

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

AGENDA ITEM NO. 4(A)

CX/FL 10/38/4

E

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING
THIRTY-EIGHTH SESSION
QUEBEC CITY, CANADA, MAY 3 - 7, 2010

IMPLEMENTATION OF THE WHO GLOBAL STRATEGY ON DIET, PHYSICAL
ACTIVITY AND HEALTH:

PROPOSED DRAFT REVISION OF THE GUIDELINES ON NUTRITION LABELLING
(CAC/GL 2-1985) CONCERNING THE LIST OF NUTRIENTS THAT ARE
ALWAYS DECLARED ON A VOLUNTARY OR MANDATORY BASIS
(CL 2009/15-FL, ALINORM 09/32/22 – APPENDIX II)

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

AUSTRALIA
BRAZIL
CHILE
COSTA RICA
MALAYSIA
MEXICO

INTERNATIONAL COUNCIL OF BEVERAGES ASSOCIATIONS (ICBA)
INTERNATIONAL DAIRY FEDERATION (IDF)

IMPLEMENTATION OF THE WHO GLOBAL STRATEGY ON DIET, PHYSICAL ACTIVITY AND HEALTH:

PROPOSED DRAFT REVISION OF THE GUIDELINES ON NUTRITION LABELLING (CAC/GL 2-1985) CONCERNING THE LIST OF NUTRIENTS THAT ARE ALWAYS DECLARED ON A VOLUNTARY OR MANDATORY BASIS (CL 2009/15-FL, ALINORM 09/32/22 – APPENDIX II)

GOVERNMENT COMMENTS AT STEP 3

AUSTRALIA:

With regard to the rationale for the retention, or removal, of *dietary fibre* in the list of nutrients that are always declared under section 3.2.1 of the *Proposed Draft Guidelines on Nutritional Labelling* (the Guidelines):

Australia's Overall Position

Australia does not support the retention of *dietary fibre* in the list of nutrients that are always declared under section 3.2.1 of the Guidelines.

Rationale for Position

Australia notes that *dietary fibre* is not identified in the *WHO Global Strategy on Diet, Physical Activity and Health* (Global Strategy) as a focus for action in relation to the risk of non-communicable diseases.

Specific Comment

In determining whether or not to retain or remove *dietary fibre* in the list of nutrients that are always to be declared on a mandatory basis, Australia used the key criteria to identify nutrients for inclusion in the list as agreed to by the 37th Session of the CCFL.

Criteria '1' - Ability to Address Public Health Issues

Australia notes that *dietary fibre* is not a nutrient that is identified in the list of nutrients in the Global Strategy that are a focus for action in relation to the risk of non-communicable diseases.

Criteria '2' – Ability to Inform Consumers Make Informed Choices

Australia notes that while inclusion of *dietary fibre* in mandatory nutrition labelling could play a broad role in the provision of information to consumers, the primary basis for inclusion of the nutrient should be on its importance from a public health perspective as per criteria '1'.

Criteria '3' – Practicality and Enforceability of Labelling

- A validated method of analysis would need to be finalised – this issue is under consideration by CCNFSU¹
- Internationally agreed definition needed - also under consideration by CCFNSDU²

¹ An electronic Working Group under CCNFSU was to start work in this area in 2009.

² This issue was progressed by CCFNSDU at their last meeting in November 2008, with their recommendations to be considered by the Commission in 2009.

Criteria '4' – Cost/Benefit

- General considerations would need to include:
 - costs, e.g.:
 - availability of nutritional data;
 - costs to industry of changing the label;
 - costs to government of enforcement and monitoring; and
 - possibly increased costs to consumers if industry passes on additional costs of products.; and
 - benefits – e.g. use and effectiveness of such labelling

Much of this information may not currently be available.

