

# CODEX ALIMENTARIUS COMMISSION



**Food and Agriculture  
Organization of  
the United Nations**



**World Health  
Organization**

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**AGENDA ITEM NO. 4(a)**

**CX/FL 11/39/4-ADD.1**

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

**Thirty-ninth Session**

**Quebec City, Canada, May 9 - 13, 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:**

**COLOMBIA  
EUROPEAN UNION  
THAILAND  
ICBA**

## COLOMBIA

1. "Declaration of the nutrient sodium as "sodium/salt" in the nutritional table (paragraphs 22 to 32 of the ALINORM 10/33/22:

Taking into account that the nutrient to be considered is sodium and not salt and that **the analysis evaluate sodium and not salt, requiring conversion factors** to report sodium as salt, we reiterate our position that **the nutrient should be declared as "sodium" in the list of nutrients and that salt should be declared as such in the list of ingredients.**

2. Mandatory declaration of trans fatty acids, (paragraphs 42 to 52 of the ALINORM 10/33/22)

Taking into account the articles published by the WHO, and the Trans Fats Free America agreement, the subcommittee is in agreement with a mandatory requirement to declare in food labeling the trans fatty acids.

## EUROPEAN UNION

Within the European Union (EU) there is an ongoing review on nutrition labelling and consideration of which nutrients should be included in the core nutrition declaration is one of the issues that is being considered. One of the factors that is being taken into consideration is the amount of information that a consumer can readily understand. There is a danger that when confronted with a large number of pieces of information the consumer might experience information overload which could mean that they do not read or use the information at all.

The amount of information that has to be provided by food businesses could have an impact on the cost of labelling. This would be particularly important if it was to be proposed that nutrition labelling should be provided on foods in general, rather than only being required when there is a nutrition or health claim made about the food.

### Proposed list of mandatory nutritional elements

Within the ongoing review of nutrition labelling legislation in the EU consideration is being given to whether the following list of nutritional elements should be core elements of the nutrition declaration: the energy value, and the amounts of fat, saturates, carbohydrate, sugars, protein and salt.

### Declaration of sodium/salt

Within the ongoing review of nutrition labelling legislation in the EU the declaration of "salt" (i.e. sodium expressed as salt) in the basic nutrition declaration is one of the issues that is being considered. As previously indicated, the EU supports the declaration as "salt" (sodium content multiplied by 2.5) in the nutrition declaration. The EU considers that if it is not possible to reach consensus on the form of the declaration that the Guidelines should allow the possibility for member countries to decide the basis of the declaration, taking into account their local circumstances. The EU believes that it is important for the terminology in nutrition labelling to be coherent with the public health messages in the country or region concerned.

### Trans fatty acids

The EU does not object to the inclusion of the footnote in paragraph 3.2.1.4 concerning the declaration of trans fatty acids.

## THAILAND

Thailand's of the view that salt should be declared in the 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, total sodium intake from all sources including added salt should be taken into account when the limitation of daily sodium intake is determined. Besides, salts are not only in the form of sodium chloride (NaCl), but also in the other forms such as potassium chloride (KCl) which does not affect the consumer health. It can confuse consumers if we declare both sodium and salt amounts on the nutrition label of the food because sometimes sodium chloride is replaced by the other form of salt, then the amount of sodium and salt are not correlated.

We, therefore, propose to remove square bracket for "sodium" and delete "salt"

## INTERNATIONAL COUNCIL OF BEVERAGES ASSOCIATIONS (ICBA)

The International Council of Beverages Associations (ICBA) is an international nongovernmental organization that represents the interests of the worldwide nonalcoholic beverage industry. The members of ICBA operate in more than 200 countries and produce, distribute, and sell a variety of nonalcoholic beverages, such as sparkling and still beverages such as soft drinks, juice-containing beverages, bottled waters, and ready-to-drink coffees and teas. ICBA is pleased to provide the following comments in response to the Circular Letter 2010/40-FL.

### Position

ICBA supports the provisions outlined in CL 2010/40-FL, specifically the declaration of energy value, the amounts of protein, available carbohydrates, total fat, total sugars, and any nutrient for which a labeled claim is made. Decisions to require more than the above nutrients should be left to national discretion. Sodium should be declared for the purpose of nutrition labeling, maintaining the proper distinction between the nutrient (sodium) and the ingredient (salt).

The above list reflects important consideration by the Committee with respect to the availability of compositional and analytical data, the suitability and reliability of methods of analysis, and the available infrastructure, both at the governmental and industry level, to effectively manage nutrition labeling.

ICBA supports establishment of consumer education initiatives at the national level to communicate the importance of consuming a balanced, varied and moderate diet that meets nutritional needs within daily energy requirements. Such initiatives should focus specifically on the importance of balancing calories consumed, with calories expended. In ICBA's view, consumer education measure can be far more effective in achieving positive dietary changes, than will overly complex nutrition labeling measures.

### Specific Comments on the Labeling of Sugars

For the purposes of nutritional labeling, ICBA does not support a distinction between sugars that are added to food and beverage products, and those that are inherently present in the same. We feel that it is important to re-emphasize this point as the list of nutrients to always be declared moves forward towards adoption. Our rationale is based on the following:

1. The FAO/WHO Scientific Update on Carbohydrates in Human Nutrition<sup>1</sup> has stated that there is no convincing scientific justification for distinguishing between "free" and "other" sugars.
2. The WHO provided further guidance to the CCFL in a communication that is recorded as part of the Report of the 37<sup>th</sup> Session<sup>2</sup>:  
*"WHO recognizes that total sugars is the only practical way of labelling the sugars content of food since added sugars cannot be distinguished analytically from intrinsic sugars. If the Committee wants to include both total sugars and added sugars, that's fine although not sure of the benefits. But if they are debating to choose either total sugars or added sugars, it should be total sugars."*
3. There is no scientific evidence that the body makes any physiological distinction between sugars that are added to foods and those that are naturally occurring. All sugars are metabolized in exactly the same manner by the body, providing 4 kcal/g (17 kJ/g), whether they are naturally occurring in food and beverage products, or added to the same.
4. Sugars that are added to food products cannot be readily distinguished from sugars that are naturally occurring in food products. This would make labeling enforcement for the declaration of added sugars difficult, if not impossible.
5. Awareness of the total amount of energy provided by a food product (whether from sugars naturally occurring in foods or sugars that are added, other carbohydrates, protein, or fat) is essential so that consumers can choose foods that meet their nutrient needs, while remaining within daily energy consumption requirements.

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

<sup>2</sup> ALINORM 09/32/22

6. Listing of added sugars on a label would not, for many food products, give the consumer a true representation of the total sugar contribution of a food product. Some foods, such as fruits, inherently are comprised principally of sugars (i.e., fructose).

### **Summary**

To summarize, ICBA supports the labeling provisions outlined in CL 2010/40-FL, in particular the labeling of total sugars, vs. added sugars. With respect to sodium/salt, ICBA supports the labeling of the nutrient sodium, which is appropriate for nutrition labeling. Education measures should be encouraged at the national level to ensure consumers are able to use and understand nutrition labeling to plan sensible, balanced diets that meet their individual nutrient and energy needs.