



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING Thirty-ninth Session Québec City, Québec, Canada, 9 - 13 May 2011

RECOMMENDATIONS ON THE DECLARATION OF SODIUM (SALT)

Report of the electronic working group

Introduction/Background

As part of the CCFL response to the implementation of the WHO Global Strategy on Diet, Physical Activity and Health (the Global Strategy) the Committee considered amendments to the Guidelines on Nutrition Labelling regarding the list of nutrients that are always declared on a voluntary or mandatory basis. At the 37th session of the CCFL (2009), the Committee considered a proposed draft revision to the Guidelines on Nutrition Labelling. The Committee noted there was consensus that the nutrient sodium and/or salt should be included in the list but no agreement on the preferred terminology. Discussions at the 38th session of the CCFL (2010) did not resolve the issue of salt /sodium terminology and the Committee decided to re-establish an electronic Working Group led by New Zealand.

The terms of reference of the Working Group were:

- (1) to consider different approaches to declare sodium/salt on food labelling to assist
 - (a) in the implementation of the Global Strategy on Diet, Physical Activity and Health; and
 - (b) in consumer choice of foods lower in sodium/salt; and
- (2) to make recommendations to the 39th session of the CCFL on the findings of the Working Group.

The participants in the electronic Working Group are listed in Annex 1.

Electronic working group consultation

Previous working groups had identified the major concerns and issues regarding the declaration of salt and or sodium on food labels, so the focus of this consultation was on “different approaches” to the declaration.

First consultation paper

To explore whether there are any variations or combinations of presentation for the declaration of sodium/salt that would be workable from a global perspective a variety of options/approaches were proposed. The options were based on a combination of possible labelling terms in the nutrient declaration and in label statements elsewhere on the label and were visually presented in a powerpoint for clarity and ease of use. The powerpoint is attached in Annex 3.

The options proposed were developed to cover a range of possibilities taking into account the strong views expressed in earlier consultations including that:

- sodium is the technically correct term for a nutrient declaration,
- sodium is linked to increased risk of hypertension,
- the major driver for nutrition labelling is to assist consumers make informed choices, yet, in the view of many members, consumers do not understand the term ‘sodium’ but do understand the term ‘salt’.

While there was recognition by all respondents that sodium is the technically and scientifically correct term for the nutrient of public health concern, and that consumer understanding of the declaration (whether it be salt or sodium) is an issue, there remained a divergence of views as to how best to present the content of the nutrient on the label and in particular in the nutrient declaration. There was no consensus on whether the declaration in the list of nutrients that should always be declared on a voluntary or mandatory basis should be as 'salt' or as 'sodium'. The suggestion of declaring the salt content elsewhere on the label did not receive unanimous approval. Likewise, the idea of declaring salt as sodium multiplied by 2.5 was not universally supported. A compilation of the 21 responses including one from the EU representing 27 countries (the UK responded separately) is attached in Annex 2.

Second consultation paper

A summary of major views and options for recommendations to the Committee was circulated to the Working Group as the second consultation paper. The proposed recommendations/options were:

- with no consensus being reached the Working Group is unable to make a recommendation as to which term, 'sodium' or 'salt', be declared in the list of nutrients which is always declared on a voluntary or mandatory basis.
- there be a requirement to list one or other of salt/sodium in the list of nutrients which is always declared on a voluntary or mandatory basis and that the decision as to which term is used be made at a national level
- The Working Group could assemble key messages as guidance to countries on selecting the most appropriate term and the form of presentation for declaration of salt/ sodium for their particular circumstances
- The Working Group could request the Committee to collate the assembled key messages into a Codex document to be made available to countries to guide the choice of the most appropriate term for their circumstances.

There were divergent views regarding the option that the decision on which term, salt or sodium, be used in the nutrient declaration be made at national level. For some delegations it was considered imperative that a global position is taken.

A number of respondents noted the difficulty in balancing the Codex's overarching objective of global harmonisation with the different needs and approaches in different countries. The suggestion was made that in order to deal with issues where this conflict arises in the nutrient declaration, that a set of criteria be developed against which decisions can be made. The chair notes that criteria were agreed at the 37th session of the CCFL and used as the basis for determining the list of nutrients to be included in the nutrient declaration. These criteria were:

- Ability to address a public health issue;
- Ability to assist informing consumers; and
- Practicality and enforceability of labelling.

The criteria are in no particular order and as such hold equal weight. It is with "Ability to assist in informing consumers" that there are divergent views as to which term, salt or sodium, fulfils the criteria best. This is mainly due to differing needs of consumers in different countries, often due to different environments with respect to public health initiatives.

Some respondents noted that to leave the decision on the term used in the nutrient declaration to national authorities conflicted with Codex's overarching objective of global harmonisation. Others considered that the recommendation to require that one or other of the terms 'salt' or 'sodium' be declared in the nutrient declaration with the decision as to which term to use made at national level may be a way forward, given the failure to reach consensus on the issue. One noted that a common Codex guidance document should be a prerequisite for national approaches. However some respondents felt the assembly of a key messages document to guide decision making on the term to be used (salt or sodium) if this decision was made at a national level was outside of the scope of the working group's terms of reference. The chair considers that while the actual development of these key messages is beyond the scope of the terms of reference, recommending that the development of such messages be considered is within the scope of the terms of reference.

Section 4 of the Codex guidelines on Nutrition Labelling: Supplementary Nutrition Information, was referred to as an existing provision to present additional nutrition information. The section of the Guideline states:

- 4.1 “Supplementary nutrition information is intended to increase the consumers understanding of the nutritional value of their food and to assist in interpretation the nutrition declaration. There are a number of ways of presenting such information that may be suitable for the use on food labels.
- 4.2 The use of supplementary nutrition information on food labels should be optional and should only be given in addition to, and not in place of, nutrient declaration, except for target populations who have a high illiteracy rate and /or comparatively little knowledge of nutrition. For these, food group symbols or other pictorial or colour presentations may be used without the nutrient declaration.”

It is noted that this Supplementary Information is considered optional and does not replace the nutrient declaration. As such the use of this section of the Guidelines does not address the inability to reach consensus regarding the declaration of salt/sodium in the nutrient declaration.

Discussion

In the light of the failure to reach consensus on the term for declaration in the nutrient declaration another option that was not considered in the earlier consultations is proposed. Salt/sodium could be removed from the list of nutrients that should always be declared on a voluntary or mandatory basis. This would have the effect of allowing countries to make a declaration using the term most appropriate to their needs and approaches if they consider this is appropriate. The Working Group’s Terms of Reference include “to assist in the implementation of the Global Strategy on Diet, Physical Activity and Health”. The Global Strategy, whose recommendations include “limit salt (sodium) consumption from all sources”, states “these recommendations need to be considered when preparing national policies and dietary guidelines, taking into account the local situation”. It follows that this option is within the terms of reference.

The decision as to the terminology to use in the declaration of salt/ sodium is the last issue outstanding in the revision of the Guidelines to Nutrition Labelling. The lack of consensus is delaying finalisation of the Guidelines regarding the list of nutrients that are always declared on a voluntary or mandatory basis. It is apparent from the responses that consensus is unlikely to be reached in the near future. It may be expedient to remove salt/sodium from the list of nutrients that are always declared or to leave the decision to national authorities. This approach could be reconsidered by the Committee in the plenary along with the other approaches.

This approach accords with the principles of the Global Strategy which states “The Global Strategy should foster the formulation and promotion of national policies, strategies and action plans to improve diet and encourage physical activity. National circumstances will determine priorities in the development of such instruments. Because of the great variations in and between different countries, regional bodies should collaborate in formulating regional strategies, which can provide considerable support to countries in implementing their national plans. For maximum effectiveness, countries should adopt the most comprehensive action plans possible.”

Conclusions

While there was recognition by all respondents that sodium is the technically and scientifically correct term for the nutrient of public health concern, and that consumer understanding of the declaration (whether it be salt or sodium) is an issue, there was a divergence of views as to how best to present the content of the nutrient on the label and in particular in the nutrient declaration. There was no consensus on whether the declaration in the list of nutrients that should always be declared on a voluntary or mandatory basis should be as ‘salt’ or as ‘sodium’ and there was limited support for any of the options considered that would result in both terms being used in the nutrient declaration. The importance of associated consumer education for whatever approach is taken was strongly supported by the Working Group. However, it is acknowledged that although Codex can note this recommendation the approach cannot be regulated.

Recommendations

The Working Group was unable to identify any approach to the declaration of salt/sodium in the nutrient declaration that could be universally supported. Therefore the Working Group is unable to provide the Committee with a clear recommendation or path forward regarding which term, ‘sodium’ or ‘salt’ be declared in the list of nutrients which are always declared on a voluntary or mandatory basis.

In the absence of such consensus and of any prospect of consensus, the Working Group has provided the Committee with some options for further discussion.

These options have not received the full endorsement of the Working Group, however they may assist members who were not part of the Working Group in their deliberations in the plenary.

Discussion points:

- (a) The choice of terminology used for declaration of salt or sodium in the list of nutrients which are always declared on a voluntary or mandatory basis should be a matter of national discretion, and
- (b) the Committee should develop guidelines to assist national authorities in the exercise of that discretion, or
- (c) If there is no consensus on the above two points, the Committee could review its decision to include salt/sodium on the list of nutrients that should always be declared on a voluntary or mandatory basis if this is the only issue delaying the progression of this important piece of work.

New Zealand thanks the electronic Working Group members that provided comments for their input into this work. New Zealand looks forward to further discussion of this agenda item at the plenary session.

Annex 1**Salt/ Sodium electronic Working Group 2010-11****List of Respondents:**

Australia
Chile
CIAA
Clitravi
Costa Rica
EU
EUSalt
Finland
ICBA
IDF
Japan
Mexico
New Zealand
Norway
Peru
Switzerland
Thailand
UK
USA

ANNEX 2: SALT / SODIUM DECLARATION 2010 FIRST CONSULTATION PAPER RESPONSE**GENERAL COMMENTS:**

CIAA: any recommendation to label nutrition information for both sodium and salt should be on a voluntary basis.

It is sodium that is discussed in regard to health, and that is the nutrient used in nutrition declarations, whether mandatory or voluntary. This is what consumers are used to in nutrition panels, and why labelling salt, instead of sodium, could lead to consumer confusion. In the list of ingredients the term "salt" is used; this is the right term in this case, as here salt is indeed an ingredient. The ingredient cannot be sodium, as this would mean the addition of the metal sodium.

Mexico: 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 that will help us guide the consumers.

1. PLEASE IDENTIFY FOOD PRODUCTS IN YOUR COUNTRY WHERE A SIGNIFICANT PROPORTION OF SODIUM IS CONTRIBUTED BY NON-NACL SOURCES AND WHAT THE SOURCE OF SODIUM IS IN THOSE FOODS. PLEASE ALSO PROVIDE COMMENT ON THE SIGNIFICANCE OF THOSE FOOD PRODUCTS TO THE DIET.

