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FOOD AND AGRICULTURE
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AGENDA ITEM NO. 4(A)

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING
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PROPOSED DRAFT REVISION OF THE *GUIDELINES ON NUTRITION LABELLING* (CAC/GL 2-1985) CONCERNING THE LIST OF NUTRIENTS THAT ARE ALWAYS DECLARED ON A VOLUNTARY OR MANDATORY BASIS

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

BENIN
BRAZIL
CANADA
COSTA RICA
MEXICO
EUROPEAN FOOD LAW ASSOCIATION (EFLA)
INTERNATIONAL BABY FOOD ACTION NETWORK (IBFAN)
INTERNATIONAL DAIRY FEDERATION (IDF)
WORLD SUGAR RESEARCH ORGANISATION (WSRO)

PROPOSED DRAFT REVISION OF THE *GUIDELINES ON NUTRITION LABELLING (CAC/GL 2-1985) CONCERNING THE LIST OF NUTRIENTS THAT ARE ALWAYS DECLARED ON A VOLUNTARY OR MANDATORY BASIS*

GOVERNMENT COMMENTS AT STEP 3

BENIN:

The Beninese government addresses its sincere thanks and congratulations to the physical work group co directed by New Zealand, Norway and the United States without forgetting the electronic Work group on the list of the nutritive elements which always voluntarily or are obligatorily declared.

The government adheres to the recommendations of the WHO world Strategy on the food mode, physical exercise and health.

Our government supports the various recommendations resulting from their work.

That the declaration of sodium forms obligatorily part of nutritional labelling when the declaration of the nutritive elements is required.

We draw the attention of the work group to the bond between sodium, the hypertension and the increasing risk of cardiovascular disease which constitutes an important public health question. In the same way the bond between potassium, the hypertension and the increased risk of cardiovascular disease constitutes an important public health question. It is thus important to pay an special attention to rich foods in potassium to respect the ideal ratio between sodium and potassium. A too weak potassium supply would increase the arterial hypertension risk as much as sodium excessive consumption. That is the conclusion reached by a study presented Saturday November 8, 2008 to the annual meeting of the American company of nephrology, Philadelphia (United States). The study identified in more one gene which would influence the effects of potassium on blood-pressure (WNK1), and confirms the results of several preceding studies on the bond between potassium and arterial hypertension. The study related to 3.300 people, of which a half was Afro-Americans, because they are recognized to have a weak potassium supply. An analysis of urines highlighted a strong association between the quantity of potassium in blood and arterial hypertension. "Less these persons had of the potassium in their blood, more their arterial tension was raised. This effect was even stronger than the effect of the sodium on arterial tension. The link between the arterial hypertension and a lack of potassium remained evident even when one took in consideration of other factors of risk as the age, the race, the high cholesterolemia, the diabetes and the tobacco use", According to Dr. Susan Hedayati, University of Texas Southwestern Medical Center of Dallas.

Comparatively high concentrations of intracellular potassium are necessary to at least two vital processes for the internal economy of all the cells. The most useful one maybe corresponds to the protein synthesis by the ribosome that necessitates, for an optimum activity, high concentrations of potassium. The second corresponds to the glycolyse, for which the potassium is necessary to the maximum activity of the pyruvate kinase. Of more, the gradients Na + and K + through the cell membrane principally are responsible of the maintenance of the potential transmembranare that, in the nervous and muscular cells, is the vehicle of the transmission of the nervous influx in the form of a potential of action, that's means a transitional discharge of the membrane potential due to a

quick increase of the permeability of the membrane to the ions Na⁺ and K⁺ when she is stimulated or excited. (ATPasique transport System of sodium and potassium ions, Albert L. LEHNINGER).

To the view of what precedes, Benin propose that the declaration of sodium forms obligatorily part of nutritional labelling when the declaration of the nutritive elements is required and **that the declaration on the potassium be obligatory jointly**.

BRAZIL:

3.2 Listing of Nutrients

3.2.1 Where nutrient declaration is applied, the declaration of the following should be mandatory:

3.2.1.1 Energy value; and

3.2.1.2 The amounts of protein, available carbohydrate (ie dietary carbohydrate excluding dietary fiber), fat, saturated fat, [trans fatty acids], sodium, [sugar], [dietary fiber], and [cholesterol];

3.2.1.3 The amount of any other nutrient for which a nutrition or health claim is made; and

3.2.1.4 The amount of any other nutrient considered to be relevant for maintaining a good nutritional status, as required by national legislation or national dietary guidelines.