Criteria '5' – Linkages between Global and National Public Health Priorities

Australia notes that, as agreed at the 37CCFL, the following matter has been referred to the CCNFSDU for consideration:

[The] development of principles for countries to evaluate criteria 1 “the ability of nutrition labelling to address public health issues” when addressing balancing national and global health issues

Part B, 3 - Proposed Draft Guidelines on Nutrition Labelling – Trans Fatty Acids

With regard to the rationale for retaining, or removing, Trans Fatty Acids (TFAs) in the list of nutrients that are always declared under section 3.2.1 of the *Proposed Draft Guidelines on Nutritional Labelling*:

Australia's Overall Position

Australia does not support a Codex requirement for the mandatory labelling of TFAs. Australia considers that requirements regarding TFAs are more appropriately addressed at the national level.

Furthermore, Australia does not see difficulty in reconciling the recommendation of the World Health Organisation's (WHO) Global Strategy for countries to significantly reduce intakes of TFAs and lower limits for TFA content in processed foods as the reduction of TFAs can be actively pursued at a national level. For this reason, Australia would support WHO's proposal for the inclusion of a footnote to para 3.2.1.4 of the Guidelines to indicate that countries whose diets exceed 1% of total energy from TFAs should consider the declaration of TFAs in nutrition labelling.

Rationale for Position

The main reasons for Australia's position can be summarised as follows – Australia notes:

- globally there is a high degree of variability in dietary TFA intakes, due to variability in food sources and associated levels of consumption;
- non-regulatory measures, such as voluntary programs to encourage efforts by international, and national, manufacturers to reduce the content of industrial TFAs in foods by reducing levels and/or switching to alternative fats or oils, can be an effective and less costly and means of addressing concerns around the potential health consequences of TFAs;

- there is limited information on the cost-benefits of imposing mandatory labelling of TFAs or requiring foods to be reformulated; and
- there is limited evidence and information to support use of TFA labelling by consumers and associated effectiveness.

Specific Comment

In determining whether, or not, to retain TFAs in the list of nutrients that are always to be declared on a mandatory basis, Australia used the key criteria to identify nutrients for inclusion in the list and agreed to by the 37th Session of the CCFL.

Criteria ‘1’ – Ability to Address Public Health Issues

Australia notes globally that there is a high degree of variability in TFA intakes, food sources, associated levels of consumption and therefore, public health risk.

Criteria ‘2’ – Ability to Inform Consumers Make Informed Choices

Australia considers that consumers’ understanding of TFAs may be low. The benefits of mandatory labelling therefore may not be great, particularly in nations where consumption levels of TFAs and/or nutritional literacy are relatively low.

Criteria ‘3’ – Practicality and Enforceability of Labelling

Australia has previously suggested non-regulatory measures, such as voluntary efforts by international, and national, manufacturers to reduce the content of industrial TFAs in foods by switching to alternative fats or oils can be an effective and less costly means of addressing concerns around the health effects of TFAs.

Australia notes that Codex has developed a definition for TFAs, which can already be used for any declarations of this nutrient.

Further Comment on the Effectiveness of Mandatory Labelling

Australia notes that mandatory labelling of TFAs may not in itself be sufficient to address the:

- i) level of industrially produced TFAs, or associated health concerns, in global or national food supplies.

This fact is emphasised in the *WHO Scientific Update on TFAs* which indicates the need for a broad, multi-sectoral and coordinated approach towards the removal of industrially produced TFAs from the food supply.

Australia also notes that if there were to be a labelling requirement to declare TFAs, it would be important to ensure that this requirement does not detract from the labelling of, or lead to increased use of, saturated fatty acids, as this could potentially lead to subsequent increases in dietary saturated fatty acids.

Criteria ‘4’ – Cost/Benefit

At this present time, there is limited information on the relative cost-benefits of imposing mandatory labelling for TFAs.

Criteria ‘5’ – Linkages between Global and National Public Health Priorities

Australia notes that, as agreed at the 37CCFL, the following matter has been referred to the CCNFSDU for consideration:

[The] development of principles for countries to evaluate criteria 1 “the ability of nutrition labelling to address public health issues” when addressing balancing national and global health issues.

BRAZIL:

The Brazilian Delegation thanks for the opportunity to present the following comments.

Trans-fatty acids:

Brazilian comments:

The WHO Scientific Update on *trans* fatty acids presented new evidences on the health consequences of this nutrient.

We also recognize that there are many measures being taken to eliminate the use of *trans* fatty acids in industrialized foods. However, the accomplishment of these actions requires a medium/long period of time.

Thus, we support the inclusion of *trans* fatty acids in the list of nutrients always declared. Consumers must know the amount of *trans* fatty acids in industrialized foods to be able to make better food choices and to limit its consumption.

Considering that some delegations that pointed out that the ingestion of trans fatty acids is not of concern in their respective countries, we could support the WHO proposal to include a footnote to paragraph 3.2.1.4 indicating that countries whose diets exceed 1% of total energy from trans fatty acids should consider the declaration of trans-fatty acids in nutrition labelling.

Dietary fibre:

Brazilian comments:

We support the inclusion of dietary fibre in the list of nutrients always declared. Information about dietary fibre is important to consumer health and necessary for consumers to make better food choices.

The Global Strategy on Diet, Physical Activity and Health recommends an increase consumption of fruits and vegetables, and legumes, whole grains and nuts.

The recommended intake of fruits, vegetables and whole grains made in the WHO Technical Report Series 916 (Diet, Nutrition and the prevention of Chronic Diseases) is likely to provide more than 25 g per day of total dietary fibre. This document also points out the protective effect of high dietary intake of dietary fibre on weight gain, obesity, type 2 diabetes and cardiovascular disease.

CHILE:

Previous position

Comments were made taking into account the recommendations of the WHO Global Strategy on Diet, Physical Activity and Health, indicating the present regulations in our country regarding that subject.

Chilean comments:

The Chilean legislation demands that the following be declared in all foods marketed in a packaged form:

- a) Size of the portion expressed in grams or millilitres and in household measurements;
- b) Number of portions per package, and;
- c) The following nutritional information: energy (Kcal), proteins (g), total fat (g), available carbohydrates (g) and sodium (mg), per 100 grams or per 100 ml of the food and per usual serving portion.

Furthermore, in Chile, saturated fats are compulsory declared when the food contains more than 3 grams of total fat per usual serving portion. In that case, the declaration of trans fatty acids, polyunsaturated and monounsaturated fatty acids and cholesterol is also compulsory, per 100 grams or per 100 ml of the food and per usual serving portion.

On the other hand the declaration of saturated, monounsaturated and polyunsaturated fats, trans fats and cholesterol is also compulsory for all such foods that include nutritional claims in their labelling or publicity, or that have health properties that involve total fats or any type of fats or fatty acids which should be included in the nutritional information. For example, if the content of ω 3 fatty acids is highlighted, their amount should also be included in the nutritional information.

Regarding sugars, the declaration of total sugars is voluntary and only becomes compulsory when a nutritional claim is made or when a health claim related to it is made. The same applies to dietary fibre.

Finally, we agree that, in point 3.2.1.2, only the brackets around sodium/salt should be removed.

COSTA RICA:*3.2 Listing of Nutrients*

Costa Rica considers that those nutrients that have been identified in the WHO Global Strategy on Diet, Physical Activity and Health (Global Strategy) and that are backed by scientific studies regarding the risk and negative impact that they have on the health of the consumers (legitimate interest), should be incorporated in the list of nutrients to be declared, with the objectives to harmonize that list as much as possible, to protect the health of the consumers and not to create obstacles to international trade.

3.2.1 Where nutrient declaration is applied, the declaration of the following should be mandatory:

3.2.1.1 Energy value; and

3.2.1.2 *The amounts of protein, available carbohydrate (i.e. dietary carbohydrate excluding dietary fibre), fat, saturated fat, [trans-fatty acids], [sodium/salt], total sugars [added sugars], and [dietary fibre];*

Costa Rica considers that, as dietary fibre is not one of the nutrients identified in the Global Strategy, it is not as necessary to declare it in the mandatory list of nutrients. As a matter of fact, Costa Rica suggests that if industry wants to make a declaration of dietetic fibre it still can do so complying with the approved definition and the new listing of methods of analysis that are expected to be send soon to the CAC for approval, probably at the end of the 31st Session of the CCNFSDU.