CLITRAVI: Sources of sodium other than salt are meat itself and various additives permitted for meat products which are used as their sodium salts. The most important ones are glutamate, phosphate, nitrite and/or nitrate and ascorbate.

Meat as a basic food contributes less than 5% to the total sodium intake the salt and additives in meat products additionally about 15 %.

IDF: 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.

Milk and dairy products are important contributors in meeting dietary requirements for high quality protein, and several key minerals and vitamins, e.g. calcium. IDF believes that the on-going Codex considerations with regard to the Implementation of the WHO Global Strategy on Diet, Physical Activity and Health should not result in discrimination or inappropriate positioning of individual food products or groups of food products that are known to contribute significant amounts of essential and valuable nutrients to the overall diet.

Costa Rica: The country has no information about foods that provide a significant amount of sodium from other sources other than salt (NaCl). It is presumed that these foods are mostly processed, and that the source of non-salt sodium comes from sodium-containing additives. Although it is unknown consumption of processed foods in Costa Rica, it is assumed that their contribution in the diet is significant.

UK: In the European Union there is a salt reduction initiative that Member States take part in on a voluntary basis. Data collection in 2008 for this initiative suggests that the main sources of sodium/salt in the diets in the Member States that had information were:

- Bread, Bakery products and cereals
- Meat products
- Cheese
- Ready to eat meals
- Soups
- Snacks

However, there is not information on the contribution of sources of sodium other than salt (NaCl) to the diet.

ICBA: With few exceptions, beverages contain very little sodium, with most of the sodium coming from the water sources used to produce the beverage.

Beverages, including soft drinks, juices, juice drinks, coffee and tea, sports drinks, energy drinks, and water beverages, are consumed widely as part of the diet, providing refreshment, enjoyment, nutrition and hydration.

Norway: In the Norwegian diet there are no food products containing sodium which contributes significantly to the total sodium intake compared with the sodium contribution from NaCl in different food products. In our diet the main NaCl sources are meat products, bread, semi-finished products and chips and such.

We do not have data on the distribution of sodium to the diet from additives, raising agents etc. But as a rule of thumb we estimate that approximately 90 % of the sodium intake comes from NaCl and the rest from foods naturally containing sodium, additives etc.

USA: The databases currently available in the USA on sodium intake do not distinguish among sodium sources in this way (i.e., salt vs. non-salt sources).

We anticipate that it may be very difficult for countries to accurately estimate the proportion of sodium contributed by non-NaCl sources. It also may be difficult to interpret responses without a definition for "significant". We note, however, that there are many sodium compounds other than NaCl that have been used in food products in the USA for a variety of purposes. These include use as emulsifying agents, buffering agents, anticaking agents, flavour-enhancing agents, leavening agents, dough-conditioning agents, stabilizing agents, neutralizing agents, thickening agents, moisture-retaining agents, texture-modifying agents and bleaching agent.¹

According to the U.S. Food and Drug Administration's website list of *Everything Added to Food in the United States* (see <http://www.fda.gov/Food/FoodIngredientsPackaging/ucm115326.htm>), which does not capture every ingredient that can be added to foods in the USA, there are 114 items that contain sodium. The intake estimate of these individual sodium-containing food additives is not possible with currently available databases in the USA. However, it is likely that the majority of sodium in the America diet is from salt added to foods during food manufacturing, processing, and/or cooking as well as by individuals prior to consumption. Nevertheless, based on the number and range of uses of sodium-containing non-salt ingredients, it is reasonable to speculate that their collective contribution to total sodium intake should not be ignored. A fact that was reinforced in the 2010 report of the Institute of Medicine (IOM) on *Strategies to Reduce Sodium Intake in the United States*² that identified finding alternatives to some of these sodium-containing compounds (e.g., for leavening, dough conditioning, and emulsifying) as a method to reduce sodium in foods.

Australia: Attached is a list of foods where there is a significant proportion of sodium contributed by non-NaCl sources.

*** 33 Sodium containing food additives to be presented on the updated Nutrition Panel Calculator (NPC), 15/10/2010.**

Calcium Disodium EDTA (385)	Ausnut SE3
Disodium 5-Guanylate (627)	Ausnut SE4
Disodium 5-Inosinate (631)	Ausnut SE4
Disodium 5TM -Ribonucleotides (635)	Ausnut SE3
Disodium Hydrogen Phosphate [339 (2)]	Ausnut SE4
Monosodium L-glutamate (621) (MSG)	Ausnut SE3
Potassium Sodium L-Tartrate (337)	Ausnut SE4
Sodium Acetate [262 (1)]	Ausnut SE4
Sodium Alginate (401)	Ausnut SE4
Sodium Aluminium Phosphate, Acidic [541(1)]	Ausnut SE4
Sodium Aluminosilicate (554)	Ausnut SE4
Sodium Ascorbate (301)	Ausnut SE3
Sodium Benzoate (211)	Ausnut SE3
Sodium Calcium Polyphosphate [452 (3)]	Ausnut SE4
Sodium Carbonate [500 (1)]	Ausnut SE4
Sodium Carboxymethylcellulose (466)	Ausnut SE4
Sodium Dihydrogen Citrate (331)	Ausnut SE3
Sodium Erythorbate (316)	Ausnut SE3
Sodium Hydrogen Sulphite (222)	Ausnut SE4
Sodium Lactate (325)	Ausnut SE4
Sodium L-Tartrate (335)	Ausnut SE4
Sodium Malate [350 (2)]	Ausnut SE4

¹ Institute of Medicine of the National Academies (2010). *Strategies to Reduce Sodium Intake in the United States*, Washington, DC: The National Academies Press. (Prepublication copy, pp. 4-7 to 4-8)

² Ibid. p. 4-11.

Sodium Metabisulphite (223)	Ausnut SE3
Sodium Nitrate (251)	Ausnut SE3
Sodium Nitrite (250)	Ausnut SE3
Sodium Propionate (281)	Ausnut SE3
Sodium Salt Of Fatty Acids (470)	Ausnut SE4
Sodium Stearoyl Lactylate (481)	Ausnut SE3
Sodium Sulphate (514)	Ausnut SE4
Sodium Sulphite (221)	Ausnut SE3
Sodium Tripolyphosphate (451)	Ausnut SE3
Starch Sodium Octenylsuccinate (1450)	Ausnut SE4
Tetrasodium Pyrophosphate [450 (3)]	Ausnut SE4

Ausnut SE3-means this record is already presented on the NPC.

Ausnut SE4-means this record that will be added as part of the NPC upgrade.

Sources of sodium in these foods include naturally occurring sodium and sodium-containing food additives. In a few foods (e.g. fresh fish, seaweed) the sodium is likely to at least in part be from salt in seawater, but not directly added. Major food additive sources of sodium would include sodium bicarbonate used as a leavening/raising agent in baked goods, as well as sodium nitrite and metabisulphite in certain preserved products. There are some foods, such as dried milk powder, gelatin powder and cocoa powder, that have natural levels of sodium well over 200 mg per 100 g. These foods are probably not major sources of sodium in the diet but overall, non-salt sources of sodium are likely to represent 10-20% of total sodium intake.

For information, the Australian 'NUTTAB' nutrient database is currently being updated and additional information being provided. Of relevance here will be the addition of further sodium containing food additives. This data may prove useful in further evidence- gathering for the implications for salt vs sodium labelling. The additional sodium containing food additives to be included in NUTTAB are provided below:

Food name	Sodium, total (mg)	Source of non-salt sodium	Comment
Tea, regular, without milk, brewed from leaf or teabags	4	Natural, from tea and water	
Coffee, from ground coffee beans, espresso style, without milk	14	Natural, from coffee and water	
Coffee, instant, dry powder or granules	19	Natural	
Cereal beverage, powder or granules	81	Natural	
Juice, fruit, variety of types, including fruit drinks	3 to 13	Natural and sodium ascorbate	
Juice, carrot	45	Natural	
Drink, fruit flavoured, dry base, reduced sugar	265	Food additives such as sodium citrate, sodium bicarbonate, sodium saccharin	
Cordial base, various types	9 to 15	Natural, sodium ascorbate, sodium benzoate	
Soft drink, carbonated, various flavours	Approx 10	Water, sodium ascorbate, sodium bicarbonate	
Soft drink, energy drink	80	May include bicarbonate	
Soft drink, energy drink, intense sweetened	80	May include bicarbonate	
Water, mineral, natural, unflavoured	8	Natural	
Water, carbonated or soda	21	May include bicarbonate	

Beverage base, drinking chocolate, milk powder and cereal based (various products)	160	Milk powder, cocoa powder, cereals	
Cocoa powder	259	Natural	
Cereal grains, various types, raw	Approx 1 - 20	Natural	
Flour, wheat, white, self-raising	695	Sodium bicarbonate and other leavening agents	
Gluten, from wheat (vital wheat gluten)	191	Natural	
Bread, from white flour	449	Natural, sodium propionate	Non salt sources assumed around 10% of total
Muffin, English-style, from white flour, plain	462	Natural, sodium bicarbonate, sodium acetate	Non salt sources assumed around 40% of total
Bun, with dried fruit, uniced	288	Natural, sodium bicarbonate	
Pasta, white wheat flour-based, dry (regular pasta)	5	Natural	
Muesli, homemade or commercial, bircher	17	Natural	
Biscuit, sweet, plain	290	Sodium bicarbonate and other leavening agents	Non salt sources assumed around 50% of total
Biscuit, savoury, cracker, not further specified	685	Sodium bicarbonate and other leavening agents	Non salt sources assumed around 20-30% of total
Biscuit, savoury cracker, rice with seaweed	700	Seaweed	Non salt sources assumed around 40% of total
Cake, chocolate, commercial	290	Sodium bicarbonate and other leavening agents, cocoa powder	Non salt sources assumed around 40% of total
Scone, white flour, plain	820	Sodium bicarbonate and other leavening agents	Non salt sources assumed around 50% of total
Doughnut, dusted with cinnamon & sugar	417	Sodium bicarbonate and other leavening agents	Non salt sources assumed around 50% of total
Butter, no added salt	10	Natural	
Fish fillets, raw, fresh, variety of types	Approx 50-100	Natural	May include some sodium chloride from sea water
Tuna, canned in water, drained	82	Natural	May include some sodium chloride from sea water The crumb on the exterior of the fish may include leavening agents and other non-salt additives
Fish, crumbed, frozen, baked, not further specified	397	Natural, leavening agents	
Fruit, all types, fresh	<10	Natural	
Dried fruit, all types	14-50	Natural, sodium metabisulphite	Will not contain added salt
Egg, chicken, whole, raw	134	Natural	
Beef, all types, raw	Approx 60	Natural	
Lamb, all types, raw	Approx 65	Natural	
Pork, all types, raw	Approx 60	Natural	
Chicken, all cuts, raw	Approx 50 - 70	Natural	
Sausage, beef, raw	650	Natural and sodium metabisulphite	Non salt sources assumed around 20% of total
Frankfurt or cheerios, fresh, simmered	754	Natural and sodium nitrite	Non salt sources assumed around 15-20% of total
Bacon, breakfast rasher, raw	1400	Natural and sodium nitrite	Non salt sources assumed around 10% of total
Ham, leg, non-canned, lean	1293	Natural and sodium nitrite	Non salt sources assumed around 10% of total
Salami, all types	Approx 1500	Natural and sodium nitrite	Non salt sources assumed around 10% of total
Milk, cow, fluid, regular fat (~3.5%)	36	Natural	
Milk, canned, evaporated, regular	104	Natural	
Milk, powder, cow, regular	310	Natural	
Milk, powder, cow, skim	428	Natural	
Yoghurt, natural, reduced fat (~2%)	91	Natural	
Cream, pure, 35% fat	36	Natural	

