

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
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**Agenda item 4(a)**

**CX/FL 10/38/5**

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## **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**

#### **Report of the electronic working group on sodium (salt)**

#### **Introduction**

At the 37<sup>th</sup> session of the CCFL, the Committee considered a proposed draft revision to the Guidelines on Nutrition Labelling. The proposal was to revise the list of nutrients that are always declared on a voluntary or mandatory basis as part of the implementation of the WHO Global Strategy on Diet, Physical Activity and Health.

The Committee agreed to the following revisions:

- protein, available carbohydrate and fat should be retained in the list of nutrients that are always declared;
- saturated fat should be added to the list;
- declarations of trans fatty acids should remain in square brackets;
- total sugar should be in the list, and declarations of added sugars should remain in square brackets;
- declarations of dietary fibre should remain in square brackets; and
- cholesterol should not be included in the list.

With regard to salt/sodium, the Committee noted there was consensus on the importance of the nutrient sodium/salt and that it should be included in the list. However, due to a diversity of views on which term to use, the Committee agreed to retain declarations of salt/sodium in square brackets and to establish an electronic Working Group to discuss the issue further. The electronic working group, led by New Zealand, was established with the following terms of reference:

1. Consider issues associated with the declaration of sodium/ salt on nutrition labelling, taking into account the experiences of member countries and observers, and the criteria developed for nutrients that should always be declared.
2. Consider different approaches to declare sodium/salt on food labelling to assist in the implementation of the Global Strategy on Diet, Physical Activity and Health and in consumer choice of foods lower in sodium/salt.
3. Make recommendations to the 38<sup>th</sup> session of the CCFL on the findings of the Working Group.

### **The Consultation Process**

In response to an invitation circulated in July 2009, 36 of the Committee members indicated that they wished to participate in the Working Group. New Zealand distributed a questionnaire on 7 September 2009 to which 14 members responded, including the EU on behalf of 27 member countries. The United Kingdom subsequently sent information drawn from recent research. On 7 December 2009, a First Consultation Paper and Recommendation was circulated among the Working Group. Nine responses were received.

### **The Questionnaire**

The questionnaire was designed to elicit information about current nutrient labelling requirements and future preferences. It included questions about the declaration of sodium and/or salt, issues with implementation, any evidence of a decrease in sodium content of foods and/or population intakes and any supporting education activities. A summary of those responses is attached at Annex 1. A compilation of the comments of members of the working group is attached at Annex 2.

### **Proposal in First Consultation Paper**

A range of views were presented in response to the questionnaire, but there was no clear consensus on a recommendation for the declaration of either sodium or salt in the nutrient declaration. The current practices were described as well as the limitations identified with the declaration of each. As a result of there being no consensus, New Zealand (as chair of the Working Group) proposed that the Working Group recommend the declaration of **both** sodium and salt. The reasoning behind this proposal is that the declaration of sodium content would provide technically correct information while the declaration of salt would be consistent with many countries' national guidelines and public health messages and consistent with the Global Strategy. It was founded on the observation that technical accuracy and pragmatic consistency would not be achieved by the declaration of salt alone. It was noted that the guidelines under consideration are entitled "Guidelines on Nutrition Labelling" and while salt is not a nutrient, it is an important component of nutrition labelling and consumer understanding of the nutritional content of the food. Accordingly, it was reasoned that if the declaration is of "nutrition information" rather than "nutrients" the inclusion of salt would be accurate. This was proposed as a consideration for moving forward and not as a New Zealand position.

### **Responses to Proposal in the First Consultation Paper**

There was no consensus on whether either 'sodium' or 'salt', or both should be declared. There was a strong position on the need for technical accuracy with the declaration of sodium in the nutrient declaration, counterbalanced by the need to assist informed consumer choice with the declaration of "salt". The EU, on behalf of 27 member countries, reserved its position pending legislation under review, but expressed a reservation on the obligation to declare both salt and sodium and preferred the possibility of using the terms 'sodium' or 'salt,' or both, according to national needs, so that local practices and public health messages could be taken into account.

Responses included:

- support for the proposal to declare both sodium and salt;

- preference for the declaration of either sodium or salt with no opposition to the concurrent declaration of terms;
- support for the declaration of sodium only; and
- opposition to the declaration of salt, and reservation in respect of sodium;

Those countries that responded to the proposed recommendation that the declaration of sodium and salt be expressed in grams per 100g/100ml and/or as grams per serving according to national needs, agreed, while two noted that milligrams may be an appropriate unit.

There was no common view among those countries which responded about the placement of salt/sodium in the nutrient declaration.

Comments on the inclusion on the label of claims of low salt or equivalent were generally in support, with one respondent advocating limiting such claims to foods where no salt was added.

### Conclusions

As there was no consensus on whether ‘sodium’ or ‘salt’ should be declared, the working group is unable to make a clear recommendation in this regard. There appears to be limited evidence supporting the proposition that a particular term is better able to convey the information to consumers. A notable exception is the UK, which quoted recent consumer research. Generally, there is a limited amount of consumer research about consumer understanding available. The majority of countries which supported the declaration of sodium cited technical correctness as the reason. Those countries which supported the use of the term ‘salt’ cited consumer understanding as the main driver. Countries appear to have based their responses to the discussion paper and the proposed recommendations on the current or proposed regulatory requirements in their countries.

There was some support for the use of the term ‘salt’ elsewhere on the label, other than in the nutrient declaration, and/or in supporting education material.

There was support for either grams or milligrams per 100g/100 ml and/or per serving as the unit in which to express a declaration of salt and sodium: There was no consensus for a recommendation for one or other of the terms.

There was significant support for some form of low or reduced salt claims on a label and provision of criteria in the Guidelines for these claims.

### Comments

The *Codex Alimentarius Food Labelling Fifth edition* states: “Food labelling is the primary means of communication between the producer and seller of food on the one hand, and the purchaser and consumer on the other.”

The declaration of sodium in the nutrient declaration certainly communicates information to the seller and consumer of the food about the sodium in the food. What still remains unclear from the consultation is the ability and willingness of the consumer to **use** the label information to make lower salt/sodium food choices.

This raises issues about the best uses of the food label and the ability of labelling to influence and modify food choices. It also raises questions as to the role of the nutrient declaration in either providing technical information or guiding food choices or both. The use of the label in supporting implementation of the Global Strategy requires further discussion. Issues for discussion should include:

- whether inclusion in a nutrient declaration is the best way to implement the Global Strategy in respect of salt;
- whether other labelling elements should be considered;
- the role of the nutrient declaration; and
- the compatibility of technical correctness with imparting readily understood consumer information.

**Recommendations**

1. That, the Committee note that, while there is no consensus as to which term should be used in the nutrient declaration and acknowledging the reservation expressed by the EU, 'sodium' is the technically correct nutrient to declare in the nutrient declaration.
2. That the Committee note that the term 'salt' is supported by some to inform consumers and support their dietary choices.
3. That the Committee consider the purpose and principles of labelling and as part of that clarify the purpose of the nutrient declaration.
4. That the declaration of salt/sodium be expressed in grams or milligrams per 100g/100 ml and/or as grams or milligrams per serving, according to national needs.
5. That the Committee consider development of criteria to underpin the declaration of low salt, or equivalent claims, in the Table of Conditions for Nutrient Contents.
6. That, to find the most effective way to implement the Global Strategy on Diet, Physical Activity and Health, with particular reference to salt and sodium, the Committee also consider means of conveying information on a label other than those in the current Codex labelling guidelines.

## Annex 1

**Key Findings Distilled From Members' Responses**

From the members' responses to the questionnaire key points emerged.

- "Sodium" is the term currently used in nutrient declarations, whether mandatory or voluntary.
- The majority of respondents use the term "salt" in the list of ingredients.
- The use of term 'salt' in the nutrient declaration is currently being considered in the EU.
- The amount of sodium is expressed as either grams or milligrams per 100g / 100ml or an absolute amount, usually grams, per serving, or both.
- The lack of consumer understanding is thought to be an issue, supported by research in some countries.
- Lack of data prevents definitive conclusions as to whether sodium intake has decreased since sodium has been declared.
- Where data exists it indicates a reduction in the sodium content of the food supply.
- There is general support for low or reduced salt claims on a label.
- There is no consensus as to whether conversion factors should be included on the label, however there is support for standardising the conversion factor.
- There is no consensus as to whether total sodium should be converted to salt should the term 'salt' be used.
- There is no consensus as to whether there should be provision for an alternative declaration of sodium

**Responses to Questionnaire**

Members' responses to the questionnaire were summarised as follows:

**Current Regulatory Approaches**

1. Of the 14 respondents to the questionnaire, six currently require the declaration of salt or sodium. Declaration is voluntary but mandatory in certain circumstances in those countries belonging to the EU. It is to be expected that the requirement which currently pertains will influence the responses of each respondent.
2. In each case the same requirements as to declaration apply to imported foods as to domestic foods.
3. How the declaration is required to be expressed ranges from milligrams or grams per serving to milligrams or grams per 100g to percentage reference value, with some respondents requiring or permitting a combination of expressions.
4. All of the countries responding currently require the term "sodium" in the nutrient declaration but there is some variation in how the declaration is expressed in the list of ingredients. However it was noted that the EU is reviewing the labelling of sodium/salt and proposing to declare the total sodium content of a food as salt by multiplying the sodium content in grams by a conversion factor of 2.5.
5. The reasons given for the choice of the term "sodium" in preference to other terms were variants of the following: sodium is the nutrient so it the correct term for the nutrient declaration; "sodium" captures sodium from all sources; "sodium" is the total sodium content as it includes naturally occurring, inherent sodium and added sodium; sodium intake is not exclusively from salt;
6. Four respondents advised that compliance with the required declaration is the responsibility of the manufacturer or the supplier. Most stated that the enforcement of compliance with the required declaration is undertaken by a regulatory agency, such as a health department or food inspector. Four noted that in enforcing compliance certain allowances are made, with the use of the word "average", a specified variation from the declared value, and a tolerance value of 20%.
7. Several respondents stated that there were no, or at least no major, practical issues associated with the declaration of sodium. Some raised the issues arising from lack of consumer understanding about the sodium/ salt relationship, such as confusion when foods contain sodium other than in sodium chloride

and also when only sodium is declared. The inability to differentiate between sodium which is naturally present and that which is added is raised as an issue when declaration depends upon direct analysis. Limited label space, presentation, the need for exemptions, the burden on businesses, consumer education, and compliance and enforcement were other practical issues noted.

8. Most respondents had either no data or little evidence as to whether there has been a change in the sodium intake since the declaration was introduced. One observed a slight decrease, while another observed a significant decrease over 20 years. Some have anecdotally observed a decrease in sodium consumption. In the UK, for example, there has been a significant decrease in sodium consumption due to a 20% decrease in the salt content of bread. One respondent noted that the decrease in consumption was due to an awareness of consumers and not attributable to labelling.
9. Lack of appropriate data prevented definitive answers for many respondents to whether there had been a change in the sodium content of the food supply, however many commented that the food industry was actively working to reduce sodium content.
10. Most respondents require the use of the term "sodium" in the nutrient declaration and "salt" in the ingredients list. Some noted that the description in the list of ingredients varies between "salt" and "sodium chloride". One noted that in nutrient content claims the terms salt and sodium are interchangeable.

#### **Non-Regulatory Approaches**

1. Non-regulatory approaches to the declaration of salt / sodium reported were dietary guidelines, heart symbols, and voluntary declaration of nutrients. The Irish initiative to reduce sodium consumption included working with the food industry to bring about labelling of salt in packaged foods.
2. In four responses the initiatives were led by government, with industry and other concerned agencies such as heart and diabetes associations named as leading initiatives in four responses.

#### **Consumer Knowledge**

1. Three respondents stated that there is a lack of consumer understanding of the terms "salt" and "sodium", while seven respondents stated that there had been no research or they were not aware of any such research. Research undertaken in Canada showed that consumers equate sodium as the technical term for salt, but are not likely to fully understand the difference between the two, and that health professionals use the term "salt" when discussing the issue with their patients. UK research suggests some awareness of a link between sodium and salt but precise understanding of this was very limited.
2. Seven respondents replied that the term "salt" was used in consumer education programmes undertaken about sodium/salt. Canada and the USA use the term "sodium", the USA because that term is always used on food labels. The remaining five respondents had not undertaken consumer education programmes.
3. All respondents answered that there are national guidelines or recommendations on the intake of sodium/salt. In Norway and New Zealand the term used is "salt"; in the USA and Canada it is "sodium".

#### **Fortification**

Eleven respondents replied that salt is a vehicle for fortification. Two replied that it is not. Of those whose salt is fortified, four stated that fortified salt is used in processed food, while four stated it is not, or not generally.

**Other Information on Label**

Most respondents replied that there should be low / reduced salt claims permitted on the label, with one also suggesting labels should indicate “high salt”. The terms “salt’ and ‘sodium’ may be used interchangeably in nutrient claims in Canada and in the EU. It was noted that such statements about the ingredient salt should complement information about the nutrient sodium presented within the nutrient information section.

**The Declaration in Future**

1. The majority of respondents stated the list of nutrients sodium/ salt should be listed at the end of the list of nutrients. One noted that listed last it is more conspicuous. One stated it should be at the end of the mandatory list of nutrients and be followed by voluntarily declared nutrients. Another stated that it should be with all nutritionally significant micronutrients, another with the minerals, while another stated that the order was not necessary to determine. It was also noted that whereabouts it is declared depends upon other elements.
2. Most respondents stated that the amount of sodium/salt should be expressed in grams or milligrams, with many preferring grams or milligrams per 100g or 100ml and some favouring grams or milligrams per serving either in addition to or as an alternative to grams or milligrams per 100g. Two also suggested permitting the declaration as a percentage of established reference intake. The mandatory use of the decimal point, where appropriate, to avoid misleading by rounding down was proposed.
3. There was no consensus on whether conversion factors should be included on the label. The risk of consumer confusion was cited as a reason against inclusion. It was also noted that foods which contain inherent sodium but no salt would be misrepresented if sodium content was converted to salt.

There was no consensus as to whether there should be provision for an alternative declaration of sodium or salt. One respondent suggested there that Front of Pack/ symbolic labelling would highlight salt in a product. Two stated that it should be left for countries to determine, noting that there should be consistency within a country

## Electronic Working Group for Salt/Sodium Compilation of WG Members' Comments

A. Current Regulatory Approaches		
1. Is the declaration of sodium or salt in your country currently?		
Argentina	Mandatory	-
Australia	Mandatory	-
Brazil	Mandatory	Some foods are exempted from mandatory nutrition labelling and therefore from sodium declaration
Canada	Mandatory	-
CLITRAVI	Voluntary	Answers on behalf of Clitravi (Liaison Centre for the Meat Processing Industry of the EU)
Costa Rica	Voluntary	Yes, the nutrition labeling regulation contains several claims for sodium and salt
European Commission	Other	<p>The European Community legislation Directive 90/496/EEC on nutrition labelling for foodstuffs provides for the voluntary nutrition labelling. Such labelling becomes mandatory under certain circumstances. The basic nutrition labelling is energy, protein, carbohydrate and fat. The fuller standard nutrition labelling is the basic four plus saturates, sugars, dietary fibre and sodium (the so-called Big 8). The labelling declaration of sodium is voluntary, unless a nutrition or health claim is made. The Big 8 list (including sodium) has to be declared if a nutrition claim is made about saturates, sugars, dietary fibre or sodium, or when a health claim is made.</p> <p>The current legislation is under review and more information on this review is provided in Section F.</p>
Finland	Other	<p>Nutrition labelling provisions in Finland are in accordance with the EC legislation. In principle nutrition labelling (incl. information about sodium) is voluntary.</p> <p>See also question 2</p>
IDF	-	-
Japan	Voluntary	-
Norway	Voluntary	Norway has the same regulation as the European Union considering declaration of nutrients. If a nutrition claim on salt/sodium is made, the declaration becomes mandatory.
NZ	Mandatory	-
Spain	Voluntary	-
US	Mandatory	-

A. Current Regulatory Approaches	
2. When was the declaration of sodium implemented?	
Argentina	It was first implemented back in 1994, on a voluntary basis. Since the Mercosur came to an agreement in 2003, it has become mandatory for all foods subject to nutritional labelling and/or foods containing claims on this nutrient. In August 2006 it became mandatory for all prepackaged food.
Australia	December 2002
Brazil	Nutrition labelling became mandatory in Brazil in 2003. Sodium is one of the nutrients in the list of nutrients that are always declared. However, the regulation provided a two and half year transition period for the implementation of mandatory labelling. Thus, the declaration of sodium as part of mandatory nutrition labelling has been done for about three years.
Canada	Prior to 2002, the declaration of sodium was mandatory only in the case where a nutrient content claim was made. In 2002, mandatory requirements were put in place, with a 3-5 year transition period, for the declaration of a Nutrition Facts table (NFT) on most prepackaged

	foods. The table must show the amount of Calories and 13 nutrients per serving, including sodium.
CLITRAVI	N/A. The declaration was proposed in 2006/07 by the industry on prepacked foods and it is done now on most prepacked food items .
Costa Rica	The voluntary nutrient declaration is implemented from 2002
European Commission	Directive 90/496/EEC was adopted on 24 September 1990. The Directive permitted trade in products complying with the legislation with effect from 1 April 1992 and prohibited trade in products no in compliance with the legislation with effect from 1 October 1993.
Finland	In addition to nutrition labelling Finland has had a national labelling requirements for salt since 1980's. There has been and still is an obligation to state the salt content on the labelling of certain foods essential for salt intake. There is also an obligation to label certain foods over a stipulated salt level to be "high in salt".These national regulations have subsequently been updated. Earlier there was also a national legislation on "low in salt" labelling. This requirement was repealed in 2007 in order to comply with the Regulation (EC) No 1924/2006 on nutrition and health claims.
IDF	-
Japan	It was implemented in 1996
Norway	Our current regulation on declaration of nutrients was implemented in 1993
NZ	2002. Prior to 2002 a nutrition information panel was only mandatory for packaged foods for which nutrition claims were made. Where a nutrition declaration was made, a declaration of sodium was not mandatory.
Spain	July 1992
US	The final regulations were adopted in January 1993 and became effective in May 1994.

## A. Current Regulatory Approaches

### 3. Does the declaration of sodium/salt apply to imported foods?

Argentina	Yes	It does. Imported products must comply with the local regulations: if this is not present in the original label, a "secondary label" must be attached the the package with the nutrition panel as required by the legislation.
Australia	Yes	-
Brazil	yes	There are no special exemptions for imported foods. However, our regulation determines that some foods don't require mandatory nutrition labelling. For example, foods with negligible amounts of nutrients (coffee, tea, spices and others), small food packages (under 100 cm <sup>2</sup> ) and foods that are prepared and sold in bakeries and restaurants do not require nutrition labelling.
Canada	yes	-
CLITRAVI	Yes	but not compulsory as all declarations on normal food items (not for special nutritional purposes) are still voluntary
Costa Rica	yes	when the product declared on the label any nutrient descriptor associated with sodium or salt, apply the provisions of the nutrition labeling regulations: Declared when the food is low or reduced energy. - Sodium Free contains no more than 5mg per serving or per 100 g or 100 mL - Under Contains not more than 140 mg per serving or per 100 g or 100 mL - Very Low Contains not more than 35 mg per 100 g per 100 g or 100 mL - Reduced, Lightweight, light contains at least 25% less sodium per serving or per 100 g or 100 mL with respect to the reference food. Salt should be free of sodium
European Commission	Sometimes	The declaration of sodium applies in the same way to imported foods as for food manufactured in the European Community. Therefore, it is voluntary unless a claim is made.
Finland	yes	-
IDF	-	-
Japan	yes	-

Norway	yes	-
NZ	yes	-
Spain	Sometimes	On a voluntary basis, unless the product makes a claim of its nutritional properties
US	yes	-

## A. Current Regulatory Approaches

### 4. How must the declaration be expressed?

Argentina	As regulated for domestic produce- content of sodium per serving, expressed in mg (mg/serving)
Australia	Sodium mg/serve food and mg/100 g food
Brazil	The declaration of sodium is expressed in absolute amounts (the amount of sodium in milligrams in the portion of the food) and in relative amounts considering a reference value (% VD) of 2400 milligrams.
Canada	The information is expressed in mg per serving of stated size and as a % of the reference standard. In Canada, the % DV is based on a reference standard set at 2400 mg of sodium.
CLITRAVI	more or less as one likes
Costa Rica	In Costa Rica is declared as sodium in milligrams per 100 grams of product or portion when indicating the number of servings of food.
European Commission	Grams (g) of sodium per 100 grams or per 100 millilitres.  In addition to the information on the basis of 100g or 100ml, the amount of sodium can also be expressed as the amount in grams per serving (as quantified on the label) or per portion (provided that the number of portions contained in the pack is stated).
Finland	On the nutrition labelling shall be expressed sodium (g/100g). On the list of ingredients salt is indicated as salt. According to the national legislation the salt content of certain foodstuffs shall be indicated as a total amount of salt (sodium chloride) as a percentage of weight.
IDF	
Japan	If importer wants to declare sodium, importer has to comply with national nutrition labelling standards. It stipulates that calorie, protein, fat, carbohydrate, sodium, should be declared this order.
Norway	It must be expressed as gram sodium, but can be given additionally as salt (NaCl)
NZ	The average quantity, expressed in milligrams or both milligrams and millimoles, in a serving of the food and in the unit quantity of the food (100g)
Spain	sodium: grams (g)
US	The amount of sodium is declared within the "Nutrition Facts" table as a separate line item, by the term "sodium" with the amount presented as both mg per serving as well as a percentage of daily value. Daily values for different nutrients including sodium are specified in the U.S. Food and Drug Administration's (FDA) regulations at Title 21 of the Code of Federal Regulations section 101.9. For additional information, please see our Food Labeling Guide available online at:

<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/FoodLabelingNutrition/FoodLabelingGuide/default.htm>

## A. Current Regulatory Approaches

### 5. What term is required, 'sodium', 'salt' or 'other'

Argentina	Sodium	The nutrition panel must bear the sodium amount; in the ingredients list, if salt (sodium chloride) has been added to the product, this must appear as "salt" in the ingredient list.
Australia	Sodium	-
Brazil	Sodium	-

Canada	Sodium	-
CLITRAVI	-	see above sodium or salt in answer to A4
Costa Rica	Other	Sodium to the nutrient content and can use salt and sodium in nutrition.
European Commission	Sodium	-
Finland	Other	See question 4. On the nutrition labelling shall be expressed sodium (g/100g). On the list of ingredients salt is indicated as salt. According to the national legislation the salt content of certain foodstuffs shall be indicated as a total amount of salt (sodium chloride) as a percentage of weight.
IDF	-	-
Japan	Sodium	-
Norway	Sodium	The draft for a EU-regulation on Food Information to Consumers (2008) suggests to declare the content of sodium in a product as g salt. Norway has no objections against this.
NZ	Sodium	
Spain	Sodium	-
US	Sodium	-

