

STANDARD FOR THE CERTIFICATION OF VEGETARIAN AND VEGAN PRODUCTS

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1. SCOPE AND FIELD OF APPLICATION

The purpose of this document is to define the requirements for the certification of products intended for vegetarian and vegan consumers. The certification normally applies to food, feed and pet food products as well as gastronomic preparations and/or menus of catering services.

The certification can also apply to products and substances in non-food sectors (cosmetics, detergents, textiles, footwear, inputs for agriculture, etc.) that meet the requirements set by this standard.

2. OBJECTIVES AND ADDED VALUE OF THE CERTIFICATION

Despite the strong relevance and interest that it encounters on the market, currently, the claim "vegetarian" and "vegan" attributed to the products is not regulated and protected by any law, both in the food sector and in the "non-food" sectors.

REGULATION (EC) N. 1169/2011, while regulating voluntary information on food (article 36) refers to future executive acts defining the requisites concerning the suitability of a food for vegetarians or vegans.

The vegetarian and vegan consumer, therefore, can encounter considerable difficulties in identifying on the market the products suited to his ethical choice. Not all consumers know that bread can contain lard or that the rennet used for cheese production is often obtained from the veal abomasum.

In many cases, even the careful reading of the list of ingredients that appears on the label is not sufficient. The use of ingredients of animal origin, at times, is masked by generic terms permitted by law. In other cases, their indication on the label is not required because they are contained in very small quantities or because, despite being used in significant quantities, they are eliminated as a result of the completion of the production cycle (e.g. technological processing aids and processing aids).

An exemplary case is that of wine whose label does not require the indication of additives and technological adjuvants that can be used in the production process, many of which are of animal origin (eg egg albumin, milk caseins, glue fish, animal jelly, lysozyme from eggs, etc.).

The marketing and administration of vegetarian and vegan foods to the public in the context of the collective catering or the gastronomy counter, is not subject to any regulatory obligation and specific control system.

Even in cosmetics it is possible to use animal or animal substances such as: placenta, cochineal, silk, etc. ⁽¹⁾ Also in this case their presence can be masked because the list of ingredients (INCI) required on the label allows the use of very technical terms, not very understandable and written in small letters. For all other non-food products, the law does not include any obligation to indicate the materials and substances used in manufacturing.

The trademark is granted exclusively to companies that submit to special controls carried out by BAC and obtain the certification of conformity to this standard.

¹ Hyaluronic acid is not mentioned because today it is produced by fermentation from bacteria

3. DEFINITIONS

- **Applicant:** Organization that requires certification.
- **Licensee:** organization to which the certificate of conformity is issued.
- **Vegetarian product:** a product that excludes the use of animal derived substances obtained with animal sacrifice and/or mistreatment at every phase of its production. Instead, the use of eggs, milk and honey is permitted.
- **Vegan product:** a product which excludes the use of any animal derived substance in every phase of its production, even if obtained without sacrifice and/or animal abuse.

4. REGULATORY REFERENCES

- REGULATION (EU) N. 1169/2011 of 25 October 2011 concerning the provision of food information to consumers, Chapter V - Voluntary food information.
- REGULATION (EC) N. 1333/2008 of 16 December 2008 concerning food processing aids.
- REGULATION (EC) N. 1829/2003 of 22 September 2003 relating to genetically modified food and feed.
- REGULATION (EC) N. 1830/2003 of 22 September 2003 concerning the traceability and labeling of genetically modified organisms and the traceability of food and feed produced from genetically modified organisms and amending Directive 2001/18 / EC.
- REGULATION (EC) N. 606/2009 of 10 July 2009 laying down certain rules for the application of REGULATION (EC) No 479/2008 of the Council regarding the categories of wine products, the oenological practices and the relative restrictions.
- REGULATION (EC) N. 889/2008 of 5 September 2008 laying down detailed rules for the application of REGULATION (EC) No 834/2007 on organic production and labeling of organic products, with regard to organic production, labeling and controls.
- REGULATION (EU) N. 203/2012 of 8 March 2012 amending REGULATION (EC) no. 889/2008 regarding the rules for the production of organic wines.
- UNI CEI EN ISO/IEC 17065 – Assessment of conformity requirements for bodies that certify products, processes and services.
- UNI CEI EN ISO/IEC 17025 – Accreditation of tests and calibrations.