Ice cream, regular fat, chocolate flavour	51	Natural plus cocoa powder	
Soy beverage, regular fat (~3%), unflavoured, unfortified	81	Natural	
Coconut, grated & desiccated	15	Natural	
Vegetables, many types, raw	<30	Natural	
Silverbeet, raw	212	Natural	
Seaweed, nori, dried	1048	Natural	Presumably contains salt from sea water
Onion, dried	89	Natural	Concentrated via drying
Sugar, brown	21	Natural	
Honey	14	Natural	
Jelly crystals, all flavours, sugar sweetened	520	Natural (gelatine), sodium citrates	Does not contain added salt
Chocolate, milk, with added milk solids	90	Natural	Does not contain added salt
Fruit, leather	54	Natural	

Dietary guidance in Australia:

The dietary guidelines are under revision at present:

- the previous (2003) version refers to salt : ie 'choose foods low in salt'. because in the 2003 edition of the Dietary Guidelines there was a general shift towards food based dietary guidance, eg the earlier guidelines about iron and calcium were converted into food-based guidelines about meat and dairy foods. However notwithstanding this, it is noted there has been no suggestion that iron and calcium, for example, should be expressed as, eg, 'meat' or 'milk' in the nutrient declaration;
- the revised nutrition reference values (2006) provide an AI for sodium (not salt).

EU: In the European Union there is a salt reduction initiative that Member States take part in on a voluntary basis. Data collection in 2008 for this initiative suggests that the main sources of sodium/salt in the diets in the Member States that had information were:

- o Bread, bakery products and cereals
- o Meat products
- o Cheese
- o Ready-to-eat meals
- o Soups
- o Snacks

However, there is no information on the contribution of sources of sodium - salt or other sources to the diet. Although it is thought that the non-salt sources are of limited importance.

New Zealand: Non salt sources of sodium have been estimated to contribute in the order of 10% of total sodium intakes. Sodium containing additives are the main contributors including raising agents and flavour enhancers, with food categories containing these being products such as packet cake mixes and similar and some sauces.

From NHMRC NRVs 2005 - "Sodium chloride, however, accounts for approximately 90% of the total sodium excreted in countries like Australia and New Zealand (Fregly 1984, Mattes & Donnelly 1991)"

The major contributor of sodium in the diet is salt (NaCl). Processed foods are the major source of salt in the New Zealand diet, contributing between 60-70% of the total sodium.

It is noteworthy that there is limited research to support the estimates of both sodium intakes from non-salt sources and sodium contributions from processed foods.

Which term, sodium or salt, is used in dietary advice in your country?

Norway: Salt is the term used in dietary advice in Norway. The recommendation is given on salt (NaCl) and not on sodium as such, because salt is the main source of sodium. In the Nordic Nutrition Recommendations 2004 the advice is given as follows:

"Recommendations on salt intake.

"Recommendations on salt intake. A gradual reduction in the intake of sodium as sodium chloride is desirable. The population target is 6g/d for women and 7g/d for men, corresponding to 2,4 and 2,8 g/d of sodium, respectively."

The Nordic Nutrition Recommendations are under currently revision and will be published in 2012.

2. PLEASE COMMENT ON BOTH CURRENT AND LIKELY FUTURE USES OF SODIUM – NEW ADDITIVES BEING PERMITTED ETC.

CLITRAVI: Sodium salts of additives are usually applied due to their good solubility in the meat batter. Potassium, zinc, calcium and magnesium salts could also be used. But this requires due to their different solubility, influence on technological properties and differences in molecular weight and ionic strength together with their influence on flavour extended research about the technological properties and sensorial acceptance. Nevertheless the use of non-sodium additives should be recommended.

We do not see any necessity for new sodium additives. In the contrary the amounts of additives should be reduced.

Costa Rica: In the proposed Central American Regulation on food additives, are including the following additives containing sodium: (table included in response). With regard to new additives, Costa Rica accepts the provisions of Codex Alimentarius.

UK: The EU legislation on food additives includes sodium containing food additives. Details of the food additives with permitted levels of use are provided in submission from the EU below.

The following sources of vitamins or minerals that contain sodium are permitted for use for nutritional purposes in food supplements or foods in general:

sodium bicarbonate sodium carbonate sodium chloride sodium citrate sodium gluconate sodium lactate sodium hydroxide sodium salts of orthophosphoric acid sodium iodide sodium iodate	sodium selenate sodium hydrogen selenite sodium selenite sodium fluoride sodium monofluorophosphate sodium borate ferric sodium diphosphate sodium-L-ascorbate riboflavin 5'-phosphate, sodium D-pantothenate, sodium
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There are no pending authorisations for sodium containing nutritional sources.

ICBA: Sodium-containing food additives are generally not used in manufacturing beverages. Where salts are needed, non-sodium salts are used in so far as possible to keep the sodium content low. Sports beverages are an exception and are one of the few beverages to which sodium is intentionally added for its electrolyte benefit.

Norway: The government and the industry have had regular meetings and discussions about salt content in foods since the 1980s, but we do not have any documentation on the effect of the efforts to reduce the salt intake in the population. Unfortunately Norway has little data on the intake of salt in the population.

Due to the European Economic Agreement, Norway has the same regulation on additives as the European Union. Please look into their answer.

USA: In the response to last year's questionnaire, the USA included data on sodium intake from survey data. With respect to future uses of sodium from new additives or other products, the USA does not have specific data that can be shared. We are currently evaluating the recommendations from the recent IOM¹ report on strategies to reduce sodium levels in the food supply.

Australia: A number of additives containing sodium are permitted in foods under Standard 1.3.1 – Food Additives in the *Australia New Zealand Food Standards Code* (the Code). These additives may be used at GMP levels in foods to obtain the desired technological effect. For example, sodium phosphates are used in dairy products such as processed cheese.

There is an industry view that any restrictions on the use of sodium-containing food additives should be limited to food safety reasons.

Australia is currently in the process of including sodium gluconate in the list of permitted food additives in Standard 1.3.1 in the Code. Other forms of gluconate are permitted in the Code, but not the sodium form. Sodium gluconate has been assessed by JECFA. It is used as a salt substitute and it is claimed that its use leads to a 35% reduction in sodium levels in food to which it is added, compared to NaCl.

Switzerland: New additives presenting a special source of sodium should not be permitted anymore. There should be paid close attention to this.

EU: The European Union (EU) Legislation on food additives is based on the principle that only those additives that are explicitly authorised may be used. Food additives may only be authorised if: there is a technological need for their use; they do not mislead the consumer; and, they present no health hazard to the consumer. Most food additives may only be used in limited quantities in certain foods. If no quantitative limits are foreseen for the use of a food additive, it must be used according to good manufacturing practice, i.e. only as much as necessary to achieve the desired technological effect. The sodium containing food additives authorised in the EU are listed below:

Sodium containing food additives authorised in the European Union

Sodium acetates	Sodium nitrite
Sodium ascorbate	Sodium nitrate
Sodium lactate	Sodium propionate
Sodium citrates	Sodium erythorbate
Sodium tartrates	Sodium phosphates
Sodium potassium tartrate	Monosodium glutamate
Sodium malates	Disodium guanylate
Sodium alginate	Disodium inosinate
Sodium carboxy methyl cellulose	Disodium 5'-ribonucleotides
Sodium salts of fatty acids	Sodium adipate
Sodium carbonates	Calcium disodium EDTA
Sodium sulphates	Sodium steraroyl-2-lactylate
Sodium hydroxide	Aluminium sodium sulphate
Sodium gluconate	Sodium aluminium phosphate
Sodium salt of glycerine	Sodium ferrocyanide
Starch sodium octenyl succinate	Sodium aluminium silicate
Sodium benzoates	Sodium salts of cyclamic acid
Sodium sulphite	Sodium salts of saccharin
Sodium tetra borate	

EU Legislation (Consolidated)

- [European Parliament and Council Directive 94/36/EC](#) of 30 June 1994 on colours for use in foodstuffs
- [European Parliament and Council Directive 94/35/EC](#) of 30 June 1994 on sweeteners for use in foodstuffs
- [European Parliament and Council Directive 95/2/EC](#) of 20 February 1995 on food additives other than colours and sweeteners

Sources of vitamins or minerals that contain sodium that are permitted for use for nutritional purposes

sodium bicarbonate	sodium selenate
sodium carbonate	sodium hydrogen selenite
sodium chloride	sodium selenite
sodium citrate	sodium molybdate
sodium gluconate	sodium fluoride
sodium lactate	sodium monofluorophosphate
sodium hydroxide	sodium borate
sodium salts of orthophosphoric acid	ferric sodium diphosphate
sodium iodide	sodium-L-ascorbate
sodium iodate	riboflavin 5'-phosphate, sodium
	D-pantothenate, sodium

New Zealand: A number of sodium based additives are permitted in accordance with GMP in specified processed foods, namely sodium acetates, alginate, aluminosilicate, ascorbate, carbonates, carboxymethylcellulose, citrates, erythorbate, fumarate, lactate, lactylates, malates, phosphates, sulphates, tartrate, monostearate and tristearate.

There is currently an application being processed to permit the use of sodium carboxymethylcellulose (CMC) as a food additive (stabiliser) in wine.

POTENTIAL OPTIONS FOR SALT / SODIUM DECLARATION (REFER TO ATTACHED POWERPOINT DOCUMENT).

GENERAL COMMENTS

Costa Rica: The country assumption the nutritional consultation uses the two terms.

New Zealand: New Zealand would like to stress that labelling is a tool that to be effective must be part of a wider sodium/salt reduction strategy, including consumer education, stakeholder engagement and monitoring,

The Codex guidelines on nutrition labelling allow for both

- 1) a nutrient declaration to provide the consumer with a suitable profile of nutrients contained in the food and considered to be of nutritional importance; and
- 2) supplementary nutrition information to meet the needs of individual countries or target populations within countries according to need.

Consumer understanding and ability to use the nutrition information provided on a food label is essential in order to meet the purpose of enabling consumers to make an informed choice. It is important that decisions about terminology to be used on labels be supported with evidence of consumer understanding. New Zealand has commissioned research on consumer awareness and understanding of salt, including use and understanding of current label information and the link between sodium and salt. Results of this research will help inform the sodium/salt reduction work being undertaken in New Zealand.

Salt/ sodium labelling may provide useful and easy to access information for monitoring levels in the food supply and compositional changes in food products.

It should be acknowledged that there is considerable global agreement regarding support for labelling with salt/sodium. It appears that Codex is trying to gauge whether there is potential for common consumer understanding of the terms. While this may be possible there has already been considerable efforts made a national level in some countries to educate consumers regarding either salt or sodium. A global approach to the terminology may not be essential to achieve the desired end result of a decreased consumer intake of sodium/salt.

3. PLEASE COMMENT ON EACH OPTION INDIVIDUALLY INCLUDING WHAT YOU SEE AS THE ADVANTAGES AND DISADVANTAGES.

OPTION 1: SODIUM IN NUTRIENT DECLARATION; SALT NOT EXPRESSED ON LABEL

EuSalt: we continue to support the option that Sodium is the sole correct and non misleading indication in the nutritional labeling. For that reason our support goes to option 1 as presented in the examples.

CLITRAVI: Sodium alone in the Nutrient Declaration is understood only by consumers with knowledge in natural/food science in its relation to salt and to health aspects (if there is one at all) . Furthermore if sodium is expressed than the Na content must be determined in the final product with rather laborious methods and expensive equipment. At least in meat products it is pure theory to calculate the Na content from the salt and additive additions as during manufacturing Na may be lost (up to 20%) by cooking, in other cases by storing in salt brine or drying like in raw ham and salami type sausages it may increase by 30%.

IDF: IDF considers this as a feasible and the most relevant option. Sodium is the technically correct nutrient to be used in the nutrition information.

“Sodium” includes sodium from all sources: “Sodium” is the total sodium content as it includes intrinsic (i.e. naturally occurring) sodium and added sodium. Sodium intake does not exclusively come from added salt only but also from other ingredients in many foods.

Costa Rica:

Advantages:

- It is assumed that a single data analysis (sodium) is easier for the consumer at the time of purchase.
- Sodium is declared in the nutritional information, which is the technically correct term.
- Declare the total sodium include sodium from all sources.

Disadvantages:

- Lack of consumer awareness in the interpretation of the value of sodium in the nutrition information.
- It is not clear in this proposal if the restriction to express the salt covers both nutrition and the list of ingredients.

UK: This is the approach that has been taken in the EU since 1990. However, experience has shown that many consumers do not understand the reference to sodium. Taking into account that the public health messages in the majority of the Member States concern reducing salt (rather than sodium) intake there is a proposal that the nutrition labelling should refer to salt (total sodium multiplied by 2.5).

ICBA: ICBA supports use of scientifically sound, fact-based nutrient information on product labels. As such, ICBA supports option 1, the declaration of sodium as part of the nutrient declaration. The ingredient panel should be used to declare the presence of the food ingredient, salt (NaCl), or any other sodium-containing ingredient that is added to the product.

It is ICBA’s position that the nutrition panel should be reserved for the declaration of nutrients, e.g., protein, carbohydrate, fat, saturated fat, sodium, etc. This is scientifically and technically accurate and appropriately addresses sodium as a nutrient of concern with respect to hypertension.

ICBA recognizes that many elements of the label, including the nutrition panel, may not be readily understandable to the consumer. It is essential that appropriate consumer education is carried out to empower consumers to use labeling information to plan diets that meet individual energy and nutrient needs.

Norway: This alternative is technically correct and shows the content of the nutrient (sodium) of nutritional importance in the same way that the other minerals are declared. We consider this to be most useful for the well educated and interested consumer.

The alternative lacks the link between sodium and salt which may be of disadvantage for the consumers and may result in little (or none) usefulness for him/her.

Technical analysis for the control authorities are carried out on sodium which means that information given on sodium is practical for their need and use.

The authorities responsible for the Norwegian food composition table benefit from information given on sodium in the nutrition declaration table and base some of their calculations on this information.

Mexico: Mexico considers that the most appropriate term to use is "sodium" and should be declare 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

USA:

This option is based on scientific evidence that sodium is the nutrient of concern regarding risk of hypertension and allows for placing the level in a product in context of nutrient requirements. In accordance with advice of the IOM^{1, 3}, because sodium is the nutrient of concern, it is most important that consumers are able to link sodium intake from *all* sources of “sodium” rather than just the food ingredient “salt” with risk of hypertension. In the USA, the Nutrition Facts panel on food labels includes % Daily Value (DV) for sodium and other key nutrients per stated serving size of food. Nutrition education materials for the public jointly developed by the U.S. Department of Health and Human Services and the U.S. Department of Agriculture use the food label as a teaching tool to indicate that 5% of the DV for sodium is low and 20% of the DV for sodium is high. The declaration of “sodium” in the Nutrition Facts panel in the USA includes the sodium contribution from salt as well as other sodium-containing non-salt ingredients (e.g., baking soda and milk). Nutritionists and health care providers have focused on educating consumers to limit total sodium intake from all sources to reduce the risk of hypertension, considering daily sodium intake recommendations for the

³ Institute of Medicine of the National Academies (2005), Dietary Reference Intakes for Water, Potassium, Sodium, Chloride, and Sulfate, Washington, DC: The National Academies Press.

general population, dietary guidance for specific population subgroups in the USA, and Tolerable Upper Intake Levels for sodium established by the IOM.

It should be noted that within this option, when salt is used as an ingredient to make a food, it should be listed as "salt" in the ingredient list on the food label. Therefore, salt would already be declared on the labels of all foods made with salt.

Moreover, we believe this option is most consistent with existing Codex food labelling provisions that are based on sodium as the nutrient of concern. These provisions include: 1) conditions for claims that a food product is "free" "very low" or "low" in sodium in the Codex Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997), and 2) the Codex Standard for Special Dietary Foods with Low-Sodium Content (including Salt Substitutes) (CODEX STAN 53-1981).

In addition, this option is consistent with the CCFL request for the CCNFSDU to consider a nutrient reference value (NRV) for sodium in its current work related to the Global Strategy and to establish NRVs for nutrients associated with risk of noncommunicable diseases (ALINORM 09/32/22, para 41).

Australia:

Advantages

- Sodium is a technically correct term and widely used in Nutrient Declarations
- Sodium can be accurately determined by analytical methods and is readily enforceable
- Food composition tables contain extensive sodium data
- Health messages in Australia and associated nutrient reference values refer to sodium intake, therefore food labels can be clearly aligned with health messages. Individuals with health conditions requiring restricted sodium intake can use on-pack information to manage their condition
- The term sodium is well understood by clinicians
- Simpler for consumers to understand where health advice relates to sodium
- Maintains the status quo in Australia for both manufacturers and consumers, therefore (in Australia) maintaining this approach would minimise costs for manufacturers and regulators and avoid confusion for consumers.
- No increase in compliance costs for Australian industry including dairy exporters, and regulators. Noting, Australian dairy products are exported to 110 countries, with around half of total milk production eventually exported.

Disadvantages

- Presents challenges with respect to consumer understanding, therefore communication and education strategies are required if messages are given in terms of salt without highlighting that it's the sodium constituent of salt that is the important factor.
- It may be suggested the use of sodium (only) limits the provision of health-related information on label about salt to consumers, however it is noted, food labelling is not the only means, nor necessarily the most relevant for conveying this information
- This would be further exacerbated if non label health messages are only about salt, (noting though salt related information on a label could still be provided voluntarily)
- In the absence of understanding that sodium may come from non-salt sources, making 'free from'/'no added salt' claims may be confusing, where only sodium has a declared value

Switzerland: The scientifically correct declaration is "Na (Sodium)", but the ordinary consumer doesn't understand this - what they would understand is the term "Salt".

EU: This is the approach that has been taken in the EU since 1990. However, experience has shown that many consumers do not understand the reference to "sodium". Taking into account that the public health messages in the majority of the Member States concern reducing salt (rather than sodium) intake it has been proposed that the nutrition labelling should refer to salt (total sodium multiplied by 2.5).

New Zealand: This is the current regulatory requirement in New Zealand. Voluntary claims may be made about salt and or sodium and criteria for this is contained in regulation.

Advantages

- Sodium is relatively easy/cheap to analyse
- Sodium is the nutrient of concern with respect to health effects

Disadvantages

- Sodium is potentially less well understood by consumers than salt (research will clarify whether this is the case)
- Public Health guidelines refer to salt (ie “choose foods lower in salt”)

New Zealand supports the continued declaration of sodium in the declaration panel but is not against reference to salt elsewhere on the label.

OPTION 2: SODIUM AND SALT (NaCl) (GRAMS) IN NUTRIENT DECLARATION.

CLITRAVI: This option would confuse the consumer

CIAA: The declaration of both sodium and salt in the nutrition declaration (*option 2 as per the Powerpoint slides of this consultation*) is not logical. As both declarations have benefits and limitations, a differentiated approach is necessary:

IDF: considers this as neither a feasible nor an appropriate option and opposes the declaration of both sodium and salt (NaCl) in the nutrient declaration.

IDF believes that the proposal of labeling both sodium and salt on the basis of the lack of consensus on the relevant criteria is not appropriate to provide the necessary information to the consumer. IDF is concerned that the labeling of both salt and sodium would confuse the consumer by providing two different and unequal pieces of information with a similar aim. The relationship between sodium and salt is not clear or well understood by consumers. There is a potential risk that the consumer would believe the total content to be the sum of both.

IDF would like to ask clarification if Salt (NaCl) in option 2 refers to **added** NaCl only. If this is the case this should be made clear in the discussion document and related PowerPoint presentation.

IDF disagrees with the declaration of NaCl values that are derived by using conversion factors to convert sodium levels to salt (NaCl) for the following reasons:

Milk naturally contains a small amount of sodium (45mg/100ml) but no added salt. The nutrition labeling of salt levels in dairy products which either don't contain added salt or are calculated based on both naturally present sodium levels and added salt would be both misleading and very confusing for consumers as it would risk being incorrectly interpreted to represent added salt.

Independent of the title of the issue, i.e. whether the term ‘Nutrition information’ or ‘Nutrient information’ is used for the nutrient declaration, IDF believes that the nutrition label should include nutrients only, and that ingredients such as (added) salt should be labeled in the ingredient list.

In addition, the nutrient declaration panel in the PowerPoint presentation shows sodium in 185 milligrams, while the salt is expressed as 0.240 grams (rather than 240 milligrams). Expressing both in different units of measurement would add another level of confusion for the consumer.

Costa Rica:

Advantages:

- Provide more information to consumers.

Disadvantage:

- Potential consumer confusion in the interpretation of terms.
- In terms of verification for the Government is not analytically possible to distinguish sodium from salt and other sources.
- The industry must provide the data of salt in the label, increasing its costs, as well as confidential information.
- The declaration of sodium including sodium would total from all sources, including salt also is being declared, which may mislead consumers and overestimate the amount of sodium.

UK: This would provide two pieces of information. However, the inclusion of both sodium and salt (as NaCl) would be a potential source of confusion for consumers who would not necessarily know the relationship between the two figures. The use of different units of measurements (mg and g) could also lead to confusion as consumers may not readily convert the two figures.

ICBA: ICBA does not support this option. In addition to the fact that salt (NaCl) is a food ingredient, and not a nutrient *per se*, the inclusion of the ingredient salt in the nutrition information has the potential to be confusing for consumers.

Provision of both sodium and salt information could lead to misinterpretation of a food or beverage's contribution to total daily intake of sodium. Additionally, for some products, in particular beverages, salt (NaCl) would appear in the nutrient declaration portion of a product label when that ingredient, in fact, had not been added to the finished product and would not appear in the ingredient list.

To provide scientifically and technically accurate nutrition information, ICBA recommends that sodium alone should be displayed in the nutrient declaration.

Norway: This alternative is technically correct and shows the content of the nutrient (sodium) of nutritional importance the same way as the other minerals are declared. In addition it has the benefit of giving information on salt which is better understood by the consumers and corresponds directly to national dietary advice on salt.

We believe that it may be appropriate to present salt as a subset of sodium. This alternative has the advantage of being both technically correct and user friendly for the consumer. This may be emphasized more than the possibility for confusion as mentioned in bullet point 2 above.

As an alternative to the possible confusion regarding information given both in mg and g, it is feasible to require sodium to be declared in grams, preferably with 2 significant numbers.

Technical analysis for the control authorities are carried out on sodium which means that information given on sodium is practical for their need and use.

The authorities responsible for the Norwegian food composition table benefit from information given on sodium in the nutrition declaration table and base some of their calculations on this information.

USA: The USA does not support this option as it appears to create a dual listing for sodium information and could be misleading and confusing to consumers. For example, it is not clear if the amount of sodium to be listed is in addition to or would be included in the amount of sodium that is present in food as salt. Including salt in the nutrient declaration is inconsistent with how other key food components are declared as single nutrients in the Nutrition Information panel.

Expressing the total sodium content of a food in terms of grams (g) of salt could be inaccurate because chloride, a component of salt, is not found in all sources of sodium (e.g., sodium bicarbonate and monosodium glutamate) that could be present in a food. Also, sodium restricted diets recommended for some individuals who have different cardiac, vascular and kidney diseases typically identify limits for daily sodium intake in terms of total milligrams (mg) or g of "sodium" versus g of "salt." It could be very cumbersome for consumers following sodium restricted diets to have to convert g of salt into mg sodium in order to decide if a labelled food is appropriate for them to eat.

Advantages

- As for option 1 as it relates to sodium in the Nutrient Declaration
- No further advantages were identified for having salt also in the Nutrient Declaration, also noting that any added salt *per se* would be declared through ingredient labelling.

Disadvantages

- Nutrient Declaration of both sodium and salt may be confusing for consumers, some consumers may mistakenly add both figures
- Listing salt to 3 decimal places may be confusing for consumers
- Analysis of NaCl is very difficult, with implications for both manufacturers and regulators
- Noting that sodium and salt values do not 'match', there may be some confusion in the absence of understanding that sodium may also be present from sources other than from salt.
- Salt is not a nutrient but a food ingredient and therefore should not appear in the Nutrient Declaration
- Where food composition tables are relied on for providing data for Nutrient Declaration, these tables do not generally include sodium chloride
- In some foods (e.g. butter and cheese) the adopted Codex method for determining salt content is by calculation from chloride content. This may not be useful as nutrition information, particularly since standards for some foods (e.g. cheese) allow for the use of KCl rather than NaCl.
- Food labels are already crowded, therefore to further crowd the label with potentially confusing information and that incurs added cost, is unproductive

- In the absence of understanding that sodium may come from non-salt sources, making 'free from'/'no added salt' claims may be confusing, especially where salt may be declared as zero and sodium may have a declared value

Switzerland: This would be the **GOLD**-standard - but the nutrient declaration might get overloaded this way.

EU: This would provide two pieces of information. However, the inclusion of both sodium and salt (as NaCl) would be a potential source of confusion for consumers who would not necessarily know the relationship between the two figures. The use of different units of measurements (mg and g) could also lead to confusion as consumers may not readily convert the two figures.

New Zealand:

Disadvantages

- Potential for consumer confusion – use of different units (mg vs g) and potential to add the two values together.
- Potential consumer confusion with respect to sodium/salt link

New Zealand considers the disadvantages outweigh advantages with this option and does not support it.

OPTION 3: SALT (NaCl) ONLY IN NUTRIENT DECLARATION

CLITRAVI: This option is understood by an average educated consumer and it can be easily measured and correctly reported by the producer

IDF: IDF believes that the nutrition label should include nutrients only, and that ingredients such as (added) salt should be labeled in the ingredient list. The consumer is already used to having nutrients in the nutrient information and ingredients in the ingredient list. We should not derogate from this logical and well known practice.

IDF would like to ask clarification if Salt (NaCl) in option 3 refers to **added** NaCl only. If this is the case then it should be made clear in the discussion document and related PowerPoint presentation.

Costa Rica: Advantages: none

Disadvantages:

- Excludes other sources of sodium.
- Salt is not a nutrient.
- It is misleading to consumers because it provides a partial sodium data from all sources.

UK: Although limiting the information declared on the label as "salt" to sodium chloride would be considered technically correct, it would not necessarily help to inform the consumers. The public health campaigns aim to reduce the sodium intake overall, the simplest message is to reduce the salt consumption by reducing the amount added during cooking, reduce the amount added at the table, and to look for products with a lower salt content. Unfortunately if the nutrition declaration concerned only sodium chloride the consumption of sodium from other sources would not be provided. This would not be a desirable situation.

ICBA: ICBA does not support this option. The nutrient of interest in relationship to hypertension is sodium. Provision of salt (NaCl) only information would not clearly and accurately represent the sodium level of a product and could lead to misinterpretation of a food or beverage's contribution to total daily intake of sodium.

Additionally, for some products, salt (NaCl) would appear in the nutrient declaration portion of a product label when that ingredient, in fact, is not added to the finished product and would not appear in the ingredient list. To provide scientifically and technically accurate nutrition information, ICBA supports the declaration of sodium only as part of the nutrient declaration.

Norway: This is a consumer friendly alternative which gives the possibility to find information in the labelling which corresponds directly to dietary advice on salt. It may encourage the consumers to actually relate to the information and use it in their effort to reduce their salt intake. This alternative also has the advantage of being short which is usually considered to be beneficial for the comprehension.

It appears as a pragmatic alternative where information to consumers may appear the only purpose of the labelling. We believe it may be disadvantageous to choose an alternative which serve one purpose only when there are other options which appears more versatile.

The possible change of the term nutrition declaration to nutrition information must be considered a technicality.

Technical analysis for the control authorities are carried out on sodium and recalculated to NaCl. For analysis of foods high in sodium from other sources than NaCl this alternative will be disadvantageous. The same will be for the usefulness of the information for work on food composition tables.

USA: The USA does not support this option as it only provides for salt declaration and not the nutrient of concern, sodium. Health care and other recommendations for reducing the risk of hypertension have focused on reducing sodium intake from all sources, not just salt intake.

The background paper states that using the term "Nutrition Information" allows for inclusion of ingredients such as salt; however, no justification or data are provided to support this assertion. We also are concerned that the proposed inclusion of "salt" could be used to justify the addition of other "food ingredients" rather than "nutrients" in the nutrient declaration. It would also appear that with this option, the Sec. 3 heading (i.e., Nutrient Declaration) in the Guidelines on Nutrition Labelling and other provisions in Sec. 3 would need to be revised to encompass ingredients, again with the potential to justify other ingredient additions.

Additionally, no data are presented on how consumers understand and use the term "Nutrition Information." Including salt in the nutrient declaration is inconsistent with the labelling of other foods components that are specific nutrients, and the declaration of salt only is inconsistent with existing Codex provisions referenced in Option 1, including Codex provisions for sodium content claims and the Codex Standard for Special Dietary Foods with Low-Sodium Content (including Salt Substitutes). Moreover, Option 3 is inconsistent with the CCFL request for the CCNFSDU to consider an NRV for sodium.

Australia:

Advantages

- Simpler for consumers to understand where health advice relates to salt intake

Disadvantages

- Absence of information used by clinicians (ie sodium)
- This would misrepresent the total sodium content where sources of sodium other than from salt are present in the food
- Listing salt only is not helpful to those consumers with medical conditions who need to limit the sodium content of foods
- Listing salt to 3 decimal places may be confusing for consumers
- Analysis of NaCl is very difficult, with implications for both manufacturers and regulators
- Salt is not a nutrient but a food ingredient and therefore should not appear in the Nutrient Declaration
- Where food composition tables are relied on for providing data for Nutrient Declaration, these tables do not generally include salt
- In some foods (e.g. butter and cheese) the adopted Codex method for determining salt content is by calculation from chloride content. This may not be useful as nutrition information, particularly since standards for some foods (e.g. cheese) allow for the use of KCl rather than NaCl.
- Manufacturers that rely on information from suppliers for Nutrient Declaration may be disadvantaged because the formulation of sub ingredients such as seasonings is proprietary and while suppliers will declare sodium content they will not generally disclose the salt content

Switzerland: Easily understandable by the consumer, but scientifically not correct. By declaring only NaCl, there is a risk that other sources of sodium are being neglected, sources that also have an impact on health.

EU: Although limiting the information declared on the label as "salt" to sodium chloride would be considered technically correct, it would not necessarily help to inform the consumers. The public health campaigns aim to reduce the sodium intake overall, the simplest message is to reduce the salt consumption by reducing the amount added during cooking, reduce the amount added at the table, and to look for products with a lower salt content. Unfortunately, if the nutrition declaration concerned only sodium chloride the consumption of sodium from other sources would not be provided. This would not be a desirable situation.

