

Your Voice In Europe: ROADMAP feedback for Initiative to limit industrial trans fats intakes in the EU

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Related document: Initiative to limit industrial trans fats intakes in the EU

Feedback:

BEUC, the European Consumer Organization, welcomes the publication of the European Commission's Inception Impact Assessment on Trans Fatty Acids and wishes to share with you its views on the series of options set out in the document.

The European Commission's report published in December 2015, which provided a first analysis on trans fats, rightfully concluded that a legal limit for industrial trans fats would be the most effective measure in terms of public health, consumer protection and compatibility with the Internal Market. BEUC welcomed the report's conclusion as it echoes our longstanding call for legislative action.

National experiences have shown that setting mandatory maximum thresholds for industrial trans fats is the most effective way to improve public health by ensuring that all food businesses abide by the same rules. This was also the conclusion reached by WHO in its report on policy options to reduce intakes of trans fatty acids. In contrast, voluntary agreements have failed to consistently reduce the presence and intakes of trans fats, especially in vulnerable groups.

In its Inception Impact Assessment, the European Commission's argues that action at Member States' level would not be sufficient. We firmly support this statement and we have repeatedly supported EU-wide action to ensure that all consumers, wherever they live and whatever they buy, are protected from the harmful effects of trans fats. Such measure should also cover all businesses, irrespective of their size, as no food businesses should use ingredients that have been proven to be harmful to health.

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As indicated in our joint letter with industry groups and health organisations, BEUC is supportive of an EU limit of 2g of trans fats per 100g of fat. However we remain open to the option of prohibiting the use of partly hydrogenated oils (PHO) provided it equally protect consumers' health. We invite the European Commission to clarify this aspect in its final impact assessment.

However we are concerned about the sub-options of setting limits or banning PHOs through voluntary agreements with food business operators. Voluntary measures have proven ineffective in ensuring that all food businesses eliminate trans fats from their products. This has been substantiated by several scientific publications as well as by our members' in-house research. Only EU legal limits will create a level-playing field and achieve full market coverage.

In addition, we believe that option 2 (mandatory labelling) should not be even considered as a suitable policy measure to reduce trans fats intakes since the option of eating trans fats should not be left to the individual consumer. It has also been described as the least cost-effective option by WHO, as it fails to protect consumers while being burdensome for businesses and national authorities.

In sum, we invite the European Commission to further assess the benefits of EU legal limits, and establish whether a ban on PHOs would be equally protective, while ensuring that these policy options are set through legally-binding measures.

We hope that the future impact assessment will consider the enormous benefits EU legislation on trans fats can bring to consumers and public health.

Feedback file: