codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00153 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 4 a) **CX/FL 09/37/4**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD LABELLING
Thirty-seventh Session
Calgary, Canada, 4 - 8 May 2009

DISCUSSION PAPER ON THE REVISION OF GUIDELINES ON NUTRITION LABELLING CONCERNING THE LIST OF NUTRIENTS THAT SHOULD ALWAYS BE DECLARED

(Prepared by an electronic working group jointly led by New Zealand and Canada with the assistance of Argentina, Australia, Brazil, Japan, Malaysia, Mexico, Poland, Singapore, Switzerland, USA, the Comité Européen des Fabricants de Sucre (CEFS), the European Community, the International Dairy Federation (IDF), International Alliance of Dietary Supplement/Food Associations (IASDA), and the International Council of Beverages Associations (ICBA))

Governments and international organizations wishing to submit comments on the following subject matter are invited to do so **no later than 6 April 2009** to: Mr. Ron Burke, Director Bureau of Food Regulatory, International and Interagency Affairs, Health Products and Food Branch, Health Canada, Bldg No. 7, Room 2395, Tunney's Pasture, Ottawa K1A 0L2, Canada, E-mail: codex_canada@hc-sc.gc.ca, with a copy to the Secretary, Codex Alimentarius Commission, Joint FAO/WHO Food Standards Programme, Via delle Terme di Caracalla, 00153 Rome, Italy, E-mail: codex@fao.org).

INTRODUCTION

1. The 36th Session of the Codex Committee on Food Labelling, in consideration of the recommendations in WHO Global Strategy on Diet, Physical Activity and Health, agreed to undertake new work on proposed amendments to section 3.2 of the Guidelines on Nutrition Labelling regarding the list of nutrients and the legibility and readability of information, and the list of nutrients that are always declared on a voluntary or mandatory basis. .

2. In order to develop the proposed amendments for consideration the Committee agreed to convene a Physical Working Group co-chaired by New Zealand, Norway and the United States to provide the 37th Session of CCFL with recommendations to progress work on the implementation of the Global Strategy in the following three areas:

I. revision of section 3.2 of the Guidelines on Nutrition Labelling concerning the list of nutrients that are always declared on a voluntary or mandatory basis and discussion of issues related to mandatory nutrition labelling;
II. development of criteria/principles for legibility and readability of nutrition labels; and
III. labelling provisions dealing with the food ingredients identified in the Global Strategy on Diet, Physical Activity and Health.

3. The Committee also agreed to establish three separate eWGs to develop discussion papers on the above issues and facilitate discussion at the Physical Working Group.

4. New Zealand has led the eWG on the list of nutrients that should always be declared on a voluntary or mandatory basis.

5. This paper provides a summary of submissions and proposes recommendations to the Codex Committee on Food Labelling (CCFL) for the revision of the Guidelines on Nutrition Labelling (CAC/GL 2-1985) (the Guidelines) regarding the nutrients that should always be declared when a nutrition claim or a voluntary nutrient declaration is made. The draft revised Guideline of Nutrition Labelling is attached at Annex I.

6. A call was made for membership of the eWG in early July 2008. There were positive responses from 37 members to be part of the eWG. The first discussion paper was circulated to members of the eWG in September 2008 and responses received from 13 members. These responses form the basis of the following discussions and a summary of responses is attached at Annex II.

7. A second discussion paper was distributed for comment on 2 February 2009 and a summary of these responses is attached at Annex III.

8. The responses to the two discussion documents have formed the basis of the recommendations from the eWG. They represent the majority views from those in the eWG who responded to the questionnaire and provide a starting point for further discussions within the physical working group and the plenary session.

9. *It is recommended that:*

- *where nutrient declaration is applied, the declaration of the following should be mandatory: energy value, protein, available carbohydrate (ie dietary carbohydrate excluding dietary fibre) fat, saturated fat and sodium*
- *the declaration of sugars (total), trans fatty acids, dietary fibre and cholesterol should be placed in square brackets in the standard for further discussion.*

10. The eWG are now pleased to present this discussion paper for comments and discussion at the Physical Working Group to be held prior to the 37th session of CCFL.

CURRENT STATUS OF GUIDELINES

11. The electronic working group (eWG) was tasked with reviewing the list of nutrients that should always be declared on a food label when nutrition information is required. The review included the nutrients that are already required to be declared on a food label as well as other nutrients specifically identified in the Global Strategy on Diet, Physical Activity and Health (Global Strategy).

12. The current Guidelines on Nutrition Labelling (CAC/GL 2-1985) require that nutrition labelling be required for foods for which nutrition claims are made. Where nutrient declarations are applied the declaration of energy value, protein, available carbohydrate and fat should be made along with any nutrient for which a nutrition claim is made.

13. The other nutrients that were identified in the Global Strategy for consideration included:

- sugars (free)
- saturated fat
- trans fatty acids
- sodium
- dietary fibre, and
- cholesterol.

SUMMARY OF ISSUES IDENTIFIED BY THE EWG

14. There was a general consensus that nutrition labelling could play an important role in assisting consumers in making informed food choices. The experiences of countries that already have nutrition labelling requirements are supportive of such regulatory regimes.

15. A number of countries do not have nutrition labelling requirements even though there are existing Codex Guidelines in this area.

16. The eWG concurred that the key criteria for requiring nutrition labelling were:

- ability to address a public health issue
- ability to assist informing consumers, and
- practicality and enforceability of labelling.

17. There were a number of issues raised in the eWG that are not unique to this issue of nutrients that should always be declared. The generic issues surrounding a number of practical considerations will also be raised in this paper.

Public Health Concerns:

18. There was consensus that nutrients of public health significance take priority for declaration but recognition that countries may differ in their public health priorities. This acknowledged both over nutrition and under nutrition as public health concerns and that a focus solely on the Global Strategy may result in a loss of important nutrient information.

Informing Consumers:

19. The key role of labelling was seen as providing consumers with information that would assist in making appropriate food choices. The nutrition information on labels was seen as a way of enabling consumers to make [healthy or healthier] food choices [that lead to healthier diets/ contribute to a healthy and balanced diet]. A number of respondents confirmed that informing consumers would require more

than food labelling and that labelling should be part of an overall consumer education approach that was appropriate for the country/region and the consumer groups for whom the information was intended.

Practical Issues:

20. There were a variety of practical issues raised in regard to both existing nutrients that are required to be declared and to new nutrients. The eWG did not consider that costs associated with existing Guidelines could be considered barriers although they may be part of the reasoning why some countries have not adopted the current Codex Guidelines on Nutrition Labelling.

The Nutrients:

21. The nutrients listed below are only those considered by this eWG in the context of/pursuant to the Global Strategy on Diet, Physical Activity and Health. Accordingly, the list is not a comprehensive list of all nutrients of public health significance. In reviewing the list the eWG has considered the global public health significance of the nutrient and the strength of the scientific evidence for the nutrient-disease relationship. The Committee may consider recommending that countries consider additional nutrients for mandatory declaration as appropriate for their population, including nutrients important in both under and over nutrition.

Energy value:

22. There was general consensus that energy declaration should remain a critical component of any nutrition labelling requirement and should remain in the Codex Guidelines. There were issues raised about the presentation of the energy declaration, however these are beyond the mandate of this eWG and it is noted that the current Guidelines require declaration of energy in both kJ and kcal per 100g or 100ml or per single portion.

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

Protein:

23**.** There was majority support that the declaration of protein should continue to be required where nutrition labelling is required. There was no consensus on the public health significance of protein by eWG members, however it was generally agreed that protein should continue to be required for completeness of information. No major issues were raised with continuing to require the declaration of protein where nutrition information is required.

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

Available Carbohydrate:

24. There was majority support that the declaration of available carbohydrate should continue to be required when nutrition labelling is required. There was widespread support for the importance of carbohydrate in the diet and recognition in the Global Strategy of the convincing evidence that high intake of energy dense foods promotes weight gain, Energy dense foods tend to be high in fat, sugars and starch. Issues were raised regarding standardisation of definitions and methods of analysis for various carbohydrate fractions, particularly dietary fibre.

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

Sugars (free):

25. No consensus on mandatory declaration of free sugar was reached. Many respondents stated that the impact of sugar on health was independent of whether sugar was free or intrinsic, and therefore argued against requiring the labelling of free sugars. Issues were raised regarding the inability to distinguish between free and intrinsic sugars analytically. The cost of analysing for sugar was also raised. There was some support for labelling of total sugars, although the Global Strategy states that for diet, recommendation for populations and individuals should include limiting the intake of free sugars

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.

Fat:

26. There was majority support for retaining the requirement to declare fat where nutrition information is required. The Global Strategy states that for diet, recommendations for populations and individuals should include limiting energy intake from total fats. Fat analysis is relatively well established and no major issues were raised with continuing with this requirement.

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

Saturated Fat:

27. There was majority support for adding saturated fat to the list of nutrients that should always be declared. Saturated fat was seen as a nutrient of significant public health importance and labelling to inform consumers of the saturated fat content was seen as important in enabling consumers to make [healthy or healthier] food choices [that lead to healthier diets/ contribute to a healthy and balanced diet]. The Global Strategy states that for diets, recommendations for populations and individuals should include a shift of fat consumption away from saturated fat and towards unsaturated fats. The lack of a Codex definition for saturated fatty acids was raised as an issue but no other major issues were noted.

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

Trans Fatty Acids (TFAs):

28. There was no consensus on the need to declare TFAs when nutrition information is required. While there was consensus that TFAs increase the risk of cardiovascular disease, differing levels of consumption between countries meant the public health significance of TFA intake was variable. Other issues raised included variable methods of analysis, cost and the need for education so as not to have a negative impact on overall fat intake.

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.

Sodium:

29. While there was no consensus on the need to declare sodium when nutrition information was required there was majority support for this. The relationship between sodium, hypertension and increased risk of cardiovascular disease is a significant public health issue. Educating consumers with regard to salt versus sodium was raised as an issue, however there were no other major issues raised.

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

Dietary Fibre:

30. There was no consensus on the mandatory declaration of dietary fibre when nutrition information is required. While fibre was seen as important in the diet, issues raised included controversy around the definition of dietary fibre and methods of analysis.

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.

Cholesterol:

31. There was no agreement on the mandatory declaration of cholesterol when nutrition information is required. The public health significance of dietary cholesterol varied between countries. Difficulty in analysing for cholesterol and consumer understanding of the relationship between cholesterol and the fatty acid profile were raised as issues.

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.

ANNEX I

Draft revised Guideline on Nutrition Labelling
(Section 3.2 Listing of Nutrients)

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 fibre) fat, saturated fat, **[trans fatty acids],** sodium, [sugar]**, [dietary fibre],** 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.

ANNEX II

SUMMARY OF COMMENTS RECEIVED

GENERAL QUESTIONS

1.1 What additional criteria should be considered?

Member/ Observer	Answer
Argentina	• Public health significance (over and under nutrition); • Provision of consumer information; • Practical considerations.
Australia	Australia supports consideration of expansion of the list of nutrients that are always declared under section 3.2.1 of the Guidelines on Nutrition Labelling. We acknowledge public health as a key driver, and propose an appropriate nutritional risk analysis process be used to determine which of the suggested nutrients has high global public health significance for potential inclusion in nutrition labelling. A specific criteria which should be drawn on, and may fit within the risk analysis process, is global consistency – that is, all nations have an interest in the nutrient(s) being declared, from a public health perspective. Other practical criteria that may require consideration in relation to possible expansion of the list of nutrients, include: ▪ availability of composition and analytical data for rarer food products; ▪ issues of suitability/reliability/agreement of methods of analysis for some nutrients; and ▪ consumer education and understanding of nutrition information on food labels. As well as considering individual nutrients within a risk assessment process, inter-relationships between nutrients should be considered – that is, where a claim triggers the declaration of one nutrient, consideration should be given to requiring declaration of nutrients that also contribute to relevant physiological effects of public health significance. For example: ▪ if trans fatty acids are to be declared, saturated fat should also be declared; and ▪ if cholesterol is to be declared, saturated fat should also be declared. We also note that nutrients to be declared will need a common internationally recognised definition. In some cases this may require development of an agreed definition. For example: Codex has a definition for trans fatty acids, but would need to develop a definition for 'free' sugars, if these were to be included in the nutrients declared.
CEFS	No Comment
Brazil	We believe that the three mentioned criteria (Public health significance of the nutrient, provision of consumer information and practical considerations) are adequate and should be taken into consideration.
EC	It is not clear if "practical considerations" include the issue of consumer understanding and use of the information that is provided and the impact on consumer behaviour. It would be important to consider whether the inclusion of the information would have the desired effect on consumer behaviour. Compositional data and the practicalities of enforcing rules, including issues associated with analysis and establishing tolerances for labelling declarations, should also be considered.
IADSA	In the case of dietetic foods and food supplements declared nutrients should be appropriate to the intended use of the product
ICBA	Infrastructure capabilities to ensure consumers are educated on effective use of information
Japan	No comment
Malaysia	The term "practical considerations" in the background document need to be elaborated, and could include the following considerations: (i) Impact on the end costs of the product as sold to the consumer. Costs that are incurred in

	developing nutrition labels i.e. analysis, labelling, design, packaging and administration would have significant impact on the costs of the final product which will eventually be passed onto the consumer. More nutrients to be analysed and the more difficult to be analysed nutrients would greatly increase the cost. Serious considerations have therefore to be given to the number of nutrients and the type of nutrients to be labelled. (ii) Serious considerations have to be given to consumers' understanding, legibility and readability of the nutrition information panel as the number of nutrients are increased as this will adversely affect these parameters. (iii) Appropriateness of the nutrients to be declared for a particular food category (iv) The frequency and amount of consumption of a food product, i.e. the significance of a food product or food group contributing to the nutrient intake of the general population. (v) Capability of the laboratories to perform accurate analyses of the proposed nutrient(s).
Mexico	The size of the package should be considered in order to determine the number of nutrients that should be declared. National legislative framework: it is obligatory just wherever a nutritional claim is made. The potential effect of the claims in the purchase decision for the consumer, as well as the nature of food.
Poland	No comment
Singapore	▪ Definition of nutrients and standardization of methods of analysis (eg there are no internationally recognized methods of analysis of trans fat). ▪ Availability of updated Recommended Dietary Allowances for consumers to interpret the nutrient content of prepacked food products.
United States	The US agrees that the three criteria listed in the discussion paper, i.e., public health significance, provision of consumer information, and practical considerations are important elements to consider in determining the list of nutrients. We recommend the following criteria: 1. Global public health significance: The US believes that CCFL in consultation with CCNSFDU should identify nutrients for mandatory labeling that are of greatest significance on a global basis, including nutrients important for under-nourished populations as well as those associated with increased or reduced risk of disease or health conditions. Nutrients that are significant to public health on a global basis, not only on a regional or national basis, should be given priority in determining the list of nutrients to be declared. In addition, it is also important to recognize that within a region or country certain nutrients may be of public health significance and, therefore, suitable for inclusion in nutrition labeling. Therefore, the flexibility provided in existing section 3.2.1.4 of the Codex Guidelines on Nutrition Labelling should be maintained. 2. Scientific knowledge base: The strength of scientific evidence for nutrient-disease relationships should be considered and those nutrients with strong and relevant scientific evidence should be given priority as CCFL considers updating the list of mandatory nutrients. The US believes that it is appropriate for CCFL to seek scientific input from CCNFSDU on this aspect. 3. Implementation of the Global Strategy: Given that FAO and WHO have asked Codex to assist with the implementation of the Global Strategy, it is important for CCFL to consider nutrients identified in the Global Strategy as those associated with increased risk of non-communicable diseases, e.g., saturated fatty acids, trans fatty acids, and sodium. 4. Practical considerations: Practical issues, such as the infrastructure and capacity of industry and government authorities, costs associated with compliance and enforcement, availability and validity of analytical methods influence the ability to implement a requirement for declaration of nutrients. 5. Other considerations: There may be a need to apply other criteria specific to local or regional circumstances in determining whether a nutrient should be declared on the label. For example, level of consumer awareness or consumer understanding and use of food labels varies among countries and regions. Listing a nutrient on the food label provides information to consumers about the nutritional value of a food that will assist in maintaining healthy dietary practices, but only when consumers are adequately informed about the information on the label and its use in daily diets. Nutrition labeling requirements should ideally be accompanied by consumer education campaigns.

	As another example, the availability of the nutrient in the food supply may impact the requirement for declaration of the nutrient on a food label. This may be considered either as a separate criterion or as part of the determination of the public health significance of the nutrient. In developing US regulations on nutrition labeling, the US Food and Drug Administration (FDA) considered the public health significance of a nutrient to identify the list of mandatory nutrients and the order in which these nutrients are declared. The nutrients whose over-consumption is related to increased risk of disease are placed at the top of the list of required nutrients. In addition, nutrition information is presented in the context of a total daily diet and, thus, links nutrient information with the dietary guidance considered important to public health. More recently, FDA required the declaration of trans fatty acids in the Nutrition Facts label to provide information to assist consumers in maintaining healthy dietary practices. FDA considered many factors, including scientific evidence that showed that consumption of trans fatty acids increases LDL-C, a primary risk factor for CHD. Scientific authoritative reports such as Dietary Guidelines for Americans (Dietary Guidelines) 2000 recommended that Americans reduce trans fats when reducing fat intake. FDA concluded that the declaration of this nutrient on a separate line will help consumers understand that trans fat is chemically distinct from saturated fat and will assist them in maintaining healthy dietary practices.

1.2 What should be the key criteria for inclusion of nutrients that should always be declared, and why?

Member/ Observer	**Answer**
Argentina	Whether they have public health implications
CEFS	The choice of the nutrients to be labelled should primarily reflect the principle that nutrition information should enable consumers to have a **representative and comprehensive overview** of the nutritional properties of foods. The **public health significance** is also an important criterion to take into account. Those nutrients that best allow consumers to select foods and compose their diet in light of widely accepted nutrition recommendations should be declared in the first place. Codex' current list of nutrients to be always declared meets these two criteria.
Australia	1. Public health – Australia recognises potential public health impact, on a global scale, as the key driver behind the Global Strategy for Diet, Physical Activity and Health. As noted above, we suggest that a structured risk analysis approach should be used to assess the global public health significance of individual nutrients. 2. Practicalities - • Readily implemented – nutrients of public health priority for which information is readily available, and for which there are few practical barriers, should be considered as higher priority for consumer information. • Enforceable – in order for nutrient information to be effective, hold consumer confidence, and to be of maximum benefit to communities, it must be enforceable. • Costs – the costs associated with declaring the nutrient should be considered, for example: for industry (costs of labelling), government (monitoring and enforcement costs) and consumers (such as increased labelling and purchase costs).
Brazil	The key criteria should be the public health significance of the nutrient. The work should focus on the nutrients associated with an increased risk of non-communicable diseases. Other nutrients considered extreme relevant for maintaining health could be included. It would ensure that the nutrients that are always declared are important to the health of the population and should be used by consumers to make better food choices. It could also avoid an excessive expansion of the nutrient list.
EC	In the international context it may be difficult to identify one or more key criteria as the most important for the inclusion of information on a nutrient. The criteria may depend on the key public

	health messages for a healthy diet. However, in the context of the ECropean situation where over-nutrition is a greater problem than under-nutrition a important consideration for the inclusion of nutrients in the basic nutrition declaration is their significance in the diet of the general population.
IADSA	For foods in general the key criteria should be based on consumer understanding of basic nutrition information based on national public health policy.
ICBA	The key criteria for including nutrients that should always be declared should be the capability for the consumer to understand and apply the information in choosing a balanced, healthy diet
Japan	Public health significance (over or under nutrition) should be the key criteria for inclusion of nutrients, since labelling of nutrients which do not have public health significance only confuse and mislead consumers.
Malaysia	(vi) Public health significance of the nutrients proposed, both in terms of over and undernutrition, as this is the scenario in most regions of the world (vii) Practical considerations especially legibility, readability and consumer understanding; cost incurred in placing the nutrients on the label;
Mexico	The significance of the nutrient within the national health system, in response to specific needs for the population, based on scientific data.
Poland	Importance of nutrients for prevention of obesity and other non communicable diseases.
Singapore	Public health significance should be key in deciding which nutrients to include. It is important for consumers to be aware of how much of the nutrients they are consuming, especially for nutrients that may contribute to chronic diseases when consumed in either excessive or inadequate amounts.
United States	See answer to 1.1

1.3 Do you have any specific recommendations to minimise the possible costs and limitations of nutrition labelling?

Member/ Observer	**Answer**
Argentina	• Allowing different methods for determining nutrient value for the purposes of labelling; • Permitting declaration of average values based on analysis or calculation; • Not requir ing full labelling of foods of negligible nutrient content;
CEFS	To minimize the possible costs and limitations of nutrition labelling, the nutrition declaration should focus on the most relevant nutrients when it comes to balanced diet and nutrition: **energy**, **protein**, **carbohydrates**, and **fats**. These nutrients are the subject of widely agreed dietary recommendations (e.g., WHO recommendation that an optimum diet should consist of at least 55% of the total energy intake from a variety of carbohydrates, 10-15% from protein and 30-35% from fat). Consumers should first get familiar with this basic – although essential – information that, when used properly, allows health conscious choices.
Australia	Australia supports a non-prescriptive approach to methods of analysis to support values on the nutrient declaration (where this approach is taken rather than by calculation). The Australia New Zealand Food Standards Code does not generally prescribe methods of analysis (with the exception of dietary fibre); allowing a number of methods of analysis, including: • Nutrition Panel Calculator (an online tool provided by the national food regulation body - Food Standards Australia New Zealand); • Other credible software; • Laboratory analysis; and • Food composition tables or databases. Average quantities of declared nutrients are supported by Australia, except where use of minimum or maximum quantities may be appropriate (for example: the Australia New Zealand Food Standards Code allows for declaration of minimum or maximum quantities of types of fatty acids where polyunsaturated or monounsaturated fatty acids content claims are made in relation to foods with specific compositional requirements). We do not agree with exemptions for foods of negligible nutrient content, for example: diet sodas, but do consider that it may be appropriate to provide exemptions from nutrition declaration for specific

	foods, such as those which do not contribute significantly to the diet, for example: spices – due to consumption in very small amounts. We note that the CCFL eWG led by Australia, considering issues around mandatory nutrition labelling, has provided for discussion of issues around possible exemptions and suggest the issue be more fully explored within that forum. Australia notes that within the work of the current CCFL eWG led by the US, considering legibility and readability, questions are raised around provision for nutrient declarations on small packages, or packages of unusual shapes – we therefore suggest that this CCFL eWG consider developing of an abbreviated list of 'core' nutrients that could be declared where physical constraints prevent inclusion of the full list.
Brazil	The options presented in CX/FL 08/36/3 to reduce the cost of nutrition labelling should be taken into consideration. The Brazilian regulation on nutrition labelling has some exceptions that might help to reduce the costs of nutrition labelling. For example, foods with negligible amounts of nutrients (coffee, spices and others) and small food packages (under 100 cm^2) do not require nutrition labelling. There are exemptions based on the place where the food is sold (bakeries and restaurants). There is flexibility in the format of the Nutrient Declaration. The regulation provided an extended transition period for the implementation of mandatory labelling (3 years). The nutrient declaration might be based on the average values of the manufacturer's analysis of the food or a calculation from the nutrient values of the ingredients used or a calculation from official data bases of the nutrient composition of foods. A tolerance value (20%) was established to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. The regulation on nutrition labelling must be linked to nutrition education programmes and materials in order to promote the correct use of nutrient declaration by the consumer.
EC	The costs associated with nutrition labelling are related to the cost of obtaining the relevant information, those associated with changing the label and the cost of producing labels (including whether there is an impact on the number of labels a food business has to have available to be able to commercialise their product on different markets). A mechanism to ease adaptation to new legal requirements is allowing firms a suitable amount of time to respond to the regulation. It costs less for firms to have to comply over the medium term than if they had to comply immediately, because there is a natural cycle in product lines and labels, into which changes to labels can be incorporated. Suitable implementation times also allow the use of existing labelling stock, reducing packaging wastage, which is especially important to Small and Medium size Enterprises (SMEs). The potential impacts of different policy options on nutrition labelling were assessed by the EU Commission recently and as part of the assessment it was noted that the costs associated with obtaining the information on up to 9 elements through the analysis of the product are estimated to be €400 per product whilst manual calculation from recipes was estimated to be around €70 and the use of online software and databases could reduce the cost to around €10. The other following mechanisms may also be considered as ways of minimising costs.: • Exemptions for specific foods e.g. primary produce like fresh fruit and vegetables and unprocessed meat, or foods that provide negligible nutrition such as tea or coffee; • Exemptions such as for very small businesses, or some products; • Limit the number of nutrients to be declared
IADSA	Except where required (e.g. dietetic foods) mandatory nutritional labelling should be restricted to the three macronutrients (protein, carbohydrate and fat) and energy, presented in a generally understandable form.
ICBA	To address cost and other limitations, at the international level, nutrition information should be limited to energy, protein, available CHO and fat. There should be no requirement to apply it to

	foods/beverages with minimal or no nutritional value, e.g., spices, plain tea/coffee, water. Also, there should be no requirements to apply it to refillable glass bottles and very small containers. Alternate means, e.g., care lines, should be considered as acceptable means for this purpose.
Japan	Only critically important nutrients in the country / region should be declared to minimise the possible cost. Effective consumer education would be the most important way to minimise costs and limitations of nutrition labelling.
Malaysia	Malaysia believes that the most practical global approach to nutrition labelling at this time is to retain the 4 core nutrients and not to expand the list of nutrients that must be labelled. It should be borne in mind that in most countries in the world, nutrition labelling is still voluntary and not on many food products. We do not believe it is time for Codex to recommend expanding the number of nutrients to be declared. We believe that through the simple implementation of mandatory labelling of 4 nutrients authorities can help in guiding food choice, thereby promoting healthy eating practices. We believe that even through these 4 core nutrients, it is also possible to help address issues related to diet-related chronic diseases such as obesity. Nutrition labelling is only one of the tools for helping consumers make better food choices, improve their eating habits and thereby improve their nutritional status. The argument that mandatory labelling of nutrients will burden small and medium industries is not valid when limited to the 4 core nutrients. Firstly, there are several practical measures that can be undertaken to help these industries, e.g. using nutrient databases for calculations, requiring labelling only for identified food groups that contribute significantly to nutrient intake of the general population and technical assistance to these industries. Secondly, many small companies are already have voluntary nutrition labelling because of the need to be competitive in the market. Indeed, it is doubtful if emphasising components like saturated fat, sugars on food labels are beneficial as many regions of the world are facing the twin facets of the malnutrition problem, i.e. undernutrition as well as overnutrition.
Mexico	The label should be simplified in order to be easier to understand by the consumer, and to reflect the real needs of the population. The obligation to use specific formats for the declaration is not considered practical. The effort should be focused on the information present and readable on the label rather than the format. National informative campaigns should be launched, information centers should be placed at consumer centers, websites, phone numbers, etc., in order to give to the public nutritional information.
Poland	No comment
Singapore	▪ To standardize the core content and format of the nutrition information panel globally (Eg. the nutrients to be declared per serving or per 100g or as % DV). . ▪ To provide food composition data and system for food manufacturers to conduct their own indirect analyses (using their recipes) for declaration of the nutrient compositions of their prepacked foods.
United States	The US believes that several options are available and should be considered by national governments to determine appropriate exemptions and special labeling provisions to minimize undue economic burden to industry and maximize the public health benefit of mandatory nutrition labeling. <u>Exemptions and special labeling provisions:</u> Options for mitigating the disproportionate costs to small and medium size enterprises of putting a nutrient declaration on labels may include exemptions based on size of enterprise, exemptions based on place of sale, extended transition periods, and exemptions for certain categories of food. The US requires mandatory nutrition labeling on most prepackaged foods. However, US regulations permit certain exemptions and special nutrition labeling provisions taking into account the economic considerations, type and place of sale, and nature of the food. For example, exemptions or special labeling provisions are provided for: ▪ Food manufactured by small businesses, provided no nutrition claims are made on the label or in labeling (“small business” is defined by FDA regulation); ▪ Food served in restaurants, etc. or delivered to homes ready for immediate consumption; ▪ Delicatessen-type food, bakery products and confections sold directly to consumers from location where prepared; ▪ Foods that provide no significant nutrition such as instant coffee and most spices;

- Infant formula, and infant and junior foods for children up to 4 y of age;
- Bulk foods shipped for further processing or packaging before retail sale; and
- Fresh produce and seafood, which are covered under a voluntary program through the use of shelf labels, signs, and posters.

During the process of developing and adopting regulations, FDA considers the factors associated with compliance and enforcement and identifies an effective date of its regulations and, as warranted, provides for a transition period for manufacturers to take necessary actions to comply with the regulations. In 1993, when FDA adopted its mandatory nutrition labeling regulations, it provided about a 15-month compliance period for industry to redesign and re-label their products to comply with the mandatory nutrition labeling requirements. More recently, when FDA mandated the declaration of trans fatty acids on food labels, FDA allowed a 29-month period between publication of the final rule and the effective date of the rule. This phase-in period minimized the need for multiple labeling changes, allowed small businesses to use current label inventories, and provided economic savings. In addition, FDA also granted enforcement discretion to some firms to use old label stock – in these cases, food firms followed the required process described in FDA's guidance for industry.

Exemptions for foods with negligible nutrient content: Several options can be considered with respect to nutrition labeling and foods with insignificant nutrient content; for example, exempting foods with negligible nutrient content from mandatory nutrition labeling, requiring declaration of only those nutrients present in amounts greater than zero, and considering a labeling statement indicating presence of insignificant amounts of a nutrient.

The US believes that these options can be used to adequately address the concern about mandatory nutrition labeling of foods with insignificant nutrient content. In the US, FDA regulations exempt foods that contain insignificant amounts of all of the nutrients required to be declared from the mandatory nutrition labeling requirements, provided that the food bears no nutrition claims or other nutrition information in labeling or advertising. Insignificant amount is defined by regulation. Examples of such foods include coffee beans, tea leaves, plain unsweetened instant coffee and tea, condiment-type dehydrated vegetables, flavor extracts, and food colors. FDA regulations also permit certain nutrients to be omitted from the list of nutrients and included in a single sentence when present at “zero” levels in a food.

Costs associated with nutrient analysis: Options for mitigating costs associated with nutrient declaration may include: permitting the declaration of average values based on manufacturer’s analysis, use of published data in official databases, and providing choice among methods of analysis. The US believes that member countries should explore these and any other viable options as suited for their countries considering the immediate public health need and the capacities of both industry and regulatory authorities.

In the US, FDA regulations list a specified set of nutrients that must be declared and other specific nutrients that may be voluntarily declared. No other nutrients except those on the mandatory and voluntary list of nutrients can be declared in the Nutrition Facts label. The nutrients are required to be declared in a specified order and format. FDA considered the public health significance of a nutrient in developing the order of nutrients and a standardized format is intended to adequately and clearly convey essential nutrient information to consumers. The nutrients whose over-consumption is related to increased risk of disease are placed at the top of the list of required nutrients. In addition, nutrition information is presented in the context of a total daily diet and, therefore, links nutrient information with the dietary guidance considered important to public health.