New Zealand:

Advantages

- Aligns with public health messages
- Salt maybe better understood than sodium (research will clarify)

Disadvantages

- Analysing for salt is potentially more difficult than for sodium (measure chloride as can't distinguish between Na from salt and non-salt sources)

- Does not consider non-salt sodium which may be misleading in terms of health risk (however in NZ approximately 90% of sodium comes from salt so the impact of this would be relatively minor)

OPTION 4: SODIUM ONLY IN NUTRIENT DECLARATION. SALT (NaCl) ELSEWHERE ON LABEL

CLITRAVI: This option like option 2 would confuse the consumer, even if it is a way to label the content of salt and the – scientifically correct -content of sodium from all sources.

IDF: IDF considers this as neither a feasible nor an appropriate option as it is proposed. Ingredients such as added salt (NaCl) should be labeled in the ingredient list, which could include also a quantification of the added salt.

IDF is concerned that the labeling of both salt and sodium would confuse the consumer by providing two different and unequal pieces of information with a similar aim. The relationship between sodium and salt is neither clear nor well understood by consumers. There is a potential risk that the consumer would believe the total content to be the sum of both. The value indicated in the labeling (ingredient list) should be a declaration of the quantity added during the production.

Costa Rica:

Advantages:

The term sodium used is technically correct.

Disadvantages:

- It is misleading to consumers since "salt" provides a partial data to be highlighted is misleading consumers by taking account of other sources of sodium, even when they are declared in the nutritional statement.
- The declaration does not include other sources of sodium.
- It is presumed that the filing of the two data can be confusing to consumers because they are not equivalent, as discussed in option 2.

UK: There would be similar concerns as for the second option. Although the information would not be appearing together in the nutrition declaration there would still be the question of the risk of creating confusion for the consumer

ICBA: ICBA does not support this option. Communication of salt (NaCl) content elsewhere on the label, i.e., as a separate item from its declaration in the ingredient statement, has the potential to be confusing for consumers and may also be scientifically/technically inaccurate.

Declaration of salt (NaCl) information as a separate item may not accurately represent the sodium level of a product and could lead to misinterpretation of a food or beverage's contribution to total daily intake of sodium. Additionally, for some products, salt content would appear on the product label when that ingredient, in fact, is not added to the finished product and would not appear in the ingredient list.

Norway: We believe that this alternative is favourable for the consumers and those who wants and needs more detailed information. The nutrient information table is kept for technically correct information on nutrients and the consumer friendly information on salt is given in a conspicuous place, preferably front of pack. This information does not necessarily have to be given pr. serving as showed in the discussion paper. It may just as well be given pr. 100 g as many countries do not use servings in labelling.

We believe that the issue of front of pack labelling needs to be discussed further. In principle we are positive to the possibility to highlight some elements in foods on the front of pack. But this is a complex matter and needs further elaboration.

Giving the numbers for the content of salt (NaCl) separately gives the consumers the possibility to link this information with listing of salt in the ingredients list. This will not always be feasible if the sodium content is recalculated to NaCl.

Technical analysis for the control authorities are carried out on sodium which means that information given on sodium is practical for their need and use.

The authorities responsible for the Norwegian food composition table benefit from information given on sodium in the nutrition declaration table and base some of their calculations on this information.

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 reduced is “sodium”.

USA: As noted under Option 1, the USA supports nutrient declaration of sodium. We have no data to assess how consumers would use and understand a salt declaration elsewhere on the label or how would they interpret this information in the context of their total sodium intake. Without such data, it is not clear how such a salt declaration would support the Global Strategy or what justification could be used to mandate providing this information.

Australia:

Advantages

- As for option 1 as it relates to sodium in the Nutrient Declaration
- Providing a declaration of salt elsewhere on the label (e.g. front-of-pack) provides simple and readily accessible information for the consumer for those countries where the key public health message relates to salt intake.

Disadvantages

- Consumers may find it difficult to understand the difference between sodium levels in the Nutrient Declaration and salt content elsewhere on the label
- It encourages consumer misunderstanding about what it is about salt that has adverse health effects
- Analysis of NaCl is difficult, with implications for both manufacturers and regulators
- Where food composition tables are relied on for providing data for salt declaration on the label, these tables do not generally include salt
- In some foods (e.g. butter and cheese) the adopted Codex method for determining salt content is by calculation from chloride content. This may not be useful as nutrition information, particularly since standards for some foods (e.g. cheese) allow for the use of KCl rather than NaCl
- Food labels are already crowded, therefore to further crowd the label with potentially confusing information and that incurs added cost, is unproductive
- Manufacturers that rely on information from suppliers for salt declaration may be disadvantaged because the formulation of sub ingredients such as seasonings is proprietary and while suppliers will declare sodium content they will not generally disclose the salt content.

Switzerland: A good choice: scientifically correct and at the same time the consumer is adequately informed

EU: There would be similar concerns as for the second option. Although the information would not be appearing together in the nutrition declaration there would still be the question of the risk of creating confusion for the consumer.

New Zealand:

Advantages

- Salt information may be more easily understood by consumers (research will help clarify) particularly those who do not normally use the nutrient declaration

Disadvantages

- Potential consumer confusion with respect to sodium/salt link
- Does not represent all sodium so could underestimate the health risk in foods with a significant amount of sodium from non salt source (including naturally occurring sodium)

New Zealand could support this as an option if there was evidence of increased consumer understanding with use of the reference to salt on the label as well as sodium in the nutrient declaration.

OPTION 5: SALT ONLY IN NUTRIENT DECLARATION. SALT IS SODIUM FROM ALL SOURCES.

CLITRAVI: Possible form, taking into account that NaCl amounts to more than 75% of sodium in a product. As salt is analytically easily determined the values will be correct in the ready-to-eat product and the control by official laboratories can be done easily, cheap and often.

IDF: IDF does not consider this as a feasible option.

IDF strongly opposes salt labeling (based on conversion of the total amount of sodium) for the following reasons:

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 both misleading and very confusing for consumers as it would risk being incorrectly interpreted to represent added salt.

Finally, if salt also is to be expressed in the nutrient information, this would mean that the term "salt" would appear twice on the label and with different interpretations and values.

Costa Rica:

Advantages: none

Disadvantages:

- Salt is not therefore a nutrient declared on the nutrition information is technically incorrect.
- It provides information on the total sodium.
- The term "salt" which includes all sources of sodium, can create a negative perception of consumers to NaCl. In Costa Rica, the salt is a vehicle for fortification with iodine and fluorine.

UK: As explained under option 1. The developments in the EU have led to consideration being given to changing the nutrition declaration from sodium to salt. The public health campaigns centre around the message of reducing salt. The intention being that not only salt but the consumption of sodium in general should decrease.

Although sodium might be considered the technically correct term the EU believes that it is essential to bear in mind who the nutrition labelling is intended for, namely the general public. The professionals have access to other sources of information or can do the necessary calculation if they wish to know the content of sodium. Equally consumers who may have special needs and a particular interest in monitoring their sodium intake would, after being made aware of the correspondence between the information on salt and the content of sodium, use the labelling information on sodium to make informed choices.

ICBA: ICBA does not support this option. It is our view that the communication of salt content as "sodium from all sources" would be confusing for consumers. Furthermore, it would be technically and scientifically inaccurate. Additionally, for some products, salt would appear in the nutrient declaration portion of a product label when that ingredient, in fact, is not added to the finished product and would not appear in the ingredient list.

Norway: This is a consumer friendly alternative which gives the possibility to find information in the labelling which corresponds directly to dietary advice on salt. It may encourage the consumers to actually relate to the information and use it in their effort to reduce their salt intake. This alternative also has the advantage of being short which is usually considered to be beneficial for the comprehension.

It may be confusing not to find information on salt in the list of ingredients if the source of sodium is not from NaCl. Such confusion may discourage the consumers from continuing using the labelling and making informed choices based on this.

Technical analysis for the control authorities are carried out on sodium which means that information given on the total amount of sodium (even if it is calculated) is practical for their need and use.

The authorities responsible for the Norwegian food composition table will not be able to use this kind of information in their work.

USA: The USA does not support this option (see comments under Option 1). Sodium is the nutrient of concern to be included in the nutrient declaration, whereas, salt is an ingredient. It is not clear what the justification is to have all sodium sources presented to consumers as salt. For example, would consumers be misled to think that salt has been added to foods that actually contain only non-salt sources of sodium?

In addition, as noted in the background paper, this option would not capture sodium from all sources, and would not reflect the evidence about adverse health effects related to sodium intake. This option also would present additional problems because it is inconsistent with existing Codex provisions that identify "sodium" as the "nutrient" of concern.

Australia:

Advantages

- Advantageous for those consumers more familiar with the term 'salt'.

Disadvantages

- Salt historically and currently is the name given to sodium chloride. Food products where a significant proportion of the sodium is from natural sources would be making a misleading declaration about the salt content of the food. For example, packaged jelly crystals do not contain added salt but do have substantial levels of sodium. Milk products (including milk powder) also have substantial sodium levels but no added salt. This results in truth in labelling issues and may also raise concern for manufacturers where their product is represented as containing salt (NaCl) when it does not
- Salt is not a nutrient but a food ingredient and therefore should not appear in the Nutrient Declaration
- To see salt in the Nutrient Declaration where NaCl is not present in the food could be confusing
- Listing salt to 3 decimal places may be confusing for consumers
- Additional compliance costs for businesses exporting to countries where sodium is required in Nutrient Declaration.
- 'Salt' would need to be defined for regulatory purposes to avoid conflict with fair trading laws (ie where salt is taken to mean different things under different legislations).
- Consideration would need to be given to criteria for salt related claims, how this may impact on countries where salt related claims are based on NaCl, and also how such criteria may relate to sodium-based claims

Switzerland: As information for the consumers surely of avail, but again, scientifically not correct

EU: As explained under option 1. The developments in the EU have led to consideration being given to changing the nutrition declaration from sodium to salt. The public health campaigns centre around the message of reducing salt, the intention being that not only salt but also the consumption of sodium in general should decrease. Therefore, the EU would like to have the option for the declaration to be sodium expressed as salt to be included in the nutrition declaration.

Although sodium might be considered the technically correct term the EU believes that it is essential to bear in mind for whom the nutrition labelling is intended, namely the general public. The medical professionals have access to other sources of information or can do the necessary calculation (divide the content of salt by 2.5) if they wish to know the content of sodium in a product. Consumers who may have special needs and a particular interest in monitoring their sodium intake would, after being made aware of the correspondence between the information on salt and the content of sodium, use the labelling information on 'salt' to make informed choices.

If there is concern about the risk of consumers having the impression that salt has been added to a food the ingredients declaration can be consulted to check which ingredients have been added. In addition, consideration could be given to allow, in cases where all the sodium present in a product is naturally present, an indication close to the 'salt' declaration that it relates to naturally present sodium.