Brazilian comments:

We agree with the proposed draft revised guideline on nutrition labelling. We understand that the list of nutrients that are always declared was proposed taking into consideration the significance of these nutrients for Public Health and practical issues.

We support the inclusion of dietary fiber and *trans* fatty acids in the list of nutrients always declared, because they are important to the health of the population and should be used by consumers to make better food choices.

We support the maintenance of sugar in square brackets. There are practical issues related to the declaration of this nutrient that must be further discussed.

CANADA:

Canada requires mandatory nutrition labelling on most prepackaged foods. The Nutrition Facts table includes the mandatory declaration of the energy value and the content of 13 nutrients (fat, saturated fat, trans fat, cholesterol, sodium, carbohydrate, fibre, sugar, protein, vitamins A and C, calcium and iron). Energy and nutrients must be declared on a per serving basis.

The list of nutrients proposed for mandatory declaration for nutrition labelling when nutrient declaration is required include Energy, protein, available carbohydrate, sugar, fat, saturated fat, trans fatty acid, sodium, dietary fibre and cholesterol.

Canada would like to note that the nutrients identified in the WHO Global Strategy on Diet, Physical Activity and Health do not include cholesterol or dietary fibre as mentioned in Proposed Action 1.3 of the CX/FL 08/36/3, submitted to CCFL 36th session. These nutrients were added, following a proposal of some delegations at the CCFL's 36th session.

Recommendation: That energy declaration remain a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Canada agrees with the recommendation. This is currently a requirement in Canada.

Recommendation: That protein declaration remain a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Canada agrees with the recommendation. This is currently a requirement in Canada.

Recommendation: That available carbohydrate declaration remain a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Canada agrees with the recommendation.

Recommendation: That further discussions on sugar declaration are held to determine whether sugar should be a mandatory declaration for nutrition labelling when nutrient declaration is required, and , if such a declaration is agreed to be required, whether total sugars or free sugars should be declared.

Comments: While Canada recognizes the public health significance of sugars in particular when consumed as components of beverages, Canada does not consider that the declaration of “free sugars” as defined within the World Health Organization Technical Report Series 916 constitutes a practical basis for nutrition labelling, due to inability to distinguish between free and intrinsic sugars analytically. This is why Canada currently requires the declaration of total sugars in its Nutrition Facts table. However, based on comments received, Canada also recognizes that other countries may wish to employ other strategies than mandatory labelling for addressing public health issues associated with the consumption of “free” sugars.

Recommendation: That fat declaration remain a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Canada agrees with the recommendation. This is currently a requirement in Canada.

Recommendation: That saturated fat declaration become a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Canada recognizes the health risks associated with excessive intakes of saturate fats and agrees with the recommendation. This is currently a requirement in Canada.

Recommendation: That further discussions on trans fatty acid declaration are held to determine whether trans fatty acid should become a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: The consumption of trans fatty acids has been identified as a major public health issue for Canada. As a result, Canada was the first country to require the mandatory declaration of trans fatty acids in the Nutrition Facts table. However, based on comments expressed by other Codex members, Canada recognizes that the public health significance of this nutrient may not be global or that other countries may wish to employ other strategies for addressing public health issues associated with the consumption of trans fatty acids.

Recommendation: That sodium declaration become a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Canada recognizes the public health risk associated with excessive intakes of sodium and agrees with the recommendation. Large proportions of the Canadian population have excessive intakes of sodium, primarily from pre-packaged foods; therefore mandatory declaration of sodium is important. This is currently a requirement in Canada.

Recommendation: That further discussions on dietary fibre declaration are held to determine whether dietary fibre should become a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Dietary fibre was not identified as a nutrient of concern in the WHO Global Strategy on Diet, Physical Activity and Health. In addition, little support was expressed by the E-WG for the inclusion of dietary fibre in the mandatory declaration for nutrition labelling. Canada notes that there is still controversy around the methods of analysis for determining dietary fibre. For these reasons, Canada recommends that further discussions regarding the inclusion of this nutrient in the mandatory declaration for nutrition labelling are not a priority at this time.

Recommendation: That further discussions on cholesterol declaration are held to determine whether cholesterol should be a mandatory declaration for nutrition labelling when nutrient declaration is required.

