

European Union Position

CODEX COMMITTEE ON FOOD LABELLING

Thirty-ninth Session

Quebec City, Canada, May 9-13, 2011

Codex Circular Letter CL 2010/40-FL:

Proposed Draft Revised Guidelines on Nutrition Labelling

Step 6 of the Codex Procedure

The European Union would like to make the following comments in response to CL 2010/40-FL concerning the proposed revised paragraph 3.2 of the Guidelines on Nutrition Labelling (CAC/GL 2-1985).

Within the European Union (EU) there is an ongoing review on nutrition labelling and consideration of which nutrients should be included in the core nutrition declaration is one of the issues that is being considered. One of the factors that is being taken into consideration is the amount of information that a consumer can readily understand. There is a danger that when confronted with a large number of pieces of information the consumer might experience information overload which could mean that they do not read or use the information at all.

The amount of information that has to be provided by food businesses could have an impact on the cost of labelling. This would be particularly important if it was to be proposed that nutrition labelling should be provided on foods in general, rather than only being required when there is a nutrition or health claim made about the food.

Proposed list of mandatory nutritional elements

Within the ongoing review of nutrition labelling legislation in the EU consideration is being given to whether the following list of nutritional elements should be core elements of the nutrition declaration: the energy value, and the amounts of fat, saturates, carbohydrate, sugars, protein and salt.

Declaration of sodium/salt

Within the ongoing review of nutrition labelling legislation in the EU the declaration of "salt" (i.e. sodium expressed as salt) in the basic nutrition declaration is one of the issues that is being considered. As previously indicated, the EU supports the declaration as "salt" (sodium content multiplied by 2.5) in the nutrition declaration. The EU considers that if it is not possible to reach consensus on the form of the declaration that the Guidelines should allow the possibility for member countries to decide the basis of the declaration, taking into account their local circumstances. The EU believes that it is important for the terminology in nutrition labelling to be coherent with the public health messages in the country or region concerned.

Trans fatty acids

The EU does not object to the inclusion of the footnote in paragraph 3.2.1.4 concerning the declaration of trans fatty acids.