New Zealand:

Advantages

- Declaration of salt is in line with public health messages
- All sodium is captured in the declaration of salt therefore the representation is in line with the health risk

Disadvantages

- Salt is not a 'nutrient' so maybe inappropriate in the nutrient declaration (Codex principles for nutrition labelling state "Nutrient Declaration - Information supplied should be for the purpose of providing consumers with a suitable profile of nutrients contained in the food and considered to be of nutritional importance.")

OPTION 6: SODIUM ONLY IN NUTRIENT DECLARATION. SALT ELSEWHERE ON LABEL. SALT IS SODIUM FROM ALL SOURCES

CLITRAVI: Not understood by the consumer

IDF: IDF considers this as neither a feasible nor an appropriate option.

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.

IDF is concerned that the labeling of both salt and sodium would confuse the consumer by providing two different and unequal pieces of information with a similar aim. The relationship between sodium and salt is

neither clear nor well understood by consumers. There is a potential risk that the consumer would believe the total content to be the sum of both..

The 'Salt' value is not technically correct as it is calculated from sodium from all sources which misrepresents the true salt content and may infer some products contain added salt when none is present.

CIAA: the declaration of "sodium" should be the rule in the nutrition information, while in the list of ingredients the use of the term "salt" is the most logical. *Option 6 as per the Powerpoint slides under this consultation therefore comes closest.*

Costa Rica:

Advantages:

- Sodium is declared in the nutritional information, which is the technically correct term.
- It informs the consumer about the total sodium content from all sources of sodium.

Disadvantages:

- In the country the term salt is known as sodium chloride, it is considered that the statement "salt from all sources" could mislead the consumer as it can be interpreted as sodium chloride.
- The statement would include sodium salt total from all sources, which also is being declared in the nutrition section, which may mislead consumers and overestimate the amount of sodium.
- The term "salt" which includes all sources of sodium, can create a negative perception of consumers to NaCl. In Costa Rica, the salt is a vehicle for fortification with iodine and fluorine.

UK: As mentioned for options 2 and 4 this could be a potentially confusing approach.

ICBA: ICBA does not support this option. While we agree with the declaration of sodium in the nutrient declaration, we view the communication of salt content elsewhere on the label as "sodium from all sources" to be confusing for consumers and technically and scientifically inaccurate.

Additionally, for some products, salt content would appear on the product label when that ingredient, in fact, is not added to the finished product and would not appear in the ingredient list.

Norway: We believe that this alternative is favourable for the consumers and those who want and need more detailed information. The nutrient information table is kept for technically correct information on nutrients and the consumer friendly information on salt is given in a conspicuous place, preferably front of pack. This information does not necessarily have to be given per serving as shown in the discussion paper. It may just as well be given per 100 g as many countries do not use servings in labelling.

We believe that the issue of front of pack labelling needs to be discussed further. In principle we are positive to the possibility to highlight some elements in foods on the front of pack. But this is a complex matter and needs further elaboration, e.g. on which elements to be highlighted.

Technical analysis for the control authorities are carried out on sodium which means that information given on sodium is practical for their need and use.

The authorities responsible for the Norwegian food composition table benefit from information given on sodium in the nutrition declaration table and base some of their calculations on this information.

USA: The USA supports inclusion of sodium in the nutrient declaration (see comments under Option 1). As noted under Options 4 and 5, no data are available to understand how consumers will use and interpret data on salt declaration elsewhere on the label. However, in all cases, salt should be listed in the ingredient list, if it is added to the product.

Australia:

Advantages

- As for option 1 as it relates to sodium in the Nutrient Declaration
- Salt and sodium values will 'match' given that 'salt' is calculated from sodium content
- Providing a declaration of salt elsewhere on the label (e.g. front or side of pack) provides simple and readily accessible information for the consumer
- For those countries where the key public health message relates to salt intake, a declaration of salt on the front-of-pack provides useful information (notwithstanding disadvantages noted below)

Disadvantages

- Salt historically and currently is the name given to sodium chloride. Food products where a significant proportion of the sodium is from natural sources would be making a misleading declaration about the salt content of the food. For example, packaged jelly crystals do not contain added salt but do have substantial levels of sodium. Milk products (including milk powder) also have substantial sodium levels but no added salt. This results in truth in labelling issues and may also raise concern for manufacturers where their product is represented as containing salt (NaCl) when it does not
- Listing salt to 3 decimal places may be confusing for consumers
- Food labels are already crowded, therefore to further crowd the label with potentially confusing information and that incurs added cost, is unproductive.
- Potential conflict with truth in labelling laws (depending on regulatory definitions)
- Consideration would need to be given to criteria for salt related claims, how this may impact on countries where salt related claims are based on NaCl, and also how such criteria may relate to sodium-based claims

Switzerland: This is the **GOLD**-Standard: scientifically correct and at the same time well understandable for the consumers.

EU: As mentioned for options 2 and 4 this could be a potentially confusing approach.

New Zealand:

Advantages

- Salt information may be more easily understood by consumers (research will help clarify) particularly those who do not normally use the nutrient declaration
- Declaration of salt is in line with public health messages
- All sodium is captured in the declaration of salt therefore the representation is in line with the health risk

Disadvantages

- Potential consumer confusion with respect to sodium/salt link

New Zealand could support this as an option if there was evidence of increased consumer understanding with use of the reference to salt on the label as well as sodium in the nutrient declaration

4. PLEASE COMMENT ON ANY POSSIBLE APPROACHES THAT WE HAVE NOT CONSIDERED, THAT WOULD FACILITATE A HARMONISED APPROACH TO THE DECLARATION OF SALT AND/OR SODIUM ON FOODS.

CLITRAVI: The added amount of salt could be declared quantitatively within the List of Ingredients. This list is more accepted and read by the consumer than the Nutrient Declaration especially if it is mixed with GDA data.

IDF: proposes to consider the option of the QUID labelling of added salt on a voluntary basis.

Costa Rica: It is proposed to declare only the sodium in the nutritional information and leave the possibility of using nutrition and health claims that mention the term salt for example, "Unsalted" understanding that the food is free of sodium and contain no added salt. It is considered that for educational purposes, could be used on an **optional** salt content in "salt equivalent", for example with the use of household measures.

ICBA: ICBA supports robust consumer education programs as the appropriate means for informing consumers about the importance of moderating dietary sodium intake. Pursuing a pathway that deviates from the standard approach to nutrition labeling – i.e., the labeling of nutrients – is unlikely to have the intended effect over the long term. Instead, consumers must be provided with fact-based nutrition information, and the appropriate level of education, so that this information is understood and can be used to make dietary choices that meet individual energy and nutritional needs.

ICBA realizes that consumer education is outside the mandate of the Codex Alimentarius. Nevertheless, ICBA feels that it would be appropriate for this electronic working group to conclude with the following recommendations:

- Sodium only should be declared within the nutrition panel

- Salt (NaCl) and any other sodium-containing ingredient should be declared in the ingredient panel where used as a food ingredient.
- Governments should work with other stakeholders to ensure consumers are informed of the importance of moderating sodium intake, the meaning of sodium information as presented in the nutrient declaration and ways to select a sensible, balanced diet that meets appropriate goals for sodium intake.

USA: Sodium is the nutrient of concern, is scientifically justified for nutrient declaration, and is the focus of health care recommendations for the general population and specific population segments to reduce the risk of hypertension. The Codex guidelines allow for countries to use additional information, as needed, to facilitate consumer understanding. There could be an approach which recognizes the need for some governments to consider declaration of salt on the label, based on the needs of their own populations. However, such a need should not ignore the scientific evidence regarding “sodium” as the “nutrient” to limit nor should it mandate such a requirement for all countries.

Australia: One option is to encourage food manufacturers to include the amount of salt (i.e. sodium chloride) in their product by including this information in the ingredient list as grams or milligrams of salt per 100 grams of product. For example:

Whole milk, concentrated skim milk, sugar, banana (8%), strawberry (6%), grape (4%), peach (2%), pineapple (2%), gelatine, salt (200mg/100g), culture, thickener (1442).

If the amount of salt is included in the ingredient list then salt added to any ingredient in that list (e.g. muesli) should be included in this amount:

Whole milk, concentrated skim milk, sugar, banana (8%), strawberry (6%), grape (4%), peach (2%), pineapple (2%), muesli, gelatine, salt (250mg/100g), culture, thickener (1442).

An education program to food manufacturers to explain how to calculate the salt content would be required.

An education program to consumers to explain the applicability of this Listing and how to compare products would be required.

A second option could be to include %RDI for sodium as this gives a clearer picture as to the relevance of sodium in the food than does the actual amount. However, this has issues as the reference values and forms of expression for sodium differ around the world.

Switzerland: In our opinion, all the possibilities have been considered.

EU: 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. The guidelines can make it clear that the declaration is in relation to the total sodium content and the conversion factor could be included but it should not be necessary to include the conversion factor on the food labelling itself

New Zealand: No comment

5. PLEASE COMMENT ON ANY ENFORCEMENT ISSUES THAT MAY ARISE WITH EACH OF THE OPTIONS PRESENTED

Costa Rica: In developing countries the ability to perform analysis is very limited. Any option that is implemented requires a consumer education campaign for the correct reading of the label, which will be more expensive as they used terms that are less familiar.

OPTION 1: SODIUM IN NUTRIENT DECLARATION; SALT NOT EXPRESSED ON LABEL

CLITRAVI: The whole sodium content analysis is more difficult and cost intensive and not understood by the average consumer.

Costa Rica: We see no implementation problems.

UK: .No particular enforcement issues arise

ICBA: This option is in line with current enforcement capabilities and should pose the least difficulty in implementation.

USA: Enforceable based on analysis of sodium in foods with appropriate methods.

Australia: Minimal enforcement issues

- Sodium can be analytically determined and potential truth in labelling issues are avoided.
- Nutrient databases and food composition tables support this option as they include sodium values.

Switzerland: Analytics of sodium don't represent any problem.

EU: No particular enforcement issues arise

New Zealand: No significant issues except that labelling often suffers from lack of priority in enforcement generally.

OPTION 2: SODIUM AND SALT (NaCl) (GRAMS) IN NUTRIENT DECLARATION.

CLITRAVI: See option 1

Costa Rica: In terms of verification for the Government is not analytically possible to distinguish sodium from salt and other sources. To achieve this would be necessary to require the industry to design all or part of each meal, which is a sensitive issue for the industrial sector due to the high costs involved and handling of confidential information

UK: It is not possible to differentiate between sodium from sodium chloride and sodium from other sources. Any control would need to be based on indirect methods, such as the measurement of both sodium and chloride. This approach would increase the costs associated with the analysis and controls.

ICBA: This option would necessitate disclosure of proprietary formula information. ICBA does not support this option.

USA: The sodium declaration is enforceable based on analytical methods. It is not clear what methods would be used to analyze only salt in foods.

Australia: Increased enforcement burden

- Requires checking for salt as well as sodium
- Salt (NaCl) would need to be ascertained by recipe for verification purposes as it cannot be determined analytically. However even 'by recipe' will have inaccuracies due to salt not readily apparent in some ingredients
- In some foods (e.g. butter and cheese) the adopted Codex method for determining salt content is by calculation from sodium chloride. Standards for some foods (e.g. cheese) allow for the use of KCl rather than NaCl therefore there is potential conflict between Codex standards with respect to permissions for cheese, versus labelling requirements.

Switzerland: No problem as for the analytic of sodium - the conversion into NaCl records any amount of sodium as salt. NaCl that has been added, will not be recorded.

EU: It is not possible to differentiate between sodium from sodium chloride and sodium from other sources. Any control would need to be based on indirect methods, such as the measurement of both sodium and chloride. This approach would increase the costs associated with the analysis and controls.

New Zealand: Analysing for salt is potentially more difficult than for sodium (measure chloride as can't distinguish between Na from salt and non-salt sources)

OPTION 3: SALT (NaCl) ONLY IN NUTRIENT DECLARATION

CLITRAVI: The salt content is easy to analyse and cheap. The true content can be easily double checked by the formulations. But the amount will differ according to the manufacturing and storage conditions (see point 3, option 1).

Costa Rica: Could not be verified analytically, we can only estimate the value of NaCl.

UK: As option 2.

ICBA: This option would necessitate disclosure of proprietary formula information. ICBA does not support this option.

USA: It is not clear what methods would be used to analyze only salt in foods.

Australia: Increased enforcement burden

- Nutrient databases and food composition tables used for calculating values in the Nutrient Declaration do not support this option as they do not generally include sodium chloride
- Salt (NaCl) would need to be ascertained by recipe for verification purposes as it cannot be determined analytically. Even 'by recipe' will have inaccuracies due to salt not readily apparent in some ingredients
- In some foods (e.g. butter and cheese) the adopted Codex method for determining salt content is by calculation from sodium chloride. Standards for some foods (e.g. cheese) allow for the use of KCl rather than NaCl therefore there is potential conflict between Codex standards with respect to permissions for cheese, versus labelling requirements.

Switzerland: See Option 2

EU: As option 2.

New Zealand: Analysing for salt is potentially more difficult than for sodium (measure chloride as can't distinguish between Na from salt and non-salt sources)

OPTION 4: SODIUM ONLY IN NUTRIENT DECLARATION. SALT (NaCl) ELSEWHERE ON LABEL

CLITRAVI: See option 1

Costa Rica: In terms of verification for the Government is not analytically possible to distinguish sodium from salt and other sources. To do so would be necessary to require the industry to design all or part of every meal.

UK: As option 2.

ICBA: Disclosure of salt elsewhere would necessitate disclosure of proprietary formula information. ICBA does not support this option.

USA: The sodium declaration is enforceable based on analytical methods. It is not clear what methods would be used to analyze only salt in foods.

Australia: Increased enforcement burden

- Requires checking for salt as well as sodium
- Issues as identified above (option 3) for salt

EU: As option 2.

New Zealand: Analysing for salt is potentially more difficult than for sodium (measure chloride as can't distinguish between Na from salt and non-salt sources)

OPTION 5: SALT ONLY IN NUTRIENT DECLARATION. SALT IS SODIUM FROM ALL SOURCES.

CLITRAVI: see point 3 option 5

IDF: Referring to the second sentence in option 5, i.e. 'Salt is sodium from all sources', IDF strongly opposes to the use of conversion factors (used to convert salt to sodium and sodium from all sources to salt) to be included on the label. 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 misrepresenting a food with natural levels of sodium as also containing (added) salt.

Costa Rica: We see no implementation problems, but again the disadvantages identified in the preceding paragraphs.

UK: When the declaration is based on a harmonised conversion factor, as with option 1 there would be no particular issues for the control of this approach.

ICBA: While this option may be feasible from an analytical standpoint, it is technically and scientifically inaccurate. ICBA does not support its consideration.

USA: See comments to Option 3. This approach is based on sodium analysis and a conversion factor. The justification to represent all sodium as salt to consumers is not clear.

Australia: Increased enforcement burden

- Requires instruction and understanding of the concept of salt equivalents and the method of calculating salt from sodium content
- Potential for tension between different legislative requirements (i.e. where 'salt' means different things under different legislations).

EU: When the declaration is based on a harmonised conversion factor, as with option 1 there would be no particular issues for the control of this approach.

New Zealand: No issues

OPTION 6: SODIUM ONLY IN NUTRIENT DECLARATION. SALT ELSEWHERE ON LABEL. SALT IS SODIUM FROM ALL SOURCES

CLITRAVI: see option 5

IDF: Referring to the second sentence in option 6, i.e. 'Salt is sodium from all sources', IDF strongly opposes the use of conversion factors (used to convert salt to sodium and sodium from all sources to salt) to be included on the label. 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 misrepresenting a food with natural levels of sodium as also containing (added) salt.

Costa Rica: We see no implementation problems, but again the disadvantages identified in the preceding paragraphs.

UK: When the declaration is based on a harmonised conversion factor, as with option 1 and 6 there would be no particular issues for the control of this approach.

ICBA: As with option 5, the listing of sodium from all sources as "salt" is technically and scientifically incorrect and is not supported by ICBA.

USA: This approach is based on sodium analysis and a conversion factor. The justification to represent all sodium as salt to consumers is not clear.

Australia: Increased enforcement burden

- Requires checking for salt as well as sodium
- Requires instruction and understanding of the concept of salt equivalents and the method of calculating salt from sodium content
- Potential for tension between different legislative requirements (i.e. where 'salt' means different things under different legislations).

EU: When the declaration is based on a harmonised conversion factor, as with option 1 and 6 there would be no particular issues for the control of this approach.

New Zealand: No issues

GENERAL:

CIAA: It has to be recognised that any additional information, whether voluntary or compulsory, to labels leads to continuous cost for determining the true values to indicate and should therefore be limited to the necessary and useful. In this respect, it is also important to look at the methods for the calculation of salt/or sodium

OTHER POSSIBLE APPROACHES:

CLITRAVI: The aim of salt reduction should lead to develop products that correspond to the accustomed meat products in both their sensorial and tactile properties and not be identified and refused by consumers as products for special nutrition purposes from the outset. This is only achieved by an optimal combination of the possible additives replacing salt and its needs extended research as described above. Additionally at the end of the day consumers must accept all the other additives which shall be mentioned in the list of ingredients

USA: No other suggestions. Support Option 1.

Australia: Refer response to question 4.

FURTHER COMMENTS:**Australia:**

1. Health-related aspects of sodium vs salt

The above discussion on each of the options is predicated on the view that sodium is the key nutrient of concern in respect of health (eg hypertension) rather than NaCl. However the following information from submitter comments is also provided, for your information, to note the different, and emerging, views on this issue.

One submitter has provided data to support the view that sodium from non-salt sources did not affect blood pressure, and that both the sodium and the chloride ions of the salt molecule have a role to play in determining the physiological effect. The references in support of this are provided below.

We also note however, the dates of the references and that since then there have been a number of reviews of the literature which have not stated this position.

With respect to emerging data, the recently released IOM Report on Hypertension has placed almost as much attention on the role of potassium reducing the risk of hypertension as it does on sodium increasing risk. It notes that the long term follow-up of a cohort study found a stronger relationship with urinary Na/K ratio than urinary Na alone. Therefore this suggests a possible role for dietary Na/K ratio. Given this possibility, Na and K need to be expressed in the same units on labels. For example, K in mg, and NaCl in g on the same label could be very confusing and give a false ratio impression.

2. Conversion factor

It is pointed out that using x2.5 for salt from sodium is not the correct conversion factor and that a more accurate approach should be used. This is for your consideration, and the suggestion that whichever way it is done, the approach be explained in the discussion paper.

ANNEX 3: FIRST CONSULTATION PAPER

•Sodium in Nutrient Declaration

•Salt not expressed on label



The image shows a red and yellow package for 'Pure Z Cake Mix'. A magnifying glass is positioned over the 'NUTRITION INFORMATION' section. The package features a photograph of several round cakes on a white plate, and a smaller image of a single cake on a spoon. The text 'Pure Z Cake' is written in a cursive font on the package. Below the nutrition table, there is a block of placeholder text in Latin.

NUTRITION INFORMATION

Servings per pack: 12
Serving size 48g Mix

	MIX	
	Quantity per serve	Quantity per 100g
Energy	884kJ	1820 kJ
Protein	2.3g	4.8g
Fat, Total	6.6g	13.6g
-saturated	2.6g	5.3g
Carbohydrate	34.9g	71.8g
-sugar	22.2g	45.7g
Sodium	185mg	380mg

All values are considered averages unless otherwise indicated

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Option 1

•Both sodium and salt in Nutrient Declaration

•Salt = NaCl only

•Salt expressed in grams



Pure Love
Cake

NUTRITION INFORMATION

Servings per pack: 12
Serving size 48g Mix

	MIX	
	Quantity per serve	Quantity per 100g
Energy	884kJ	1820 kJ
Protein	2.3g	4.8g
Fat, Total	6.6g	13.6g
-saturated	2.6g	5.3g
Carbohydrate	34.9g	71.8g
-sugar	22.2g	45.7g
Sodium	185mg	380mg
Salt *	0.240g	0.500g

All values are considered averages unless otherwise indicated

* Salt = NaCl

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Option 2

•Salt only in Nutrient Declaration

•Salt = NaCl only



Pure Love
Cake

NUTRITION INFORMATION
Servings per pack: 12
Serving size 48g Mix

	MIX	
	Quantity per serve	Quantity per 100g
Energy	884kJ	1820 kJ
Protein	2.3g	4.8g
Fat, Total	6.6g	13.6g
-saturated	2.6g	5.3g
Carbohydrate	34.9g	71.8g
-sugar	22.2g	45.7g
Salt *	0.240g	0.500g

All values are considered averages unless otherwise indicated

* Salt = NaCl

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Option 3

•Sodium only in Nutrient Declaration

•Salt highlighted elsewhere on pack

•Salt = NaCl only



Option 4

•Salt only in Nutrient Declaration

•Salt = sodium from all sources x 2.5



Pure Love
Cake

NUTRITION INFORMATION

Servings per pack: 12
Serving size 48g Mix

	MIX	
	Quantity per serve	Quantity per 100g
Energy	884kJ	1820 kJ
Protein	2.3g	4.8g
Fat, Total	6.6g	13.6g
-saturated	2.6g	5.3g
Carbohydrate	34.9g	71.8g
-sugar	22.2g	45.7g
Salt*	0.463g	0.950g

* Salt = Sodium from all sources x2.5

All values are considered averages unless otherwise indicated

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Option 5

•Sodium only in Nutrient Declaration

•Salt highlighted elsewhere on pack

•Salt = sodium from all sources x 2.5



