

CODEx ALIMENTARIUS COMMISSION



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Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 12

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD LABELLING

Forty-sixth Session

Virtual

27 September - October 1 and 7, 2021

Comments from FEDIOL, IMACE

Future work and direction of CCFL (discussion paper)
CX/FL 21/46/12

Comments from FEDIOL

FEDIOL is the European federation representing the interests of the European vegetable oil and protein meal industry. Directly and indirectly, FEDIOL covers about 150 processing sites that crush oilseeds and/or refine crude vegetable oils. These plants belong to around 35 companies. It is estimated that over 80% of the EU crushing and refining activity is covered by the FEDIOL membership structure.

FEDIOL, as an observer to the Codex Alimentarius, would like to submit the following comments on the discussion paper on future work and direction of CCFL (CX/FL 21/46/12).

General comments

FEDIOL welcomes the overview of proposed work and direction of CCFL as provided. For this note, FEDIOL would like to focus its comments on *trans* fatty acids (TFAs).

TFA in foods, as defined by Annex I point 4 of EU Regulation 1169/2011, originate from three main sources and can be of animal or vegetable origin, as highlighted by the European Food Safety Authority (EFSA).

FEDIOL already provided comments on the previous proposals put forward by Canada in the Codex Committee on nutrition and foods for special dietary uses (CCNFSDU) in November 2014, December 2016 and July 2018.

The discussion paper at stake suggests to:

- 1) Amend the Guidelines on Nutrition Labelling (CXG 2-1985) to require the declaration of the amount of TFA where nutrient declaration is required.
- 2) Amend the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) to add a requirement that partially hydrogenated and fully hydrogenated oils be declared by their specific names (similar to Section 4.2.3.2 regarding pork fat, lard and beef fat) and to define these terms.

FEDIOL would like to recall that in the forty-first meeting of the CCNFSDU held on 24-29 November 2019, the committee examined 7 options ranging from A to G. As highlighted in the report of such meeting, options A (voluntary limits for TFA levels in processed foods), B (Adopt regulations that limit TFA levels in processed food) or C (Adopt regulations that prohibit the use of partially hydrogenated oil (PHO) in processed foods) were those which were the most supported by members. It was further pointed out that at EU level, *“one Member Organization pointed out that following an in-depth impact assessment in 2018, it was concluded that a legal limit for the presence of industrially manufactured TFA in food performed best and a 2% maximum limit in this regard had*

been established subsequently. (...) Option E (i.e. adopting regulations related to the mandatory declaration of TFA on labels of prepackaged processed foods) was neither cost-effective nor efficient since foods in bakeries and street food which might contain high TFA contents would not normally be labelled.”

As also recalled by another member at the same meeting, *implementing option E (i.e. amending the Guidelines on Nutrition Labelling (CXG 2-1985)) has already been considered by the CCFL, and the declaration of trans fatty acids in nutrition labelling had already been included in footnote 6 of the Guidelines on Nutrition Labelling (CXG 2-1985).*

In the context of TFA, many studies have proved that increasing the complexity of nutrition labels is not the way forward to enhance healthy diets across countries and across various population subgroups¹. Setting mandatory TFA labelling is also not supported by consumers in Europe² and was not the approach implemented by EU authorities³.

Along comments made by Codex members, FEDIOL further concurs that declaring the amount of TFA on food labelling is not the way forward. In the same way, combining it with the obligation to label partially and fully hydrogenated vegetable oils/fats on the food labelling will not reach the desired objective of protecting consumers' health as it will rely extensively on consumers' ability to read and to understand detailed nutritional labelling concepts. As already assessed in great detail by the European Commission, this approach will not address food which is unlabelled. FEDIOL also considers that it will ultimately depend on consumers' ability or not to assess the label and is not supported by consumers⁴.

Instead, FEDIOL considers that if there is a desire to further address TFA, it would be better to set maximum levels on *trans* fatty acids. Such approach was supported by FEDIOL since 2014. It will undoubtedly provide incentives to reformulate food products, address hotspots and build on industry reformulation work.

