

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
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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

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**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:

BRAZIL
CANADA
COSTA RICA
IRAN
MALAYSIA
MEXICO
NEW ZEALAND
PERU
SUDAN
UNITED STATES OF AMERICA
CONSUMERS INTERNATIONAL
IDF
IFT

BRAZIL

Brazil proposes the exclusion of the term “salt” from the document because we are discussing the list of nutrients that are always declared and salt is not a nutrient. Additionally, 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. The use of the term salt should be left to the declaration of ingredients (list of ingredients) and claims.

CANADA

Canada would like to confirm its support for the recommendations made by the Committee at the 37th and 38th sessions of CCFL, namely to retain protein, available carbohydrates and fat in the list of nutrients to always be declared and to add saturated fat, sodium/salt, and total sugars. As well, we support a footnote at the end of 3.2.1.4 of the Guidelines stating 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.”

With regard whether the term “sodium” or “salt” should be used to represent the nutrient “sodium” for the purposes of nutrition labelling, Canada supports the use of the term “sodium” as it accurately represents the nutrient in the food. Salt is the name of an ingredient, not a nutrient. Canada feels that the use of the term “salt” may be confusing and potentially misleading for consumers, as sodium is contributed to foods not only by table salt (NaCl), but also by various ingredients such as soy sauce and hydrolyzed vegetable proteins, as well as food additives such as sodium bicarbonate, sodium phosphate and sodium citrate. Sodium is also a naturally occurring constituent of some foods, for example, milk. It may be confusing to see a food such as milk, labelled as containing salt, when no salt is actually added to the milk.

Facilitating consumer understanding of what sodium represents could be assisted through the addition of supplementary information in the nutrition labelling, for example, the optional declaration of “salt” or “Salt Equivalents” following the sodium declaration. Such information could also help support and reinforce national education efforts in individual countries.

COSTA RICA

Costa Rica considers that the term that should be used is sodium, as shown below:

DRAFT REVISED GUIDELINES ON NUTRITION LABELLING (CAC/GL 2-1985) (Section 3.2 Listing of Nutrients) (at Step 6 of the Procedure)

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]~~ 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 guidelines¹.

¹Countries 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.

Justification:

Costa Rica position is that the term “sodium” should be used, as it is the technically correct term. It is known that there is a conceptual gap in the majority of the population regarding the difference between the terms salt/sodium and this represents an opportunity to focus on consumer education efforts regarding the interpretation of the micronutrient (sodium) which is directly related to hypertension. Furthermore, we consider that it is more clear for the consumer to use only one term and not two, as the use of both could create confusion for the consumer; and regarding education, (time and resources among others) it is more simple to explain just one term than two.

As a follow up to the aforesaid, and in terms of consumer education, it should be taken in consideration that the list of nutrients to be declared in the Codex is expanding from 4 nutrients (energy, proteins, total fats and carbohydrates) to 7 (saturated fats, total sugar and [salt/sodium]), thus being useful to choose just one term for the content of sodium.

Regarding the use of the term "salt" there is a concern that the consumer may interpret it only as sodium chloride and not as all the equivalent sources or sodium.

This issue should be discussed in the Committee, as in many Latin American countries table salt is a vehicle for Iodine and Fluor fortification and, if its use decreases, the need to modify the levels of fortification presently used would need to be considered to avoid the appearance of a higher percentage of deficiencies of these nutrients in the population.

IRAN

Iran is agreed in case "any food for which a nutrition claim is made should be labelled with a nutrient declaration in accordance with the Codex Guidelines on Nutrition Labelling."

Obviously the term (total) sodium could be used in the nutrient declaration and the term sodium-chloride (salt) in the ingredient list. In this regard, Iran recommends both terms Sodium/salt to be used for purpose of nutrition labelling. Although it's not mandatory.

Regarding Trans Fatty Acid Isomers, it's only used as a mandatory declaration, in terms of Edible Oils and the related Hydrogenated Products.

In Furthermore, generally Iran is agreed with nutrients listing, where nutrient declaration is applied, the declaration of the energy value, as well as amounts of protein, carbohydrate... should be mandatory, although still needs more work on that.

MALAYSIA

SUBJECT: Request for Comments at Step 6 on the 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

GENERAL COMMENTS

Malaysia acknowledges that the 33rd Codex Alimentarius Commission (CAC) adopted the Proposed Draft Revision at Step 5 and the decision that comments made at the 38th Codex Committee on Food Labelling (CCFL) may be resubmitted to the 39th CCFL.

SPECIFIC COMMENTS

Malaysia would like to make specific comments as follows;

[Sodium/salt]

Malaysia proposes to remove the square brackets for sodium and delete the term salt. We are of the view that the term sodium is more technically accurate to present the intended information to the consumer. It is total sodium intake of an individual which has health effects, and total sodium intake is derived not only from sodium chloride (salt) but also other sources of sodium in food. The concern on consumer understanding on the term 'sodium' can be addressed through consumer education.

Trans-fatty acids

Malaysia would like to refer to the Report of the 33rd CAC i.e. paragraph 70-73 regarding the Proposed Draft Revisions on the Guidelines on Nutrition Labelling Concerning the List of Nutrients that are Always Declared on a Voluntary or Mandatory Basis. In view of the well-established health hazards of trans-fatty acids, Malaysia would like to propose to include "trans-fatty acids" after the word "fat" in section 3.2.1.2 rather as the footnote of section 3.2.1.4. We are of the opinion that trans-fatty acids should be included as one of the components that is always declared on voluntary or mandatory basis for the following reasons:

1. Our proposal is in-line with the Global Strategy on Diet, Physical Activity and Health which recommends population and individuals to limit energy intake from total fats and shift fat consumption away from saturated fats to unsaturated fats and towards the elimination of trans fatty acids. The three components highlighted in the Global Strategy are: total fat, saturated fat and trans fatty acids. It is only logical that all these three components are included in the nutrients that are to be labelled.

2. Numerous recent research studies have established the health hazards of trans-fatty acids, which are now well known to contribute to cardiovascular diseases [1-3] such as coronary artery disease, primary cardiac arrest [4], proinflammatory [5-8] and causes endothelial dysfunction [5, 8-10].
3. In consonance with the above, the Joint FAO/WHO Expert Consultation on Fats and Fatty Acids in Human Nutrition, 2008 concluded that there is strong evidence that TFA from commercial partially hydrogenated vegetable oils (PHVO) increase CHD risk factors and CHD events. There is also **probable** evidence of an increased risk of fatal CHD and sudden cardiac death in addition to an increased risk of metabolic syndrome components and diabetes.
4. Trans fatty acid has been reported to decrease HDL-cholesterol and increase total/HDL cholesterol ratio in comparison to saturated fat (C12:0 – C16:0), cis MUFA or PUFA [11]
5. In view of these well-established detrimental health effects of trans-fatty acids, several countries have already implemented mandatory trans-fatty acids labelling in their national legislations.

Hence, Malaysia would like to reinsert the word “trans-fatty acids” after the word “fat” in the section 3.2.1.2, as follows:

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

and the deletion of footnote 1.

References

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6. Mozaffarian, D., et al., *trans fatty acids and systemic inflammation in heart failure*. Am J Clin Nutr, 2004. **80**(6): p. 1521-5.
7. Mozaffarian, D., et al., *Dietary intake of trans fatty acids and systemic inflammation in women*. Am J Clin Nutr, 2004. **79**(4): p. 606-12.
8. Baer, D.J., et al., *Dietary fatty acids affect plasma markers of inflammation in healthy men fed controlled diets: a randomized crossover study*. Am J Clin Nutr, 2004. **79**(6): p. 969-73.
9. de Roos, N.M., et al., *Trans monounsaturated fatty acids and saturated fatty acids have similar effects on postprandial flow-mediated vasodilation*. Eur J Clin Nutr, 2002. **56**(7): p. 674-9.
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Mexico thanks New Zealand for coordinating this group and wants to notify the following general comments:

Mexico considers that the most appropriate term to use is "sodium" and should be declared in the Nutrient Declaration, and this declaration should include all sources. That is why from all six options, the technically correct number is 1, which best contribute to the WHO Global Strategy, however Mexico is open to analyze the option number 4 based on the common understanding of the term "salt" by consumers. It is therefore important to know if there are studies on the amount of sodium that is consumed and the amount that only comes from salt (NaCl) as well as the sodium coming from other sources such as additives and their relationship to health problems. Note that the nutrient of concern and the one that should be reduce is "sodium".

It is also important to have studies that reflect consumer's concerns, and would guide us through finding the adequate proposal.

Finally, we like to stress out the importance of having promotional campaigns

the will help us guide the consumers.

NEW ZEALAND

New Zealand supports the proposed revisions to the Guidelines. Specifically, New Zealand's position on the individual revisions is as follows;

Total sugars

New Zealand supports the declaration of total sugars but not a declaration of added sugar. The rationale for this position is:

- The body does not differentiate physiologically between intrinsic and intrinsic sugars
- In terms of energy value there is no difference between intrinsic and added sugars; it is the total sugar consumption which matters
- It is not possible to differentiate analytically between intrinsic and extrinsic sugars, therefore enforcement of any requirement to declare only added sugars would be difficult.
- The declaration of total sugars may persuade consumers to moderate their sugar intake, and may influence the food industry to reformulate their products with a reduced sugar content.

Saturated Fat

New Zealand supports the declaration of saturated fats. The rationale for this position is:

- Saturated fats are a nutrient significant to public health for New Zealanders, particularly because of the relationship of saturated fats to coronary heart disease and the potential to contribute to other public health issues, such as stroke, obesity and type 2 diabetes.

Dietary Fibre

New Zealand does not support the mandatory declaration of dietary fibre. New Zealand considers the decision as to whether dietary fibre should be a nutrient which is always declared should be made at a national level. The rationale behind this position is:

- Dietary fibre is not considered a priority issue of public health significance in New Zealand
- There are inherent difficulties with the definition and analysis of dietary fibre. It is therefore costly to declare.
- Monitoring and enforcement would be difficult because of the issues with definition and analysis.

Trans-fatty acids

New Zealand does not support mandatory declaration of trans-fatty acids. New Zealand considers the decision as to whether trans-fatty acids should be a nutrient which is always declared should be made at a national level. The rationale behind this position is:

- The rates of consumption of trans-fatty acids are not high in New Zealand
- New Zealand acknowledges that globally there is a high degree of variability in intakes of trans-fatty acids

- New Zealand does not dispute the science behind the consideration of trans-fatty acids as a nutrient of public health significance.

New Zealand notes that the revisions reflect the changes agreed by the Committee of Food Labelling at the thirty-eighth session.

With regard to **[sodium/salt]**, New Zealand is chairing the electronic Working Group considering different approaches to declare sodium /salt on food labelling. While the deliberations of the working group are not yet completed, no consensus has been reached as to which of the terms “sodium” or “salt” should be declared.

New Zealand’s country position with respect to salt /sodium supports the declaration of sodium in the nutrient declaration as being the most accurate approach. However we remain open to the declaration of salt elsewhere on the label.

We continue to recommend that all nutrient declarations and nutrition labelling generally should be supported with consumer education that has been developed for the appropriate population groups and backed by evidence of consumer understanding of the terms used within these population groups.

Our detailed submission regarding salt/sodium has been submitted through the electronic working group.

PERU

General comments: None.

Specific comments:

Paragraph 3.2.1 – We request the following amendment: “When the nutrient declaration is applied it ~~will be~~ **should be** mandatory to declare the following information”.