## A. Current Regulatory Approaches

### 6. Why was the required term 'sodium', 'salt' or 'other' chosen in preference to other terms?

Argentina	Sodium was considered for a variety of reasons- essentially because it is the nutrient- and we are dealing with nutritional information on the label. Besides, because sodium intake is not exclusively composed by salt intake, but by a wide variety of food, including additives. Careful consideration should be given to the term salt, regarding the availability of modified salts in the market for consumers choice. Argentina believes that the concern about salt intake is better dealt with in the claims labelling provisions.
Australia	Because declarations in the NIP are nutrients and sodium is the nutrient; because it captures sodium from all sources; and because declarations in the NIP are generally understood to represent the 'total ' of the nutrient.
Brazil	The Brazilian nutrition labelling regulation is harmonized in Mercosur and the term sodium was chosen during this process since it was considered more appropriated from a scientific and analytical perspective. The term sodium includes not only added salt (sodium chloride) but also the sodium that occurs naturally in almost all foods and the sodium present in other ingredients added to foods.
Canada	The term sodium was chosen to be declared in the Nutrition Facts table as it most accurately reflects the nutrient of concern. It was also chosen to be consistent with terminology used by trading partners.
CLITRAVI	-
Costa Rica	In the case of the declaration of sodium content is only used because it is so established the Codex Alimentarius as well consider that you must declare. In the case of nutrition were used both (sodium salt). In the case of the term salt is already included in view of food existed in the market using this designation in their nutrition.
European Commission	When the legislation was being harmonised in 1990 within the European Community the focus of the nutrition labelling was to identify the nutrients that were most relevant to the consumer and to inform their dietary choices. The focus was on nutrients themselves.  The process of the review of the nutrition labelling legislation has led to a review of the labelling of sodium/salt and it has been proposed that sodium should be declared as salt (understood as "salt equivalent" i.e. sodium (Na) x conversion factor of 2.5). However, the review of the existing legislation is not complete and the final rules that are adopted will depend on the outcome of the ongoing discussions.
Finland	Salt is an ingredient and term is appropriate on the list of ingredients. Sodium is a nutrient and term is appropriate on the nutrition declaration.
IDF	-
Japan	Nutritional point of view, sodium intake amount influences the health promotion and disease

	prevention. Furthermore, sodium is component element of salt.
Norway	We have to follow the EU legislation due to the European Economic Agreement.
NZ	Declarations in the Nutrition Information Panel are of nutrients. Also 'sodium' conveys sodium from all sources, whereas 'salt' just conveys sodium chloride, and declarations in the NIP represent the total content of the nutrient in the food as recommended for consumption.
Spain	the term sodium is required due to supranational rules
US	The declaration of sodium content on food labels has been in practice in the U.S. marketplace for a number of years. For example, an FDA marketing study conducted in 1977 showed that quantitative sodium labeling appeared on several food products, including cereals, baking mixes, flour, canned juice, etc. The term that has been consistently used to declare the sodium content of foods is "sodium" (not salt). Mandatory nutrition labeling regulations, adopted in 1993, made the declaration of the content of certain nutrients, including sodium, mandatory on most food products sold in the U.S. However, voluntary nutrition labeling, including sodium content, was practiced prior to the implementation of the 1993 rule. FDA adopted sodium labeling regulations in 1984 that required that the sodium content of foods be included as part of nutrition labeling information, whenever nutrition labeling was provided voluntarily or was required because of the presence of a claim (for example, when a claim is made regarding the usefulness of the food in regulating sodium or salt intake). In this rulemaking, FDA explained that consumers often used the terms "salt" and "sodium" interchangeably whereas, in fact, these terms are not the same. Sodium chloride or ordinary salt, containing almost 40 percent sodium, is only one of several sources of sodium in the diet. Recognizing the consumers should be informed about the total sodium content of foods, FDA noted that the public should be aware that there are other common sources of sodium used in food processing that contribute to the sodium content of foods.

## A. Current Regulatory Approaches

### 7. How is compliance with the required declaration enforced?

Argentina	By analytical analysis
Australia	Enforced by Australian State and Territory Health Departments
Brazil	The actions related to compliance of mandatory nutrition labelling in Brazil are conducted by the local food inspectors in enforcement programmes of foods available in the commerce and by the official public laboratories. A tolerance value (20%) was established to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis.
Canada	In Canada, manufacturers are responsible for ensuring that all foods are sold in a manner that is truthful and not misleading or deceptive. The Nutrition Labelling Compliance Test: <a href="http://www.inspection.gc.ca/english/fssa/labeti/nutricon/nutricone.shtml">http://www.inspection.gc.ca/english/fssa/labeti/nutricon/nutricone.shtml</a> describes how the Canadian Food Inspection Agency would determine if values are considered to be accurate. It is based on the laboratory analysis of the nutrient content of three composite samples of four consumer units each, randomly selected from a lot and the results of analysis subjected to three acceptance criteria. The principal acceptance criterion would require accuracy within 20% of declared value for the average of three composite samples for naturally occurring nutrients in the Nutrition Facts table, i.e., the analyzed nutrient content would have to be at least 80% of declared value for protein, carbohydrate, fibre, vitamins and minerals and not more than 120% of declared value for Calories, fat, saturated fat, trans fat, cholesterol, sugars and sodium. For added vitamins, mineral nutrients and amino acids in claims or in the Nutrition Facts table, the amount found in the sample must be at least equal to the label value. In addition, adjustments are made for rounding in accordance with rounding rules in the Food and Drug Regulations. Acceptance criteria for overall variability of nutrient levels also apply.
CLITRAVI	-
Costa Rica	In Costa Rica Apart from the year 2007 will start the verification process of nutrition labeling. However, this program has not had the expected continuity. In sampling conducted by the Ministry of Health in 2007, included statements relating mainly food with sodium, but sampling was done by food type, not by statement.
European Commission	In the European Community the individual Member States are responsible for the enforcement of the legislation.

Finland	The salt content of a product is considered as added sodium chloride. The content is usually defined on the basis of chloride content. It can also be defined on the basis of sodium content and then calculate as sodium chloride by multiplying by 2,5. According to the Guidance of the Finnish Food Safety Authority the salt content shall be defined on the basis of sodium if salt preparations containing other chloride compounds (like potassium chloride) have been used.
IDF	-
Japan	Compliance with national nutrition labeling standards has been monitored by the local regulatory authority (ex. health center).
Norway	The food business operators are responsible and shall ensure that foodstuffs are in compliance with the requirements of Norwegian food law. The Norwegian Food Safety Authority performs controls to monitor this.
NZ	Responsibility to comply rests on the supplier of the food. If non-compliance is brought to attention of regulator, in first instance regulator would notify supplier and seek rectification of label. If supplier refuses, or is deliberately misleading consumer, would ultimately consider prosecution. However finite compliance resources necessitate prioritisation of enforcement actions and our focus is on food safety.
Spain	High
US	<p>Compliance and enforcement of sodium declaration is handled similar to the declaration of other nutrient values. FDA regulations do not state how manufacturers should determine the nutrient content of their product for labeling purposes. It is the manufacturer's responsibility to ensure the accuracy and compliance of the information presented on the label. However, FDA provides guidance to industry about its compliance and enforcement policies. With respect to nutrient analysis, FDA does not object to the use of "average" values based on manufacturer's analyses provided the information is accurate and reliable. In addition, FDA will review and accept industry data bases for firms to use in nutrition labeling. While the regulations do not specify acceptable sources (laboratories or methods) of obtaining the declared values, they state that for compliance purposes, FDA uses appropriate methods published by the Association of Official Analytical Chemists in the U.S. or other methods as needed. Manufacturers are responsible for the accuracy of the values declared regardless of which method or database they use to determine those values.</p> <p>To account for reasonable variations in nutrient content (inherent variability in food production or processing) and analytical variability, FDA permits certain specified variation from the value that is declared on the label. For compliance and enforcement purpose, a food is not deemed to be misbranded if it contains 1) at least 80% of the declared value for vitamins, minerals, protein, total carbohydrate, dietary fiber, other carbohydrates, polyunsaturated or monounsaturated fat, and potassium and 2) no more than 20% in excess of the declared value for calories, sugars, total fat, saturated fat, trans fat, cholesterol, and sodium (21 CFR 101.9(g)). Reasonable excesses or deficiencies over labeled amounts are acceptable within current good manufacturing practice.</p> <p>FDA's food labeling guide, which addresses most frequently raised questions about FDA's food and nutrition labeling regulations, can be accessed online at:</p>

<http://www.fda.gov/Food/GuidanceComplianceRegulatoryInformation/GuidanceDocuments/FoodLabelingNutrition/FoodLabelingGuide/default.htm>.

<b>A. Current Regulatory Approaches</b>	
8. Where are the practical issues associated with the declaration of sodium/salt?	
Argentina	There are no inconvenients in relation to practical issues. There is a great availability of analysis and of variable costs.
Australia	None identified for sodium. Salt not been implemented however envisage possible problems with conflicting values [ ie between NaCl and other] and confusion or misleading when foods contain sodium beyond NaCl. May be of particular concern for ,eg, renal or hypertensive patients
Brazil	The declaration of sodium or salt depends on direct analysis. However, it does not differentiate

	among natural sodium present in foods, added sodium from salt and added sodium from other sources such as additives.
Canada	-
CLITRAVI	n.a. (some like it, some don't)
Costa Rica	In Costa Rica since the declaration is allowed both sodium and salt (for the descriptor without salt) sees no practical problem, because consumers can make an informed decision.
European Commission	It is not considered that there are major practical issues around the declaration of sodium or salt.
Finland	-
IDF	-
Japan	There are some comments from consumers, media coverage that declaration of sodium only can cause confusion. Salt equivalence also may be necessary to display.
Norway	Norway believes there is generally a lower understanding of the term Na than the term salt by the average consumer. Dietary recommendations are usually given on ingredients (eg. salt), not on nutrients (sodium). Then it can be difficult for the consumer to transform the information given on sodium into information on salt.
NZ	Lack of consumer understanding: Many (77%) do not know how much sodium/ salt per day is recommended, so don't know whether the amount declared is high or low. When asked the amount of salt in a product most quoted the sodium value from the label, showing they relate sodium to salt but did not know the conversion factor. (Nutritional information about sodium; it it worth is salt? Gilbey, Fifield NZMJ 21. April 2006. Vol 119 No 1232) . Also sodium occurs in ingredients other than salt. The label space is limited and there is a risk of consumer confusion if we try to accommodate both salt and sodium, and a conversion factor.
Spain	Yes but it should not be associated to the presence of salt in the food label but to an increased awareness of consumers.
US	Practical issues related to nutrient declaration, in general, include: 1. presentation of nutrition information such as language, format, and link to reference values; 2. need for exemptions and special labeling provisions, considering <ul style="list-style-type: none"> <li>▪ foods of no nutritional significance,</li> <li>▪ small package sizes, and</li> <li>▪ bulk foods</li> </ul> 3. compliance and enforcement issues; for example, <ul style="list-style-type: none"> <li>▪ capacity and infrastructure of industry and regulatory authorities,</li> <li>▪ analytical testing for nutrient content (availability and validity of methods),</li> <li>▪ permitted variability from declared value (accounting for inherent analytical variability and variations within good manufacturing practices),</li> <li>▪ costs to public and private sectors for compliance and enforcement, and</li> <li>▪ procedures for enforcement and follow-up corrective actions</li> </ul> 4. impact on small businesses and approaches to minimize undue economic burden; and 5. consumer education to assist in understanding and use of nutrient declaration (recognizing that nutrition labeling should be one aspect of broader communication efforts regarding public health).

## A. Current Regulatory Approaches

9. Is there any evidence of a change in sodium/salt intake in your country since the declaration was introduced?

Argentina	There is no evidence.
Australia	Data not available.
Brazil	No. We don't have data about the relation of sodium declaration in nutrition labelling and changes in salt or sodium intake.
Canada	There is no baseline data available to assess this.
CLITRAVI	There may be a compulsory declaration in the EU in a few years time. But it is not clear yet, what will be preferred.
Costa Rica	In Costa Rica there are no such data. However there will be data table salt for comparison with previous periods.

European Commission	<p>The declaration of sodium is not mandatory in the European Community so it is difficult to assess whether the declaration of sodium in the nutrition labelling has had any impact on the intake of sodium/salt.</p> <p>In fact in the case of the Netherlands the intake of salt had increased in the last five years. Therefore, the food industry has been urged to reformulate their products to reduce the amount of salt added.</p>
Finland	<p>Dietary salt intake has decreased significantly in Finland during the last 20 years. The annual average reduction in salt intake between 1979 and 2002 has been 0,14 g in men and 0,11 g in women. The salt intake in 2007 was about 8 g in men and 6 g in women. The decline in salt intake is in line with an observed decrease in blood pressure level in Finnish population.</p>
IDF	-
Japan	<p>Average salt intake per person tends to decrease slightly.</p>
Norway	<p>The average intake of salt is estimated to be approximately 10 g per day per person, but varies greatly from person to person. Almost three quarters of the salt is estimated to come from processed foods.</p>
NZ	<p>No evidence that has been directly attributable to labelling. A number of food companies have introduced voluntary initiatives as a socially responsible action; others have formulated or reformulated food products to achieve endorsement from not-for-profit, non-government organisations. More recently, there have been efforts by industry associations to reformulate product to lower the sodium concentration. this has been stimulated by advocacy from both Government and non-government organisations.</p>
Spain	-
UK	<p>The 2008 urinary sodium survey assessed salt intakes in the general adult population in the UK. The survey showed a reduction in the UK's average daily salt consumption from 9.5g to 8.6g since the National Nutrition and Diet Survey (NDNS) in 2000/01</p>
US	<p>Responses to this question may be difficult to interpret considering that the question does not specify the type of declaration (e.g., whether voluntary or mandatory under certain or all circumstances), and that the availability and quality of data to assess sodium intake since "the declaration was introduced" varies among countries. For example, in the United States, there is little evidence of a change in total sodium intake between two national food consumption surveys conducted between 1988-94 and 2003-04 (with the majority of Americans still not meeting sodium recommendations). However, these surveys do not provide a true "pre" /"post" comparison of sodium intake "since the declaration was introduced" because declaration of sodium was required under certain circumstances with the regulations adopted by FDA in 1984 (See response to A.6). Moreover, mandatory sodium labeling would likely have been implemented by some food manufacturers during two years of the 1988-94 survey (i.e., 1993 and 1994). In addition, for the few Codex member countries who may have quality and comparable data to assess sodium intake over time and a suitable pre-post declaration comparison, the relevance and importance of this question to the Committee's recommendation with regard to the declaration of "sodium" versus "salt" on the nutrition label is unclear.</p>

## A. Current Regulatory Approaches

### 10. Is there any evidence of change in the sodium/salt content of the food supply in your country?

Argentina	<p>There are evidence of change in the sodium/salt content of the food supply in our country. The food industry has already taken steps to reduce salt in some food products and is currently working together with the Ministry of Health to tackle this issue.</p>
Australia	<p>The Australian food industry is active in various initiatives to produce lower sodium products in the marketplace.</p>
Brazil	<p>No. We don't have data about the relation of sodium declaration in nutrition labelling and changes in salt or sodium content of food supply in Brazil. However, the government and the food industry are working together to establish goals for the reduction of salt and other nutrients in industrialized foods.</p>
Canada	<p>There is no baseline data available to assess this. Anecdotally, we have seen a decrease in</p>

	trans fat levels because of labelling requirements, but it would appear that there is not the same sense of urgency around sodium reduction in Canada as there was for trans fats.
CLITRAVI	In a number of member states of the EU there has been a reduction of the use of salt in various food groups since the 1980ies. In these countries the values have been lowered already. In other member states the reduction is proposed to take place within the next years by about 4-5% per year. With regard to the meat processors all consider a reduction as much as possible to a food safe level.
Costa Rica	There are no data to quantify the sodium content in the whole food supply chain, yet due to international trade tendency to provide positive nutritional foods (lower sodium), has increased consumer choice reduced salt products.
European Commission	<p>In the European Community as a whole, since 2007/2008, the food industry has been encouraged to reformulate foods to reduce the content of certain nutrients.</p> <p>Since 2008 there has been voluntary initiative in the European Community for Member States to encourage the reduction in the amount of salt added to foods, generally focussing on foods that are important contributors to the salt/sodium intake of the population.</p> <p>Prior to the more general initiatives within the European Community, in the United Kingdom between 1998 and 2001 the content of sodium/salt in bread decreased by over 20 %. In the Netherlands the salt content of bread has decreased by 10% over a number of years. In France, since 2001, the PNNS - Plan National Nutrition Santé (national plan for nutrition and health) has encouraged stakeholders to reduce the content of salt in processed foods. The results obtained in the past 8 years highlights a significant trend thorough a diminution of the consumption of salt.</p> <p>Increased consumer awareness of the importance of trying to reduce the intake of salt has encouraged consumers to look for lower salt alternatives.</p>
Finland	Surveys made by food industry branch associations (Finnish Food and Drink Industries Federation, Finnish Bakery Association, Finnish Meat Research Institute etc.) have shown that especially the obligation for "high in salt" labelling has clearly contributed to the salt content of food products (decreased the salt content).
IDF	-
Japan	Average salt intake per person tends to decrease slightly.
Norway	No
NZ	<p>The initiatives mentioned in response to Question 9 suggest there may be a change in the sodium/salt content of the food supply, however this has not been formally evaluated. The mean concentration of sodium in bread appears to have dropped between 1990-1 and 2003-4. The sodium content in milk has also dropped. (Thomson, British Journal of Nutrition 2009)</p> <p>The New Zealand Government is currently conducting a total diet study that will analyse sodium in foods to determine concentration changed over a 5 year period and estimate exposure changes for a variety of age-sex groups.</p>
Spain	Yes but it should not be associated to the presence of salt in the food label but to an increased awareness of consumers.
UK	<p>The UK's major retailers have also undertaken a significant amount of work on salt reduction and made commitments to salt reductions across a wide range of own-brand products. Some have met the 2010 targets ahead of time, and one retailer is using the original 2010 targets as maximum salt levels.</p> <p>The reductions achieved by industry so far include:</p> <ul style="list-style-type: none"> <li>• The average amount of salt found in branded pre-packed, sliced bread has been reduced by around one-third.</li> <li>• Reductions of about 44% have been achieved in branded breakfast cereals.</li> <li>• Reductions of between 16% and 50% have been achieved in some top-selling cakes and biscuits between 2006 and 2007.</li> <li>• The snack sector has been particularly active and in 2007 alone there was a 13% reduction in standard crisps, 32% in 'extruded snacks' and 27% in 'pelleted snacks'. In some standard crisp ranges, average reductions in the sodium content of up to 55% have been reported.</li> <li>• There have also been reductions in processed cheese products, including a range of soft white cheeses with 50% less salt for the UK market, a 32% reduction in some retail standard</li> </ul>

	<p>cheese slices, and 21% in the equivalent reduced-fat cheese slices.</p> <ul style="list-style-type: none"> <li>• Earlier work led by the UK Food and Drink Federation (Project Neptune) produced reductions of about 30% in cooking and pasta sauces and 25% in soups by a range of the largest manufacturers.</li> </ul> <p>More than 40 of the UK's major catering companies (including two of the largest suppliers to the foodservice sector) have published details of the activities they are undertaking on procurement, menu planning, consumer information, and kitchen practice. All companies have activities relating to salt reduction. The vast majority use the FSA's salt targets to benchmark and monitor progress, while others are using the Agency's traffic light nutrient guidelines in a similar way.</p>
US	<p>The U.S. Department of Agriculture's Center for Nutrition Policy and Promotion routinely collects data to identify trends and provide estimates of the content of nutrients available for consumption in the U.S. food supply. However, these data cannot serve as a "proxy" for intake estimates. In addition, due to the nature of data collection and survey methodology, these data provide estimates of nutrient amounts that are available for consumption only (but not actual consumption). Nevertheless, the data provide valuable information necessary to monitor the potential of the food supply to meet the nutritional needs of the U.S. population. Specifically, with respect to sodium, it is important to note that, with the exception of canned vegetables and cheeses, the estimates of sodium content in the food supply do not account for sodium that is added in processing of foods; thus, the sodium values are underestimated. Another factor to consider is that voluntary declaration of sodium on food labels was in practice in the U.S. marketplace prior to FDA's implementation of mandatory nutrient (including sodium) declaration in 1993. All of these factors must be considered when using these data to determine the impact of implementation of regulations to declare sodium content on food labels on the sodium content in the food supply. Data on amounts of nutrients available for consumption on a per capita per day basis indicate that the sodium content of the food supply averaged about 1270 mg per capita per day in 1993 and steadily declined to about 1210 mg in 2002. Following an increase in the sodium content of the food supply during 2003-2004, the most recent data point for 2006 estimates an average of 1150 mg per capita per day (References: Nutrient Per Capita Per Day Food Supply Database, <a href="http://65.216.150.146/NFSdatabase/QueNut.asp">http://65.216.150.146/NFSdatabase/QueNut.asp</a>; Nutrient Content of the U.S. Food Supply, 2005, Home Economics Research Report No. 58).</p> <p>FDA's Food Label and Package Survey data indicate that the prevalence of nutrient content claims for sodium on processed, packaged foods declined after FDA adopted regulations defining nutrient content claims in 1993. The prevalence of claims for lower sodium content of foods declined from 13.6% in 1993 to 4.9% in 1995, which then rose to 6.7% in 1997. The most recent data for 2006-07 continues the increasing trend with the figure at 7.5%, perhaps due to reformulation. The decline from 1993 may illustrate the impact of defining specific criteria for sodium nutrient content claims.</p>

<b>A. Current Regulatory Approaches</b>	
12. Is there consistency in the terminology used between the nutrient declaration and list of ingredients in your country?	
Argentina	There isn't consistency in the terminology used between the nutrient declaration and list of ingredients. The term "sodium" is used for the nutrient declaration and "salt" for the ingredient list. It must be pointed out, however, that no consistency can be reached, since the first terminology applies to ingredients, readily added in the quantitative composition and the other one refers to nutrients, which compose each one of the ingredients
Australia	Sodium is used in nutrient declaration. Salt is listed in ingredient list. Sodium-containing additives are declared in the ingredient list using the class name (e.g. preservative) followed by the additive's specific name (e.g. sodium nitrate) or code number in brackets (e.g. 251).
Brazil	The term sodium is used in nutrient declaration and the terms salt or sodium chloride are

	employed in the ingredient list.
Canada	In the Nutrition Facts table, the nutrient must be declared as sodium. The constituents in the list of ingredients must be named by their common name. Therefore, salt and sea salt would appear as such, and food additives are declared by their common name, eg. sodium phosphate, sodium metabisulphites, etc. Additionally when making nutrient content claims with respect to sodium, the terms sodium and salt are interchangeable for flexibility for manufacturers.
CLITRAVI	The ingredient list states salt. In nutrient declaration it varies between salt /sodium
Costa Rica	In Costa Rica for the declaration of nutrients used (sodium) and the list of ingredients we use the term (salt).
European Commission	<p>There are no Community rules on the terminology for the listing of ingredients with respect to salt. The term used for salt/sodium chloride is for the manufacturer to decide.</p> <p>The food additives that contain sodium can be designated by their specific name, or if appropriate, the EC number assigned to that food additive.</p> <p>The European Community legislation on nutrition and health claims (Regulation 1924/2006) includes criteria for claims related to 'sodium' or 'salt'.</p> <p>Directive 90/496/EEC on nutrition labelling for foodstuffs requires the use of the term 'sodium' in the nutrition labelling but as previously noted this legislation is under review.</p>
Finland	<p>See questions 4 and 6</p> <p><b>A4</b> - On the nutrition labelling shall be expressed sodium (g/100g). On the list of ingredients salt is indicated as salt. According to the national legislation the salt content of certain foodstuffs shall be indicated as a total amount of salt (sodium chloride) as a percentage of weight.</p> <p><b>A6</b> - Salt is an ingredient and term is appropriate on the list of ingredients. Sodium is a nutrient and term is appropriate on the nutrition declaration)</p>
IDF	-
Japan	"Dietary Reference Intakes for Japanese, 2010 (DRI-J)" does, Sodium Bearing in mind in order to prevent lifestyle-related diseases increased risk of overdose, "Tentative Dietary Goal for Preventing Life-Style Related Diseases (DG)" set.
Norway	In Norwegian salt = salt, sodium = natrium. As answered in question 4 the declaration is required as sodium (natrium), so there is not consistency in the terminology. Some food operators gives the information on g sodium also as g salt (NaCl)
NZ	No. Ingredients must be declared by their common name, or name that describes its true nature therefore the term 'salt' is mostly used in the ingredients list.
Spain	manufactures usually declare ClNa as "salt" in the ingredient list. However they have to declare sodium in the nutrient declaration
US	The nutrient "sodium" is required to be declared by the term "sodium" in the "Nutrition Facts" table on a food label. When salt is used as an ingredient in a food, it is declared by its common or usual name, i.e., "salt" in the ingredient statement on the food label. The Nutrition Facts table provides information on the content of nutrients in a food. The amount of sodium cannot be declared by any term other than "sodium" in the Nutrition Facts, therefore, it cannot be declared as "salt" in the nutrition facts information

## B. Non-regulatory approaches

### 1. Are there, or have there been, any non-regulatory approached in respect of the declaration of sodium/salt?

Argentina	The recommendations in the Food Guidelines for the Argentine Population, published in 2000 by the Argentine Dietician and Nutritionist Association and supported by the Health Ministry, which recommend eating no more than a teaspoonful of salt a day and reducing the consumption of food rich in sodium: concentrated soups and broths, commercial sauces, cold meats, luncheon meats, hamburgers, etc., replacing the consumption of commercial processed condiments with natural spices, and avoiding having table salt at hand when eating.