Comments: Cholesterol was not identified as a nutrient of concern in the WHO Global Strategy on Diet, Physical Activity and Health. In addition, there is a lack of consensus on the mandatory declaration of cholesterol and there are issues surrounding the relationship of cholesterol intake with heart disease risk. For these reasons, Canada recommends that further discussions regarding the inclusion of this nutrient in the mandatory declaration for nutrition labelling are not a priority at this time.

COSTA RICA:

Costa Rica would like to thank the Working Group led by New Zealand and Canada for their coordination of the development of the Discussion Paper regarding the list of nutrients that should always be declared, and will like to make the following comments regarding the conclusions advanced in the Paper:

Free Sugars: Costa Rica agrees that further discussions need to be held regarding this nutrient. However, it considers better to declare total sugars given the difficulty in differentiating between free and intrinsic sugars. Therefore, Costa Rica considers declaring only total sugars.

Trans fatty acids: Costa Rica believes that the inclusion of this nutrient in mandatory nutritional labelling is important over the medium term but, at the same time, the appropriate infrastructure needs to be created to have the capacity to do the analysis.

Dietary Fibre: Costa Rica agrees that further discussions need to be held, in the hope of reaching global consensus about the definition and methods of analysis.

Cholesterol: Eliminate this nutrient from the compulsory declaration based on the fact that there is no overwhelming scientific evidence to demonstrate the linkage between cholesterol intake and cardiovascular disease or coronary risk.

MEXICO:

Mexico is grateful for the opportunity to present its comments regarding document CX/FL 09/37/4 “Draft Proposal for the Revision of the Guidelines on Nutrition Labelling (CAC/GL 2-1985) concerning the list of nutrients that are always declared on a voluntary or mandatory basis”.

Being aware of the problem that non transmittable diseases represent worldwide, of the increase in the incidence of such diseases, and of the need to find adequate mechanisms to reverse this trend, we consider that labelling can be a tool within a public health campaign focused on educating the consumer, but that it can not solve this problem on its own. Overweight and obesity are problems derived from multiple factors (diet, physical activity and life style, among others).

Due to this, to try to approach a multifactorial issue with just one tool is not only ineffective but actually a wasted effort. On the other hand, the compulsory declaration of certain nutrients must take into account the specific nutritional needs of each country or region, and should not disregard the costs it implies for the trade in industrial foods.

We thank the effort of New Zealand and Canada of conducting the eWG work and preparing the proposal. However, we consider that the focus reflected in this document is not viable, as guidelines that allow offering correct nutritional information to the consumer are already contemplated within the Codex framework.

EUROPEAN FOOD LAW ASSOCIATION (EFLA):

The European Food Law Association (EFLA) enrolls professionals working in all branches of the food sector, including executives from the industry or trade and officials in national or European administrations, academics, consultants and lawyers. Its purpose it is to contribute to the debate by providing legal expertise, without taking any position regarding political choices.

EFLA would like to comment on the “*Implementation of the WHO Global Strategy on Diet, Physical Activity and Health*” (“Global Strategy”) to be discussed as **item no. 4** of the agenda for the forthcoming Codex Committee on Food Labelling, 37th Session, Calgary, Canada, May 4 to 8, 2009.

Agenda Item no. 4 (a) “Proposed Draft Revision of the Guidelines on Nutrition Labelling (CAC/GL 2-1985) Concerning the List of Nutrients that are always declared on a Voluntary or Mandatory Basis”:

EFLA believes that a possible expansion and / or modification of the current list of nutrients shall be done only upon strong scientific substantiation, which shall demonstrate and support the applicability and relevance of the proposed changes on a worldwide basis. Furthermore, EFLA supports that the above-mentioned revision should be conditional to and take into consideration future work to be undertaken by CCNFSDU in relation to developing Nutrient Reference Values (NRVs) for macronutrients of public health significance as per the Global Strategy.

In relation to the proposal to make nutritional declaration become mandatory instead of voluntary, EFLA has no particular position from a legal point of view.

However, if nutrition labelling became mandatory in all member States, a minimum harmonisation as to the required ingredients and the values would be necessary, taking into account the work of the CCNFSDU, in order to avoid creating new barriers to trade.

INTERNATIONAL BABY FOOD ACTION NETWORK (IBFAN):

A key recommendation of the Global Strategy is to reduce sugar intake, fats (total fat saturated and trans fatty acids) to increase fibre intake and reduce total cholesterol intake. Hence it is logical that mandatory declaration of these key ingredients - added/total sugars, saturated fats, trans fatty acids, sodium, dietary fibre and cholesterol - be on the labels of prepackaged food products.