Justification – The national Committee indicates that paragraph 3.2.1 should be modified, replacing the term “will be” for the terms “should be”, to avoid generating confusion regarding the compulsory nature of nutrition labelling, as it is mandatory only when a nutritional claim is made.

Paragraph 3.2.1.2 – Regarding sodium/salt, the national committee noted that the nutritional labelling must indicate the “total sodium” value (from NaCl and from other sources). Salt on the other hand, must be mentioned in the list of ingredients of the product.

In addition we also request the following change in wording: “The amounts ~~of~~ of protein, available carbohydrate,”

SUDAN

Kindly find the comment of Sudan for the above subject given by Dr.Tagelsir Suleiman from the Food Research Center.

1. **in para 3.2.1.2 unsaturated fat particualary mono and poly need to be declared.**
2. **vitamines and minerals need to be clarified whether natural or synthatics .**

UNITED STATES OF AMERICA

The United States is pleased to provide comments on the Proposed Draft Revised Guidelines on Nutrition Labelling (CAC/GL 2-1985) (Section 3.2 Listing of Nutrients at Step 6).

The United States supports the work of the Committee on Food Labeling (CCFL) with respect to the list of nutrients that should always be declared where nutrient declaration is applied. The United States believes that CCFL made significant progress on this item at its 38th Session.

The United States supports inclusion of saturated fat and total sugars to the nutrient declaration in Section 3.2.1.2. We further support the inclusion of the footnote on trans-fatty acids which recognizes that the declaration of trans-fatty acids in nutrition labelling should be considered in countries where the level of intake is a public health concern, especially in view of the Committee’s decision to add saturated fat to the list of nutrients that are always declared.

The United States supports removing the brackets from sodium and deleting salt in Section 3.2.1.2. The United States fully supports the inclusion of sodium in the list of nutrients that are always declared when nutrition labelling is applied. At the 37th Session of CCFL, the Committee noted that there was consensus on

the importance of this nutrient and the need for its inclusion in the list of mandatory nutrients. However, CCFL also noted that there was a diversity of views on whether the term “sodium” or “salt” should be used in nutrition labelling.

In deciding which term should be used, the United States believes it is important to clarify the criteria that are relevant for identifying viable options(s) for nutrient declaration in Section 3 (listed below). At a minimum, the United States believes that any new Codex provision(s) related to the goals of the Global Strategy needs to:

- Be scientifically accurate and reflect the scientific evidence for the nutrient;
- Be truthful and not misleading when applied to all foods; and
- Consider existing Codex provisions and current Codex work related to sodium and/or “salt.”

The United States believes that the declaration of “sodium” meets all of the above criteria. It is scientifically accurate to include the nutrient sodium under the Section 3 heading on “Nutrient Declaration” and subheading on “Listing of Nutrients.” Additional factors that support sodium as the most appropriate term are listed as follows:

- The FAO/WHO proposed draft action plan for implementing the Global Strategy mentioned specifically sodium (not salt) among the nutrients that should always be declared (CL 2006/44-CAC);
- The 2003 Report of the Joint WHO/FAO Expert Consultation on Diet, Nutrition and the Prevention of Chronic Diseases emphasizes the scientific evidence for sodium intake as a risk factor for high blood pressure and chronic disease (Sec. 5.4.4 and 5.4.5, WHO Technical Report Series 916);
- In its 38th session, CCFL requested that the CCFNSDU consider establishing a Nutrient Reference Value (NRV) for sodium;
- Sodium declaration is consistent with Codex provisions for sodium content claims and for special dietary foods with low sodium content.

The United States has major concerns with the use of the term “salt” in Section 3 based on the above criteria. Our concerns were reinforced by comments from other Codex member countries and observer organizations in the CCFL electronic working group. The declaration of “salt” in 3.2.1.2 would be:

- Scientifically inaccurate (and not truthful) to list in the sections on nutrient declaration;
- Confusing and misleading for many Codex member countries and for certain foods, regardless of whether a footnote was added that “salt” equals sodium chloride only;
- Not reflective of the nutrient that has been identified as a public health concern by the scientific evidence; and
- Inconsistent with existing Codex provisions on sodium content claims and current Codex work to propose an NRV for sodium.

In addition, the United States notes that flexibility for national governments to craft nutrition information and related messages based on the needs of their consumers is already incorporated into the Guidelines on Nutrition Labelling.

CONSUMERS INTERNATIONAL

Introduction

Consumers International welcomes this opportunity to comment on the draft revision of the Guidelines on Nutrition Labelling at Step 6. We consider it essential that nutrition information is provided on foods in order

to enable consumers to make informed food choices on the basis of the nutrients of most public health significance.

Diet-related, chronic diseases are the major killers globally and so Codex has an important role in encouraging governments and industry to provide information to consumers in a way that is comprehensive and user-friendly as recognised in the World Health Organisation's Global Strategy on Diet, Physical Activity and Health.

Diets are changing with many people now consuming more processed foods where it can be difficult to assess the levels of nutrients that products contain. Nutrition information is therefore important in order to enable consumers to understand the contribution of individual foods to their overall diets.

Mandatory nutrient declaration

Some countries already require provision of nutrition information, but the majority do not. We consider it essential that nutrition information is provided on all prepacked foods. We agree with the current draft at Step 6, setting out the nutrient declaration that should be mandatory, ie. energy value, carbohydrate, fat, saturated fat, [sodium/salt] and total sugars, but consider that fibre should also be included.

We consider that sodium/ salt has to be included given the evidence around salt and hypertension. The term 'salt' is most easily understandable for consumers and should be specified.

We also agree that trans fatty acids should be labelled unless countries have required their removal. This should be specified directly rather than being referred to in a footnote.

Front and back of pack declaration

In addition to the mandatory 'back of pack' information that is specified, we consider that Codex should also provide advice on front of pack nutrition information. This is an issue that is being debated in many member countries and research by consumer organisations has highlighted the benefits of highlighting key nutrients on the front of pack, in addition to the full nutrition information on the back of pack.

But several different schemes are now in use, which is more likely to add to consumer confusion, rather than help informed choices when shopping in a hurry. It is also important that any schemes that are used are based on independent, robust consumer research and that the criteria to underpin them are evidence-based.

Research by Consumers International's members testing consumer understanding of different formats has highlighted the importance of using an interpretative element with the addition of colour coding on front of pack. This indicates to consumers whether the levels of key nutrients (ie. energy value, fat, saturated fat, total sugars and salt) are high, medium or low. It is therefore important that this scheme is promoted by governments and applied by the food industry.

INTERNATIONAL DAIRY FEDERATION (IDF)

The International Dairy Federation (IDF) submits the following position and comments for consideration by the Committee:

- 1. IDF supports the mandatory labeling of the 4 basic nutrients: Energy, Protein, Available carbohydrate, and Fat.**
- 2. IDF asks for recognition of the emerging body of evidence of differentiation between different saturated fatty acids (SFA) by means of adding a footnote**

The recognition that individual fatty acids within each broad classification of fatty acids, including saturated fatty acids, may have unique biological properties and health effects has also been confirmed in the online published interim conclusions of the FAO/WHO Expert Consultation on fats and fatty acids in human nutrition (FAO/WHO, 2010) as well as in the scientific Opinion of the French Food Safety Agency (AFSSA) on Updated recommended nutrient intakes of fatty acids (AFSSA, 2010) (note: AFFSA was the French public administrative institution conducting independent risk assessments, which has been incorporated in the new French agency for food, environmental and occupational health safety (ANSES) in July 2010).

