

CODEX ALIMENTARIUS COMMISSION

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



**World Health
Organization**

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Agenda Item 4

CX/FL 13/41/4-Add.1

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING

Forty-First Session

Charlottetown, Prince Edward Island, Canada, 14 - 17 May 2013

**Proposed Draft Revision of the Guidelines on Nutrition
And Health Claims (CAC/GL 23-1997) Concerning Non-Addition of Sodium Salts**

COMMENTS AT STEP 6

COMMENTS FROM:

**EUROPEAN UNION
PHILIPPINES**

EUROPEAN UNION

The European Union (EU) has the following comments on the proposed draft section 7.2 of the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997): Non –Addition of Sodium Salts.

The EU supports the proposed new nutrition claim 'no added sodium/salt' and its conditions of use. The EU agrees with the insertion of the proposed paragraph 7.2.

The EU would like to propose the replacement of the words '*national authorities*' by '*competent authorities*' in line with other Codex texts.

PHILIPPINES

Provision	Philippines Position
7.2 Non-addition of Sodium Salts Claims regarding the non-addition of sodium salts to a food, including “no added salt”, may be made provided the following conditions are met	The Philippines supports this provision as this indicates and reflects the purpose of the guideline, as a nutrient content claim rather than merely an ingredient claim.
a. The food contains no added sodium salts (Examples: sodium chloride, sodium tripolyphosphate, etc.); and	The Philippines supports provision “a” and “b” as this is consistent with the aim of creating truthful and non-misleading claims, and specifically clears out that the nutrient of public health concern is ‘sodium’ which can be found in a number of ingredients, including but not limited to sodium chloride. However, It is suggested to change the word “contains” to “has” as the word <i>contain/s</i> is redundant in the sentence.
b. The food has contains no ingredients that contain added sodium salts (Examples: Worcestershire sauce, pickles, pepperoni, soya sauce,)etc. and	
C, The food contains no ingredients that contain sodium salts that are used to substitute for added salt (Examples: seaweed, depending on how it is used)	The Philippines does not support this provision. Our interpretation for provision(c) is that the food contains no added sodium salts as ingredients used as “salt” for its sensory properties which is difficult to implement and also there are no other examples that can be cited. In addition, since most of the ingredients that are used to substitute for salt are already covered by item “b”, the Philippines proposed to delete this provision. Thus, it is suggested that the word “AND” be inserted after the semi-colon in provision (a).

<p>“National authorities may permit the addition for technological purposes use of sodium salts other than sodium chloride for technological purposes (e.g. processing aid), where such use addition would not result in the food not meeting the conditions “low in sodium” claims as described in the Table to these Guidelines.”</p>	<p>The Philippines supports a provision that provides flexibility to national authorities. However, in this case we would like first to seek clarification and specific examples for “technological purposes” of sodium salt.</p> <p>In addition, we suggest to change the word “addition” to “use” as “addition” in this text appears contrary to the claim “Non-addition of Sodium Salts” and “no added salt” as follows:</p> <p>“National authorities may permit the addition for technological purposes use of sodium salts other than sodium chloride for technological purposes (e.g. processing aid), where such use addition would not result in the food not-meeting the conditions “low in sodium” claims as described in the Table to these Guidelines.”</p>
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