FEDIOL remains available in providing input into the next steps of the process.

Comments from IMACE

IMACE is the European Margarine Producers Association representing the interests of the margarine and spread industry. IMACE members encompass both national associations and corporations.

IMACE, as an observer to the Codex Alimentarius, would like to submit the following comments on the discussion paper.

General comments

IMACE welcomes the overview of proposed work and direction of CCFL as provided. For this note, IMACE would like to focus its comments on *trans* fatty acids (TFAs). IMACE already provided comments on the previous proposals put forward by Canada in the Codex Committee on nutrition and foods for special dietary uses (CCNFSDU) in November 2019.

The European margarine and spread industry stands for a high-level of protection for consumers' health.

We have made significant progress on elimination of TFA from our products through reformulation and improved processes, and we continue to monitor TFA levels closely. Thanks to the successful voluntary reformulation efforts from the vegetable oil and fat sector, the intake of industrial TFA is below the limits of public health concern in the majority of EU Member States.

Specific Comments on the “Proposal For New Work on Trans Fatty Acids”

¹ See for example Downs S. *et al.*, the effectiveness of policies for reducing dietary *trans* fat: a systematic review of the evidence, Bulletin of the World Health Organization 2013.

² The consumer case for EU legal restrictions on the use of artificial *trans*-fats in food, BEUC Position Paper February 2014

³ Commission report regarding *trans* fats in foods and in the overall diet of the Union population COM (2015) 619 final, December 2015; European Parliament resolution of 26 October 2016 on trans fats (TFAs) (2016/2637(RSP)).

⁴ Ibidem footnotes 1 and 2.

1) Relevance and timelines

IMACE is fully supportive of the WHO stance that

- A. “any reduction in TFA may help decrease CHD risk” and
- B. “TFA intake from all sources should be limited to less than 1% total energy”

The impact of trans fatty acids on public health was established many years ago and is well understood (Willett, Stampfer, Colditz, Spiezer, & Rosner, 1993) (Stender, Dyerberg, Hølmer, Ovesen, & Sandström, 1995). Several high-quality reviews, including (Mozaffarian, Aro, & Willett, 2009) (Brouwer, 2016) have clearly shown that elevated consumption of trans-fatty acids increases risk of CVD morbidity. It is also well-known that trans-fats may occur in foods derived from ruminant animals, and industrial sources. So far research has not demonstrated that origin of TFA has a meaningful effect on health impact. There is no demonstrable difference in health impact between trans-fat from ruminant- or industrial-origin based on equal intake levels (SACN, 2007) (Laake, et al., 2012) (Brouwer, Wanders, & Katan, 2015) (Stender S. , 2015) (Brouwer, 2016) (EFSA, 2018) and hence intake guidance should not discriminate by source. Expert opinion has long agreed that total intake TFA should be limited to <1% daily energy intake, e.g. (WHO/FAO, 2002) and this is reaffirmed by more recent advice from WHO (NUGAG, 2020).

A recent systematic review of trans fat intakes (Wanders, Zock, & Brouwer, 2017) found that in 22 out of 29 countries studied, intake from ruminant sources was higher than industrial sources, and intake from industrial sources has reduced progressively over the last twenty years. From this we can conclude that manufacturers have heeded calls to eliminate industrial source trans fatty acids, but otherwise consumer habits regarding consumption of sources of ruminant trans fatty acids are not changing. This is not compatible with the goal of reducing trans-fat intake levels to ‘as low as possible’.

It has been reported that while average intake has declined, millions of consumers still consume trans-fats at levels that significantly increase their risk for CHD (WHO Regional Office for Europe, 2015). Other studies have suggested that in some countries, population-average, total TFA intake is meeting the recommended 1% maximum daily intake level, but some sub-groups within populations are exceeding the recommended intake level, suggesting that diet and food choices have a significant role to play in addition to food composition (Stender, Astrup, & Dyerberg, 2012). We have shown in Appendix 1, that even when consuming only foods that meet regulatory limits on industrial trans fats, some dietary patterns can still feature significant trans-fat intake.