In addition, the food matrix has an impact on physiological effects of saturated fatty acid (SFA). Despite the contribution of dairy products to SFA composition of the diet, there is no clear evidence that dairy food consumption is consistently associated with a higher risk of chronic diseases (German *et al.*, 2009). In fact, a recent meta-analysis shows the opposite is true, dairy consumption is associated with a decreased all-cause mortality risk (Elwood *et al.*, 2010), and a recent prospective cohort study reported that full-fat dairy, but not low fat dairy was associated with decreased CVD risk (Bonthuis *et al.*, 2010). For example, one emerging

recent meta-analysis of prospective epidemiologic studies by Siri-Tarino et al (2010) showed that there is no significant evidence for concluding that dietary saturated fat is associated with an increased risk of CHD or CVD.

In addition, a labeling strategy to improve health that focuses only on saturated fat may not necessarily result in improved health outcomes as the replacement nutrients also have an effect on health. FAO/WHO (2010) indicates that there is probable evidence that replacing SFA with largely refined carbohydrates has no benefit on CHD, and may even increase the risk of CHD and favour metabolic syndrome development (Re: recent pooled individual data from multiple studies, Jakobsen et al., AJCN:89, 2009) and that reducing SFA by itself (reducing the amount of SFA or the % energy from SFA) has no effect on CHD and stroke (Re: recent pooled study data, Siri-Tarino et al., AJCN:91, 2010).

IDF therefore considers it of great importance to reconsider the labeling of **total saturated fat**. IDF would suggest that the Committee consider that if saturated fat will be labeled, the following footnote may be added in section 3.2.1.2. of the Proposed draft revised guidelines on nutrition labelling (CAC/GL 2-1985):

'Recognizing the emerging body of scientific evidence on the differentiation of the roles of the various saturated fatty acids (SFA), Codex members may, for the purpose of saturated fat labeling, adopt such a position focusing on individual SFAs.'

3. IDF proposes that if countries consider declaration of trans fatty acids (TFA), foods containing only naturally occurring TFA should be exempted from labeling.

The revised section 3.2 of the guidelines contains a footnote indicating that ¹'Countries where the level of intake of trans-fatty acids is a public health concern should consider declaration of trans fatty acids in nutrition labeling'. The WHO Scientific update on Trans fatty acids concluded that "Although ruminant TFAs cannot be removed entirely from the diet, their intake is low in most populations and to date there is no conclusive evidence supporting an association with CHD risks in the amounts usually consumed. In contrast, TFA produced by partial hydrogenation of fats and oils should be considered industrial food additives having no demonstrable health benefits and clear risks to human health." (Jauy et al., 2009). The interim conclusions of the FAO/WHO Expert Consultation on Fats and Fatty Acids in Human Nutrition concluded that "There was strong evidence to recommend a reduction in TFA due to an increased risk of developing coronary heart disease and adverse blood lipid changes" (CX/FL 10/38/12-CRD2). However, the differentiation between trans fats from animal and industrial sources is not reflected in this recommendation, while it would appear justified based on the scientific evidence presented in the report which only indicates harmful effects of industrially-produced sources of TFA. IDF therefore proposes to reflect this scientific evidence in the footnote and to modify the footnote on trans fatty acids as follows:

¹Countries where the level of intake of trans-fatty acids is a public health concern should consider declaration of trans fatty acids **in nutrition labellings of foods that contain industrially produced trans-fatty acids.**

4. IDF opposes salt labeling and salt equivalent labeling in the nutrition declaration

IDF strongly opposes salt labeling and salt equivalent labeling in the nutrition declaration for the following reason:

Some foods contain sodium but do not contain salt. This is the case for milk, yoghurt, eggs, and some vegetables. This makes it inapplicable to use a conversion factor such as "salt" = sodium x 2.54.

Milk naturally contains a small amount of sodium (45mg/100ml) but not added salt. The nutrition 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.

In addition to the common scientific arguments in favor of sodium labeling instead of salt labeling in the nutrition panel, i.e. it is sodium that is discussed in regard to health; sodium is a nutrient whereas salt is an ingredient, the understanding of the term "sodium" by consumers is a key issue.