5. CERTIFICATION REQUIREMENTS

5.1 SPECIFIC REQUIREMENTS of VEGETARIAN PRODUCTS

IT IS FORBIDDEN to use any substance, ingredient, additive or adjuvant or derivative of animal origin or which entails for its attainment procedures which provide, directly or indirectly, the sacrifice and/or mistreatment of animals.

The use of animal products such as milk, eggs and honey IS PERMITTED provided they are produced on farms that comply with European animal welfare standards. Organic breeding farms or those that comply with other voluntary disciplinary measures which provide more restrictive requirements in this regard are preferable.

EGGS and other derived products must be obtained from hens raised organically (code: 0), outdoors (code: 1) or on land (code: 2). The use of eggs from intensive battery farms is forbidden (code: 3).

In ANIMAL FEED the use of feed, raw materials for feed and other substances obtained or derived from GMOs IS PROHIBITED, according to the EC Reg. N. 1829/03 and EC Reg. 1830/03. As an example, therefore, in the preparation of VEGETARIAN PRODUCTS the following substances of animal origin are excluded a priori:

- meat, poultry, fish, seafood;
- products containing ingredients derived from meat or bones; products containing animal fats (except dairy fat), frying fats or margarines containing fish oil or similar products; jellies, gums and other gelling agents of animal origin;
- other products containing ingredients derived from slaughtering products;
- all the cheeses produced with rennet coming from the veal abomasum or, in any case, of animal origin;
- filtration aids with gelatin, egg white (from battery farms), fish glue or cases derived from shells or crabs.

5.2 SPECIFIC REQUIREMENTS of VEGAN PRODUCTS

The use throughout the production process of any ingredient/adjuvant/processing aid of animal origin is NOT PERMITTED.

No animal substance can also be used indirectly in the production process, also as an additive, excipient, adjuvant (2) or carry-over (3).

This may include but is not limited to, in formulating the products it is advisable to consult:

ANNEX 1 - Examples of ANIMAL SUBSTANCES (FORBIDDEN)

ANNEX 2 - Examples of SUBSTANCES OF POSSIBLE ANIMAL DERIVATION (it is necessary to ascertain with the producer/seller that they do not derive from animals)

Please note that the additives and adjuvants used in the preparation of organic food and feed must still respond to the appropriate lists of REGULATION (CE) No. 889/2008.

Products typically 100% VEGETABLE (e.g. fruit, vegetables, dried fruit, extra virgin olive oil, tomato puree, etc.) can be certified as VEGAN, only on condition that the raw materials of origin are produced without using substances of animal origin even during the cultivation and conservation phase.

Therefore, the use of manure, pollen, manure and other fertilizers/soil improvers obtained from livestock or industrial by-products of animal origin IS FORBIDDEN (e.g. blood meal, meat, horns, fish, etc.), including any plant protection products of animal origin.

For all other processed products, where it is possible the use and/or cohabitation within the same facility and/or contamination with products of animal origin, the vegan requirement is only required within the manufacturing process.

In vegan food products, the indication on the label of any animal allergens (eggs, milk, etc.) is PERMITTED on condition that, obviously, they are not related to the ingredients.

(2) Definition REGULATION (CE) N. 1333/2008 of 16 December 2008

"Technological adjuvant" means a substance which:

- i) it is not consumed as a food in itself;
- ii) is intentionally used in the processing of raw materials, foods or their ingredients, to exercise a certain technological function in processing or manufacturing; and
- iii) may give rise to the presence, unintentional but technically unavoidable, of residues of this substance or of its own derivatives in the finished product, provided that these residues do not pose a risk to health and do not have technological effects on the finished product.

(3) Additives and other substances contained in the ingredients of origin of a food which, in the finished product, no longer perform any technological functions.

Therefore, the following indications are allowed: "*may contain traces of ... (eg milk, eggs, etc.)*", or "*obtained in a factory that also works (eg. milk, eggs, etc.)*".

In any case, the ADOPTION OF ALL MEASURES TO PREVENT CONTAMINATIONS with substances of animal origin that can enter directly or indirectly inside the factory is required.