Additionally, in order for nutrient declarations to be meaningful to the consumer, IBFAN supports the use of labelling programs such as Traffic Light warnings used on products in the United Kingdom: <http://www.eatwell.gov.uk/foodlabels/trafficlights/>
Nutrient declaration of key ingredients affecting health without a meaningful way to interpret the information leaves consumers with unclear, promotional and inconsistent information regarding decisions they need to make in order to improve their diets.

How else can a consumer modify their intakes unless the levels of these ingredients are declared and the consumer is provided with a means to evaluate the information to make health food choices?

For vulnerable populations mandatory labelling of these key ingredients is especially critical - children, pregnant and lactating women - need to maximize their nutrient intake in order to sustain optimal growth, health and development, while minimizing their intake of food ingredients that contribute to health risks. The mandatory declaration of added/total sugars, saturated fats, trans fatty acids, sodium, dietary fibre and cholesterol facilitates their capacity to do this in order to reduce and prevent non-communicable diseases.

It should be noted that World Cancer Research Fund in its recent report "Policy and Action for Cancer Prevention, Food Nutrition, and Physical Activity: A Global Perspective", which reviews the scientific evidence for the relationship between diet and cancer, recommends reduced consumption of energy dense commercially processed foods and the avoidance of sugary drinks. To achieve this, the report notes that the UN agencies must work together to ensure integrated policies among all relevant agencies.

The definition of sugars as "added" or "free" needs to be made so that it is meaningful to the consumer.

The distinction can be made between all available/total carbohydrates and the added sugars.

INTERNATIONAL DAIRY FEDERATION (IDF):

The International Dairy Federation (IDF) appreciates the opportunity to provide comments to the discussion paper CX/FL 09/37/04.

IDF would like to provide the following comments:

Paragraph 9 Recommendations

IDF supports the mandatory labelling of the 4 basic nutrients: Energy, Protein, Lipids and Carbohydrates. The nutrient “protein”, in addition to lipids and carbohydrates, is very important to ensure basic information of consumers on products composition, and given the importance of proteins in a balanced diet.

Paragraph 25 Sugars (free)

IDF noted the absence of consensus within the Working Group and would propose neither to declare total sugars nor free sugars and proposes to delete the text in square brackets. Sugar is not directly linked to non communicable diseases (Nantel, 1999) and only linked indirectly to obesity via over consumption of energy intake. IDF notes that Energy is already required to be declared.

In addition, IDF is against mandatory labelling of 'sugars' as such which might lead to the false interpretation that foods that constitutes important parts of a balanced diet are unhealthy (due to their content of intrinsic (milk and fruit-)sugars). Moreover, the segregation of carbohydrates (including starch and other carbohydrates that are readily hydrolysed to simple sugars) from other sugars (such as lactose) does not reflect true metabolic differences. As long as the term 'sugars' does not help the consumer to separate food choices that contribute to a healthy and balanced diet from 'empty calories' such labelling should be avoided.

In any case, it would be more appropriate to replace the wording “free sugars” with “added sugars”.

Paragraph 27 Saturated fat

IDF would be against mandatory nutrition labelling of saturated fats for the following reasons:

- IDF would like to emphasise that research continues to unravel the complexities associated with individual fatty acids and fats from different sources and it is becoming increasingly apparent that not all saturated fatty acids individually have the same biological effects (Lock et al., 2008).
- Despite the contribution of dairy products to saturated fatty acid composition of the diet, there is no clear evidence that dairy food consumption is consistently associated with a higher risk of chronic diseases (Lock et al., 2008).

Paragraph 28 : Trans fatty acids

IDF recommends that trans fatty acid (TFA) declaration should not be a mandatory declaration for nutrition labelling when nutrient declaration is required.

Regarding TFA of natural origin, IDF would like to highlight that the results of recent scientific studies by Chardigny (2008), Destailats et al (2008) and Motard-Belanger et al. (2008) provide no evidence that consumption of naturally occurring TFAs, at levels well above the current upper limits of human consumption, increase the risk of cardio vascular disease (CVD). Therefore IDF finds no reason to believe that normal or even higher intake of natural occurring TFAs, as those found in milk and milk products, to be harmful for human consumption.

Moreover, the broader public health issue remains the identification of ways to reduce the intake of industrially produced TFA in a healthful and safe manner (Willett and Mozaffarian, 2008).

As a consequence IDF would suggest amending the second sentence of this paragraph to ‘While there was consensus that **some particular** TFAs increase the risk of cardiovascular disease, differing levels of consumption between countries meant the public health significance of TFA intake was variable.’

