

CODEX ALIMENTARIUS COMMISSION



**Food and Agriculture
Organization of
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**World Health
Organization**

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AGENDA ITEM NO. 4(a)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

Thirty-ninth Session

Quebec City, Canada, 9 – 13 May 2011

**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
(AT STEP 7)
(CL 2010/40-FL)**

COMMENTS AT STEP 6

COMMENTS FROM:

URUGUAY

URUGUAY

Uruguay is grateful for the opportunity of presenting its comments regarding the CL 2010/40-FL and requests this document be distributed as “conference room document” CRD during the 39th meeting of the CCFL.

DRAFT REVISED GUIDELINES ON NUTRITION LABELLING

(CAC/GL 2-1985) (Section 3.2 Listing of Nutrients)

3.2 Listing of Nutrients

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

3.2.1.1 Energy value; and

3.2.1.2 The amounts of protein, available carbohydrate (i.e. dietary carbohydrate excluding dietary fibre), fat, saturated fat, ~~sodium/salt~~, **sodium** and total sugars; and

3.2.1.3 The amount of any other nutrient for which a nutrition or health claim is made; and

3.2.1.4 The amount of any other nutrient considered to be relevant for maintaining a good nutritional status, as required by national legislation or national dietary guidelines.

Uruguay is in agreement with including SODIUM and not to use the term SALT in the nutrient declaration.

Justification:

Uruguay, in agreement with its national and regional legislation (MERCOSUR), confirms its support for the recommendations made by the Committee during the 37th and 38th sessions of the CCFL, specifically regarding the compulsory labelling of proteins, available carbohydrates and fats in the nutrient list, and to add saturated fats, sodium and total sugars.

Uruguay proposes removing the brackets around sodium and eliminating the term “salt”. Regarding if it is term “sodium” or the term “salt” the one that should be used to represent the nutrient “sodium” for the purposes of nutritional labelling, Uruguay supports the use of the term “sodium” as it represents in a precise manner the nutrient in the food. Salt is the name of an ingredient and not of a nutrient. The term “salt” could be confusing and potentially misleading for consumers as sodium can be provided to foods not only through table salt (NaCl), but also through various ingredients such as soy sauce and hydrolyzed vegetable proteins as well as by food additives such as sodium bicarbonate, sodium phosphate and sodium citrate. Sodium is also a naturally present constituent of some foods, such as milk. The term sodium is technically more precise for the purpose of presenting the desired information to the consumers. What has an effect on health is the total sodium intake of a person, and the total sodium intake comes not only from the intake of sodium chlorate (salt) but also from other sodium sources in food. The concerns regarding the understanding that consumers may have regarding the term “sodium” can be covered through consumer education.

It also supports the foot note at the end of point 3.2.1.4 of the Guidelines indicating that “*Countries where the level of intake of trans-fatty acids is a public health concern should consider the declaration of trans-fatty acids in nutrition labelling.*”