

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

E

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 NO. 4

CX/FL 13/41/4

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

Forty-first Session

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

AUSTRALIA
BRAZIL
CANADA
COSTA RICA
IRAN
JAPAN
NEW ZEALAND
PERU
UNITED-STATES OF AMERICA
URUGUAY
ITF

AUSTRALIA

Australia would like to submit the following comments in response to **Circular Letter 2012/21-FL – Request for Comments at Step 6 on the draft section 7.2 of the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997): Non-Addition of Sodium Salts**

Parts (a) and (b)

The text for parts (a) and (b) of section 7.2 of the Guidelines is supported as drafted, including the use of the term 'sodium salts'.

Part (c)

It is proposed that the part (c) is deleted in its entirety. However, if part (c) is to be retained, it is proposed that the text 'depending on how it is used' be deleted so that the paragraph would read "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: We have particular concerns that the text 'depending on how it is used' would be open to inconsistent interpretation and may create enforcement issues. Adding an ingredient such as seaweed could have multiple functions in a food, which could be difficult to separate. It is also unclear whether there are other examples of ingredients that would provide significant amounts of sodium and not otherwise be addressed by part (b).

Footnote

It is proposed that the footnote text is redrafted to clarify the intent and incorporate some grammatical changes so that it would read "**For the purposes of claims regarding the non-addition of sodium salts**, ~~N~~ational authorities may permit the addition for technological purposes of sodium salts ~~other than sodium chloride~~ where **the final food meets** ~~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*".

Rationale: given the intent of the Guideline to decrease sodium intake for public health reasons, and that sodium from sodium chloride is as relevant as sodium from other sources, it is proposed that the text 'other than sodium chloride' is deleted. It is also noted that the latter part of the footnote addresses the overall sodium content of a food, regardless of the source. In addition, we have concerns that the text 'for technological purposes' would cover many reasons including flavour (e.g. saltiness). However, we note that this text does provide an indicator of intent that may be helpful within the footnote.

BRAZIL

(i) General Comments:

Brazil supports the proposed conditions for the use of nutrition claims related to the non-addition of sodium salts. These conditions are consistent with the recommendations of the Global Strategy to limit sodium consumption from all sources and do not prevent reformulation of foods.

CANADA

Canada is pleased to offer comments in respect of the proposed amendment to the *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997) to add Non-Addition claims for Sodium Salts. Canada supports advancing this proposal to Step 7 for consideration at the 41st Session of the Codex Committee on Food Labelling.

Canada agrees with the proposal because we support having the conditions for claims regarding the non-addition of salt cover all sources of sodium. Canada is also supportive of the footnote which states that national authorities may permit the addition of small amounts of sodium salts other than sodium chloride for technical purposes since it appears to be helpful in reaching consensus on the text. Canada has a few minor comments regarding the proposed text for the Committee's consideration.

With respect to the English text, Canada suggests an amendment to the footnote to improve clarity of the text, as follows:

*National authorities may permit the addition ~~for technical purposes~~ of sodium salts other than sodium chloride **for technical purposes** where such addition would not result in the **sodium content of the food exceeding the level set out in** ~~not meeting~~ the conditions for the "low in sodium" claims as described in the Table to these *Guidelines*.

With respect to the French text:

1. Canada notes the following words in the last line of the first paragraph of the Background section should also be translated:

..., qui se déroulera à Charlottetown, ~~PEI~~ **ÎPÉ**, Canada, du 14 ~~au~~ 17 ~~May~~ **mai** 2013.-

2. Canada suggests the following correction to the French text within the condition for 7.2 (c) :

(c) L'aliment ne contient aucun ingrédient contenant des sels de sodium qui se ~~substituent~~ **substitue** à du sel ajouté (Exemples : algues, en fonction de leur usage).

3. Canada suggests amendments to the footnote to accord with the changes we proposed for the English text, as follows:

* Les autorités nationales peuvent autoriser l'adjonction ~~de d'autres~~ sels de sodium que le chlorure de sodium à des fins technologiques pourvu ~~qu'un~~ **qu'à la suite d'un** tel ajout ~~n'ait pas pour effet les teneurs en sodium de rendre l'aliment ne non conforme dépassent pas la teneur visée dans la~~ **dépassent pas la teneur visée dans la** ~~aux~~ conditions des ~~l'~~allégations de «faible teneur en sodium» énoncées dans le Tableau des présentes directives.

COSTA RICA

Costa Rica wishes to express its thanks for the opportunity to present comments and ratifies its approval of the insertion of the new section 7.2 with the following modification.

1. Eliminate the term ~~others~~ from point a), to read as follows:

- a) **The food contains no added sodium salts. (Examples include sodium chloride, sodium tripolyphosphate, etc.).**

IRAN

1- Sodium Salts

Technically and from a nutritional point of view the term of "Sodium Salts" is more sound, since it encompasses pretty much all possible sources for addition of sodium to food.

2- Salt (sodium chloride)

The use of the term Salt (sodium chloride) on food labelling is consumer-friendly; better for conveying nutritional information to the interested consumer.

