

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5

CX/FL 03/5-Add.1

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Thirty-first Session

Ottawa, Canada, 28 April - 2 May 2003

DRAFT AMENDMENT TO THE GUIDELINES ON NUTRITION LABELLING (SECTION 3.2 LISTING OF NUTRIENTS)

GOVERNMENT COMMENTS AT STEP 6

EUROPEAN COMMUNITY

1. Extension of the Nutrient Declaration:

The European Community welcomes the proposed extension of the number of nutrients to be declared in nutrition labelling (including sugars, dietary fibre, saturated fatty acids and sodium) according to the conditions outlined in para 3.2.2., ie when these are declared voluntarily, are the subject of a nutrition claim or a health claim is made. This declaration will provide consumers with a more complete view of the specific food concerned.

3.2.2.1. For greater clarity, we suggest that the wording of this paragraph should be modified as follows: "The amounts of one or more **of the following nutrients** (sugars, dietary fibre, saturated fatty acids, [trans fatty acids], and sodium) are declared voluntarily,"

3.2.2.3. As a health claim can be made not only for the food itself but also for one of its constituents (eg role of folic acid in reducing the risk of neural tube defects), we wonder whether it might not be more precise to reference this as follows: "A health claim is made for the food **or one of its constituents.**"

2. Declaration of n-3 and n-6 polyunsaturated fatty acids (para 3.2.4)

We express reservation concerning the possibility of replacing the declaration of polyunsaturated fatty acids by the specific declaration of n-3 and n-6 polyunsaturated fatty acids. Indeed we consider that consumers may not be able to utilise and understand such specific information regarding fatty acid content. We therefore support maintaining this sentence in square brackets.

3. Format for fat declaration (para 3.4.7)

Reference to cholesterol has been omitted from the format for fat declaration indicated in paragraph 3.4.7.. When it is declared, we believe that the cholesterol content of a food should be indicated at the end of the fat declaration, following polyunsaturated fatty acids. We therefore propose that the wording of this paragraph be modified as follows: "Where the amount and/or type of fatty acid **and/or amount of cholesterol** is declared, this declaration should follow immediately the declaration of the total fat in accordance with Section 3.4.3." Cholesterol should also be added to the format for fat declaration outlined in paragraph 3.4.7. following polyunsaturated fatty acids.

We also would like to point out that the current format (indent of trans/monounsaturated/polyunsaturated fat underneath saturated fat) could imply that these are all subcategories of saturated fat; hence, these sub-items if indicated should be aligned with the preceding line, ie “**of which...**”.

4. Vitamin declaration

Para. 3.2.5. For completeness, we suggest that paragraph 3.2.2. should also be included in the list of paragraphs referring to mandatory declaration requirements. This sentence should therefore read: “In addition to the mandatory declaration under 3.2.1, **3.2.2**, 3.2.3. and 3.2.4, vitamins and minerals may be listed in accordance with the following criteria...”

Para. 3.2.6: As indicated in comments made by the European Commission for the CCFL 2002, we believe that the level of 5% of the Nutrient Reference Value (NRV) is too low to be considered as what constitutes a significant amount for the declaration of vitamin and mineral content, particularly when this refers to a reference quantity of 100 g/ml. The level of 5% NRV/100g is also not in line with the agreed values for a “source claim” for vitamins and minerals, ie 15% NRV/100g, as indicated in the table of nutrient content claims attached as an Annex to the proposed draft guidelines for the use of health and nutrition claims (ALINORM 03/22, Appendix VII).

5. Other comments re style and format of guidelines

Para. 3.2.3. : We suggest separating this sentence into two, ie commencing a 2nd sentence after “...Section 3.2.1. **The** amounts of starch and/or other carbohydrate...”.

Para. 3.2.6. We suggest replacing the number of this paragraph by 3.2.5.2 as this is a subpoint of 3.2.5, ie concerning vitamin and mineral declaration. The following paragraph could then be renumbered as 3.2.6. (instead of 3.2.7).