

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 11

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD LABELLING

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DISCUSSION PAPER ON CRITERIA FOR THE DEFINITION OF 'HIGH IN' NUTRITIONAL DESCRIPTORS FOR FATS, SUGARS AND SODIUM

(Comments from Canada and Malaysia)

CANADA

DRAFT PROJECT DOCUMENT - DEVELOPMENT OF CLAIMS FOR "HIGH IN" NUTRIENTS OF PUBLIC CONCERN (ADDITION TO THE *GUIDELINES ON THE USE OF NUTRITION AND HEALTH CLAIMS (CAC/GL 23-1997)*)

1. PURPOSE AND SCOPE OF THE NEW WORK

The scope and purpose of the work is develop claims for "high in" levels for nutrients of public health concern globally, specifically sodium (salt), saturated fats, and sugars that would be placed in the *Guidelines on the Use of Nutrition and Health Claims (CAC/GL 23-1997)* (Guidelines).

2. RELEVANCE AND TIMELINESS

The proposal relates to the development of claims for "high in" specifically for nutrients that may be contributing directly or indirectly to non-communicable chronic diseases such as cardiovascular diseases, diabetes and some types of cancers. Currently, the Guidelines outline conditions that are defining "Free" or "Low" for various nutrient components that consumers are generally recommended to limit, including sodium, saturated fats and sugars; and conditions for defining "Source" or "High" for various nutrients that consumers are usually advised to consume more of, such as dietary fibre, vitamins and minerals, and protein. This work could contribute to having a uniform approach with defining what a "high" level would be for nutrient of public health concern, and could inform other work such as the guidance on front-of-pack nutrition labelling or potential work by the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) on nutrient profiling.

3. MAIN ASPECTS TO BE COVERED

The proposal is to develop specific "high" claims on components including sodium (salt), saturated fats, and sugars to be added to the Table of conditions for nutrient content claims that appears in the *Guidelines on the Use of Nutrition and Health Claims*. While CCFL will seek to set out claims for "high" claims, CCNFSDU would be responsible for determining the conditions that would specify the levels of nutrients present in a food to qualify for the claim.

4. ASSESSMENT AGAINST THE CRITERIA FOR THE ESTABLISHMENT OF NEW WORK PRIORITIES

General criterion

Criteria applicable to general subjects

(a) *Diversification of national legislations and apparent resultant or potential impediments to international trade*

Countries have established different values for what is considered a "High" level of nutrients of public health concern presumably using different considerations. This contrasts somewhat with other nutrients like vitamins and minerals which appear to be set in a more uniform method.

b) *Scope of work and establishment of priorities between the various sections of the work.*

Conduct an update to the Guidelines on the Use of Nutrition and Health Claims to add sodium, saturated fats, and sugars to the existing list of nutrient content claims and establish conditions of “more than” for the claims. This will require CCFNSDU to support this work through the development of the conditions.

(c) *Work already undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies)*

Work has been undertaken at the WHO to review the various nutrient profiling approaches used globally, but the report has not yet been made public. This work may be able to help inform the levels determined.

(d) *Amenability of the subject of the proposal to standardization*

Many countries are looking to Codex for clear and unambiguous guidance on matters related to nutrition and health-related labelling. The current *Guidelines in the Use of Nutrition and Health Claims* already have a list of claims and conditions for “Low”, “Free”, “High” and “Source” levels of various nutrient. The purpose of the new work proposal is to add sodium, saturated fats and sugars to the “High” claims and establish related conditions to the existing table in the *Guidelines in the Use of Nutrition and Health Claims*. This work will assist countries by using consistent nutrient criteria to underpin their front-of-pack nutrition labelling approaches.

(e) *Consideration of the global magnitude of the problem or issue*

Front of pack nutrition information is a topic of interest in a number of countries around the World. Voluntary and mandatory systems are in place in a number of countries. In addition, at a global level, this is a topic of discussion at the WHO. There is also work underway to do a stocktake of nutrient profiling systems underway at CCFNSDU and WHO has undertaken work as well on nutrient profiling. Having a consistent manner to setting conditions for “high” levels of nutrients of public health concern will help promote harmonization. Promoting healthier diets for consumers and encouraging manufacturers to improve the healthfulness of the food supply are areas where strong guidance could have a significant impact globally.

5. RELEVANCE TO CODEX STRATEGIC OBJECTIVES

The proposed work is in line with the Commission’s mandate for the development of international standards, guidelines and other recommendations for protecting the health of consumers and ensuring fair practices in food trade. The new work proposal will contribute to advancing Strategic Goals 1 and 3 as described below.

Strategic Goal 1: Establish international food standards that address current and emerging food issues

A number of countries have proceeded with developing and implementing front-of-pack nutrition labelling systems that use nutrient based conditions of “high” and/or “low” levels of various nutrients. Some are more direct in the use of “High” statements or (red) colour as part of the front-of-pack system, while others use the conditions, as part of an algorithm or behind the scenes, for summary approaches. The CCFL is currently working on Guidance on front-of-pack nutrition labelling, and this work could help inform countries’ work in this area and increase harmonization amongst the underlying conditions for the systems.

Strategic Goal 3: Facilitate the effective participation of all Codex members

Bringing this topic to CCFL will enable all members who have an interest in using “high” claims or the actual conditions for the claim for other purposes to participate in discussions.

6. RELATION BETWEEN THE PROPOSAL AND OTHER EXISTING CODEX DOCUMENTS

The proposal is to review the *Guidelines on the Use of Nutrition and Health Claims (GAC/GL-1997)* and these guidelines are applicable horizontally across all prepackaged foods.

7. REQUIREMENT FOR AND AVAILABILITY OF EXPERT SCIENTIFIC ADVICE

This work will require input from CCFNSDU in order to set the conditions for the claims.

8. NEED FOR TECHNICAL INPUT TO THE STANDARD FROM EXTERNAL BODIES

None identified

9. PROPOSED TIMELINE:

If approved by the Commission in 2019, the work is expected to take the Committee at least three sessions to complete, as work will need to be referred to CCNFSDU.

MALAYSIA

Malaysia is of the opinion that there are major concerns and issues in developing harmonised criteria for establishing “high in” nutritional descriptors for fats, sugars and sodium as proposed in the discussion paper.

Firstly, the term “high in” is more commonly used for nutrients that play an important role in improving general health e.g. vitamins and minerals. Hence, by having “high in” terms to reflect a negative impact to health would be confusing and misleading to consumers.

In addition, it has already been noted in the discussion paper that there would be technical complexity in the implementation and standardization of the ‘high-in’ labelling criteria due to the dissimilarities in the food categories in terms of its natural form, composition of food, techniques for food processing and their physical properties. These dissimilarities may impose different risk factors and health impact to myriad population groups. Furthermore dietary patterns and requirements as well as lifestyle vary across different ethnicity and geographical boundaries.

Classification of the proposed nutrients to be considered for ‘high-in’ labelling is imprecise and would lead to further complexity for harmonization. Fats and sugars for instance encompass various types and sources which could exhibit different health impacts. Moreover there is increasing evidence over the recent years to show that there is no association of saturated fats to all-cause mortality including cardiovascular disease, coronary heart disease and ischemic stroke. Therefore such labelling would unnecessarily confuse, arouse and exploit fear among consumers.

To add to the complexity of the proposed labelling of ‘high-in’, Malaysia regards that specific attention towards any single nutrient as opposed to the whole food intake and consumption pattern, does not correctly address the public health concerns. Consumer should be empower to know their food and opting for balanced, adequate and varied diet.

Hence, Malaysia strongly feels that it is unmerited to establish negative ‘high-in’ labelling criteria as proposed in the discussion paper.