From this it can only be concluded that the intake of both sources of TFA, being ruminant or non-ruminant, should be addressed equally. This is further supported by WHO’s guidance in their “REPLACE Trans Fat” action package: Module 3 – “Legislate or Regulate” (WHO, 2020). This document contains the following excerpt (page 11 – emphasis added separately):

Key elements of an effective TFA restriction include the following.

- *Mandatory nutrition labelling requirement: **An effective label should include a consistent and understandable statement of the amount of TFA in line with Codex Alimentarius (Codex) guidelines – that is, immediately following the declaration of the total fat, an amount expressed as grams per 100 grams or per 100 millilitres or per package. See Annex 2 for a sample annotated label.***
- *Definition of the restricted substance: “Trans-fatty acids (TFA)” must be defined in a clear and scientifically sound manner. WHO defines TFA as all fatty acids with a double bond in the trans configuration, **regardless of whether they are produced industrially or come from ruminant sources, including conjugated linoleic acid.***
- *Specific threshold limits for industrially produced TFA in oils and fats in all foods: 2g of industrially produced TFA or less per 100 g of total fat in all foods is recommended.*

As such, the recommended measures proposed by WHO address both industrial and ruminant sources of TFA, and WHO condones mandatory nutrition labelling measures for all TFAs – both industrial and ruminant.

2) ASSESSMENT AGAINST THE CRITERIA FOR THE ESTABLISHMENT OF NEW WORK PRIORITIE

General Criterion. Consumer protection from the point of view of health, food safety, ensuring fair practices in the food trade and taking into account the identified needs off developing countries.

Labelling is a useful tool towards educating and informing consumers about food and nutrition. The amendments proposed by Canada fully rely on information to the consumer. Consumer protection through labelling is best served by providing clear and concise information independent of consumer knowledge. The mandatory labelling of Fully and Partially hydrogenated oils is at best indirect information to the consumer which requires additional knowledge by the consumer about the relationship between hydrogenation of oils and TFA which may be insufficient in many countries.

We would like to remind the committee that:

- 1) Fully hydrogenated vegetable oils do not contain trans fats, and are therefore irrelevant to this proposal.
- 2) The mandatory labelling of hydrogenated oils (fully and/or partially) was implemented by several countries as a measure to address the non-ruminant TFA intake (e.g. in the EU) because no consensus could be reached on mandatory quantitative TFA declaration (from all sources) on-pack in the nutrition table. In line with WHO's above recommendations, mandatory quantitative TFA declaration should cover all sources of TFA.
- 3) The ban on PHVO in many countries (like US and Canada) already means that only FHVO will appear in ingredient declaration. As a result, the labelling of PHVO will not occur and thus the most important information to the consumer about the presence of partially hydrogenated oils which are the actual source of TFA will not be communicated effectively to the consumer.

The current proposal clearly demonstrates that the mandatory labelling of PHVO and FHVO alone did not achieve the target to reduce intakes of all TFA. Hence other measures are required to reduce intakes of TFA from all sources.

To ensure fair practices in trade all sources of TFA should be treated equally and therefore the labelling of PHVO/FHVO is insufficient to address total intakes of TFA from all sources as recommended by the WHO. The most cost-effective way to draw consumers' attention as to the presence of all sources of TFA and their association with heart diseases and type 2 diabetes via the nutrition declaration.

- 3) a) Diversification of national legislations and apparent resultant or potential impediments to international trade.

Many countries have already implemented labelling of PHVO. However, in the majority of the countries a clear definition of FHVO and PHVO is absent. On the other hand a clear international accepted definition for TFA that is adopted in most countries does exist (CODEX).