Australia	No
Brazil	There are no non-regulatory approaches in respect of the declaration of sodium/salt. In 2007, the Ministry of Health and the Brazilian Association of Food Industry (ABIA) signed a technical cooperation agreement aimed to develop actions to improve the nutritional quality of foods, including the reduction of sodium and salt in industrialized foods.
Canada	N/A
CLITRAVI	As said in A2 and A3 there is a wide spread voluntary declaration of nutrients as BIG 4 including salt or 5 including energy additionally
Costa Rica	In Costa Rica there are some guides (dietary guidelines) for patients of hypertension.
European Commission	<p>Due to the legislation the information on sodium content is in general expressed as 'sodium'. However, some food business operators have included information on the "salt" content of a food by providing outside the ingredients list information on the sodium content expressed as "salt" or "salt equivalents". During recent years information on selected nutrients have been included voluntarily on the front of pack, and these declarations tend to include the amount of salt (i.e. sodium expressed as salt equivalents) in a portion/serving of the food.</p> <p>In Ireland in 2003 the Food safety Authority of Ireland (FSAI) began voluntary work with the Irish food industry on salt reduction. One of the objectives is to work with the food industry to bring about the universal labelling of salt in packaged foodstuffs. Further information about the initiative is provided in Section G.</p>
Finland	Heart Symbol was launched by the Finnish Heart Association and Finnish Diabetes Association in 2002. The symbol tells the consumer at a glance that the product with this symbol is a better choice in its product group regarding fat and sodium. For granting the Heart Symbol one of the criteria is total amount of sodium.
IDF	-
Japan	Japanese government has coped with decreasing, as an anti-hypertensive cerebrovascular disease since 1960. The policy has contributed to reduce salt intake continuously.
Norway	The government and the industry have had regular meetings and discussions about salt content in foods since the 1980s.
NZ	A number of food companies have introduced voluntary initiatives as a socially responsible action; others have formulated or reformulated food products to achieve endorsement from not-for-profit, non-government organisations. More recently, there have been efforts by industry associations to reformulate product to lower the sodium concentration. This has been stimulated by advocacy from government and non-government organisations. The Heart Foundation tick programme, a symbol on the label of the best in category for heart health, takes sodium content into account. Content claims by manufacturers on labels are common, for example low salt/ low sodium/ reduced salt. % Daily intake often includes sodium.
Spain	Not yet but we are planning for the next future.
UK	<p>Since 2004 the FSA has promoted awareness of salt as a public health issue and has informed consumers how they can lower their intakes. This consumer awareness activity, coupled with actions to improve food labelling by the introduction of voluntary front of pack traffic light labelling has helped to promote increased demand for reformulated lower salt products.</p> <p>In May 2009 the Agency published revised salt reduction targets for 2012, for 80 categories of foods. These are more challenging than the previous targets for 2010.</p> <p>The Food Standards Agency's new advertising campaign on TV, radio and in print, is urging people to pay closer attention to the salt levels in the foods they are buying. The campaign features foods that make significant contributions to the salt intakes of UK adults and children, bread, breakfast cereal and pasta sauce. The salt levels of these foods vary across brands, so a simple way to reduce the amount of salt we eat is to choose the ones that are lower in salt.</p>
US	The National Academy of Sciences (NAS) in the U.S. serves as an adviser on scientific and technological matters. The NAS and its associated organizations (including the Institute of Medicine (IOM)) have undertaken studies and published reports on nutrition recommendations, including Dietary Reference Intakes (DRIs). DRIs for sodium were published in 2004. In 2007, the Centers for Disease Control (CDC) and IOM published

	Nutrition Standards for Foods in Schools, which include recommendations about appropriate nutritional standards for the availability, sale, content and consumption of foods at school. These standards are currently being reviewed for implementation in schools. In addition, the IOM is currently developing strategies to reduce dietary sodium intake to levels recommended by the Dietary Guidelines for Americans ( <a href="http://www.iom.edu/CMS/3788/59128.aspx">http://www.iom.edu/CMS/3788/59128.aspx</a> ).
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<b>B. Non-regulatory approaches</b>		
2. Have the approaches been led by government, industry or other?		
Argentina	Government	The recommendations in the Food Guidelines for the Argentine Population, published in 2000 by the Argentine Dietician and Nutritionist Association and supported by the Health Ministry.
Australia	-	N/A
Brazil	-	-
Canada	-	N/A
CLITRAVI	Industry	-
Costa Rica	Government	In Costa Rica staff has been designated National Public Health Institute to continue the efforts of PAHO and its implementation in the country. However, this process has not begun.
European Commission	Other	In most Member States the initiatives on providing information on the salt content of a product have been led by the food industry. In some Member states there have been initiatives on providing voluntary declaration of the salt content of food. In one country there are mandatory rules on the declaration of "high salt" for certain products.  France provides also information to consumers on the salt content of different foodstuffs through websites of public institutions : food composition tables published on the website of AFSSA- Agence Française de Sécurité sanitaire des Aliments (French Foods Safety Authority), INPES (Institut national pour l'éducation pour la santé –National institute for health education : <a href="http://www.mangerbouger.fr">www.mangerbouger.fr</a> ), "Observatoire de la Qualité des Aliments (OQUALI)" (Observatory for Food Quality).
Finland	Other	Finnish Heart Association and Finnish Diabetes Association are responsible for the implementation of the Heart Symbol system. Organisations in charge give the right to use the label on application. An expert group appointed by the organisations in charge together with the Cancer Society of Finland considers the applications.
IDF	-	-
Japan	Government	Salt intakes reduction policy in Japan has been carried out by not only national government, but also local government. Society and group of health professionals such as doctors and nutritionists have made a great contribution to achieve that policy.
Norway	Industry	The Norwegian Action Plan on Nutrition (2007 - 2011) - recipe for a healthier diet - by the Norwegian authorities sets the reduction of salt consumption as a general goal. A dialog forum for cooperation between food industry, authorities, researchers and consumer organisation has been established and the government shall encourage product development of healthy food products and meals. Recently, Nofima, a business oriented research group working in research for the food industry, has established a network on salt content in food. The aim of the network is to give the participants increased insight into the various functions of salt in food in order to develop new products or further develop existing products with a reduced salt content. The target group of the network is primarily small and medium-sized businesses in the food industry in Norway, particularly within meat, bread, cheese and composite products. There will be held 3-4 meetings in the course of around 12 months.
NZ	Other	Government, industry and other organisations, such as th New Zealand Heart

		Foundation, have led the various approaches described in Question 1 above.
Spain	-	-
US	-	Studies undertaken for the government by the NAS and IOM are funded by government agencies.  We are not aware of any non-government programs.

### C. Consumer Knowledge

1. Has there been any research undertaken in your country about public/consumer understanding of the terms, 'sodium' and 'salt'?  
If yes, what were the findings?

Argentina	No research has been undertaken	-
Australia	Yes research on public and consumers has been done	Lack of consumer understanding of different terms was noted in the review of Nutrition Labelling conducted by FSANZ in 1999 (Proposal P167), but no specific research has been undertaken by FSANZ in this area. The most recent consumer survey undertaken by AWASH (the Australian Division of World Action on Salt and Health, <a href="http://www.awash.org.au">http://www.awash.org.au</a> ) found that 60% of consumers do not understand what sodium content in NIP means. We note that this finding should be considered in the context of: i) consumer's understanding of all label elements (eg 'sodium' content may not be the only nutrition information element that is not understood) and ii) the fact that only a quarter of those surveyed reported regularly checking food labels for salt content.
Brazil	No research has been undertaken	-
Canada	Yes research on public and consumer	In general, Canadians equate sodium as the technical term for salt, but are not likely to fully understand the difference between the two. However, in terms of labelling, if searching for information on salt content, they look for the amount of sodium. In focus groups, it would appear that health professionals use the term "salt" when discussing the issue with their patients. This recent consumer research was conducted for the Public Health Agency of Canada on: "Sodium: Knowledge, Attitudes and Behaviours" which should be publicly available in early 2010. Stakeholder and Expert Perspectives on Dietary Sodium Reduction in Canada 2009 : <a href="http://www.hc-sc.gc.ca/fn-an/pubs/nutrition/_sodium/2009-reduction/index-eng.php">http://www.hc-sc.gc.ca/fn-an/pubs/nutrition/_sodium/2009-reduction/index-eng.php</a> - it is interesting to note that in this report from Canadian stakeholders, the issue of salt versus sodium declaration in the NFT was not highlighted as a concern.
CLITRAVI	-	I am not aware of any such research in this respect
Costa Rica	No research has been undertaken	In Costa Rica there have been no such studies, it is considered essential to conduct this study in the future.
European Commission	Yes research on public and consumer	The European Commission has not conducted research specifically in the area of consumer understanding or use of the term salt/sodium. However, the European Consumer Organisation (BEUC) conducted a survey in 2005 in five European Countries (Denmark, Germany, Hungary, Poland and Spain) which indicated that consumers would like to have consistent information with preference being expressed for "salt". (Report on European Consumers' Perception of Foodstuffs Labelling, Results of Consumers Research conducted on behalf of BEUC from February to April 2005). Consumer organisations in Member States, such as the Netherlands, also promote the use of the term 'salt' as this is more widely understood by consumers.

		Further to the general research there is more detailed research in Member States. For example, recent research conducted in Ireland by Safefood revealed that while 51% of consumer are aware that most of the salt intake is from processed foods, only 30% believe eating less of these foods is the most effective way to reduce salt intake. In addition, 48% of consumers reported adding salt to their main evening meal. (See: <a href="http://www.safefood.eu/Global/Publications/Market%20Research/Building%20Authority.pdf?epslanguage=en">http://www.safefood.eu/Global/Publications/Market%20Research/Building%20Authority.pdf?epslanguage=en</a> )
Finland	-	-
IDF	-	-
Japan	No research has been undertaken	-
Norway	No research has been undertaken	-
NZ	Yes research on public and consumer	A 2006 study of 226 participants (Nutritional information about sodium; it it worth its salt? Gilbey, Fifield NZMJ 21.April 2006. Vol 119 No 1232) found most participants did not know how to interpret the nutritional information and that many underestimated the salt content of the product by confusing it with sodium content.
Spain	No research has been undertaken	-
UK	Yes research has been undertaken	<p>The FSA commissioned research to explore public understanding of sodium and salt. The primary aim of the research was to investigate the public's comprehension and preferences of the term 'sodium', 'salt' and 'salt equivalents'. The secondary aim was to get the UK public's thoughts on current food labels and supporting information on salt and also their views on how they would like salt/sodium to be labelled in the future. The research consisted of a series of post shop interviews with consumers actively reducing salt consumption and a series of group discussions with the general public. A full report of this research is expected to be published ahead of for this year's CCFL meeting in May.</p> <p>The research findings are summarised below:</p> <ul style="list-style-type: none"> <li>• Participants had some understanding of salt and what it is although awareness of sources was inconsistent.</li> <li>• Levels of awareness/interest in/understanding of the health consequences of salt consumption varied considerably.</li> <li>• Awareness/understanding of 'sodium' was very low.</li> <li>• There was some awareness of a link between 'sodium' and 'salt' but precise understanding of this was very limited and often incorrect.</li> <li>• The sources of 'sodium' in food and its role in relation to health were relatively poorly known compared with salt.</li> <li>• There was no spontaneous awareness of the term 'salt equivalent'. Following exposure, it was commonly interpreted as 'salt substitute'.</li> <li>• Participants wanted labelling to be clear, simple, clear, straightforward and consistent and to focus on 'salt'.</li> <li>• Participants wanted consistency across labelling information (e.g. back of pack information and front of pack information where relevant and also consistency between products).</li> <li>• Participants wanted supporting information (e.g. supplementary information, Government campaigns, news items etc.) to retain focus on salt.</li> </ul>
US	We are not aware	Note, however, that historically the term "sodium" has been used on

	of such research.	food labels in U.S. to declare the content of sodium in foods. Research on consumers in the U.S. have largely focused on understanding of the dietary guidelines for sodium, the relationships between sodium and hypertension, and the ability to use the food label to determine sodium content of foods.
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<b>C. Consumer Knowledge</b>		
2. Have there been any public/consumer education programmes undertaken in your country about sodium and/or salt? Please describe. What were the key messages? Which term, 'sodium' or 'salt' was used? Was the campaign driven or paid for by industry or government? Were there costs directly associated with the campaign?		
Argentina	yes	The answer to this question appears in Annex 1.
Australia	yes	<p>In May 2007, the Australian Division of World Action on Salt and Health (AWASH) launched the Drop the Salt! campaign to reduce daily population salt intakes to below 6 grams over five years (by 2012). It has four clear objectives:</p> <ol style="list-style-type: none"> <li>1. An average 25% reduction in the salt content of food</li> <li>2. An average 25% reduction in salt used by the catering industry</li> <li>3. Increased consumer knowledge of the benefits of low salt diets</li> <li>4. Clear labelling of foods that makes the salt content immediately apparent to the consumer</li> </ol> <p>These objectives have been underpinned by a detailed program comprising research, intervention and evaluation.</p> <p>The term 'salt' has been used in the campaign.</p> <p>The project received seed funding through a National Health and Medical Research Council Program Grant with in kind support from The George Institute for International Health. AWASH also received additional funding from New South Wales Health and Sydney West Area Health Service to commission a review of the evidence to support proposals for a government action. The campaign has/will also be seeking additional funding from a range of government programs, trusts and corporations, to maintain and expand the project.</p> <p>AWASH is a growing network of representatives from the medical profession, scientific community, food industries, consumer associations, education and health promotion bodies.</p> <p>Sources:  <a href="http://www.awash.org.au/documents/Drop_the_Salt_Campaign_Launch_and_Networking_Lunch_Report.pdf">http://www.awash.org.au/documents/Drop_the_Salt_Campaign_Launch_and_Networking_Lunch_Report.pdf</a>  <a href="http://www.awash.org.au/dropthesaltcampaign.html">http://www.awash.org.au/dropthesaltcampaign.html</a>  <a href="http://www.awash.org.au/documents/Drop_the_Salt_Campaign_Brochure.pdf">http://www.awash.org.au/documents/Drop_the_Salt_Campaign_Brochure.pdf</a>  <a href="http://www.awash.org.au/documents/AWASH-Strategic-Review-2007_08.pdf">http://www.awash.org.au/documents/AWASH-Strategic-Review-2007_08.pdf</a></p> <p>The Heart Foundation Tick was established in 1989 to improve the food supply by challenging food companies to develop healthier foods. Food companies accepted the Heart Foundation's Tick's challenge to make a real difference to the health of Australians. Amongst the public health impacts claimed by the Heart Foundation as a result of the campaign is the following:</p> <p>Removed 235 tonnes of salt in just one year when just one manufacturer [Kellogs] reformulated 12 breakfast cereals to Tick nutrition standards</p>