Regarding *trans* fatty acids and sodium, there is an interest in Costa Rica to include them within the list of nutrients,

Regarding the issue of “total sugars” vs. “added sugars”: Costa Rica would like to make the following comments:

Any such declaration about sugars should be based on “total” sugars rather than “free” or “added” sugars as, according to the FAO/WHO and the latest studies³, there is no scientific evidence justifying the need to distinguish between “free” and “other” sugars. The report indicates that, metabolically, the human body makes no distinction between added sugars and natural sugars normally present in the food. The report concludes that such a distinction would not provide consumers with meaningful information, which would be the case if the total sugars content is provided. That is the most useful way to describe, measure and label this nutrient.

It would be very difficult for governments to verify the labelling of the amount of added and of natural sugars, as laboratory analysis only report the presence of total sugars.

All sugars provide energy. Labelling of “added sugars” would reinforce misperceptions that added sugars are more caloric than naturally-occurring sugars.

All sugars contribute 4 kcal/g (17 kJ/g).

Awareness of the total amount of energy (whether from sugars naturally occurring in foods or sugars that are added, protein or fat) is essential so that consumers can choose foods that meet their dietary needs and the recommended daily energy consumption levels.

Listing of added sugars on a label would not give the consumer a true representation of the total sugar contribution of a food product. Some fruits are naturally high in sugar. Listing of added sugars only, e.g., from syrup in canned fruits, could distort the actual amount of sugar provided by a product (fruit, plus syrup). Such a situation could mislead the consumer as to the actual amount of sugar that is being consumed and provide them with erroneous information.

Consumer education measures should be focused on the importance of consuming a balanced, varied and moderate diet rather than distinguishing between the intake of added and naturally-occurring sugars.

3.2.1.3 *The amount of any other nutrient for which a nutrition or health claim is made; and*
3.2.1.4 *The amount of any other nutrient considered to be relevant for maintaining a good nutritional status, as required by national legislation or national dietary guidelines.*

MALAYSIA:

GENERAL COMMENTS

Malaysia would like to reiterate our position that mandatory nutrition labelling should only be for the four (4) core nutrients namely energy, available carbohydrate, protein and fat due to the fact that nutrition labelling is still a relatively new subject for many countries. Very few countries require mandatory labelling of food products and in many cases, whenever mandatory labelling was required, it was normally restricted to energy, fat, carbohydrate and protein. The addition of five (5) more nutrients might in fact lead to increased consumer confusion.

However, taking into consideration decisions during the 37th Session of the Codex Committee on Food Labelling to expand the nutrients that must always be declared, Malaysia would like to propose that the labelling of the additional nutrients be made only to selected groups of food relevant to the nutrients and in addition, only if there is a nutrition or health claim made on the food product.

SPECIFIC COMMENTS

We would like to make specific comments as follows:

1. [Trans-fatty acids]

Malaysia proposes to remove the square brackets for trans-fatty acids for the following reasons:

- Trans-fatty acids are well known health hazards which contribute to cardiovascular diseases such as coronary artery disease. WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases has recognised that there is convincing evidence that trans-fatty acids contribute to an increase risk to cardiovascular diseases. The Report has recommended the reduced intake of trans-fatty acids to <1% of total energy intake.
- To be in-line with the Global Strategy on Diet, Physical Activity and Health which recommends population and individuals to limit energy intake from total fats and shift fat consumption away from saturated fats to unsaturated fats and towards the elimination of trans-fatty acids.
- Several countries such as the US, Canada and Taiwan have mandated the labelling of trans-fatty acids.

2. [Sodium/salt]

Malaysia proposes to remove the square brackets for sodium and delete the term salt. We are of the view that declaration of total sodium content of a food in nutrition labelling is more meaningful to the consumer. The WHO Technical Report 916 has highlighted that all data reviewed show convincingly dietary intake of sodium, from all sources, influences blood pressure levels in populations and should be limited so as to reduce the risk of coronary heart disease and both forms of stroke. The Report further emphasised that limitation of daily dietary sodium

intake should take into account total sodium intake from all sources, including additives and preservatives containing sodium.

3. [Added sugars]

Malaysia does not support the inclusion of the term added sugar as it would not provide meaningful information to consumers and thus proposes that this item be deleted from the list. We are of the opinion that the listing of 'total sugars' is more meaningful and since this has been agreed upon, it should suffice. The Global Strategy and the WHO Technical Report 916 have highlighted that reduced intake of total sugars could contribute to the prevention of diabetes, obesity and dental caries. However, such effects to human health do not depend on the sugars being natural/intrinsic sugars or added sugars as the human body makes no distinction between natural or added sugars. Furthermore in the analytical perspective, it is not readily possible to distinguish the presence of natural sugars and added sugars in food products. Therefore it is not necessary to specify the added sugar content.

4. [Dietary Fibre]

Malaysia proposes to remove the square brackets for dietary fibre and include it to the list of nutrients to be declared for the following reasons:

- The dietary fibre content would already have been made obtained when reporting the available carbohydrate content as the available carbohydrate content is actually the content of total carbohydrate minus the dietary fibre content. As such, the value of dietary fibre content could be reported if it is required.
- Dietary fibre promotes a number of positive physiological effects to human health such as helping to lower blood cholesterol and/or glucose level. A low fibre intake, on the other hand could result in constipation and gut diseases such as diverticulitis and bowel cancer. The labelling of dietary fibre as a positive nutrient declaration is useful to consumers in the effort to educate them on healthy eating.

MEXICO:

General Comments:	
Original Document	Comment
3.2 Listing of Nutrients	
3.2.1 Where nutrient declaration is applied, the declaration of the following should be mandatory:	
3.2.1.1 Energy value; and 3.2.1.2 The amounts of protein, available carbohydrate (i.e. dietary carbohydrate excluding dietary fibre), fat, saturated fat, [trans-fatty acids], [sodium/salt], total sugars, added sugars, and [dietary fibre];	<p>We agree to declare proteins, carbohydrates, fats, and saturated fats, as in the Position for the May 2009 session of the CCFL</p> <p>We support including sodium, regardless of the decision that may be reached by the EWG regarding this purpose.</p> <p>We approve declaring sugars as well as dietary fibre.</p> <p>Eliminate added sugars.</p>
3.2.1.3 The amount of any other nutrient for which a nutrition or health claim is made; and	We support
3.2.1.4 The amount of any other	

nutrient considered to be relevant for maintaining a good nutritional status, as required by national legislation or national dietary guidelines.	
---	--

INTERNATIONAL COUNCIL OF BEVERAGES ASSOCIATIONS (ICBA):

The International Council of Beverages Associations (ICBA) is a nongovernmental organization that represents the interests of the worldwide nonalcoholic beverage industry. The members of ICBA operate in more than 200 countries and produce, distribute, and sell a variety of nonalcoholic beverages, such as sparkling and still beverages such as soft drinks, juice-containing beverages, bottled waters, and ready-to-drink coffees and teas. The International Council of Beverages Associations (ICBA) is pleased to provide the following comments in response to the Circular Letter and Appendix II of ALINORM 09/32/22.

When considering issues related to the list of nutrients to be declared, the CCFL must consider important issues related to the availability of compositional and analytical data, the suitability and reliability of methods of analysis and available infrastructure, both at the government and industry levels to effectively manage nutrition labelling. The CCFL must also consider issues related to consumer understanding and education. As a list of nutrients for global use, any list that is considered must have wide application to consumers from all parts of the world, with varying nutritional needs. As such, the list should not include nutrients that are of relevance only to sub-populations, or particular regions of the world.