Such prevention measures must be documented and recorded. The effectiveness must be the subject of a specific self-control plan and continuous improvement actions.

Thanks to these activities, in relation to the actual risk of contamination, the indication of the indirect presence of allergens on the label must be subject to a periodic review.

Here are some examples of non-compliant substances:

- A)** Meat and derivatives, animal oils and fats, animal jellies, bones, dried blood, chitin, squalene, parchment, placenta, shellac, animal glue, snails, urea, pepsin, keratin, abomasum, animal poison, coals of animal origin, ceramics treated with animal coals, stearic acid, glycerin and stearin (of animal origin), cochineal and other additives of animal origin (E120, E154, E631, E901, E904, etc.), skins, furs, silk, ivory, suede, horns or hooves, coral, waxes, pearls, cases and shells, animal bristles, feathers, sea sponges.
- B)** Milk and other milk derivatives and yoghurt, casein and caseinates, whey, eggs and derivatives, pollen, royal jelly, honey, beeswax, wool and lanolin.

5.3 SPECIFIC REQUIREMENTS OF VEGAN WINES

VEGAN WINE is obtained without the use of the following additives and technological adjuvants of animal origin, provided for by the normal oenological practices and processes authorized by REGULATION (EC) N. 606/2009. It is therefore forbidden to use the following substances: egg ALBUMIN, milk CASEIN, animal JELLY, FISH GLUE and LISOZIMA (from eggs). Lysozyme is also prohibited in the production of organic wines, in accordance with REGULATION (EC) No. 203/2012.

For consistency with the chosen certification and respect for ethics and vegan sensibility, in certified wines it is advisable to avoid indications and descriptions on the label that suggest combinations with dishes based on meat or fish and/or dairy products.

5.4 COMMON REQUIREMENTS of VEGETARIAN and VEGAN PRODUCTS

The use in the whole production process of any ingredient/processing aid/adjuvant obtained or derived from genetically modified organisms in accordance with the provisions of REGULATIONS (EC) No. 1829/03 and N. 1830/03 is NOT PERMITTED.

It is COMPULSORY to ensure the traceability of the lot number and of the manufacturer of the ingredients/substances and other critical components. The criticality is related to the probable content/contamination with substances of animal origin.

The applicant company must not have carried out or commissioned any tests or procedures that involved the direct exploitation of animals; all testing or control procedures on the finished product that have involved the exploitation of animals must be excluded.

In the event that one or more animal experiments have been carried out or commissioned in the past, the company must declare the date from which it committed itself to the complete interruption of the tests and the commitment not to carry out or commission any experimentation on animals.

The company must therefore undertake to declare the refusal to use the tests, as well as to support the use of alternative tests. This commitment should also be reported on company information materials.

The requirement is obviously not applicable in the case the tests are imposed by law and performed by the public authorities in the markets of destination of the products.

6. CONTROL METHODOLOGY

6.1 INITIAL EVALUATION

A) CONFORMITY OF THE PRODUCTION UNITS / THIRD PARTY USED

BAC checks the data and documents related to the production, packaging and labeling units in order to assess compliance with the most significant (mandatory) requirements and with the requirements of the standard applicable to the specific situation.

B) CONFORMITY OF THE PROPOSED FORMULATIONS

In the start-up phase or in case of request to extend the application field of the certification (new products), BAC checks the recipes of the products for which certification is required, the technical sheets of the raw materials/ingredients considered critical, the labels and other communication material.

BAC reserves the right to evaluate the compliance of the labels and claims made regarding the vegetarian and vegan requirements.

C) TECHNICAL REPORT (or business quality plan)

With the indication of all the particular measures that will be adopted to ensure compliance with the requirements imposed by the product standard for Vegetarian and/or Vegan products, compared to the normal operation of the production process.

6.2 NUMEROSITY/FREQUENCY OF INSPECTIONS

During the certification start-up phase, BAC checks the production plant of the Company as well as any subcontractors or third parties where it is necessary to check the conformity requirements required by this standard. The number and type of verified plants are defined by BAC in relation to the critical nature of the sites and activities carried out.