		<p>The Heart Foundation Tick continues to be a symbol Australians use and trust to more easily make healthier food choices from supermarkets.</p> <p>In August 2006, the Heart Foundation also introduced Tick to meals eaten out of the home - a world first program.</p> <p>Outlets serving lunch and dinner meals now have the opportunity to serve up genuinely healthier meals by meeting Heart Foundation nutrition and quality standards, clearly signposting them with the trusted Tick.</p> <p>Just like food in the supermarket, the Tick on meals eaten out must be earned. To do so, food outlets must meet strict standards across three main areas:</p> <ul style="list-style-type: none"> <li>i) Quality systems and processes such as food safety (HACCP), quality management, staff training, portion control, internal audits and purchasing specifications;</li> <li>ii) Nutrition standards for serve size, saturated fat, trans fat, salt and vegetable/fibre content;</li> <li>iii) Promotions including point of sale information, nutrition information panels, correct use of the Tick trademark and compliance with current food regulations and codes of practice. The Heart Foundation checks all promotional material prior to use.</li> </ul> <p>Source:  <a href="http://www.heartfoundation.org.au/sites/tick/Food_Industry/foodservice/Pages/default.aspx">http://www.heartfoundation.org.au/sites/tick/Food_Industry/foodservice/Pages/default.aspx</a></p>
Brazil	No	-
Canada	-	<p>Health Canada fact sheet: Its Your Health: Sodium - describes both salt and sodium, their effects and how to get more information from the NFT. It is web based and did not have an associated promotional campaign <a href="http://www.hc-sc.gc.ca/hl-vs/iyh-vsv/food-aliment/sodium-eng.php">http://www.hc-sc.gc.ca/hl-vs/iyh-vsv/food-aliment/sodium-eng.php</a> The Canadian Stroke Network: <a href="http://www.sodium101.ca/">http://www.sodium101.ca/</a> - refers to sodium, this has some strong messages such as "sodium kills", it is privately financed; Champlain Cardiovascular Disease Prevention Network: <a href="http://www.giveyourheadshake.ca/">http://www.giveyourheadshake.ca/</a> - refers to sodium, targeted to area residents, financed at the public health level, with some contributions from the federal government; Canadian Obesity Network: Salt Lick Awards: <a href="http://www.obesitynetwork.ca/page.aspx?page=1619&amp;app=182&amp;cat1=457&amp;tp=12&amp;lk=no&amp;menu=37">http://www.obesitynetwork.ca/page.aspx?page=1619&amp;app=182&amp;cat1=457&amp;tp=12&amp;lk=no&amp;menu=37</a> - refers principally to sodium</p>
CLITRAVI	No	-
Costa Rica	No	<p>In Costa Rica Institutional Guidelines for Comprehensive Care in Chronic Non-Communicable Diseases: diabetes, dyslipidemia, hypertension, whose latest release is 2008.</p>
European Commission		<p>In the European Community there have been public education campaigns in certain countries. The public health messages are generally determined by the public authorities or recognised advisory bodies of the countries concerned. However, in the past few years, within the European framework for national salt reduction initiatives numerous initiatives including public awareness raising campaigns had been initiated. It has been decided by Member States in the High Level Group on Nutrition and Physical Activity that the term 'salt' should be used for communication purposes but the reformulation is aimed at reducing the sodium content. As sodium is consumed overwhelmingly in the form of salt (sodium chloride), the decision was taken to communicate about 'salt' and not 'sodium', as reference to 'salt' is better understood by consumers. The amount of 'salt' in a product is determined by multiplying the content of sodium a factor of 2.5. Therefore it is expected that the public awareness campaigns will focus on messages on salt. The first reporting by the Member States of the European Community on their initiatives is due around the end of 2009, so it is not possible to give information on the extent of campaigns across the European Community at the present time. The information provided by the European Commission in its leaflets and on its website on healthy eating focus on 'salt' rather than 'sodium'.</p> <p>Specific information on a recent campaign in Ireland is that in October 2009 SafeFood launched a campaign aimed at encouraging consumers to reduce their salt intake. The campaign entitled "Shake the Salt habit" was designed to raise awareness among</p>

		consumers that their diets are too high in salt and that the majority of dietary salt is from processed foods such as processed meats, sauces and bread. At present, dietary salt intake levels among adults on the island of Ireland are up to 66% more than the recommended daily amount of 6g per day as advocated by health professionals. More information is available on <a href="http://www.safefood.eu">www.safefood.eu</a> .
Finland	-	Finnish Food Safety Authority has produced information material on salt intake. Ministry of Social Affairs and Health, National Institute for Health and Welfare, National Nutrition Council and the Finnish Hypertension Society have organised 2008-2009 national briefings as a part of an international theme week "salt awareness week". Campaigns for the Heart Symbol (see questions B.1 and 2) can be seen as work for encouraging consumers to choose foodstuffs with lower salt content. Work for recognition of the Heart Symbol is funded with the fees for the right to use the symbol. The Heart Symbol is involved in all the material related to the good nutrition produced by the Finnish Heart Association. This material is funded from the budget of the Association.
IDF	-	-
Japan	yes	In Japan, dietary guidelines (2000), "Cut down salty foods", "Let's take salt less than 10 gram per day" is the slogan. In "Dietary Reference Intakes for Japanese, 2010(DRI-J)", as for the adult man, under 9 gram, an adult woman regard under 7.5 gram with quantity of tentative dietary goal for preventing life-style related diseases (DG) of a salt intake tentative dietary goal for preventing life-style related diseases.
Norway	Yes	Information about the importance of reducing the salt intake has been included in general nutrition recommendations and education.
NZ	no	-
Spain	no	-
US	yes	Several federal agencies, including the National Institutes of Health, CDC, and FDA, have education campaigns for various health messages. FDA's consumer education campaigns target different population audiences to increase consumer understanding and use of the nutrition information provided on food labels. The education campaigns with respect to sodium included messages to achieve sodium intakes to levels consistent with national Dietary Guidelines and IOM recommendations. It is important to note that sodium chloride is not the only source of sodium in the U.S. food supply. Examples of other sources include monosodium glutamate and other food additives such as sodium phosphate, sodium carbonate, and sodium benzoate. As noted previously, the term "sodium" has always been used on food labels in U.S. to declare the content of the nutrient sodium in foods.

## C. Consumer Knowledge

### 3. Are there national guidelines or recommendations on the intake of sodium/salt?

Argentina	Yes we have guidelines and recommendations	Although under Resolution Res. GMC 46/03 the declaration of sodium is mandatory, there are Food Guidelines for the Argentine Population (Methodology Manual), published in 2000 and recommended by the Health Ministry, which address both salt and sodium (See question B.1).
Australia	Guidelines and recommendations	The Australian Dietary Guidelines recommend choosing foods low in salt. NHMRC recommend an Upper Safe Level of Intake (UL) for sodium of 2300 mg/day for those aged 14 years and above. A Suggested Dietary Target (SDT) of 1600 mg/day is recommended for "older, overweight hypertensives and for those wishing to maintain low blood pressure over the lifespan".
Brazil	Yes we have guidelines	Both terms are used. The guidelines recommend limiting salt and sodium intake. The guidelines point out the importance to explain the relation between salt and sodium.
Canada	-	The U.S. Institute of Medicine has developed two sodium recommendations for use in North America (includes Canada): -an "Adequate Intake", which is the amount of sodium that will meet the needs of most healthy individuals (1500 mg for general population); and

		<p>-an “Upper Level”, which is the highest continuous daily amount of sodium intake that doesn’t appear to put a person at risk for health problems (2300 mg for general population).</p> <p>Source: Institute of Medicine Dietary Reference Intakes for Water, Potassium, Sodium, Chloride, and Sulfate. National Academies Press, Washington, DC, 2004.</p> <p>Canada’s Food Guide directional statements include the following: Choose vegetables and fruit prepared with little or no added fat, sugar or salt.; If you eat luncheon meats, sausages or prepackaged meats, choose those lower in salt (sodium) and fat.; Choose grain products that are low in fat, sugar or salt. ;</p> <p>Compare the Nutrition Facts table on labels to make wise choices; Reference <a href="http://www.hc-sc.gc.ca/fn-an/food-guide-aliment/index-eng.php">http://www.hc-sc.gc.ca/fn-an/food-guide-aliment/index-eng.php</a></p>
CLITRAVI	Yes we have recommendations	mainly salt (5 to 6g/day)
Costa Rica	Yes we have guidelines and recommendations	In Costa Rica the food guides use the term soda. You explained that the term salt is also known as sodium chloride.
European Commission	Yes we have guidelines and recommendations	<p>The Member States of the European Community have guidelines and/or recommendations.</p> <p>The recommendations or guidelines for the intake of salt in individual Member States or regions of the European Community vary and range from less than 5g salt per day to 5-10 g salt per day.</p> <p>Some specific recommendations/guidelines include:</p> <p>Nine Member States recommend a limit of 5 grams of salt per day (Bulgaria, Cyprus, the Czech Republic, Greece, Hungary, Latvia, Lithuania, Slovenia, Spain)</p> <p>Three Member States recommend a limit of 5-6 g salt/day (Estonia, Poland, Sweden)</p> <p>Seven Member States recommend a limit of 6 g salt/day (Germany, Ireland, Italy, the Netherlands, Portugal, Romania, the United Kingdom)</p> <p>One Member State recommends a limit of 6-7 g salt/day (Finland)</p> <p>One Member State recommends a limit of 5-8 g salt/day (Malta)</p> <p>One Member State recommends a limit of 5-10 g salt/ day (Luxembourg)</p> <p>One Member State recommends a limit of 8 g salt/day (France)</p> <p>One Member State recommends a limit of 8.75 g salt/day (Belgium)</p> <p>Many Member States make recommendations on salt intake as the term is more frequently used by doctors and consumers.</p>
Finland	Yes we have recommendations	National Nutrition Recommendations (2005) by National Nutrition Council use both term salt and sodium.
IDF	-	-
Japan	Yes we have guidelines and recommendations	We have guidelines and recommendations which is defined as "salt".
Norway	Yes we have guidelines and recommendations	According to the national recommendations on nutrition by the Norwegian Directorate of Health the intake of salt should be limited to 5 g a day. For children below two years the intake of salt should not exceed 0.5g/MJ. The justification for the recommendation for children is to avoid the get accustomed to salty flavour.
NZ	Yes we have recommendations	Australia and New Zealand share common nutrient reference values (NRVs). NRVs for sodium have been established that include an adequate intake and upper level of intake for infants, children, adolescents, adults and/or pregnant and lactating women. New Zealand also has a range of national food and nutrition guideline statements, The