FDA regulations do not state how manufacturers should determine the nutrient content of their product for labeling purposes. However, it is the manufacturer’s responsibility to ensure the accuracy and compliance of the information presented on the label. There is no prohibition from using “average” values based on manufacturer’s analyses provided the information is accurate and reliable. In addition, FDA will review and accept industry data bases for firms to use in nutrition labeling. While the regulations do not specify acceptable sources of obtaining the declared values, they state that for compliance purposes, FDA uses appropriate methods published by the AOAC or other methods as needed. Manufacturers are responsible for the accuracy of the values declared regardless of which method or database they use to determine those values.

Issues related to package size or shape: Nutrition labeling provisions may also take into account issues such as package size or shape that influence space on the food label. The package size may be too small to permit the inclusion of the nutrient declaration or the shape of the package may be such that a label bearing the nutrient declaration cannot be affixed to it. Some options to consider may be setting a minimum package size below which nutrient declaration is not required, permitting flexibility in the list or format of nutrient declaration considering packaged size, and providing for the use of additional means of nutrition labeling such as tags. The US believes that such approaches should be considered by national governments to determine appropriate ways of declaring nutrient information on different types and sizes of food packages.

In the US, FDA regulations provide certain exemptions and special labeling provisions for small and intermediate-sized packages. Depending on the surface area of the food package, flexibility is provided in the format, type size, and use of abbreviations in declaring nutrient information. In addition, small packages with less than 12 square inches of total surface area available to bear labeling can provide a telephone number or address to obtain nutrition information, rather than declaring the Nutrition Facts, provided the product does not bear any nutrient content claims or other nutrition information in labeling or advertising. Use of tags is permitted under limited circumstances only under permission from FDA.

Compliance and Verification: The technical difficulty and cost of verifying the nutrient information may be of concern in some countries. However, there are several approaches to address this issue, including verifying industry measures to provide accurate nutrient information, for example through use of recognized laboratories or databases and establishing tolerances to account for inherent or analytical variability.

The US believes that such options can be considered to provide sufficient direction to industry with respect to compliance with established requirements. In the US, FDA regulations do not state how manufacturers should determine the nutrient content of their product for labeling purposes. It is the manufacturer's responsibility to ensure the accuracy and compliance of the information presented on the label. However, FDA provides guidance to industry about its compliance and enforcement policies. With respect to nutrient analysis, FDA does not object to the use of "average" values based on manufacturer's analyses provided the information is accurate and reliable. In addition, FDA will review and accept industry data bases for firms to use in nutrition labeling. While the regulations do not specify acceptable sources (laboratories or methods) of obtaining the declared values, they state that for compliance purposes, FDA uses appropriate methods published by the US' Association of Official Analytical Chemists or other methods as needed. Manufacturers are responsible for the accuracy of the values declared regardless of which method or database they use to determine those values.

To account of reasonable variations in nutrient content (inherent variability in food production or processing) and analytical variability, FDA permits certain specified variation from the value that is declared on the label. For compliance and enforcement purpose, a food is not deemed to be misbranded if it contains 1) at least 80% of the declared value for vitamins, minerals, protein, total carbohydrate, dietary fiber, other carbohydrates, polyunsaturated or monounsaturated fat, and potassium and 2) no more than 20% in excess of the declared value for calories, sugars, total fat, saturated fat, trans fat, cholesterol, and sodium (101.9(g)). Reasonable excesses or deficiencies over labeled amounts are acceptable within current good manufacturing practice.

FDA's food labeling guide, which addresses most frequently raised questions about FDA's food and nutrition labeling regulations, can be accessed online at: http://www.cfsan.fda.gov/~dms/2lg-toc.html.

ENERGY VALUE

1.4 What is the public health significance of the nutrient?

Member/ Observer	Answer
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	Energy value is pivotal in understanding the relationship between energy input (dietary intake) versus energy expenditure (basal metabolism and exercise) and health. In Australia, this is mostly significant in relation to overnutrition. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of energy.
CEFS	The energy value reflects the calorie content of the food product, and calorie management ought to be the principal objective in bodyweight control and in the context of the debate on obesity. The energy content of foods and drinks is **the most relevant nutrition information** from a public health perspective, which consumers should primarily make use of.
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases concludes that high intake of energy-dense foods increases the risk of developing obesity. The Global Strategy on Diet, Physical Activity and Health points out that elevated consumption of energy-dense foods is one of the factors that increase the risks of noncommunicable chronic disease and rises concern about the negative consequences of energy imbalances in children and adolescents. The recommendations for populations and individuals diets include the achievement of energy balance and a healthy weight. It seems clear the importance of energy intake to public health and its disclosure on nutrient declaration.
EC	The regulation of energy intake is one of the important factors in avoiding excessive weight gain. Given the increasing prevalence of overweight and obesity in the European Union and across the world it is important that consumers understand the impact of energy consumed and expended on the maintenance of a healthy weight.
IADSA	Important in weight/obesity control and in dietary intake calculations *** NOTE: Energy is not a nutrient**
ICBA	Overweight and obesity are multi-factorial problems. However, a fundamental cause is an imbalance between calories consumed and calories expended. Labeled Information on the energy (calorie) content of a product is critically important so that consumers develop calorie awareness and are able to select portions of foods and beverages within context of their daily calorie needs.
Japan	Excessive intake level
Malaysia	High public health significance as chronic energy excess contributes to serious overweight and obesity problem that now plagues many parts of the world.
Mexico	Indicating this value was based to guide the consumer on the energy that a food can contribute to him, in order that caloric ingestion was considered.
Poland	Prevention of obesity.
Singapore	Implication for increased risk of obesity when energy intake is in excess.
United States	A discussion of key nutrients that impact health should include nutrients important for under-nourished populations (such as calories and protein), those associated with increased risk of chronic diseases (such as saturated fat, cholesterol, and sodium), and those that can improve health and help reduce the risk of some diseases and conditions (such as dietary fiber and certain vitamins and minerals).

	In the United States, the Institute of Medicine of the National Academy of Sciences provides evidence-based and authoritative information and advice concerning health and science. The IOM has established Dietary Reference Intakes (DRIs) for nutrients considering latest scientific knowledge about the roles of nutrients in human health, including the function of nutrients in the human body, food sources, usual dietary intakes, and effects of deficiencies and excessive intakes. The IOM dietary recommendations offer quantitative estimates of nutrient intakes to be used for planning and assessing diets applicable to healthy individuals in the US. In addition, the Dietary Guidelines for Americans (Dietary Guidelines), first published in 1980, provides science-based advice to promote health and to reduce risk for chronic diseases through diet and physical activity. The recommendations contained within the Dietary Guidelines are targeted to the general public over 2 years of age who are living in the United States. Because of its focus on health promotion and risk reduction, the Dietary Guidelines form the basis of federal food, nutrition education, and information programs. The IOM dietary recommendations and the Dietary Guidelines help formulate federal food and nutrition policies, including food labeling regulations. Excess intake of fat, saturated fat, trans fat, cholesterol, or sodium may increase the risk of certain chronic diseases, such as heart disease, some cancers, or high blood pressure. In contrast, consuming adequate amounts of certain other nutrients can improve health and help reduce the risk of some diseases and conditions. For example, getting enough calcium may reduce the risk of osteoporosis and a diet high in dietary fiber promotes healthy bowel function. Additionally, a diet rich in fruits, vegetables, and grain products that contain dietary fiber and low in saturated fat and cholesterol may reduce the risk of heart disease. Taking into account the public health significance of the nutrient, FDA's nutrition labeling regulations require the declaration of key nutrients that should be limited (total fat, saturated fat, trans fat, sugars, cholesterol and sodium) as well as nutrients that should be consumed in adequate quantities (dietary fiber, vitamin A, vitamin C, calcium, and iron). In addition, calories, calories from fat, protein, and total carbohydrates are required to be declared within the Nutrition Facts panel (See FDA's food labeling guide at http://www.cfsan.fda.gov/~dms/2lg-7b.html#general). The US recognizes that declaration of all of the mandatory nutrients applied to foods marketed in the US may not be feasible or necessary on a global basis. We recommend that the CCFL and CCNFSDU consider the global public health significance and practical considerations in determining the list of mandatory nutrients to be included in Codex texts.

1.5 What are the practical issues with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health.
Australia	

	Information around energy value is readily available by analysis or sourced from databases or texts, however costs may be incurred in accessing these databases in some countries. There could be costs associated with: • building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; • costs to industry of changing the label; • costs to government of enforcement and monitoring; and possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Conversions factors established for the nutrients that contribute to energy production are utilized to calculate the energy content of the food. In this way, the declaration of energy content depends on the analyses or databases about the macronutrient composition of foods.
EC	The energy content of a food is often estimated through calculation from the energy-providing components of the food. The lack of specific energy conversion factors for some specific nutrients can be an issue if operators use the conversion factors of the category (such as carbohydrates) which do not represent the actual energy value of the product.
IADSA	Varying conversion factors across the world, particularly between the USA and the EU
ICBA	Energy (calorie) labeling is currently part of any nutrition labeling requirement. It is relatively easy to calculate. As such, there are no practical issues, other than labeling space, that would impede labeling of energy (calories)
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	Minimal practical problem, as energy value is obtained by calculation. The components required to be analysed (moisture, ash, protein, carbohydrate and fat) to enable the calculations to be made are not particularly difficult to obtain.
Mexico	With the declaration of this nutrient, the population has come to realize how much calories are gaining by the ingestion of certain foods, and taking into account it for their diet, at the same time, the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	Declaration of energy value as % of reference intake set for labelling purposes.
Singapore	The method by which energy value is derived. For instance, by calculation or by bomb calorimetry.
United States	In this section, we provide responses to both question 1.5 and question 1.8 as there is some overlap among issues relevant to these questions. Practical issues related to nutrient declaration, in general, include: • presentation of nutrition information such as language, format, and link to reference values; • need for exemptions and special labeling provisions, considering o foods of no nutritional significance, o small package sizes, and o bulk foods • compliance and enforcement issues; for example, o capacity and infrastructure of industry and regulatory authorities, o analytical testing for nutrient content (availability and validity of methods), o permitted variability from declared value (accounting for inherent analytical variability and variations within good manufacturing practices), o costs to public and private sectors for compliance and enforcement, and o procedures for enforcement and follow-up corrective actions • impact on small businesses and approaches to minimize undue economic burden; • consumer education to assist in understanding and use of nutrient declaration (recognizing that nutrition labeling should be one aspect of broader communication efforts regarding public health) In addition to these practical issues that apply to nutrient declaration in general, some nutrients may pose specific challenges:

	Total sugars versus Free or added sugars – The Global Strategy states that dietary recommendations for populations and individuals should include "limit[ing] the intake of free sugars." The US notes that it is difficult to make the distinction between free or added sugars and naturally occurring sugars for the purposes of food labeling. There is no scientific evidence that the body makes any physiological distinction between added sugar molecules and those naturally occurring in a food. In addition, a requirement to declare added sugars is impossible to enforce. When a product is sampled for compliance, laboratory analysis yields a value for total sugars and, for most foods, it is not possible to differentiate between added and naturally occurring sugars. Therefore, regulatory authorities would not be able to determine the accuracy of a label declaration of added sugars. Moreover, a declaration of only added sugars may significantly underrepresent the sugars content of a food, particularly those that are high in naturally occurring foods (for example, for some fruits canned in heavy syrup, added sugars may account for only 50 percent of total sugars). Disclosure of only the added sugars could be misleading to consumers who are concerned with total sugar intake. For these reasons, we believe that sugars, when declared, should represent the total sugar content (not just added sugars) of the food. In this respect, we agree with section 3.2.4 of the Codex Guidelines on Nutrition Labeling, which refers to "total sugars" rather than added sugars only when "sugars" is declared on the food label. Dietary fiber – The US notes ongoing discussions at the CCNFSDU with respect to the definition of dietary fiber, availability and limitations of analytical methods to determine dietary fiber, and nutrient content claims for dietary fiber. CCNFSDU has discussed conditions for (dietary) fibre content claims (ALINORM 93/26, Appendix III) since 1992. Early in these deliberations, it noted the difficulties associated with the definition of (dietary) fibre and the methods of analysis for its determination (ALINORM 95/26, para 9). In recent years, CCNFSDU has discussed a draft revised definition of dietary fiber for purposes of nutrition labeling and nutrient content claims. It would be appropriate for CCFL to take into account any recommendations of the CCNFSDU with respect to the definition or analysis of dietary fiber as CCFL considers the inclusion of dietary fiber within the list of mandatory nutrients.

1.6 What are the costs that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The control-related costs to be covered by the state in conducting routine analysis need to be considered. Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	There could be costs associated with: • building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; • costs to industry of changing the label; • costs to government of enforcement and monitoring; and • possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of energy must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	In 2004 the estimated average costs of direct analysis associated with the declaration of energy, protein, carbohydrate and fat was €57. Therefore, the costs of analysis associated with the declaration of energy are relatively small. The information is readily available in food composition tables so it would be readily available to food manufacturers.
IADSA	Unless internationally recognised food composition tables are available, the

	calculations have to be based on assays of the food
ICBA	Energy is determined by calculation. Costs to declare are therefore minimal.
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	Minimal cost incurred, as explained above, energy value is obtained by calculation from protein, carbohydrate and fat content of the food.
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment.
Singapore	▪ Labelling costs ▪ Nutrient analysis cost For calculated values such as energy, the total costs would cover analyses of the quantities of carbohydrate, protein, fat, as well as other energy-contributing ingredients such as alcohols and sugar alcohols.
United States	The costs associated with declaring a nutrient are encompassed in the overall costs associated with nutrition labeling. When the US implemented its mandatory nutrition labeling, it identified five specific costs that firms would incur: • Administrative costs, which are costs of interpreting the regulation and deciding on an appropriate action in response to the regulation; estimated at 152 million USD for 8,900 firms • Costs of testing to determine the nutrient content (would not affect firms that already include nutrition information on their label since these firms would already carry out analytical testing); estimated at 112 million USD in the first year and 195 million USD over the next 20 years • Printing costs, the costs of changing the printing plates or other printing mechanism; estimated at 756 million USD (the largest costs associated with mandatory nutrition labeling) • Inventory costs, the value of the labels in inventory that cannot be used due to the new regulation; estimated at 421 million USD • Reformulation costs, i.e., costs of changing product recipes in response to the required nutrition labeling; costs of which FDA did not attempt to quantify because of the difficulty in predicting a firm's reaction to the regulation. FDA estimated a total quantified cost of 1.5 billion USD over 20 years of the regulation. For mandatory trans fat declaration, FDA estimated that industry would incur a one-time cost of approximately 140 to 250 million USD. These costs include determining the amount of trans fat in the food products, relabeling the Nutrition Facts panel to add trans fat, and reformulating products voluntarily to decrease the amount of trans fat.

1.7 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	The declaration of energy content provides important information for consumers on which to base well informed and healthy choices that could lead to improved public health outcomes.
CEFS	No comment
Brazil	The declaration of energy can help consumers to control energy intake and contribute to achievement of healthy weight. The control of energy intake and the maintenance of healthy weigh can decrease the

	risk of noncommunicable chronic disease.
EC	Consumers are informed of the energy content of a product and this may influence their food choices if they need to reduce their energy intake to maintain a healthy weight,
IADSA	See 1.4 above (Important in weight/obesity control and in dietary intake calculations)
ICBA	Declaring energy as part of nutrition labeling offers the consumer the chance to build important energy/calorie awareness. Concurrent educational programs (which are outside the scope of Codex mandate) must be carried out to ensure the consumer understands how to use and apply energy information on food labels to achieve "energy balance."
Japan	Provide information to the consumers who would already know their intake energy value from other food and would like to know total energy values for themselves
Malaysia	It is highly beneficial for consumers to be informed of the calories content of the food as chronic excessive energy intake is to be avoided.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	Form of education of consumers about energy value of food products and possibility to them of choosing proper food suitable for reaching adequate energy value of daily diet (and not exceeding individual energy requirements)
Singapore	Nutrition labelling in general helps to encourage intake of "healthier food products" and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the energy value helps consumers to moderate their total daily energy intake so as to achieve their ideal body weight.
United States	The benefits associated with declaring a nutrient are encompassed in the overall benefits associated with nutrition labeling. When the US implemented its mandatory nutrition labeling, it based the estimate of benefits on health improvements resulting from consumers' changing their diets in response to the nutrition information. The health benefits arising from the labeling changes were assessed using a three-step model: 1) changes in consumer diets, leading to 2) changes in health states, and 3) valuation of these health changes. The analysis focused on changes in consumption of fat and cholesterol and their effect on cancer and coronary heart disease (CHD). FDA estimated that the decrease in fat and cholesterol due to the nutrition information would prevent 35,179 cancer cases, 4,028 cases of CHD, and 12,902 premature deaths over 20 years. Finally, to estimate the benefits of nutrition labeling, the agency valued this reduction in deaths and illnesses, which amounted to 3.6 billion USD. FDA estimated the total social benefits (including reduced medical costs of 0.6 billion USD) to be about 4.2 billion USD over 20 years. With respect to trans fat declaration, FDA estimated that 3 years after the effective date, January 2006, trans fat labeling would annually prevent from 600 to 1,200 heart attacks and save 250-500 lives. It was also estimated that the trans fat rule would realize a cost savings of 900 million to 1.8 billion USD per year in medical costs, lost productivity, and pain and suffering. Another benefit from requiring the declaration of a nutrient on the label relates to the potential reformulation of products by manufacturers to produce products with healthier nutrition profiles. Firms that are forced to disclose negative characteristics of their products may choose to reformulate to eliminate the negative characteristics rather than risk losing sales as a result of the disclosure label. In this way, labeling benefits all consumers who use the products, not just those who read the label. In the US, food producers responded to the 1993 mandatory nutrition labeling regulations by creating healthier foods. More than 6,500 reduced fat foods are reported to have been introduced in the marketplace between 1995 and 1998. Similarly, FDA's requirements for mandatory declaration of trans fatty acids prompted manufacturers to reformulate their products using healthier oils to either reduce or eliminate trans fat from foods.

1.8 What are the enforcement and/or regulations issues that need to be considered?

Member/ Observer	Answer
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions.
Australia	No specific issues in relation to this nutrient have been identified.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on energy and nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	For official controls, tolerances around the declared value would need to be considered.
IADSA	Standardisation of factors and tolerances allowed for food variation and analytical variation
ICBA	The process of determining energy contributions is relatively straight forward. There should be little impact on enforcement.
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made
Malaysia	No major issue as obtaining these values do not pose great practical difficulties.
Mexico	Legal national framework should be updated.
Poland	Food labelling law and some regional regulations e.g. EU regulations
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.
United States	See answer to 1.8

1.9 What issues should be considered in addressing consumer understanding of the nutrient declaration?

Member/ Observer	Answer
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	Use of terminology would require consideration – for example, consumers may not have a good understanding of the terms 'energy' versus kilojoules versus calories and the relationship of these concepts to overweight and obesity. These issues may also be covered by the work of the CCFL eWG on legibility and readability of nutrition labelling.
CEFS	No comment
Brazil	Consumers should be aware that energy needs depend on many factors, such as sex, age and level of physical activity
EC	Energy content is one of the nutritional aspects of a food that consumers are often interested in having information on. Issues can be consumers' knowledge of their individual energy requirement. Also the way the information is expressed and consumer understanding of the units of measurement for energy.
IADSA	Confusion between kJ and kcal. Method of reporting (e.g. per portion or per 100g)
ICBA	Nutrition labeling information is a tool. It cannot, by itself, serve as a means of education. Concurrent education programs, which are outside the scope of the CCFL, need to be established to ensure that the consumer knows how to use and understand energy information, as well as other nutrition information on the label
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves
Malaysia	Not difficult to communicate information on energy value of foods. Public should be educated in relation to total energy need in relation to total energy expenditure.

Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	Expression in kcal in intelligible, information given in labelling shall be visible and legible
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For energy value, we suggest to educate consumers on reading calorie values declared in food labels and using the information to balance their energy intake and expenditure, to achieve their ideal body weight.
United States	Consumer understanding is an important aspect of nutrition labeling. To some extent, consumer understanding can be enhanced through appropriate presentation of nutrition information. However, nutrition labeling requirements should ideally be accompanied by consumer education campaigns taking into account the level of consumer awareness and use of food labels within the country. Listing a nutrient on the food label provides information to consumers about the nutritional value of a food that will assist in maintaining healthy dietary practices, but only when consumers are adequately informed about the information on the label and its use in daily diets. In the US, nutrients whose over-consumption is related to increased risk of disease are placed at the top of the list of required nutrients that are declared in nutrition labeling. In addition, nutrition information is presented in the context of a total daily diet and, thus, links nutrient information with the dietary guidance considered important to public health. FDA conducted consumer focus groups and reviewed consumer research studies conducted by food industry groups, consumer groups, public health organizations, health professionals, and academic researchers to identify key aspects of nutrient presentation and determine the most useful and appropriate format to present nutrition information. The current nutrition labeling format used in the US provides nutrient content as a percent of daily value per serving of the food as well as the daily reference values of nutrients based on total caloric intake. Thus, the nutrition label in the US serves two roles: 1) helps consumers make appropriate food choices and 2) helps consumers to understand the relative significance of the food in the context of total daily diet. Most recently, in the case of trans fatty acids, FDA concluded that the declaration of trans fatty acids on a separate line will help consumers understand that trans fat is chemically distinct from saturated fat and will assist them in maintaining healthy dietary practices.

1.10 What is your overall recommendation for this specific nutrient?

Member/ Observer	**Answer**
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of energy value should be **mandatory**.
Australia	Supported. Australia requires mandatory disclosure of energy content within the nutrition information panel.
CEFS	The energy value **should be part of the list of nutrients to be always declared** as it provides essential information to consumers on the calorie content of the food products they buy, and hence enables them to consciously manage and limit their caloric intake.
Brazil	The overall recommendation is to achieve energy balance. The Brazilian regulation on mandatory nutrition labelling requires the absolute declaration of the energy content present in the food portion (kcal and kJ) and its relative contribution to a diet base on 2000 kcal. We support keeping energy value in the list of nutrients that are always declared.

EC	Dietary energy balance is an important issue in the EU, therefore it is considered that energy content is one of the nutritional characteristics of a food that should normally be available if nutrition information is provided.
IADSA	Information on energy is important for some food categories, but not all Energy declarations should only be mandatory for foods where the declaration has a relevance and, with the exception of some commodities, should be on portion and not 100g/100ml. For example, the daily consumption of food supplements has a very small impact on the daily energy consumption and a 100g could relate to a potential 2-3 months recommended intake
ICBA	Information on the energy content of foods and beverages is critical and must continue to be an integral part of nutrition labeling.
Japan	Current guideline on nutrition labelling (CAC/GL2-1985) would be sufficient.
Malaysia	Highly recommended to be declared on the label.
Mexico	This value must be present always in the nutrimental information.
Poland	Energy value of diet adequate to actual needs (not too high and not too low)
Singapore	Compulsory to label
United States	The US believes that the following nutrients could be included in the list of nutrients that are always declared: • energy value • protein • available carbohydrate • fat • dietary fiber • sodium • saturated fat • trans fatty acids • cholesterol However, we recognize that flexibility is needed, taking into account the global public health significance of the nutrient and practical issues associated with the declaration of the nutrient. In addition, existing Codex guidance that requires the declaration of any other nutrient for which a health or nutrition claim is made and any other nutrient required by national legislation should be

PROTEIN

1.11 What is the public health significance of the nutrient?

Member/ Observer	Answer
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases. In Argentina, the National Nutrition and Health Survey (Encuesta Nacional de Nutrición y Salud, conducted by the Health Ministry) is the first national nutrition and health survey providing, for the first time, representative information on relevant aspects in terms of both health and nutrition in vulnerable populations. Diet quality shows deficiencies, with high caloric intake such as sugars, fats or cereals with low nutrition quality and low caloric-proteic intake. Average iron and calcium values are inadequate. In short, the diet shows deficiencies, so it needs quality improvement and protein inclusion.
Australia	Protein intake is not generally a public health issue in Australia. However, we recognise it may play a more important role in public health on a global basis. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of protein.

CEFS	Information on the protein content of foods is necessary in order to allow consumers to follow the widely agreed dietary recommendation that an optimum diet should consist of 10-15% of the total energy intake from protein.
Brazil	Proteins are essentials to growth and development. The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases sets ranges of population protein intake goals between 10 to 15 % of total energy intake. Families with low income are more exposed to the risk of protein deficiencies. Some studies show that the intake of beans, a good source of protein, has decrease considerable over the last decade in Brazil. Brazilian guidelines recommend the ingestion of adequate amounts of proteins derived from animal and vegetables foods to promote the growth of children and the maintenance of health.
EC	In the EU it is unlikely that individuals will have insufficient protein intake on a normal diet.
IADSA	Protein is an essential macronutrient
ICBA	While most of the world is not deficient in dietary protein, certain sections of the world suffer from nutrient insufficiencies, including protein insufficiencies.
Japan	When individual has an insufficient level of intake of protein, he will have a health problem, thus protein can be claimed as "high" in Japan. As a public health significance, Japanese people tend to take too much protein, but in this case, excessive intake of fat has more significant public health problem,
Malaysia	High public health significance as protein is a well recognized essential nutrient for all stages of the life-cycle for all segments of the community. At the same time, the increase in uric acid from high-protein diets can lead to gout, a disease that causes painful inflammation in the joints, severe dehydration, and weak bones.
Mexico	Giving information to consumers, in order to find out the importance of protein in the tissue construction. A high protein intake can lead to an increase of the risk for certain chronically diseases, but always keep in mind that a lack of protein in the diet is cause of malnutrition.
Poland	Intake adequate to requirements and needs
Singapore	Implication for protein energy malnutrition.
United States	

1.12 What are the practical issues with declaring the nutrient?

Member/ Observer	Answer
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health.
Australia	No significant additional issues in relation to this nutrient have been identified (other than the general issues identified above). We note that information around protein content is generally available by analysis or sourced from databases or texts.

CEFS	No comment
Brazil	The declaration of protein content depends on direct analysis. Brazil regulation determines that the amount of protein should be calculated using the formula: Protein = Total Kjeldahl Nitrogen x factor established according to the protein origin.
EC	There are standard methods of analysis on which protein content is calculated. The issue is whether the calculation of the protein content should be specific to the source of the protein in the food or whether a standard conversion factor should be used. Currently in the EU the approach of a single conversion factor is used as this simplifies the application and enforcement of the legislation and the protein content is not normally a determining factor for consumer food choices.
IADSA	Natural variation in foods and consistency in analysis and reporting
ICBA	Adequate databases, measurements of protein quality, analytical capabilities
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	No major practical issue as analytical methodology has been well established for a long time.
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of protein are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	Methods by which protein is measured. The conventional method used is based on the nitrogen content. However, this will include nitrogen from non-protein source. The more accurate measurement is by the sum of individual amino residues.
United States	

1.13 What are the costs that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The control-related costs to be covered by the government in conducting routine analysis. Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	There could be costs associated with: • building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; • costs to industry of changing the label; • costs to government of enforcement and monitoring; and • possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of protein must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	In 2004 the estimated average costs of direct analysis associated with the declaration of energy, protein, carbohydrate and fat was €57. Therefore, the costs of analysis associated with the declaration of protein are relatively small. The information is readily available in food composition tables so it would be readily available to food manufacturers.
IADSA	Assay costs (see 1.6 above) (Unless internationally recognised food composition tables are available, the calculations have to be based on assays of the food)

ICBA	Costs of databases and analysis
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	Medium analytical cost will be incurred.
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost o Dependent on the methods to analyse protein
United States	

1.14 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases
Australia	Australia recognises that there may be significant public health benefits relating to the declaration of protein content for some countries, such as those where under-nutrition, or protein malnutrition is a problem. There may also be benefits to consumers in assisting with making better informed choices.
CEFS	No comment
Brazil	The declaration of protein can help consumers to achieve protein balance, thus contributing to children growth and maintenance of adult health.
EC	Protein is one of the proximal nutrients so its declaration can provide a more complete picture of the nutrient content of an individual food. Also, if the energy content of the food is based on calculation from the energy providing nutrients then the information on the protein content of the food would need to be known by the food manufacturer.
IADSA	Important in foods where dietary intake is of consideration (e.g. dietetic foods)
ICBA	Labeling of protein is critical where there are nutrient insufficiencies. In other parts of the world, it may not be so critical. However, it has a strong familiarity with consumers and we would recommend that protein labeling be retained.
Japan	Provide information to the consumers who would already know their intake protein level from other food and would like to know total protein intake level for themselves
Malaysia	Highly beneficial to the consumer.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of "healthier food products" and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the protein content helps consumers to ensure appropriate intake of the nutrient for their age, gender and specific health condition.
United States	

1.15 What are the enforcement and/or regulation issues that need to be considered?

Member/ Observer	Answer
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions
Australia	No specific issues in relation to this nutrient have been identified.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	There are standard methods of analysis on which protein content is calculated an enforcement/regulatory issue would be whether the calculation of the protein content is specific to the type of the protein in the food or whether a standard conversion factor has been applied. Tolerances around the declared value would need to be considered.
IADSA	Natural variation in the food(s) and processing and analytical tolerances
ICBA	Government infrastructure, costs to analyses, costs to build appropriate databases
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	No major issue as most enforcement agencies will be able to undertake such analyses.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose
United States	

1.16 What issues should be considered in addressing consumer understanding of the nutrient declaration?

Member/ Observer	Answer
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	No significant issues in relation to this nutrient have been identified.
CEFS	No comment
Brazil	Consumers should be informed about the importance to achieve an adequate protein intake from different sources.
EC	Consumers are generally aware of the concept of protein and its importance in the diet so the EC does not foresee any particular issues of consumer understanding in relation to protein. It appears that European consumers find protein labelling of less importance than some other nutrients such as fat, saturates, sugars and salt.
IADSA	Declaration should be on basis of portion or daily intake not 100g or 100ml
ICBA	Consumer understanding of any labeled nutrient is essential. This requires that robust nutrition education programs be in place, which is outside the remit of the CCFL.
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves.
Malaysia	Not difficult to communicate importance of protein intake to consumers. Public should be educated in relation to total daily protein need.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment

Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For protein, we suggest to communicate the health impacts of high protein diet.
United States	