Paragraph 37: Cholesterol

IDF recommends not to declare cholesterol in mandatory nutrition labeling. The impact of content of cholesterol in foods is negligible compared to endogenous synthesis. (Becker et al., 2004, Lecerf and De Lorgeril, 2008).

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WORLD SUGAR RESEARCH ORGANISATION (WSRO):

General Issues

1. The provision of nutrient labelling is currently being considered by CCFL principally in relation to the declaration of nutrient content **on the packaging** of food products. Other forms of information provision may be appropriate in some circumstances. These include shelf marking, posters at the point of sale, websites, and “help line” telephone, text messaging or e-mail services. Consideration of these other forms of communication may be valuable in circumventing some of the practical problems associated with nutrition labels on food packaging, especially information overload and limitations on space, and consequently, on legibility. These other forms of communication may also be useful in allowing some flexibility as to the requirements placed upon food manufacturers to provide

- specialized nutrition information on their products to certain markets, without over-burdening the printed labels.
2. The prime object of the current discussion is to arrive at **an agreed list of nutrients that should be declared on all packaged food products throughout the countries that are adherents to the Codex Alimentarius Commission**. This means that the list must have very wide usefulness to a vast array of consumers with different nutritional needs. The list must therefore rest on strong scientific evidence of relevance to almost all individual consumers and evidence that is generally accepted by Codex members. The list should not include, therefore, nutrients that are only of relevance to particular population subgroups or countries. Other approaches to tackling public health issues in specific, often narrowly defined, population subgroups should be considered, rather than trying to use mandatory nutrient labelling to address every problem in every part of each member country.
 3. It follows from the above that **variations in mandatory labelling requirements from country to country should be kept to a minimum** in order to avoid labelling requirements becoming either a non-tariff barrier to trade or a barrier to innovation. The acceptance of individual country competence to set differing labelling requirements should not be used as a means of avoiding the resolution of differences of opinion among members. It is extremely important that an agreed list of nutrients should be very widely accepted if the expense (ultimately to the consumer) of introducing mandatory labelling is to be worthwhile. Commonality of the nutrient list between countries will also assist with consumer education, since consumers will not be presented with different nutrient labels on products originating from different countries.
 4. The **list of nutrients that should always be declared should be short and simple**. This will assist consumer understanding and also aid the development of agreed symbols for these nutrients.
 5. The nutrients chosen **should not have the effect of reinforcing common consumer misunderstandings on nutrition**. If consumer nutrition education is to progress beyond its current parlous state, the mandatory nutrient label must not inadvertently perpetuate currently common misconceptions. Nor should the label be readily amenable to misrepresentation by popular, but usually ill-informed, media “nutrition” celebrities.
 6. **Enforcement authorities must be easily able to check the declared nutrient content of any food**. If the analytical costs are too high, or the laboratory skills required too demanding, enforcement will be neglected and the existence of the mandatory list will become an invitation to fraud. Recent examples have illustrated the axial importance of this point.
 7. Whatever nutrients are chosen, **the content of these particular nutrients in any food must be readily and inexpensively determined by an agreed method by the manufacturer**. It would be counter-productive to over-burden packaged food producers with additional costs, especially in the poorer parts of the world. The consequence of increasing the cost for packaged foods would be to encourage the food supply system to revert to unpackaged foods, with a resulting deterioration in standards of microbiological and nutritional quality.

8. **Consumer information and education must be undertaken when any change in nutrient labelling requirements is introduced.** This will serve to enhance the general usefulness of the label to consumers and counter any attempt at misinformation by the media or special interest groups. If public information is not provided in a highly accessible manner, the current low level of interest in the nutrient content of foods seen in many countries will persist, and the purpose of providing nutrient content information will be largely negated.

