

<b>Policy Title:</b> <i>Vegan Guidance Document</i>	<b>Policy:</b> <i>TBD</i>
<b>Issue Date:</b> <i>April 9, 2018</i>	<b>Origin:</b> <i>QFR – Loblaw Companies Ltd.</i>
<b>Effective Date:</b> <i>April 9, 2018</i>	<b>Written by:</b> <i>J. Friday, A. Koo &amp; T. Malley</i>
<b>Supersedes:</b> <i>New</i>	<b>Approved by:</b>

## **Guidance Document Vegan**

Vendors who wish to manufacture control brand products for Loblaw that make a vegan claim must adhere to the following requirements:

1. Vendor, of food products, must be certified to a Global Food Safety Initiative (GFSI) standard.
2. Vendor facility/facilities must meet all requirements of the VegeCert Vegan Certification Guidelines developed by VegeCert and must join in an agreement with VegeCert.
3. Product must be certified vegan by VegeCert and meet its Vegan Certification Guidelines and Loblaw requirements for vegan as indicated below.

GFSI, VegeCert and Loblaw requirements include, but are not limited to:

- a) Vendor must enter into a Licensing Agreement with VegeCert and allow for VegeCert product assessment and audits at VegeCert's discretion.
- b) Hazard Analysis and Critical Control Point (HACCP) with supporting prerequisite programs & Good Manufacturing Practices (GMP) programs must be in place for food manufacturing facilities.
- c) A risk analysis of the manufacturing process and the facility must be conducted with the appropriate control measures in place for the identified risks.
- d) Vendor must have a management system in place that prevents the risk of non-vegan contamination/cross contamination. The use of a precautionary "may contain" statements of milk, egg, fish or shellfish are not permitted.
- e) An effective "on-hold" program and traceability system must be in place in the event of a non-conformity with the appropriate corrective action in place.
- f) A supplier approval process must be in place. All ingredients received must be approved and monitored. All ingredients used in a vegan product must be properly identified and handled throughout the manufacturing process and the facility.
- g) Product is free of ingredients and components of ingredients or processing aids that are derived from animal or animal by-products. In the case for non-food, product has not been tested on animals.
- h) Vendor is responsible for collecting, maintaining and providing a copy of the Letter of Compliance (certificate) from VegeCert for each Loblaw control brand vegan product. The vendor must circulate the artwork to VegeCert at the time of artwork circulation, and forward the approval e-mail to the Loblaw Assistant Product Manager (APM).
- i) Records must be available and maintained demonstrating

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compliance to the VegeCert Vegan Certification Guidelines.

- j) The VegeCert Vegan Certification Guidelines must be reviewed and re-assessment must happen at VegeCert’s discretion or as required: when there is a change in the formulation of the product; when a new raw material supplier is being sourced for the product; when the process or equipment is changed; and/or when product is found to be non-conforming. It is the vendor’s obligation to notify VegeCert and Loblaw of such changes in advance of the change’s implementation.

It is Loblaw’s expectation that all vegan products meet the above requirements on a continuous basis. Achieving vegan certification does not absolve a vendor of its on-going responsibility and accountability to meet the VegeCert Vegan Certification Guidelines and Loblaw requirements. Non-compliance may result in suspension (temporary ineligibility) or cancellation (completely ineligible) to participate as a recognized vegan manufacturer.

In the event of product non-conformity or a change in activities of the manufacturing process, VegeCert and Loblaw Quality Assurance Specialist (QAS) must be notified immediately. All products since the last conformity must be segregated and placed “on-hold” pending further investigation, and may result in a product recall/withdrawal.

### **Additional Information**

VegeCert Contact:

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### **Definitions**

**Vegan:** is a person who does not consume any product containing animal ingredients or animal by-products (e.g. dairy, eggs, honey, clarifying agents, sugar refined with bone char, insects, etc.).

**Vegan product:** a product containing no animal ingredients or animal by-products, including no animal ingredient or animal by-product in the manufacturing process and is not tested on animals. Is plant-based only.

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### **Resources:**

- Loblaw Vegan Policy
- VegeCert Vegan Certification Guidelines – a manual for manufacturing vegan certified products
- CFIA’s Food Labelling for Industry – Vegetarian Claims  
(<http://www.inspection.gc.ca/food/labelling/food-labelling-for-industry/composition-and-quality-claims/eng/1391025998183/1391026062752?chap=2#s5c2>)