

CODEX ALIMENTARIUS COMMISSION

E



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



**World Health
Organization**

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4

CX/FL 13/41/4-Add.2

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:

EGYPT
INDIA
KENYA
MALAYSIA
URUGUAY

EGYPT

As regards the document No.(CX/FL 13/41/4) concerning the Proposed Draft Revision of the Guidelines on Nutrition and Health Claims (CAC/GL 23-1997) Concerning Non-Addition of Sodium Salts, Egypt proposes to amend the paragraph 7.2 as follows :

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.

- (a) The food contains no added sodium salts (Examples: sodium chloride, sodium tripolyphosphate **sodium benzoate, sodium carbonate, sodium nitrate,...** etc.);
- (b) The food 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).

In addition, Egypt proposes to omit the last paragraph marked with the foot note.

INDIA

7.2 Non-Addition of Sodium Salts

The text should be modified as under:

Claims regarding the non-addition of sodium salts to a food, including “no added salt”, may be made provided the following conditions are met*:

- (a) The food contains no added sodium salts (Examples: sodium chloride, sodium tripolyphosphate, etc.);
- (b) The food 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~~).

Rationale: To have more clarity in implementation of the section.

*National authorities may permit the addition for technological purposes of sodium salts other than sodium chloride where such addition would not result in the food not meeting the conditions for “low in sodium” claims as described in the Table to these *Guidelines*.

The footnote should be modified as below:

“For the purposes of claims regarding the non-addition of sodium salts, National authorities may allow the addition for technological purposes of sodium salts where the final food meets the conditions for “low in sodium” claims as described in the Table to these *Guidelines*”.

Rationale: India supports the proposal of Australia in rewording the footnote to have a clearer meaning and the intent should be clearly understood.

KENYA

Kenya 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.

Insert a new section 7.2 as follows:

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.*

- (a) The food contains no added sodium salts (Examples: sodium chloride, sodium tripolyphosphate, etc.);
- (b) The food 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).

*National authorities may permit the addition for technological purposes of sodium salts other than sodium chloride where such addition would not result in the food not meeting the conditions for “**low in sodium**” claims as described in the Table to these *Guidelines*.

Comment:

We support the addition of 7.2 Non-Addition of Sodium Salts clauses

Justification

This is in line with the thresh hold of 0.12/100g given in_CAC/GL 23-1997

MALAYSIA

Malaysia appreciates the opportunity to provide comments on the Draft Section 7.2 of the Guidelines for Use of Nutrition and Health Claims: Non-Addition Claims for Sodium Salts.

In general, Malaysia supports the inclusion of a new Section 7.2 on non-addition claims for sodium salts as proposed by the 40th CCFL. Malaysia is of the view that the conditions outlined in the section as well as the footnote are consistent with the intent of the WHO to limit the consumption of salt/sodium from all sources without being too restrictive to the industry to formulate products using sodium salts other than sodium chloride for technological purposes that could carry this claim.

In addition, Malaysia would like to offer specific comments as follows:

i) Conditions (a), (b) and (c)

Malaysia proposes to delete the word “examples” and replace with the words “including but not limited to”. Malaysia also proposes to delete the word “etc” at the end of conditions (a) and (b) as well as the words “depending on how it is used” in condition (c).

The proposed amendments would be as follows:

- a) The food contains no added sodium salts including but not limited to sodium chloride and sodium tripolyphosphate;

- b) The food contains no ingredients that contain added sodium salts including but not limited to Worcestershire sauce, pickles, pepperoni and soya sauce; and
- c) The food contains no ingredients that contain sodium salts that are used to substitute for added salt including but not limited to seaweed.

ii) Footnote

Malaysia proposes to amend the footnote as follows for clarity:

“National ~~A~~ authorities may permit the addition ~~for technological purposes~~ of sodium salts other than sodium chloride for technological purposes where such addition would not result in the food not complying with ~~meeting~~ the conditions for “low in sodium” claims as described in the Table to these Guidelines.

URUGUAY

Uruguay is grateful for the opportunity of presenting its comments to the CL 2012/21-FL and requests that this document be distributed as a “conference room document” CRD during the 41st session of the CCFL

Uruguay supports the insertion of a new section 7.2 with the proposed text.

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.*

- a) The food contains no added sodium salts (Examples: sodium chloride, sodium tripolyphosphate, etc.);
- (b) The food 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).

*National authorities may permit the addition for technological purposes of sodium salts other than sodium chloride where such addition would not result in the food not meeting the conditions for “low in sodium” claims as described in the Table to these Guidelines.

Additional conditions and/or disclaimer statements may be used with non-addition claims to assist consumer understanding of the claims within countries. Disclaimer statements should appear in close proximity to, on the same side and in the same prominence as the claims. These may be developed based on evidence of consumer use and understanding