		Food and Nutrition Guidelines, that include reference to salt such as "Prepare foods or choose pre-prepared foods, drinks and snacks...that are low in salt; if using salt, choose iodised salt."
Spain	Yes we have recommendations	Yes. the term salt is used because we believe that it's better understood and frequently used by the consumers and doctors, while sodium is much more a scientific term.
US		<p>In the United States, the term "sodium" is used in national recommendations that address levels for adequate intake and levels to reduce the risk of chronic disease. The Institute of Medicine (IOM) in the U.S. has established an Adequate Intake (AI) level of 1,500 mg sodium per day for 9- to 50-year olds, and lower amounts for other age groups. The IOM also has established a maximum level of daily sodium consumption, the Tolerable Upper Intake Level (UL) of 2,300 mg per day for individuals aged 14 years and older, with lower amounts for younger ages. In addition, the 2005 Dietary Guidelines for Americans advise daily consumption of less than 2,300 mg of sodium for adults. For individuals with chronic disease (such as hypertension, diabetes, and kidney disease), African-Americans, and older adults, the Guidelines suggest no more than 1,500 mg of sodium per day.</p> <p>A consideration in quantitative nutrient intake recommendations is the inclusion of all dietary sources relevant to achieving adequate intakes or reducing the risk of chronic disease. As previously noted, sodium chloride is not the only source of sodium in the U.S. food supply. Examples of other sources include monosodium glutamate and other food additives such as sodium phosphate, sodium carbonate, and sodium benzoate.</p>

<b>D. Fortification</b>			
Is salt a vehicle for fortification with, for example iodine or fluoride in your country?			
Is fortified salt used in processed fo			
	Vehicle	Fortified	
Argentina	yes	no	Under Act 17,259 (Ley n° 17. 259), salt for human consumption, whether dietetic or not, should be iodine enriched. This should be declared in the salt label. When salt is added as an ingredient to a food, it is not mandatory to use iodine-enriched salt, and normally non enriched sat is used for this purpose.
Australia	yes	-	Iodised salt is mandatory in bread from 9 October 2009. The mandatory fortification standard requires the replacement of non-iodised salt with iodised salt in bread; however bread represented as 'organic' is exempt, consistent with the mandatory folic acid fortification Standard.
Brazil	yes	yes	The term salt or sodium chloride can be used. All salt aimed to human consumption must be fortified with iodine.
Canada	yes	-	Salt sold for table or general household use is required to be fortified with 0.01% potassium iodide. In general, salt used in food processing is not fortified, however, some smaller food manufacturers and foodservice/restaurant operators may purchase table salt for manufacturing purposes.
CLITRAVI	yes	-	Within the EU not all countries fortify or recommend fortification with iodine or fluoride. To my knowledge there is nowhere widespread fortification with fluoride , most is done with iodine. It is used in processed foods. In meat products in one member state more than 60% of products were processed with iodized salt. It is declared "with iodized salt" .
Costa Rica	yes	yes	In Costa Rica, the majority of processed foods using iodized salt, but the legislation other web sites except the use of iodized salt for those cases in which scientific studies demonstrating that this ingredient significantly

			affect production processes or product organoleptic Characteristics. Salt intended for food industry should not contain fluoride. Processed foods that use iodized salt to declare the list of ingredients (salt).
European Commission	yes	yes	Salt is used as a vehicle for iodine fortification in the some Member States these activities varies, often depending on the prevalence of iodine deficiency in the individual Member State. For example there is fortification of all salt in Austria, Bulgaria, Latvia, Romania, Slovenia and Slovenia. Fortification of household salt is required or encouraged in: the Czech Republic, Denmark, France, Germany, Greece, Hungary, Lithuania, Ireland, Italy, Luxembourg, the Netherlands, Poland, Spain and Sweden.  The use of salt as an ingredient in a food, with few exceptions, must be declared on the labelling in the list of ingredients. There is no general obligation to declare if the salt is fortified but this may be done voluntarily. If there is voluntary fortification of a food then nutrition labelling is required.
Finland	yes	no	Fortified salt is used very little in processed foods. If it is used, it is not declared on the label.
IDF	-	-	-
Japan	no	-	-
Norway	no	Yes	Fortification of salt with iodine is not mandatory. Such fortification is not systematically used as a means to prevent iodine deficiency, by the Health Authorities. No specific action has been undertaken to encourage the industry to fortify salt with iodine. Some producers use fortified salt in their production, in the list of ingredients they may express this by writing "salt (iodised)". Traditionally feed has been fortified with iodine, this has resulted in relatively high levels of iodine in milk and meat. A working group on the intake of iodine in the population has recently been established within the National Council for Nutrition.
NZ	yes	yes	As iodised salt. The use of iodised salt in mandated in bread, but may be used voluntarily in other foods.
Spain	yes	no	-
US	yes		Per FDA regulation in 21 CFR 100.155, the name of salt for human food use to which iodide has been added is "iodized salt" or "iodized table salt". In addition, the statement "This salt supplies iodide, a necessary nutrient" shall appear on the label immediately following the name. Salt or table salt for human food use to which iodide has not been added shall bear the statement, "This salt does not supply iodide, a necessary nutrient."

## E. Other information on the label

Should there be provision for any other information about sodium/salt on the label?

Argentina	<p>Indeed, the Argentine Food Code (Código Alimentario Argentino) establishes the following: A Food Low in Sodium is a food in which the sodium content has been significantly reduced, constituting a means to regulate sodium intake. These foods are classified into:</p> <p>Foods low in sodium: 40-120 mg of sodium/100 g of the ready-to-eat product.</p> <p>Foods very low in sodium: Less than 40 mg of sodium/100 g of the ready-to-eat product.</p> <p>The label of these foods shall include be labelled with the name of the product concerned followed by the claim "Low in Sodium" or "Very Low in Sodium" as appropriate. They shall meet all the labelling requirements and indicate the sodium content in miligrams/100 g of finished product. The addition of dietetic, sodium-low salt shall be declared. When it is a salt mixture totally or partially consisting of potassium salts, the total potassium content/100 g of the ready-to-eat product shall be indicated.</p> <p>Dietetic, sodium-low salt is a salt mixture similar to table salt (sodium chloride) in taste (with no flavoring additives).</p> <p>They shall meet all the labelling requirements and the following:</p> <p>Their packaging shall contain the following name in letters of the same size, highlight and</p>
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	visibility: Dietetic, sodium-low salt.
Australia	Yes, there should be provision for low and reduced salt claims on the label.
Brazil	We have developed criteria for the voluntary declaration of low sodium (120 mg/100g or ml), very low sodium (40mg/100g or ml) and free sodium claims (5mg/100g or ml).
Canada	Yes, in Canada, we allow the use of nutrient content claims for reduced in and lower in sodium/salt; free of sodium/salt and low in sodium/salt. The terms salt or sodium can be used interchangeably in nutrient content claims. We also permit the use of one diet-related health claim: A healthy diet containing foods high in potassium and low in sodium may reduce the risk of high blood pressure, a risk factor for stroke and heart disease. (Naming the food) is (low in sodium or sodium free).
CLITRAVI	It should be and in most cases it is used together with % GDA values.
Costa Rica	In Costa Rica iodized salt must meet certain specifications regarding the classification labeling and fortification.
European Commission	The claims - low, very low or free in relation to the content of sodium or salt should be permitted. The criteria for the claims should be equivalent and based on the total sodium content of the food.  In one Member State, Finland there are rules concerning the labelling of foods as "High in salt", so it should be possible for indications of high salt (or sodium) content to be indicated.
Finland	About the national salt labelling requirements see questions A.2-6
IDF	-
Japan	No
Norway	No
NZ	Currently the regulations permit content claims about salt/ sodium. The level of sodium in foods claiming low sodium/salt is regulated.
Spain	-
Thailand	Due to the lack of consumer understanding of the sodium/salt relationship, we do not agree with the recommendation to the Committee to consider inclusion of the label of claims of low salt, or equivalent, when justified. As mentioned above, there are some products which use the other form of salts such as potassium chloride to replace sodium chloride and does not reduce the amount of salt. Then, these products are not able to claim of low salt although they promote consumer health. And, consumer may misunderstand that these products are not healthy. As a result, the claim of low sodium should be retained as it is.
US	CCFL may consider the need for guidance on the use of truthful and non-misleading labeling statements related to the amount of ingredient salt in a food. For example, is there a need for CCFL to develop guidance on the use of statements such as "no added salt" which provide information to consumers about the ingredient salt? Such labeling statements about the ingredient salt would complement information on the amount of the nutrient sodium that is presented within the nutrition information section of a label.

## F. The declaration in future

1. Given that it has been agreed that sodium/salt should be included in the list of nutrients that should always be declared on a food label, whereabouts in the list of nutrients should sodium/salt be listed?

Argentina	At the end of the list
Australia	May depend on other elements and their presentation. In Australia it is listed as the final nutrient in the nutrition information panel.
Brazil	The declaration of sodium should be placed at the end of the nutrient list, after the declaration of other nutrients.
Canada	In Canada sodium is declared in the Nutrition Facts table following cholesterol which follows fat.
CLITRAVI	As one of the last ones in the list as it is already done.
Costa Rica	Costa Rica is not considered necessary to establish order in the declaration of nutrients. However it is considered necessary to declare the term sodium and no salt in the nutritional information.
European Commission	The European Commission proposal for the revision of the European Community on nutrition labelling is for salt to be declared in the nutrition labelling. It is proposed that salt should be

	declared on a mandatory basis at the end of the mandatory list of nutrients. In practice this means that the nutrients that are declared on a voluntary basis (unless they are components of fat or carbohydrate) would appear after salt in the nutrition declaration list.
Finland	We support a mandatory nutrition labelling including the declaration of salt. Salt is more familiar term to consumers than sodium. If a food contains natural sodium but no added salt, declaration of salt might confuse consumers. However we support the use an agreed term on nutrition labelling in a consistent way - either salt or sodium.
IDF	Sodium should be listed along with other nutritionally significant micronutrients. Milk naturally contains sodium (45mg/100ml) but not added salt as such: the labeling of salt levels in dairy products which either don't contain added salt or is calculated based on both naturally present sodium levels and added salt would be misleading for consumers and very confusing as it would risk being incorrectly interpreted to represent added salt.
Japan	Calorie, protein, fat, carbohydrate, sodium should be declared as this order.
Norway	We support the inclusion of sodium/ salt in the list of nutrients that should always be declared. It should be listed together with the others minerals in the list of nutrients. To list it as the last item on the list will make it more conspicuous, which is beneficial. It could also be beneficial to have a kind of Front of Pack/Symbolic labelling to highlight salt and other selected elements in the product.
NZ	Currently it is listed as the final nutrient in the nutrition information panel. The reason for its position is the nutrients which must be declared should be declared first, of these mandated nutrients the macronutrients precede the micronutrients. Future placement may depend upon other elements and their presentation.
Spain	At the bottom of the list of nutrients, after energy, fats, etc.
US	In the U.S., sodium is listed following the declaration of calories, total fat, saturated fat, trans-fatty acids, and cholesterol. In addition to the order of nutrients listed, we believe it is equally important to consider other elements of presentation such as format and font to ensure the legibility of nutrition information. For example, per FDA regulations, sodium is one of the five core nutrients that appears in Bold format in the Nutrition Facts table and must always appear on all Nutrition Facts labels regardless of its amount present in the food.

<b>F. The declaration in future</b>	
<b>2. How should sodium/salt be numerically expressed?</b>	
Argentina	It should be expressed in miligrams (mg)
Australia	mg sodium/serve and mg sodium/100 g food
Brazil	We express the amount of sodium in milligrams (mg)
Canada	Sodium should be expressed in mg per serving (or per 100 mg for those countries following such a system). The Committee may wish to also explore the use of a %NRV once an NRV is established for sodium.
CLITRAVI	g salt or sodium/100g and g/portion of xg
Costa Rica	In Costa Rica the numerical expression is used in milligrams.
European Commission	The declaration should in grams per reference quantity. The main reference quantity would be 100g or 100ml, in addition information can be provided on the basis of per serving or portion or reference intake (often referred to as 'guideline daily amounts').
Finland	onko tähän näkemyksiä?
IDF	'Na: mg/100g or mg/100 ml or mg per serving'. If sodium is to be expressed in grams it should be expressed to 3 decimal places, e.g. 0,045g/100ml
Japan	Basically, sodium is expressed as milligram (or gram) per 1 serving or 100 gram.
Norway	The salt (g total sodium x 2.5) content should be expressed as g/100 g or 100 ml. Some producers seem to omit the use of decimals when the content of Na is less than 1 g, i.e. they state the content to be 0 g. This may be misleading for the consumers and can possibly be avoided by mandatory use of a decimal where appropriate.
NZ	in grams per 100 grams to allow comparison with different products
Spain	in grams per 100 grams to allow compare different products

Thailand	We realized that the sodium amount expressed in <u>milligrams</u> per 100 g / 100ml and/or <u>milligrams</u> per serving would be more appropriate than that expressed in <u>grams</u> per 100 g / 100ml or per serving since the amount of sodium in 100 g / 100 ml of food is normally in milligram unit.
US	Sodium should be declared in an amount per serving of the food. The amount must be presented as an absolute amount (i.e., mg per serving). Codex guidance should incorporate flexibility for national governments to require or permit the declaration as a percentage of established reference intake in addition to the declaration as an absolute amount. The U.S. believes that presenting nutrient amounts on the basis of per serving of a food (that is then declared on the label) provides meaningful information to consumers that they can readily use in making dietary choices.