BAC will perform subsequent surveillance audits at least annually and it will define the control and analysis plan on the basis of a careful risk analysis. BAC reserves the right to carry out additional visits (even if not announced) and/or to intensify the surveillance activity in case of serious non-conformities found in the context of normal controls or reported by other interested parties.

6.3 ELEMENTS SUBJECT TO BAC CONTROLS

During inspections, BAC evaluates all aspects of the quality system applicable to obtaining the product. The following list summarizes these aspects:

1. Quality system related to the product/process/service
2. Control of documents and data
3. Supplier sourcing and their qualification
4. Identification and traceability of the product
5. Process control
6. Testing and analysis
7. Control of the non-compliant product
8. Corrective and preventive actions

- 9. Handling, storage, packaging, conservation and delivery
- 10. Control of records related to quality
- 11. Internal audits elated to quality
- 12. Training
- 13. Complaints

6.4 ANALYTICAL TESTS

The Company requesting certification, in relation to the criticality of its production process and product composition, must prepare an adequate analysis plan within the self-control system.

Based on the specific criticality, as a rule, the following analytical tests are used: research of allergens milk and eggs, research of lactose, research of animal DNA.

BAC will verify the accuracy and effectiveness of this plan, also through sampling and analysis carried out at its own qualified laboratories. Both BAC and the applicant organization will have to resort, in all cases in which they are available, laboratories with accredited tests based on the UNI CEI EN/IEC 17025 standard.

7. MODALITY OF DECLARATION OF CONFORMITY

The communication of vegetarian or vegan certification must always be reported and clearly referable to food products/gastronomic preparations or non-food products subject to certification.

Once they have obtained the Certificate of Conformity, Licensee Companies may use the following certification marks provided for the specific type of product (VEGETARIAN or VEGAN).

Certification marks must be used in the following color modes: Green/Black, White/Black or Grayscale. Any other combinations must be previously authorized by BAC. The mark shown on the label must be clearly visible and identifiable by the consumer.



VEGETARIAN



VEGETARIAN



VEGAN



VEGAN

ANNEX 1 – Examples of SUBSTANCES OF ANIMAL ORIGIN

(source: Vegan Society - UK)

ADDITIVES

- E120 (cochineal)
- E542 (phosphate of edible bones)
- E631 (disodium inosinate)
- E901 (beeswax, white and yellow)
- E904 (shellac)

INGREDIENTS AND OTHER SUBSYNCES

- Hexaphosphosphate mesonositol of calcium
- Lactose
- Oil of spermaceti
- Spermaceti
- ANIMAL FIBERS (angora, astrakhan, cashmere, mohair, wool)
- ANIMAL MILK AND MILK DERIVATIVES (casein, caseinates, lactates, lactic acid, lactose)
- BEES PRODUCTS (pollen, poison, virgin wax, honey, propolis, royal jelly)
- DAIRY PRODUCTS AND MILK DERIVATIVES (butter, cheese, whey, yogurt).
- PRODUCTS OBTAINED DIRECTLY FROM SLAUGHTERING ANIMALS: fish, game and its derivatives (e.g. meat/fish extracts and broths), poultry, meat.
- MARINE ANIMAL PRODUCTS: ambergris, capiz, caviar, chitin, coral, fish scales, fishmeal, isinglass, sea oils and extracts (e.g. fish oil, squalene, seal oil, whale oil), sponges, pearls, fish eggs, seal meat, mollusks and crustaceans, spermaceti oil, spermaceti, whale meat.
- MISCELLANEOUS PRODUCTS: amniotic fluid, fish and animal glue, carmine/carminic acid, catgut, chamois, cochineal, chopped insects and snails, fixatives (e.g. musk, civet, castoreo), hormones (e.g. estrogen, progesterone, testosterone), ivory, lanolin, mustelid oil, parchment, placenta, silk, shellac, snake venom, some vitamins (e.g. D3, urea, parchment, and any carrier element), gelatin is often used to carry beta-carotene and vitamin D2), substances used in food processing), lactose often used to fix flavor in French fries), or anti-adherent agents (often used to prevent confectionery and sweets adhering to the package) containing or made with animal substances of any kind.
- PRODUCTS DERIVED FROM SLAUGHTERING ANIMALS: animal fats (e.g. fat, lard, suet, tallow), amino acids, aspic, bones, bone charcoal/animal black, bone meal, bristles, collagen, down, dry blood, derivatives of fatty acids, feathers, fur, gelatin, glycerine/glycerol, hair, hide/leather (leather, suede, etc.), hoof flour or animal horns, oleic acid, oleic oil, oleostearin, pepsin, proteins (e.g. elastin, keratin, reticulin), abomasum, skin, stearates, stearic acid, stearin).

