ISO/DIS 23662 Standard.

We remain available for any question you may have and would welcome the possibility to exchange further with you on this important issue.

Yours sincerely,

Hélène Modrzejewski, President, Association Vegan France

Renata Balducci, President, AssoVegan (Associazione Vegani Italiani Onlus)

Floriana Cimmarusti, Secretary General, Safe Food Advocacy Europe

Sauro Martella, Founder, VEGANOK

Louise Davies, Head of Campaigns, Policy and Research

Signatories

ASSO  VEGAN
ASSOCIAZIONE VEGANI ITALIANI



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Safe Food Advocacy Europe
STRIVING FOR SAFER FOOD FOR EUROPEAN CONSUMERS

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