Choice of nutrients always to be declared

1. Bearing these general principles in mind, the suggestion that **energy value, protein, carbohydrate and fat** should always be declared **is supported**. It would be preferable, however to use the plural terms as appropriate i.e **energy, proteins, carbohydrates and fats**, as an aid to consumer education. Of these, carbohydrates should be defined as available carbohydrates but not labelled as such, since most consumers will not understand the term and its use will merely confuse. It is not necessary to distinguish available carbohydrates from non-available carbohydrates on food labels intended for the consumer, since the latter is generally called dietary fibre. Thus the terms carbohydrates and dietary fibre will serve perfectly well on labels.
2. This set of four pieces of nutritional information (energy, proteins, carbohydrates and fats) provides the basic information necessary to all consumers. It will considerably assist all consumers in selecting a diet that will meet their varying nutritional needs.
3. This **information is readily accessible** for all food products either from published information or from analysis. The costs to industry are therefore likely to be reasonable (depending on the method required for obtaining these data). It can be easily **checked** by enforcement authorities and is amenable to straightforward consumer **education** campaigns.
4. **The current Guidelines on Nutrition Labelling (CAC/GL 2-1985) require that these nutrients be declared whenever a nutrient claim is made**, irrespective of the nutrient for which a claim is made. It would be an entirely reasonable development, therefore, for Codex members to agree that these should form the core of any mandatory scheme.

Nutrients that might be declared

1. The suggested **additional nutrients** that might be declared (**saturated fat, trans fatty acids, sodium, sugars, dietary fibre and cholesterol**) represent a variety of problems. The additional value of adding these nutrients should be weighed against the disadvantages, both in cost and information overload, of including them in the recommendation for **universal** mandatory labelling.
2. All of these additional nutrients derive from recommendations contained in the WHO Global Strategy on Diet, Physical Activity and Health. The scientific basis for the suggestion that all of these nutrients are of public health significance, and that consumption of them should be specifically targeted, has not reached the level of general acceptance to merit the inclusion of all of them in a universal mandatory nutrient label.

3. Particular issues arise with regard to the declaration of sugars content and these will be addressed below.

Declaration of sugar/sugars/free sugars/total sugars

1. There is widespread misunderstanding as to the content of sugars in foods and its nutritional significance. Many consumers (and a number of authorities) use the terms sugar, sugars and total sugar(s) interchangeably. Others believe that sugar and sucrose are synonymous, and moreover, that sucrose only occurs in foods as a result of the activities of the food industry. Indeed, many professionals are unaware that sucrose is ubiquitously distributed in nature in plants, fruits and vegetables. Any labelling for sugar(s) - total, free or added - must take account of these misconceptions and avoid reinforcing them.
2. The original nutritional logic in drawing consumers attention to the sugar(s) content of a food (or drink) no longer holds.
 - (a) The content of these nutrients has no significance in terms of **energy balance** and weight control beyond their contribution to food energy (Food and Nutrition Board, 2002).
 - (b) The current advice to those with **diabetes** no longer focuses on sugar. Rather, carbohydrates are grouped together and, in addition, some authorities suggest attention to the glyceamic response to different carbohydrates. Sucrose is unexceptional (when compared to the common sources of starch) with regard to glyceamic response, and the other common sugars (fructose, glucose, maltose) are usually present as mixtures also with moderate glyceamic impact when consumed (Franz et al. 2002).
 - (c) All sugars are nowadays considered together with all other forms of fermentable carbohydrate as potential contributors to the risk of dental caries (especially when fluoride protection is inadequate) (FAO/WHO 1998).

There is therefore no longer any nutritional logic for labelling sugar(s) content separately from the carbohydrates contained in a food.
3. Many consumers have been misled into believing that sugar (sucrose) has an importance in weight control and slimming beyond its contribution to the energy content of a food or drink. This canard has appreciable impact on consumer purchasing behaviour, leading them to select products solely on the grounds of their sugar content without regard to other nutritional attributes, including actual energy value. The continuation of current practice, in some countries, to require sugars to be labelled reinforces consumer misinformation from the media, some commercial sources, and “dieting” books on this topic. There is therefore a powerful argument for discontinuing this practice. **Without the distraction of the (unhelpful) “sugars” content figure on the nutrition label, consumers interested in weight control, will be obliged to focus on the meaningful information provided by the “energy value” figure.**
4. The WHO Strategy suggests a focus on “free sugars”. The scientific justification for distinguishing “free sugars” from other sources of sugars has been criticised as inadequate, suggesting attributes to sugars that are, in fact attributable to the food matrix rather than the sugars themselves (FAO/WHO 2007). Similar criticisms can be levelled at the assertion that sugars contribute to increases in energy density of foods or drinks. Nutritionally, free sugars are indistinguishable from any other sugars, indeed the human body is unable to distinguish between “free” or “added” sugars and those occurring within the matrix of a

food. In addition, there is no analytical procedure to discriminate between “free sugars” and other sugars in products, making the task of enforcement authorities wishing to check any declaration impossible.

The suggestion that “free sugars” or “added sugars” should be declared on any nutrition label is therefore not supported.

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