

STANDARD FOR VEGETARIAN, VEGAN AND PLANT BASED PRODUCTS

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VEGETARIAN



VEGAN



PLANT
BASED

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 and in any case interested in consuming and using plant-based products without any component or involvement of the animal kingdom.

The certification applies to agri-food products, food supplements and drugs, feed and pet food, to gastronomic preparations and/or menus of catering services, to products and substances in the Non-Food sectors (e.g. cosmetics, detergents, textiles, other products for the house, to footwear and clothing products, tools, products of general use such as packaging, furniture and furnishings and inputs for agriculture, etc.) that meet the requirements set by this specification.

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.

We verify, all over the world, a growth trend in the expression of these values that is no longer driven only by animal rights ethics but also by greater attention to health and, in particular, to the growing environmental awareness that directs consumers towards new models and lifestyles as well as the demand for vegetal products called "plant-based products".

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 (e.g. 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.

In cosmetics it is possible to use animal substances or substances of animal origin such as: placenta, cochineal, silk, eggs, refined animal fats, crustacean exoskeleton, collagen, cetacean fats, glands and particular organs of wild mammals also for odorous substances etc.

Also in this case, their presence can be masked or difficult to identify since the mandatory list of ingredients (INCI) on the label allows the use of technical terms, not understandable to the common consumer and written in very small characters.

An exemplary case is glycerol which can be of animal or vegetable origin (the animal one has a lower cost) and in the INCI list of the label is generically indicated as "glycerin" and animal fats that are generically indicated "tallow" or "tallowats".

For all other non-food products, the law does not provide for any obligation regarding the indication of the materials and substances used in the manufacture.

The mark is granted exclusively to companies that are subject to specific controls carried out by BAC and obtain certification of compliance with this specification.

3. DEFINITIONS

- **Applicant:** Organization that requires certification.
- **Licensee:** organization to which the certificate of conformity is issued.
- **Vegetarian product:** product that excludes the use of animal-derived substances obtained with the sacrifice and/or mistreatment of animals at every stage of its production. On the other hand, the use of eggs, milk, honey, wool and other products derived from live animals is allowed, provided that mistreatment and mutilation are avoided and animal welfare is guaranteed in a controlled manner.
- **Vegan product:** product that excludes the use of any substance of the animal kingdom and animal derivation at every stage of its production, even if obtained without sacrifice and/or animal abuse.
- **“Plant based” product:** product consisting mainly of plant ingredients and other natural substances or substances of natural origin but exclusively of vegetable or mineral origin (any component derived from the animal kingdom is excluded).
- **Ingredients and substances of natural origin:** water, minerals and ingredients of mineral origin, physically processed agro-ingredients and chemically processed agro-ingredients.

4. REGULATORY REFERENCES

- ISO 22662: 2021 Definitions and technical criteria for foods and food ingredients suitable for vegetarians or vegans and for labelling and claims.
- BRCS Plant Based Global Standard.
- Position Paper prepared by the Working Group to define food as "suitable for vegans" SAFE (Safe Food Advocacy Europe) 6MEPs, 22nd February 2017.
- Food Standards Agency (FSA) guidelines - UK.
- 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.
- 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.

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EGGS and other derived products must be obtained from hens raised organically (code: 0), outdoors (code: 1). The use of eggs from battery farms (code: 3) and on land (code2) is prohibited.

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 ⁽¹⁾ or carry-over ⁽²⁾.

For processed products, the vegan requirement is only applicable 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.

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

- 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.

⁽¹⁾ 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.

⁽²⁾ Additives and other substances contained in the ingredients of origin of a food which, in the finished product, no longer perform any technological functions.

- Milk and other milk derivatives and yoghurt, casein and caseinates, whey, eggs and derivatives, pollen, royal jelly, honey, beeswax, wool and lanolin.

The VEGAN attribute implies that, as far as possible and practicable, the animals have never been involved in any phase of production, preparation, treatment or placing on the market. For example, glues of animal origin are also prohibited for attaching labels or sealing packaging.

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).

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 SPECIFIC REQUIREMENTS OF PLANT BASED PRODUCTS

The PLANT BASED product is obtained without the use of any ingredient/adjuvant/manufacturing aid of animal origin and consists mainly of plant ingredients and other natural substances or of natural origin (including water added in the preparation).

The incidence in weight or volume of the ingredients/plant components, of natural substances or of substances of natural origin must meet the following parameters:

	Food	Non Food
Vegetal Ingredients (the calculation does not include the water added in the preparation)	≥ 95%	≥ 51%
Other ingredients and natural substances or of natural origin (the water added in the preparation is included in the calculation)	≥ 95%	≥ 95%

5.5 COMMON REQUIREMENTS OF VEGETARIAN, VEGAN AND PLANT BASED PRODUCTS

The use in the whole production process of any ingredient/processing aid/adjuvant obtained or derived from genetically modified organisms.

It is MANDATORY 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/SUBCONTRACTORS USED

BAC verifies 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, vegan and plant-based requirements.

C) TECHNICAL REPORT (or business quality plan)

With the indication of all the measures that will be adopted to ensure compliance with the requirements imposed by the product standard for Vegetarian, Vegan and/or Plant Based 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 relevant 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 related 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, vegan or plant-based 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 logo provided for the specific type of product (VEGETARIAN, VEGAN or PLANT BASED).

Certification logo must be used in the following color modes: Green/Blue, White/Black or Grayscale. Any other combinations must be previously authorized by BAC.

The certification logo shown on the label must be clearly visible and identifiable by the consumer.