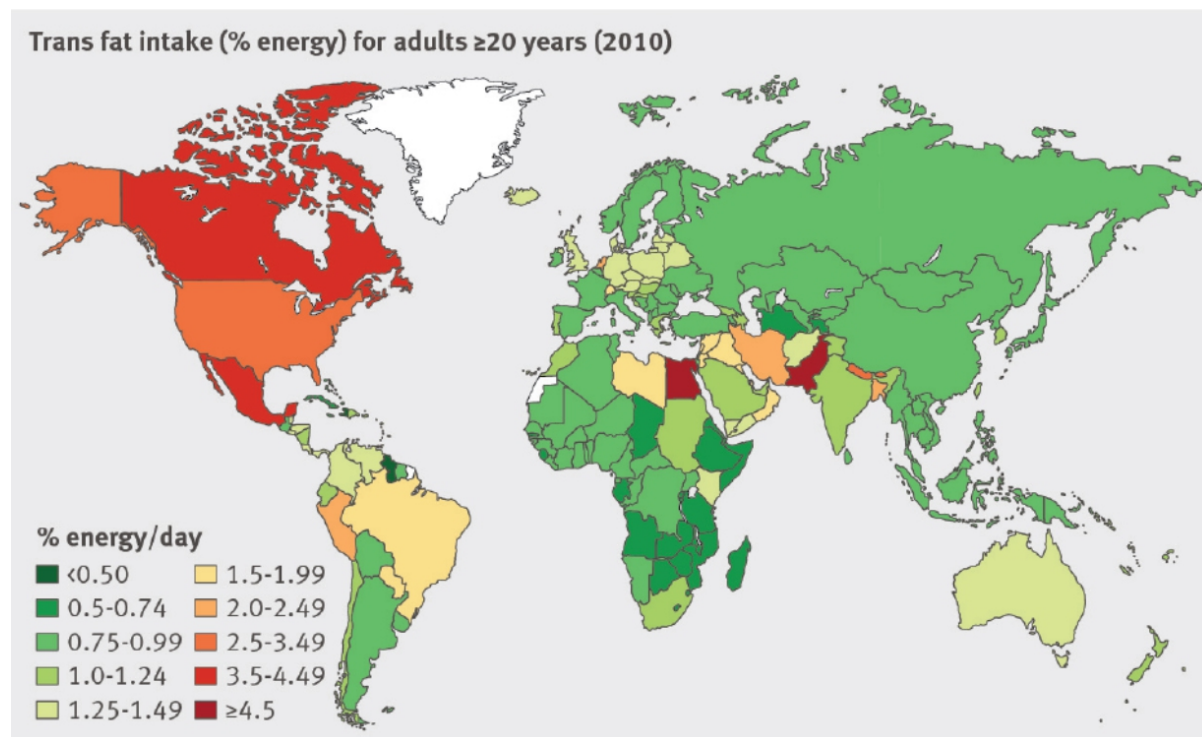
It should be borne in mind that an exemption to labelling the amount of trans fat in single-ingredient foods, especially those of animal origin that contain significant levels of trans fats would cause a distortion of the competitive environment, and potentially mislead consumers when they see trans fat labelled on some products, but not at all on others, they may incorrectly assume that the unlabelled products contain no trans fat. Therefore the requirement for quantitative labelling of trans fat content should apply to all pre-packaged foods in a market.

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

The WHO REPLACE action plan aims to eliminate use of partially hydrogenated oils and also recommends labelling policies covering both industrial and ruminant sources of TFA. The elimination of partially hydrogenated oils will result in that only FHVO will appear in ingredient declarations and addresses only one source of TFA instead of all sources. Thus, the proposal to label and differentiate fully- and partially-hydrogenated vegetable oils is in fact redundant. Quantitative labelling trans fat content (all sources, all foods) is a simpler and clearer way to communicate the presence of trans fats in foods.

5) e) Consideration of the global magnitude of the problem:

In many countries, the population average intake of total trans-fat exceeds, or is marginally below the 1% energy recommendation (Micha, et al., 2014). As this is an average, some individuals will exceed the recommended maximum intake.