In any case, sodium chloride remains the single most significant source of sodium for food products. Other sources of sodium are used as additives or processing aids, usually in very small quantities and tend not to be significant contributors to sodium levels in food.

JAPAN

The Government of Japan is pleased to submit its comment on Request for Comments at Step 6 on the draft section 7.2 of the *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997): Non-Addition of Sodium Salts.

Japan supports the draft section 7.2 of the *Guidelines for Use of Nutrition and Health Claims* (CAC/GL 23-1997): Non-Addition of Sodium Salts (REP 12/FL Appendix III).

NEW ZEALAND

New Zealand is happy to provide the following comments on the drafting of a new section 7.2 of the *Guidelines for Use of Nutrition and Health Claims* entitled Non-Addition of Sodium Salts.

New Zealand is supportive of the inclusion of the new section 7.2 Non-Addition of Sodium Salts. New Zealand supports the addition of the foot note to this clause to allow for the continued use of sodium containing additives at **nutritionally insignificant levels** in products making non-addition of sodium/salt claims. New Zealand believes this will provide for reformulation of a much greater range of products to reduce sodium levels in line with the intent of the WHO Global Strategy on Diet, Physical Activity and Health.

New Zealand would like suggest some minor editorial changes as follows:

7.2 (a) removal of the word 'etc' from the end of the list of examples.

7.2 (b) removal of the word 'etc' from the end of the list of examples.

This is to maintain consistency with drafting of other lists of examples in the *Guidelines for Use of Nutrition and Health Claims*. Clause 2.1.1 and 2.1.2 of these *Guidelines* also have examples listed in the same way as proposed for the new section 7.2 but do not contain the word 'etc' at the end of the list.

New Zealand finds the example listed in clause 7.2 (c) confusing. It is our recollection from CCFL 40 that the modification of the text in subclause 7.2 (c) to include the words "that are used

to “substitute for ... eliminated the need for the words “depending on how it is used” in the example. New Zealand suggests the words “depending on how it is used” are deleted from the example in subclause (c).

The final text would then read:

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);
- (b) The food contains no ingredients that contain added sodium salts (Examples: Worcestershire sauce, pickles, pepperoni, soya sauce); and
- (c) The food contains no ingredients that contain sodium salts that are used to substitute for added salt (Examples: seaweed).

*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*

New Zealand would like to thank the delegation of Canada for their work on this final part of the Draft Revision of the *Guidelines for Use of Nutrition and Health Claims: Additional conditions for nutrient content claims and comparative claims*.

PERU

National Codex Committee - Peru

General comments: The Food Labelling Technical Commission presented its approval of the inclusion of section 7.2 in the document *Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)* with the text proposed by the Codex Committee on Food Labelling.

Specific comments: None

UNITED-STATES OF AMERICA

The United States is pleased to provide comments in response to CL 2012/21-FL with regard to the draft section 7.2 of the *Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997)*: Non-Addition of Sodium Salts.

New section 7.2 Non-Addition of Sodium Salts

While the United States does not oppose the proposed new section 7.2., as stated in previous sessions, the United States questions the usefulness of such a claim because of the limitations on the products for which this claim could be used. The United States notes that only products without the addition of any sodium salt could bear the claim; thus, it would appear more reflective of a

nutrient content claim than an ingredient claim. Guidance for such nutrient claims already exists in section 8.6 of *the Guidelines for Use of Nutrition and Health Claims*. The United States notes that a claim for the non-addition of salt (the ingredient) could be supported with the use of disclaimers or additional conditions rather than preventing the use of all sources of sodium.

The United States appreciates the opportunity to provide these comments.

URUGUAY

Uruguay is grateful for the opportunity of presenting its comments to the CL 2012/21-FL.

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*.

ITF

The Institute of Food Technologists (IFT) exists to advance the science of food. Our long-range vision is to ensure a safe and abundant food supply contributing to healthier people everywhere. Founded in 1939, IFT is a nonprofit scientific society with individual members working in food science, food technology, and related professions in industry, academia, and government. As an international non-governmental organization with Observer Status within the Codex Alimentarius Commission, IFT appreciates the opportunity to actively participate in the Codex process as it is an important means to our mutual aims.

IFT supports the new section on "Non-Addition of Sodium Salts" as proposed during the last Session of CCFL and presented in CL 2012/21-FL.

IFT participated in the electronic working group on the proposed draft revisions to the *Guidelines for Use of Nutrition and Health Claims*, and we realize the difficulty in developing a proposal to fully address the positions of all members of the eWG. IFT was among the members of the eWG that supported a recognized distinction between salt as an ingredient and sodium as a nutrient.

Although the proposed draft does not make this distinction, it offers a good compromise for the different positions in the eWG. Therefore, IFT supports this draft.

IFT appreciates the opportunity to submit these comments in support of the Proposed Draft Section 7.2.of the Guidelines for Use of Nutrition and Health Claims: Non-Addition of Sodium Salts.