## F. The declaration in future

### 3. Should conversion factors (used to convert salt to sodium and sodium to salt) be included on the label?

What would you use?

Argentina	no	-
Australia	-	If salt (NaCl) is declared the conversion factor is 1g NaCl = 390mg sodium (0.4g
Brazil	no	We don't agree with the use of conversion factors because the amount of sodium in foods is not related exclusively to the content of added salt.
Canada	no	Currently, Canada does not use such a declaration as our system is more focused on "sodium", this concept has been used more in educational materials.
CLITRAVI	yes	preferably salt x 0.4 = sodium content
Costa Rica	-	N/A
European Commission	no	It would not be necessary to include a conversion factor for sodium/salt on the labelling of a product and there is a danger that this could create confusion for the consumer. Education of the consumer by means other than the label can help the consumer to better understand the information that is provided. Explanations on the conversion factors could be given to the consumers through public information campaigns (for example, public web sites).  The proposal for the revision of the European Community legislation on nutrition labelling is that the declaration of 'salt' should be determined by multiplying the total content of sodium in grams by 2.5
Finland	no	Conversion factor used to convert sodium to salt is 2,5 (salt = 2,5 x sodium). Conversion factor is not included on the label.
IDF	No	Using conversion factors risks confusing consumers. 100 ml of milk contains 45 mg of sodium which if conversion factors are used would be calculated as 114 mg of salt (45 mg x 2,54). However, milk does NOT contain added salt. Conversion factors risk are confusing consumers as regards the total sodium levels and the quantity of added salt and should not be included on the label.
Japan	yes	Table salt (gram) = sodium (gram) X 2.54
Norway	no	To be in line with the national nutrition recommendations the information about salt content in foods should be declared as 'salt'. The inclusion of conversion factors may confuse consumers.
NZ	no	Would require consumer research to show whether this would be useful. Would not want to include more numbers which would only clutter the label and confuse consumer. Conversion factor sodium to salt 1 x 2.5
Spain	-	-
US	No	-

## F. The declaration in future

### 4. Should there be provision for alternative declaration of sodium/salt?

Argentina	no	-
Australia	-	-

Brazil	yes	Each country should be able to choose the better term to use in nutrition labelling according to nutrition and health programs.
Canada	yes	Should be left to national authorities to coincide with educational approaches used in the country. However, to avoid consumer confusion, governments should require the use of consistent terminology within their country.
CLITRAVI		In many processed foods a considerable part (10 - 25%) of sodium is coming from other sources like additives. But so far the consumer is using salt and sodium as synonymous, if he/she understands the meaning at al.
Costa Rica	-	N/A
European Commission	Yes	The Codex guidelines should allow flexibility at national or regional level for the information on the content of sodium in a food to be expressed as "sodium" or "salt" to take into account the public health messages and consumer understanding.  In addition to the information that is provided on the label additional or supplementary information to the information that has to be included on a label can be provided by other means such as websites.
Finland	-	-
IDF	-	-
Japan	no	-
Norway	no	Please see question F1.  F1: We support the inclusion of sodium/ salt in the list of nutrients that should always be declared. It should be listed together with the others minerals in the list of nutrients. To list it as the last item on the list will make it more conspicuous, which is beneficial. It could also be beneficial to have a kind of Front of Pack/Symbolic labelling to highlight salt and other selected elements in the product.
NZ	no	There is a need for consumer education on the conversion factor of sodium and salt but we do not support having a 'salt equivalence' declaration unless there is strong consumer research to support this.
Spain	-	That would confuse even more the consumers
US	No	Sodium should be declared as "sodium" and the ingredient salt should be declared as "salt" in the ingredient statement. The distinction between the nutrient sodium and ingredient salt should be maintained.

## G. Additional Information

Please provide any additional comments that you think are relevant, including copies of relevant labels and promotional materials

Argentina	<p>Several activities have been undertaken in the Framework of ANMAT activities through the National Food Institute for the National Healthy Life Plan designed by the Health Ministry with the objective of developing healthy eating habits in the population, including:</p> <ul style="list-style-type: none"> <li>-Responsible advertising: Promotion of healthy lifestyles and eating habits, preventing unhealthy environments.</li> <li>• Agreement with Argentina's Supermarket Board (CAS-FASA): Education and Consumer Education Campaign on Healthy Eating Habits</li> <li>• Agreement with the United Supermarket Association (ASU) together with the Secretariat of Agriculture, Livestock, Fisheries and Food (Ministry of Economy): Education and Consumer Education Campaign</li> <li>• Framework Agreement of Collaboration and Cooperation with the Bread Industry Federation (FAIPA): The commitment to develop and transfer technology and training to the bread sector to make bread and bread products with a lower sodium content. Salt + Life Campaign.</li> </ul> <p>In this context messages were developed and disseminated through various means, such as the ANMAT's and Health Ministry's websites, leaflets, posters, brochures, calendars available on these websites <a href="http://www.msaf.gov.ar">www.msaf.gov.ar</a> and <a href="http://www.anmat.gov.ar">www.anmat.gov.ar</a>.</p>
Australia	FSANZ provides fact sheets for consumers about salt. The most recent fact sheet was released in September 2009

	<p>(<a href="http://www.foodstandards.gov.au/newsroom/factsheets/factsheets2009/howmuchsaltandsodium4439.cfm">http://www.foodstandards.gov.au/newsroom/factsheets/factsheets2009/howmuchsaltandsodium4439.cfm</a>). Amongst other information this fact sheet states that about 90% of our dietary sodium is derived from salt. A copy of the Nutrition Information Panel, a mandatory labelling component for most packaged foods in Australia, is included as an attachment with this response. Declaration of sodium is required as the final nutrient in the panel. The Australian Government is working with the food industry to make and advertise healthier products. Part of this work will involve reducing the amount of nutrients such as salt, saturated fat and sugar, in foods.</p>
Brazil	-
Canada	<p>Canada currently is running a Working Group on Dietary Sodium Reduction for Canada. More information on this working group can be found on Health Canada's web site at the following link: <a href="http://www.healthcanada.gc.ca/sodium">www.healthcanada.gc.ca/sodium</a> A report is expected from the group in 2010. We can also provide labels if you would like - to illustrate the Canadian Nutrition Facts table, nutrient content claims and health claims and the list of ingredients. Please advise if these would still be useful.</p>
CLITRAVI	<p>The Eu with 27 member states has very different eating habits. Mediterranean countries eat more fresh food, northern and eastern countries eat more processed ones which contain salt. Thus the salt intake varies between 7 /8 and 18g/day. In consequence this means that some countries see little need to reduce salt and the need for salt declaration, others are very interested in reducing their salt level and push for action in this area.</p>
Costa Rica	<p>Costa Rica supports mandatory reporting of sodium in the nutrition label.</p>
European Commission	<p>a certain decrease in salt content in the foods monitored. Finland showed that salt reduction in products led to a reduction in sodium excretion levels and to a corresponding drop in blood pressure levels.</p> <p>The Netherlands also includes messages on salt intake within the broader message on healthy dietary patterns and monitors sodium excretion levels of the population.</p> <p>Specific details on the Irish initiatives in relation to salt are as follows:</p> <p>The Food Safety Authority of Ireland (FSAI) began voluntary work with the Irish Food Industry on salt reduction in late 2003 with the following objectives:</p> <ol style="list-style-type: none"> <li>1. Raise awareness in the general food industry of the salt and health issue, the role of processed food in salt intake and the health gains to the Irish population of reducing salt in processed food.</li> <li>2. Focus on the manufacturers of food in the food groups that contribute most salt to the diet, and secure gradual and sustained reductions in the salt content of their food working on a united front across each sector.</li> <li>3. Bring on board the manufacturers of food in other food groups that contribute to salt intake and secure gradual and sustained reductions in the salt content of their food working on a united front across each sector.</li> <li>4. Work with the food industry to bring about the universal labelling of salt in packaged foodstuffs.</li> <li>5. Target the retailers of food who set specifications for own brand processed food and also have strong influence on manufacturers through their buying power. Secure gradual and sustained salt reductions in own brand processed food and start to focus on stocking low salt options of branded processed food.</li> <li>6. Target catering representative bodies and companies to secure a reduction in the use of salt in prepared food eaten outside the home.</li> <li>7. Work with other State bodies who's role it is to increase consumer understanding of the salt and health issue and bring about behavioral change in consumers.</li> </ol> <p>More information specifically related to Ireland is provided in "Salt and Health: Review of the Scientific Evidence and Recommendations for Public Policy in Ireland" see: <a href="http://www.fsai.ie/uploadedFiles/Science_and_Health/salt_report-1.pdf">http://www.fsai.ie/uploadedFiles/Science_and_Health/salt_report-1.pdf</a></p>
Finland	-

IDF	<p>The purpose of nutrition labeling is to provide consumers with a suitable profile of nutrients contained in the food and considered to be of nutritional importance (CAC/GL 2-1985 Guidelines on nutrition labeling). A main argument used against sodium labeling is the lack of knowledge on this mineral, its link with salt, its role and significance in the total diet and the distinction between total sodium and added salt/sodium.</p> <p>Intrinsic sodium levels such as in eggs, plain milk, meat, fish and certain vegetables, are low and are not generally regarded as of concern to health. Alderman (2006) mentions that available data provides no support for any universal recommendation of a particular level of dietary sodium. Although hypertension is a cardiovascular risk factor, there is at present no overall scientific consensus linking salt consumption to hypertension for the general population (McCarron, 2008). While it is recognized that an excess of sodium and thus of salt is advised against for salt-sensitive people who are hypertensive, their role as regards the remainder of the general population is not yet clearly established (McCarron, 2008). Therefore, consumer education is key.</p>
Japan	No
Norway	<p>Norway has recently introduced a voluntary labeling system, the Keyhole, which helps to identify healthier food products within different food groups. Foods qualified for the label contain less fat, salt, sugars and more fibre than other products within the same food group. Specific criteria are set for relevant nutrients and priority is given to the gradual reduction of the sodium criteria.</p>
NZ	<p>New Zealand supports %NRV where the NRV is based on chronic disease prevention. Attach copy of sample ingredient list and NIP</p>
Spain	-
Thailand	<p>We do not think that “salt” should be retained in the square bracket. We are of the view that salt should be declared in list of ingredients; on the other hand, the declaration of sodium should be in the list of nutrients because the declaration of total sodium content of food in nutrition labeling is more meaningful to the consumer. In nutritional point of view, the amount of sodium intake influences blood pressure. Moreover, the limitation of daily sodium intake should take into account total sodium intake from all sources, including added salt. Besides, salts are not only in the form of sodium chloride (NaCl), but also in other forms such as potassium chloride (KCl) which does not affect the consumer health. It can make consumers confused if we declare both sodium and salt amounts on the nutrition label of the food which sodium chloride replace by the other form of salt because the amount of sodium and salt are not correlated.</p>
US	<p>We provide the following comments on the background information titled “Introduction” in the Excel document.</p> <ol style="list-style-type: none"> <li>1. In the first paragraph, we recommend referring to “salt” as an ingredient or a nutrient compound rather than as “a nutrient”.</li> <li>2. In the Background section, 2<sup>nd</sup> paragraph that addresses WHO Global Strategy, it would be helpful to the discussion to add the following sentence:  “<i>In addition, the WHO/FAO Draft Action Plan for Implementation of the Global Strategy on Diet, Physical Activity and Health proposed that “sodium” rather than “salt” be included in nutrition labeling (CL 2006/44-CAC, para 20).</i>”</li> <li>3. Re: the section on International Context, we suggest adding the following text to this section for additional relevant context:  “<i>The Committee may also want to consider terminology in existing Codex texts. For example, in the Table of Conditions for nutrient content claims in section 8.6 of the Guidelines for Use of Nutrition and Health Claims, the conditions refer to “free”, “very low”, and “low” claims about the content of “sodium” rather than “salt”.</i>”</li> </ol>