Wanders et al. (Wanders, Zock, & Brouwer, 2017) found that daily TFA intakes varied between 0.3% to 4.2% energy intake in the 29 countries studied, and 7 exceeded the 1%en recommendation in their 2017 systematic review. Furthermore, intake of TFA from animal sources was found to be greater than from industrial sources.

6) 7. Requirement for availability of expert scientific advice.

The discussion document proposed that CCNFSDU should be asked to propose definitions for PHVO and FHVO. However, in our view CCFO as the experts on standards for oils and fats would be more appropriate. As explained earlier, we question the relevance of this considering that the definitions are of little value and that consumers will be better served by provision of quantitative data on levels of trans fat present in the food.

In conclusion.

IMACE welcomes the proposal to amend the Guidelines on Nutrition Labelling (CXG 2-1985) to require quantitative declaration of the amount of TFA from all sources (per 100 gram). Information on the amounts of TFA in the food should be, as per the existing Guidelines on Nutrition Labelling (CXG 2-1985), expressed in g per 100 g or per 100 ml.

IMACE does not support amendment of the General Standard for the Labelling of Prepackaged Foods (CXS 1-1985) to add a requirement that partially hydrogenated and fully hydrogenated oils be declared by their specific names. As explained, in light of other measures in force and proposed, this is redundant.

Many consumers worldwide are unfamiliar with the concepts of partial or full hydrogenation. Most consumers ignore the link between hydrogenation, trans fats and health impacts. In addition, this proposal only addresses

again only one source of TFA intake. Therefore, requirements for PHVO and FHVO labelling as ingredients would not contribute to the reduction of total TFA intake (i.e. both ruminant and non-ruminant), in addition to the elimination of partially hydrogenated oils.

Consumer choice is a powerful driver for industry to change practices. Using labelling to educate them about the impact of trans fats on health would empower them and further provide incentives for industry to reformulate. It also aligns with WHO's guidance. IMACE believes that any endeavour to regulate and reduce the total TFA content of all foods should directly target the nutrient of concern i.e. trans fatty acids.

IMACE remains available in providing input into the next steps of the process.

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APPENDIX I

Illustrative Daily Intakes

The tables below show predicted trans-fat intake based on three different, illustrative daily menus. The menus are only intended to show the potential range in TFA intakes resulting from different dietary choices. All items selected in these menus meet the limit of 2g industrial TFA per 100g Fat, and limitations on use of partially-hydrogenated vegetable oil implemented by regulation in several countries.

- *Food composition data is taken from the United Kingdom Composition of Foods Integrated Dataset (CoFID) (Public Health England, 2020).*
- *The number appearing in parentheses after the food name is the 'Food code', used to identify the relevant entry in the database.*
- *Trans fat content and energy content (KCal) is taken from table 1.3 (Proximates) "FODTRANS", "KCALs".*
- *Portion data is taken from product information provided by a European retailer*
- *Total trans-fat is the sum of the trans-fat content for the indicated portions.*
- *% energy from trans-fat is calculated⁵ as: $\frac{\text{total trans fat (g)} \times 9}{\text{total energy (KCal)}} \times 100$*

These illustrations show that even when comprising only foods that individually meet limits on industrial trans-fat, total daily intake can significantly exceed the recommended 1%en limit.