It is apparent that there is a divergence of views in different countries whether to label either salt or sodium, based on different levels of consumer understanding in these countries. Therefore, IDF would like to reiterate its view that public health education campaigns targeted to consumers on the understanding of and interrelations between salt and sodium are of key importance to avoid confusion.

5. IDF opposes labeling of total sugars

Total sugars are indirectly (through their energy value) and erroneously linked to non communicable diseases (NCD) (Nantel, 1999) while in fact the added sugars are more important in causing overconsumption of energy thereby increasing the risk of NCD. Lactose, inherent in all dairy foods, is not of concern to human health and should not be disadvantaged by a labeling action to implement the WHO Global Strategy on Diet, Physical Activity and Health that aims at reducing the intake of added sugars. Total sugars are important in terms of caloric value but do not have an effect on diseases as such. In addition, lactose is already required to be declared under 'available carbohydrates'. Labeling of total sugars could discredit dairy foods and thus have unintended consequences to the nutritional value of the total diet

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INSTITUTE OF FOOD TECHNOLOGISTS (IFT)

The Institute of Food Technologists (IFT) exists to advance the science of food. Our long-range vision is to ensure a safe and abundant food supply contributing to healthier people everywhere. Founded in 1939, IFT is a nonprofit scientific society with individual members working in food science, food technology, and related professions in industry, academia, and government. IFT champions the use of sound science across the food value chain through knowledge sharing, education, and advocacy, encouraging the exchange of information, providing educational opportunities, and furthering the advancement of the profession. As an international non-governmental organization with Observer Status with the Codex Alimentarius Commission, IFT appreciates the opportunity to provide comment on the draft revision of the *Guidelines on Nutrition Labeling* (CAC/GL 2-1985) concerning the list of nutrients that are always declared on a voluntary or mandatory basis.

IFT agrees with the inclusion of energy value, protein, available carbohydrate (i.e. dietary carbohydrate excluding dietary fiber), fat, saturated fat, total sugars, and other nutrients for which a nutrition or health claim is made in Section 3.2 of the draft revised *Guidelines on Nutrition Labeling*, but proposes that the words [sodium/salt] be removed from brackets and the word salt be deleted. IFT is of the opinion that *only* sodium should be included in the list of mandatory nutrients since that is the nutrient of concern with regards to hypertension and other public health-related diseases, whereas salt is an ingredient. Furthermore, sodium and salt are not synonymous and should therefore not be used interchangeably on a food label. Sodium chloride (or salt) is only one of several sources of sodium in the diet. Sodium is already the required term

used in nutrient declarations in a number of Codex member countries, including the United States, typically because the term sodium most accurately represents the nutrient of public health concern (CX/FL 10/38/5). IFT supports declaring sodium in grams or milligrams per serving, or grams or milligrams per 100g or 100ml.

Many Codex member countries use the term salt only in the ingredient declaration (CX/FL 10/38/5). IFT suggests that salt could be declared as sodium chloride (salt) on the ingredient list could help provide a linkage between the two terms if there is concern that consumers will not make the linkage between sodium and salt otherwise. IFT does not support the use of conversion factors to convert salt to sodium or vice versa on food labels, as this would only add another element of confusion for consumers to comprehend as such conversion factors represent a barrier to ready use of label information. IFT also supports the use of reduced or low sodium or salt claims on food products. However, IFT believes that to help consumers make the linkage between salt and sodium and to truly address public health concerns related to sodium, consumer education programs must be implemented in countries. A component of a broader public health campaign should be to help consumers better understand and use nutrient and ingredient declarations such as those for sodium and salt.

Thank you for the opportunity to provide IFT's opinion that the words [sodium/salt] be removed from brackets and the word salt be deleted from Section 3.2 of the draft revised *Guidelines on Nutrition Labeling*. IFT appreciates the opportunity to actively participate in the Codex process as it is an important means to our mutual aims.