ANNEX 2 - Examples of substances of POSSIBLE ANIMAL DERIVATION

(source: Vegan Society - UK)

ADDITIVES

- E101 (riboflavin, lactoflavin, vitamin B2)
- E101 (a) (riboflavin, riboflavin-5'-phosphate)
- E153 (black coal, vegetable coal)
- E161 (b) (lutein)
- E161 (g) (cantaxanthin)
- E236 (formic acid)
- E237 (sodium formate)
- E238 (calcium formate)
- E270 (lactic acid)
- E322 (lecithin)
- E325 (sodium lactate)
- E327 (calcium lactate)
- E422 (glycerol/glycerine)
- E432 (polyoxyethylene sorbitan monolaurate, polysorbate 20, between 20)
- E433 (polyoxyethylene sorbitan monooleate, polysorbate 80, between 80)
- E434 (polyoxyethylene sorbitan monopalmitate, polysorbate 40, between 40)
- E435 (polyoxyethylene sorbitan monostearate, polysorbate 60, between 60)
- E436 (polyoxyethylene sorbitan tristearate, polysorbate 65, between 65)
- E470 (a) (sodium, potassium and calcium salts of fatty acids)
- E470 (b) (magnesium salts of fatty acids)
- E471 (glycerides of fatty acids, glyceryl monostearates, glyceryl distearates)
- E472 (a) (acetic esters of glycerides of fatty acids, acetoglycerides, esters of glycerol)
- E472 (b) (lactic esters of monoglycerides and diglycerides of fatty acids, lactylated glycerides, lactoglycerides)
- E472 (c) (citric esters of monoglycerides and diglycerides of fatty acids)
- E472 (d) (tartaric esters of monoglycerides and diglycerides of fatty acids)
- E472 (e) (methadartaric and diaceltartaric esters of glycerides of fatty acids)
- E472 (f) (tartaric acetic mixed esters of monoglycerides and diglycerides of fatty acids)
- E473 (sucrose esters of fatty acids)
- E474 (sucroglycerides)
- E475 (fatty acid polyglycery esters)
- E476 (polyglycol esters of polycondensated fatty acids of castoreum oil, polyglycerol polyiricinoleate, polyglycerol esters of soybean oil dimerized fatty acids)
- E477 (glycol-propylene esters of fatty acids, propane- esters of 1,2-propanediol of fatty acids)
- E479 (b) (reaction product of thermally oxidized soybean oil with monoglycerides and diglycerides of fatty acids)
- E481 (stearoyl-2-sodium lactyl)
- E482 (stearoyl-2-calcium lactylate)
- E483 (steroid tartrate)
- E491 (sorbitan monostearate)
- E492 (sorbitan tristearate, equal to 65)
- E493 (sorbitan monolaurate, equal to 20)
- E494 (sorbitan mono-oleate, equal to 80)
- E495 (sorbitan monopalmitate, equal to 40)
- E570 (fatty acids, including myristic, stearic, palmitic and oleic, butyl stearate)
- E572 (magnesium salts of fatty acids, including magnesium stearate, calcium stearate)
- E585 (ferrous lactate)
- E627 (guanosine 5'-disodium phosphate, sodium guanilate, disodium guanylate)
- E635 (5'-sodium ribonucleotides)
- E640 (glycine and its sodium salt)
- E920 (L-cysteine hydrochloride)
- E1518 (glyceryl mono-, di- and tri-acetate, triacetin)

INGREDIENTS AND OTHER SUBSTANCES

- Calcium hepatatus
- Calcium phytate
- Fiacetina
- Glyceryl
- Leucine
- Monoacetina
- Oxystearin