ICBA cordially submits the following views for consideration and specifically wishes to comment on the proposed listing of “total sugars” vs. “added sugars”:

- 1. At the international level, nutrition labelling should be limited to energy, protein, available carbohydrates and fat, as well as any nutrient for which a claim is made. The labelling of additional nutrients should be left to national discretion, taking into account the nutritional needs of national populations.**
- 2. If consideration is given to the nutrition labelling of sugars,**
 - a. “Sugars” rather than “sugar” should be used to reflect the inclusion of all mono- and disaccharides. “Sugars” is the term used in the Codex Guidelines on Nutrition Labeling, CAC/GL 2-1985 (Rev. 1-1993), 2.6 and 3.2.4.
 - b. Any such labelling should be based on “total” rather than “free” or “added” sugars.**
3. With respect to the labelling of “sugars,” the FAO/WHO Scientific Update on Carbohydrates in Human Nutrition⁴ has stated that there is no convincing scientific justification for distinguishing between “free” and “other” sugars. The Report cites the absence of any practical and easily enforceable analytical method to distinguish between added and naturally-occurring sugars and confirms the well-known fact that the human body does not distinguish between added sugars and naturally-occurring sugars. The report concludes that such a distinction would not provide consumers with meaningful information as to the nutritional value or physiological influence of foods containing sugars and states that the

⁴ Joint FAO/WHO Scientific Update on Carbohydrates in Human Nutrition. European Journal of Clinical Nutrition, 61: S 1. December 2007.

labelling of total sugars is “probably the most useful way to describe, measure and label sugars.”

4. Rationale for the labelling of “total” vs. “free” or “added” sugars:

- a. There is no scientific evidence that the body makes any physiological distinction between sugars that are added to foods and those that are naturally occurring. Rather scientific evidence suggests that all sugars are metabolized in exactly the same manner by the body.
 - b. Sugars that are added to food products cannot be readily distinguished from sugars that are naturally occurring in food products. This would make labelling enforcement for the declaration of added sugars difficult, if not impossible.
 - c. Laboratory analysis for the presence of sugars yields a value for total sugars. This information would not allow authorities to determine the accuracy of a stated label value for added sugars.
 - d. All sugars, whether added or natural occurring, provide energy. Labelling of “added sugars” would reinforce misperceptions that added sugars are more caloric than naturally-occurring sugars.
 - i. All sugars contribute the same amount of energy, i.e., 4 kcal/g (17 kJ/g).
 - ii. Awareness of the total amount of energy provided by a food product (whether from sugars naturally occurring in foods or sugars that are added, protein or fat) is essential so that consumers can choose foods that meet their dietary needs, while remaining within daily energy consumption levels.
 - iii. Listing of added sugars on a label would not, for many food products, give the consumer a true representation of the total sugar contribution of a food product. Some foods, such as fruits, are naturally high in sugar. Listing of added sugar only, e.g., from syrup in canned fruits, could distort the actual amount of sugar provided by a product (fruit, plus syrup). Such a situation could mislead the consumer as to the actual amount of sugar that is being consumed.
5. Consumer education measures would be far more effective in communicating the importance of consuming a balanced, varied and moderate diet within daily caloric needs, than would measures that attempt to distinguish between added and naturally-occurring sugars in foods and beverages.

Further, if the Committee decides to include sodium in the list, we support declaration of sodium rather than salt that we consider would be misleading and not scientifically accurate.

INTERNATIONAL DAIRY FEDERATION (IDF):

The International Dairy Federation (IDF) appreciates the opportunity to submit the following position and comments on the ‘Proposed Draft Revised Guidelines on Nutrition Labeling concerning the list of nutrients that are always declared on a voluntary or mandatory basis’ for consideration by the Committee:

- **IDF supports the mandatory labelling of the 4 basic nutrients: Energy, Protein, Fats and Available carbohydrates.**

The nutrient “protein”, in addition to lipids and carbohydrates, is very important to ensure basic information of consumers on products composition, and given the importance of proteins in a balanced diet.

This corresponds to the current draft (step 3) of the revision of the guidelines for nutrition labelling.

- **IDF proposes the retention, in square brackets, of both total sugars and added sugars.**

IDF would like to emphasize that labelling of total sugars is not relevant for all type of products. Sugar is not directly linked to non communicable diseases (Nantel, 1999) and only linked indirectly to obesity via over consumption of energy intake. Energy is already required to be declared. Especially, in the case products that have intrinsic sugar such as milk (lactose) or fruits (fructose) naturally present in the products but may also included added sugars for additional sweetening such as yogurt flavored with fruits and added sweeteners or jams, jelly and fruit spreads that may contain sweeteners.