1.17 What is your overall recommendation for this specific nutrient?

Member/ Observer	Answer
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of protein content should be **mandatory**.
Australia	Supported. Australia requires mandatory disclosure of protein content within the nutrition information panel.
CEFS	Protein **should be part of the list of nutrients to be always declared**.
Brazil	Brazilian guidelines recommend the ingestion of adequate amounts of proteins derived from animal and vegetables to promote the growth of children and the maintenance of health. We support keeping protein in the list of nutrients that are always declared.
EC	Although protein is an important nutrient in the diet there is rarely a problem of adequacy for the intake of protein for the population as a whole. The EC believes that the inclusion of protein in the basic nutrition declaration will depend on the main aim of the provision of the nutrition declaration and whether there is a risk of information overload for the consumer.
IADSA	As for 1.10 above (Information on energy is important for some food categories, but not all Energy declarations should only be mandatory for foods where the declaration has a relevance and, with the exception of some commodities, should be on portion and not 100g/100ml. For example, the daily consumption of food supplements has a very small impact on the daily energy consumption and a 100g could relate to a potential 2-3 months recommended intake)
ICBA	Continue to require labeling of protein, whenever nutrients are declared on the product label. Label space could be reduced by allowing a statement that the "(food) is not a significant source of……"
Japan	Current guideline on nutrition labelling (CAC/GL2-1985) would be sufficient.
Malaysia	Highly recommended to be declared on the label
Mexico	This nutrient should always be stated
Poland	No comment
Singapore	Compulsory to label
United States	

AVAILABLE CARBOHYDRATE

1.18 What is the public health significance of the nutrient?

Member/ Observer	Answer
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	Australia suggests that an appropriate risk assessment process be used to determine the relative global

	public health significance of available carbohydrate.
CEFS	Carbohydrates should be the **main calorie source** in a healthy balanced diet. The WHO recommends that an optimum diet should consist of at least 55% of the total energy intake from a variety of carbohydrates. Moreover, where oral hygiene and fluoride exposure are insufficient, the frequency of consumption of fermentable carbohydrates is relevant with respect to dental caries.
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases sets ranges of population carbohydrates intake goals between 55 to 75 % of total energy intake. The Brazilian diet has changed towards a reduced intake of complex carbohydrates and dietary fibre and a higher intake of simple carbohydrates (sugars). Brazilian guidelines recommend the ingestion of adequate amounts of foods containing complex carbohydrates (45% to 65% of total energy intake).
EC	The health eating messages in the EU are that the majority of the energy intake should come from carbohydrate sources, preferably complex carbohydrate sources.
IADSA	Essential for supplying the body's energy requirements
ICBA	Certain sections of the world suffer from nutrient insufficiencies, including carbohydrate insufficiencies.
Japan	Excessive intake level
Malaysia	High public health significance as available carbohydrates contribute to total energy content of a food.
Mexico	Consumer should be aware of the importance of the energy intake given by certain foods, as well as the importance for the good development of body functions. An excess in energy intake (carbohydrate) is being recognized as a cause of augmenting the risk for non-transmissible diseases. This is one of the main nutrients that have to be present in the diet, in order to have a normal development.
Poland	Prevention of obesity
Singapore	Implication for increased risk of obesity when carbohydrate intake is in excess.
United States	

1.19 What are the practical issues with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health.
Australia	Information around carbohydrate content is readily available by analysis or sourced from databases or texts. However, we note that definitional issues would require consideration as available carbohydrate can be calculated via different methods, such as by difference (for example: subtracting from one hundred the average percentage quantity of water, protein, fat and any other relevant nutrients) or by summing (for example: adding together the quantity of total available sugars and starch, and any other relevant oligosaccharides, glycogen and maltodextrins). Both of these methods are defined for use within the Australia and New Zealand Food Standards Code. We are not aware of any definition for available carbohydrate currently in use by Codex.

CEFS	No comment
Brazil	The declaration of carbohydrates includes both complex and simple carbohydrates. Brazil regulation established that the amount of carbohydrates should be calculated by difference from the sum of proteins, fat, dietary fibre, water and ash.
EC	Analytical issues associated with trying to identify whether carbohydrate content is derived from complex sources or not.
IADSA	There are issues between major economic blocs (e.g. USA and EU) as to that is included as CHO.
ICBA	Adequate databases, analytical capabilities
Japan	To have consensus in definition and method of analysis which industries can implement and consumers can understand..
Malaysia	Available carbohydrate itself is obtained by calculation by difference which is not difficult or expensive. However, for plant foods or composite foods, analysis of dietary fibre is required to determine available carbohydrate content. Analysis of dietary fibre is difficult, expensive and time consuming (elaborated below).
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of carbohydrates are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	▪ Standardization of the definitions- total carbohydrate or available carbohydrate (exclude dietary fibre) and their health implications. ▪ Other ingredients that will affect the energy value, such as alcohols, sugar alcohols, intense sweeteners and fat replacers
United States	

1.20 What are the costs that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The control-related costs to be covered by the government in conducting routine analysis. Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	There could be costs associated with: • building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; • costs to industry of changing the label; • costs to government of enforcement and monitoring; and • possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of carbohydrates must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	In 2004 the estimated average costs of direct analysis associated with the declaration of energy, protein, carbohydrate and fat was €57. Therefore, the costs of analysis associated with the declaration of carbohydrate are relatively small. The information is readily available in food composition tables so it would be readily available to food manufacturers.
IADSA	See 1.6 above (Unless internationally recognised food composition tables are available, the calculations have to be based on assays of the food)

ICBA	Costs of databases and analysis
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	High cost due to analysis of dietary fibre.
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.21 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases
Australia	We recognise that there may be important public health benefits on a global basis associated with declaration of available carbohydrate.
CEFS	No comment
Brazil	The declaration of carbohydrates can help consumers to control carbohydrate intake, thus contributing to their health.
EC	Carbohydrate is one of the proximal nutrients so its declaration can provide a more complete picture of the nutrient content of an individual food. Also, if the energy content of the food is based on calculation from the energy providing nutrients then the information on the carbohydrate content of the food would need to be known by the food manufacturer. The information on the carbohydrate content of the food can be important for certain population groups, for example diabetics, who need to manage their diet carefully.
IADSA	See 1.14 above (Important in foods where dietary intake is of consideration (e.g. dietetic foods)
ICBA	Labeling of available CHO is critical where there are nutrient insufficiencies. In other parts of the world, it may not be so critical. However, it has a strong familiarity with consumers and we would recommend that available carbohydrate labeling be retained.
Japan	Provide information to the consumers who would already know their intake available carbohydrate level from other food and would like to know total intake level of available carbohydrate for themselves
Malaysia	Highly beneficial to the consumers because of its contribution to energy content of a food.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of “healthier food products” and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the available carbohydrate helps consumers to ensure appropriate intake of the nutrient for their age, gender and specific health condition.
United States	

1.22 What are the enforcement and/or regulation issues that need to be considered?	
Member/ Observer	**Answer**
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions.
Australia	No significant additional issues in relation to this nutrient have been identified.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	For official controls, tolerances around the declared value would need to be considered.
IADSA	See 1.15 above (Natural variation in the food(s) and processing and analytical tolerances)
ICBA	Government infrastructure, costs to analyses, costs to build appropriate databases
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	Need for resources and technical considerations, such as the capability and accuracy of laboratory analysis for dietary fibre in some categories of foods.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.
United States	

1.23 What issues should be considered in addressing consumer understanding of the nutrient declaration?	
Member/ Observer	**Answer**
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	No significant issues have been identified.
CEFS	No comment
Brazil	Consumers should be informed about the importance to achieve an adequate carbohydrate intake, mainly from foods that are source of complex carbohydrates
EC	Consumers are generally aware of the concept of carbohydrates and its importance in the diet so the EC does not foresee any particular issues of consumer understanding in relation to declaration of carbohydrate content.
IADSA	See 1.16 above (Declaration should be on basis of portion or daily intake not 100g or 100ml)
ICBA	Consumer understanding of any labeled nutrient is essential. This requires that robust nutrition education programs be in place, which is outside the remit of the CCFL.
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves. Not all consumers understand the relationship between Carbohydrate and Available Carbohydrate.
Malaysia	Not difficult to communicate about carbohydrates in foods to consumers. But need to create greater public awareness on different types of carbohydrates and their metabolism.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing.

	Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For available carbohydrate, we suggest to differentiate sugar from carbohydrate and their impacts on weight gain.
United States	

1.24 What is your overall recommendation for this specific nutrient?	
Member/ Observer	**Answer**
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of available carbohydrate content should be **mandatory**.
Australia	Supported. Australia requires mandatory disclosure of both total available carbohydrate and sugars (monosaccharides and disaccharides) within the nutrition information panel.
CEFS	Carbohydrates **should be part of the list of nutrients to be always declared**.
Brazil	Brazilian guidelines recommend the ingestion of adequate amounts of foods containing complex carbohydrates (45% to 65% of total energy intake). We support keeping available carbohydrates in the list of nutrients that are always declared.
EC	The EC believes that the inclusion of carbohydrate in the basic nutrition declaration will depend on the main aim of the provision of the nutrition declaration and whether there is a risk of information overload for the consumer.
IADSA	As for 1.10 above (Information on energy is important for some food categories, but not all Energy declarations should only be mandatory for foods where the declaration has a relevance and, with the exception of some commodities, should be on portion and not 100g/100ml. For example, the daily consumption of food supplements has a very small impact on the daily energy consumption and a 100g could relate to a potential 2-3 months recommended intake)
ICBA	Continue to require labeling of CHO, whenever nutrients are declared on the product label. Label space could be reduced by allowing a statement that the "(food) is not a significant source of……"
Japan	Current guideline on nutrition labelling (CAC/GL2-1985) would be sufficient.
Malaysia	Highly recommended to be declared on the label.
Mexico	This nutrient should always be stated
Poland	No comment
Singapore	Compulsory to label
United States	

FAT

1.25 What is the public health significance of the nutrient?	
Member/ Observer	**Answer**
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	Fat (in particular, saturated fatty acids and trans fatty acids) is of particular public health significance

	due to its relationship to coronary heart disease, and potential to contribute to overweight and obesity. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of fat.
CEFS	Information on the fat content of foods is necessary in order to allow consumers to follow the widely agreed dietary recommendation that an optimum diet should consist of 30-35% of the total energy intake from fat.
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases sets ranges of population fat intake goals between 15 to 30 % of total energy intake. The report concludes that high intake of energy-dense foods increases the risk of developing obesity. The Global Strategy on Diet, Physical Activity and Health points out that elevated consumption of energy-dense foods, high in fat, is one of the factors that increase the risks of noncommunicable disease. The recommendations for populations and individuals diet include the advice to limit energy intake from total fats.
EC	Diets high in fat generally have high energy density, can contribute to excessive energy intake and energy imbalance and thus might promote weight gain. However, no causal relationship has been established between total fat intake and obesity or chronic disease risk. According to the European Nutrition and Health report, the average contribution of fat to the total energy intake in Europe varies between 28 and 48 energy percent in adults. This contribution is higher than the recommended maximum intakes for adults in the various EU countries, which vary between 30 and 40 energy percent. (Ref: Elmadfa I and Weichselbaum E (2005). Energy and nutrient intake in the European Union. European Nutrition and Health Report 2004. Forum Nutr 58: 19-46, Karger, Basel.)
IADSA	Essential macronutrient
ICBA	Fat provides the highest number of calories, gram-for-gram and is directly linked to some NCDs. Since overweight and obesity are related to an imbalance between calories consumed and calories expended, information on the fat content of products is critical so that consumers can select foods that are within fat allowances and calorie needs.
Japan	Excessive intake level
Malaysia	High public health significance because fat contributes (and indeed the most important contributor) to energy content of a food and therefore to total energy intake.
Mexico	Information to the consumer, relating the fat intake, and their importance in creating body reserves.
Poland	Prevention of obesity
Singapore	Increase risk of heart diseases and stroke.
United States	

