

EAZA Position Statement on the EU 'Food Labelling Directive'



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Introduction

This statement presents the position of the European Association of Zoos and Aquaria (EAZA) on the *Proposal for a Regulation of the European Parliament and of the Council on the provision of food information to consumers*. EAZA is interested in the proposed regulation as we believe that clear labelling of the presence of palm oil in food products would better inform EU citizens of the potential environmental, social and ethical impacts of their purchases.

While a native species of Africa, oil palm (*Elaeis guineensis*) grows well in many tropical countries and the majority of palm oil production takes place in Southeast Asia. The impact of the conversion of tropical forest to mono-culture oil palm plantations and the associated declines in already threatened species, such as the orangutan¹, are of significant concern to EAZA. In addition the removal of large areas of tropical forest leads to increased atmospheric levels of greenhouse gases through release of carbon from felled forests and methane release from the drying out of peaty soils on which they originally stood, thus accelerating the well-documented effects of climate change.

Currently there is no mandatory requirement in the EU for manufacturers to label palm oil (manufactured from the fruit of oil palm) or palm kernel oil (manufactured from the seeds of oil palm) on food products. Palm oil is generally labelled using the generic term 'vegetable oil' and is therefore a hidden ingredient of a wide variety of food products commonly found on EU supermarket shelves.

The remainder of this statement will provide further detail on EAZA's position.

EAZA's current status and general position;

- As laid down in EAZA's constitution the objects of the association are: **a.** to promote cooperation for the furtherance of wildlife conservation, through internationally coordinated breeding programmes of wild animals and *in situ* conservation; **b.** to promote education, in particular environmental education; **c.** to promote scientific study; **d.** to represent the interests of its members;
- EAZA represents 327 members from 36 countries, 300 of which maintain public collections of animals. More than 280 institutions of the total EAZA membership are located within the European Union. EAZA member institutions receive approximately 140 million visitors a year and house more than 250,000 animals, excluding fish and invertebrates. EAZA member institutions employ 20,000 staff members, 5000 of whom are seasonal;
- EAZA members are often important economic drivers and cultural centres in their local communities;
- In the context of local areas EAZA members are often important 'opinion formers' on environmental issues;
- EAZA has a significant social role in educating European citizens about animals, their conservation, and overarching threat processes such as climate change, habitat loss and how consumer behaviour interacts with these global challenges. Zoos and aquariums have been

demonstrated to host a far more representative and inclusive visitor social spectrum than either museums or science centres;

- EAZA has adopted the World Zoo and Aquarium Conservation Strategy (2005) which articulates the modern role of zoos and aquariums and their commitment to conservation;
- EAZA institutions in the European Union comply with Council Directive 1999/22/EC relating to the keeping of wild animals in zoos.

We believe;

- EU citizens are becoming increasingly aware of the impact of their consumer choices on the environment, both in Europe and elsewhere, in particular their impact on climate change and loss of species;
- Providing clear information to consumers to enable them to make informed choices is a key role of the EU;
- The current EU focus on overhauling EU food labelling in respect to Directive 2000/13/EC and Directive 90/496/EEC is welcome in that it seeks to promote these enhanced consumer choices;
- That conversion of tropical forest, particularly in Southeast Asia for oil palm plantations is negatively affecting biodiversity conservationⁱⁱ and climate changeⁱⁱⁱ;
- That while the concerns relating to EU citizen health and increasing obesity levels in Europe are well catered for in the proposal other aspects of consumer choice in relation to food labelling are missing;
- In respect to Recital 3 of the EU proposal: *“In order to achieve a high level of health protection for consumers and to guarantee their right to information, **it should be ensured that consumers are appropriately informed as regards food they consume. Consumers choices can be influenced by, inter alia, health, economic, environmental, social and ethical considerations**”*; that the detrimental environmental impacts of the inclusion of palm oil in food products have not been catered for in the proposal;
- In respect to Article 3 on General objectives of the proposal: *“The provision of food information shall pursue a high level of protection of consumers’ health and interests by providing a basis for final consumers to make informed choices and to make safe use of food, with particular regard to health, economic, **environmental, social and ethical considerations**”*; that the detrimental environmental impacts of the inclusion of palm oil in food products have not been catered for in the proposal;
- That allowing EU citizens to make a choice as to whether they purchase products that contain palm oil and palm kernel oil through clear labelling should be included in this proposal.

What we would like to see;

- The inclusion of palm oil or palm kernel oil clearly labelled in food products sold in the EU;
- Therefore an amendment to be included in the current proposal to make *mandatory* the labelling of oil palm derivatives in food products sold in the EU;
- Whilst acknowledging the difficulties of manufacturers in tracing combined vegetable oils for use in products, that the use of the phrases *‘May contain products derived from oil palm’* or *‘May contain palm oil’* be made mandatory for products that knowingly contain palm oil or where it cannot be guaranteed that palm oil is not included in the product;
- Where a product label contains a mandatory phrase indicating the use of oil palm products that an additional mandatory element should be to indicate whether the palm oil is from certified sustainable sources or is from unsustainable sources;
- Where palm oil is not contained in a food product and where the remaining ingredients do not impact negatively on tropical forests or the species contained therein that manufacturers

are encouraged to develop 'orangutan friendly' optional labelling schemes to further increase consumer choice.

ⁱ <http://www.unep.org/grasp/docs/2007Jan-LastStand-of-Orangutan-report.pdf>

ⁱⁱ Fitzherbert, E. B., et al (2008) How will oil palm affect biodiversity? Trends in Ecology & Evolution Volume 23, Issue 10,

ⁱⁱⁱ Edwards, D.P, et al (2010) Wildlife-friendly oil-palm plantations fail to protect biodiversity effectively Conservation Letters (xxxx)