As nutrition labelling is also a tool for consumer's education and understanding of the innovation and the evolution of the products, IDF is of the opinion that consumers should be better informed about inherent and added sugars in foods. Labelling added sugars will also help to promote products that have a lower content of added sugars. IDF realizes that it is difficult to analytically distinguish inherent sugars from added sugars that are the same form of monosaccharides. However, national inspection bodies have other means than labelling to control, e.g. documentary controls.

- **IDF opposes to mandatory nutrition labelling of total saturated fats at the current state of knowledge for the following reasons:**

IDF would like to emphasize that research continues to unravel the complexities associated with individual fatty acids and fats from different sources and it is becoming increasingly apparent that not all saturated fatty acids individually have the same biological effects (Lock et al., 2008). Despite the contribution of dairy products to saturated fatty acid composition of the diet, there is no clear evidence that dairy food consumption is consistently associated with a higher risk of chronic diseases (Lock et al., 2008).

It is therefore of great importance to reconsider the labelling of **total saturated fat**. IDF would suggest that the Committee consider defining the saturated fat that may be declared to only include fatty acids that negatively impact health.

- **IDF recommends that trans fatty acid (TFA) declaration should not be a mandatory declaration for nutrition labelling when nutrient declaration is required.**

Regarding TFA of natural origin, IDF would like to highlight that the results of recent scientific studies by Chardigny, Destailats et al. (2008) and Motard-Belanger et al. (2008) provide no evidence that consumption of naturally occurring TFAs (as those found in milk and milk products), at levels well above the current upper limits of human consumption, increase the risk of cardio vascular disease (CVD). Therefore IDF finds no reason to believe that normal or even higher intake of natural occurring TFAs at the level of the natural occurring TFA's are harmful for human consumption and therefore do not need a specific mandatory labelling.

- **IDF supports the decision to not declare cholesterol in mandatory nutrition labelling.**

The impact of content of cholesterol in foods is negligible compared to endogenous synthesis. (Becker et al., 2004, Lecerf and De Lorgeril, 2008).

- **IDF does not take any position regarding the labelling of salt/sodium at this stage.**

IDF participates to the eWG led by New Zealand with the aim to consider issues associated with the declaration of sodium/salt on nutrition labelling and to consider different approaches to declare sodium/salt on food labelling.

References:

- Becker W, Lyhne N, Pedersen A, Aro A, Fogelholm M, Hórsdóttir I&T, Alexander J Anderssen S; Meltzer H, Pedersen J. Nordic Nutrition Recommendations 2004 - integrating nutrition and physical activity. 2004, Scandinavian Journal of Nutrition, 48 (4)178-187
- Chardigny J-M, Destailats F, et al. Do trans fatty acids from industrially produced sources and from natural sources have the same effect on cardiovascular disease risk factors in healthy subjects? Results of the trans Fatty Acids Collaboration (TRANSFACT) study. American Journal of Clinical Nutrition. 2008;87:558-566.
- Lecerf O, De Lorgeril M. Dietary cholesterol: from physiology to cardiovascular risk Sciences des Aliments 2008 28/1-2, 68-76
- Lock A., Destailats F., Kraft J., German JB. Introduction to the Proceedings of the Symposium "Scientific Update on Dairy Fats and Cardiovascular Diseases", Journal of the American College of Nutrition, 2008;27:720S-722S.
- Nantel G. Carbohydrates in human nutrition. 1999. pp.1-50. In: J.L. Albert and L. Craffi-. Cannizzo. Food Nutrition and Agriculture. FNA/ANA 24.
- Motard-Bélanger A, Charest A, Grenier G, et al. Study of the effect of trans fatty acids from ruminants on blood lipids and other risk factors for cardiovascular disease. American Journal of Clinical Nutrition. 2008;87:593-599.