MENU "A"	Kcal per 100g	Total TFA g per 100g	Portion size (g) or (ml)	Total TFA per portion	Kcal per portion
Breakfast					
Orange juice (14-329)	36	0,00	200	n/a	72
Black coffee (17-833)	2	0,00	150	n/a	3
Croissant (11-988)	373	0,77	90	0,69	336
Butter (17-685)	744	2,87	10	0,29	74
Jam (17-688)	261	0,00	10	n/a	26
Low-fat yoghurt (12-379)	57	0,02	150	0,03	86
Lunch					
Bread roll (white) (11-1006)	254	0,00	50	n/a	127
Cheddar cheese (12-346)	416	1,44	25	0,36	104
Butter (17-685)	744	2,87	10	0,29	74
Bread roll (white) (11-1006)	254	0,00	50	n/a	127
Ham (19-021)	204	0,03	20	0,01	41
Butter (17-685)	744	2,87	10	0,29	74
Whole milk (12-596)	63	0,13	200	0,26	126
Dinner					
Beef steak (18-073)	257	0,50	140	0,70	360
Broccoli (13-583)	28	0,00	200	n/a	56
Potatoes (13-621)	52	0,00	125	n/a	65
Tiramisu (12-476)	244	1,03	150	1,55	366

Total trans fat (g)	4,43
Total Energy (KCal)	2117
TFA Intake %en	1,9%

⁵ CAC/GL 2-1985 3.3.1 Calculation of energy

MENU "B"	Kcal per 100g	Total TFA g per 100g	Portion size (g) or (ml)	Total TFA per portion	Kcal per portion
Breakfast					
Toast (11-1136)	266	0,03	35	0,01	93
Butter (17-685)	744	2,87	10	0,29	74
Scrambled eggs (12-963)	152	0,01	122	0,01	185
Bacon (19-498)	295	0,10	30	0,03	89
Sausage (beef) (19-489)	265	0,53	75	0,40	199
Tea with (whole) milk (17-168)	8	0,13	150	0,20	12
Lunch					
Bread 2 slices (white) (11-1145)	236	0,02	70	0,01	165
Cheddar cheese (12-346)	416	1,44	25	0,36	104
Pickles (17-718)	111	0,00	25	n/a	28
Butter (17-685)	744	2,87	10	0,29	74
Dinner					
Lamb curry (vindaloo) (19-599)	199	0,83	500	4,15	995
Cheesecake (12-562)	325	0,67	125	0,84	406
Single cream (12-332)	193	0,68	10	0,07	19

Total trans fat (g)	6,65
Total Energy (KCal)	2444
TFA Intake %en	2,4%

MENU "C"	Kcal per 100g	Total TFA g per 100g	Portion size (g) or (ml)	Total TFA per portion	Kcal per portion
Breakfast					
Muesli (11-939)	450	0,01	40	0,00	180
Soya-yogurt (12-529)	72	0,00	150	<i>n/a</i>	108
Blueberries (14-325)	40	0,00	21	<i>n/a</i>	8
Honey (17-050)	288	0,00	10	<i>n/a</i>	29
Orange juice (14-329)	36	0,00	200	<i>n/a</i>	72
Black tea (17-167)	0	0,00	150	<i>n/a</i>	0
Toast 2 slices (11-1136)	266	0,03	70	0,02	186
Reduced fat spread (12-503)	533	0,13	20	0,03	107
Snack					
Pear (14-361)	37	0,00	178	<i>n/a</i>	66
Lunch					
Avocado (14-386)	171	0,00	68	<i>n/a</i>	116
Toast 2 slices (11-1136)	266	0,03	70	0,02	186
Reduced fat spread (12-503)	533	0,13	20	0,03	107
Poached egg (12-943)	149	0,02	50	0,01	75
Snack					
2 Crackers (11-1134)	421	0,02	20	0,00	84
Lower-fat cheese (12-549)	190	0,31	28	0,09	53
Dinner					
Brown rice (11-867)	131	0,00	250	<i>n/a</i>	328
Chicken, roasted (18-331)	177	0,10	85	0,09	150
Chilli sauce (17-719)	40	0,00	10	<i>n/a</i>	4
Lime juice (14-279)	9	0,00	10	<i>n/a</i>	1
Mushrooms (13-506)	9	0,00	100	<i>n/a</i>	9
Spinach (13-573)	19	0,00	100	<i>n/a</i>	19
Apple (14-319)	51	0,00	100	<i>n/a</i>	51

Total trans fat (g)	0,28
Total Energy (KCal)	1939
TFA Intake %en	0,1%