1.26 What are the practical issues with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases

	associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health. In Argentina, the food industry has signed agreements under which it committed to reduce fat and salt content in food and to fortify food with biologically necessary nutrients like iron in order to meet the Argentine population's nutritional requirements.
Australia	No significant issues identified for declaration of fat – information around fat content is readily available by analysis or sourced from databases or texts. Consideration should be given to any practical issues if specific types of fat (eg monounsaturated and/or polyunsaturated fatty acids etc) are also required to be declared.
CEFS	No comment
Brazil	The declaration of fat content depends on direct analysis.
EC	No comment
IADSA	See 1.12 above (Natural variation in foods and consistency in analysis and reporting)
ICBA	Adequate databases, analytical capabilities
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	No major issue because total fat analysis methodology is well established and is of relatively low cost.
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of fats are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	None identified at this time
United States	

1.27 What are the costs that need to be considered with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	The control-related costs to be covered by the government in conducting routine analysis. Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	There could be costs associated with: • building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; • costs to industry of changing the label; • costs to government of enforcement and monitoring; and • possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of total fat must be linked to nutrition education materials and programmes to promote its correct use by the consumer
EC	In 2004 the estimated average costs of direct analysis associated with the declaration of energy, protein, carbohydrate and fat was €57. Therefore, the costs of analysis associated with the declaration of fat are relatively small. The information is readily available in food composition tables so it would

	be readily available to food manufacturers.
IADSA	See 1.6 above (Unless internationally recognised food composition tables are available, the calculations have to be based on assays of the food)
ICBA	Costs of databases and analysis
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	Relatively low cost required for analysis of total fat.
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.28 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	The declaration of fat is important information for consumers and public health, given the relationship to coronary heart disease, and other public health issues, such as overweight and obesity.
CEFS	No comment
Brazil	The declaration of total fat can help consumers to limit fat intake. It can stimulate the food industry to reduce the total fat content of foods
EC	Fat is one of the proximal nutrients so its declaration can provide a more complete picture of the nutrient content of an individual food. Also, if the energy content of the food is based on calculation from the energy providing nutrients then the information on the fat content of the food would need to be known by the food manufacturer. Evidence suggests that in the EU the contribution of fat to the overall energy intake is higher than recommended. Therefore, public health messages for healthier eating often encourage the public to reduce their fat intake. The declaration of fat content of a food would enable consumers to more readily identify lower fat products. In the responses to the European Commission Health and Consumers Directorate General 2006 consultation on labelling issues fat was the most frequently mentioned nutrient and evidence suggests that it is one of widespread interest to the consumer.
IADSA	See 1.14 above (Important in foods where dietary intake is of consideration (e.g. dietetic foods)
ICBA	No comment
Japan	Provide information to the consumers who would already know their fat intake level from other food and would like to know total fat intake level for themselves
Malaysia	Highly beneficial to the consumers because of its energy content and hence contribution to energy content of a food.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of “healthier food products” and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles.

	Declaration of the fat content provides useful information which is of health significance to consumers.
United States	

1.29 What are the enforcement and/or regulation issues that need to be considered?	
Member/ Observer	**Answer**
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions.
Australia	No specific issues have been identified regarding the enforcement of the declaration of fat.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	For official controls, tolerances around the declared value would need to be considered.
IADSA	See 1.15 above but also variations in methodology (Natural variation in the food(s) and processing and analytical tolerances)
ICBA	Government infrastructure, costs to analyses, costs to build appropriate databases
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	No major difficulty is expected as most enforcement agencies have the capability to set up total fat analysis facilities.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.
United States	

1.30 What issues should be considered in addressing consumer understanding of the nutrient declaration?	
Member/ Observer	**Answer**
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	There may be consumer confusion in relation to the different types of fat, that is, saturated versus unsaturated and that these are sub-groups of total fat. Presentation of information may assist in this regard, for example, through requiring sub-categories types of fats (saturated fatty acids and trans fatty acids) to be 'nested' underneath the information for 'fats'. We note that issues around presentation of nutrient information are currently being considered within the CCFL electronic working group to address legibility and readability, led by the US.
CEFS	No comment
Brazil	Consumers should be informed about the importance to limit fat intake and the effect of different types of fat on health.

EC	Consumers are generally aware of the concept of fat and its importance in the diet so the EC does not foresee any particular issues of consumer understanding in relation to declaration of fat content.
IADSA	See 1.16 above (Declaration should be on basis of portion or daily intake not 100g or 100ml)
ICBA	Consumer understanding of any labeled nutrient is essential. This requires that robust nutrition education programs be in place, which is outside the remit of the CCFL.
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves.
Malaysia	Not difficult to communicate the concept of importance of fat to consumers. Need to create greater public awareness on the recommended daily needs of fats in relation to total energy needs.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For fat, we suggest to educate consumers on all types of fat and how they impact on health individually and synergistically.
United States	

1.31 What is your overall recommendation for this specific nutrient?

Member/ Observer	**Answer**
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of fat content should be **mandatory**.
Australia	We support the declaration of (total) fat. Please see relevant sections below with respect to declaration of saturated and trans fatty acids. Australia requires mandatory disclosure of fat content within the nutrition information panel. We note that the declaration of saturated fat is also required, however, trans fatty acids are not required.
CEFS	Fat **should be part of the list of nutrients to be always declared**.
Brazil	To limit fat intake and shift fat consumption away from saturated fats to unsaturated fats. We support keeping fat in the list of nutrients that are always declared.
EC	Dietary energy balance and the contribution of fat to the overall energy intake is an important issue in the EU, therefore it is considered that fat content is one of the nutritional characteristics of a food that should normally be available if nutrition information is provided.
IADSA	As for 1.10 above (Information on energy is important for some food categories, but not all Energy declarations should only be mandatory for foods where the declaration has a relevance and, with the exception of some commodities, should be on portion and not 100g/100ml. For example, the daily consumption of food supplements has a very small impact on the daily energy consumption and a 100g could relate to a potential 2-3 months recommended intake)
ICBA	Continue to require labeling of fat, whenever nutrients are declared on the product label. Label space could be reduced by allowing a statement that the "(food) is not a significant source of……"
Japan	Current guideline on nutrition labelling (CAC/GL2-1985) would be sufficient.
Malaysia	Highly recommended to be declared on the label.
Mexico	This nutrient should always be stated
Poland	No comment
Singapore	Compulsory to label

United States	

(FREE) SUGARS

1.32 What is the public health significance of the nutrient?

Member/ Observer	Answer
Argentina	No comment
Australia	Australia notes the need for clarity and international agreement as to the definition of 'free' sugars. This term is not defined where used in the Global Strategy on Diet, Physical Activity and Health (paragraphs 22 and 61). We note that there is a definition for 'free sugars' within World Health Organisation Technical Report Series 916, page 56 'all monosaccharides and disaccharides added to foods by the manufacturer, cook or consumer, plus sugars naturally present in honey, syrups and fruit juices' and we suggest that consideration should be given as to whether this definition is appropriate within the current context. For the purpose of this response, Australia understands the term 'free' sugars to be analogous to added sugars, that is, sugars that are added to foods by the manufacturer. Australia recognizes that total sugar consumption may play an important role in relation to energy intake, exercise, and health. However, we note that the nutritional value and physiological effects of added (or 'free') sugars cannot be distinguished from those of intrinsic sugars and therefore there should be no distinction in labeling on the sugar content from intrinsic and extrinsic sources. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of free sugars.
CEFS	First of all, CEFS would like to recall that the **use of the term "free" sugars was recently recommended against** in the first chapter of the FAO/WHO Scientific Update on Carbohydrates in Human Nutrition[1] dealing with carbohydrate terminology and classification. There is no convincing scientific justification for distinguishing between "free" and "other" sugars and neither is there any practical, easily enforceable analytical method to distinguish between them. Furthermore, the human body makes no distinction between "free" or "added" sugars and naturally occurring ones (sugars contribute to the same amount of calories (4kcal/g) whether they are added or naturally occurring); therefore, information on "free" or "added" sugar content would not provide consumers with any meaningful information as to the nutritional value or physiological influence of a food. As for **"total sugars", both their relevance** in terms of informing consumers on the overall nutritional properties of foods and **their public health significance are questionable**. The current scientific evidence **does not suggest any justification for the declaration of the sugars content in addition to the total carbohydrates** value. All carbohydrates, be they starches or sugars, contribute 4kcal/g. Furthermore, the European Food Safety Authority (EFSA) has recently pointed out that "the evidence relating high intake of sugars (mainly as added sugars), compared to high intakes of starch, to weight gain is inconsistent" [2]. The FAO/WHO Expert Consultation on Carbohydrates in Human Nutrition (1997)[3] similarly concluded that "there is no direct evidence to implicate either [sugars or starch] in the etiology of obesity". In the Annex detailing the strength of evidence for any influence of dietary factors on the diseases considered, the WHO Technical Report 916 (2003)[4] itself

[1] FAO/WHO Scientific Update on Carbohydrates in Human Nutrition. *European Journal of Clinical Nutrition* (2007) 61 (Supplement 1).
[2] EFSA Scientific Opinion on Nutrient Profiles - The EFSA Journal 2008, 644, 1-44, p 14.
[3] FAO/WHO (1997) Expert Consultation on Carbohydrates in Human Nutrition.
[4] World Health Organization / Food and Agriculture Organization (2003). Diet, Nutrition and the Prevention of Chronic Diseases. WHO Technical Report Series 916. WHO. Geneva. pages 147-149.

	stated that there is no "convincing," "probable" or even "possible" evidence for a link between ("free") sugars and obesity. Finally, as for dental caries, they do not justify a specific reference to sugars in the nutrition panel as **all fermentable carbohydrates equally contribute to dental caries** by providing substrate for bacterial fermentation in the mouth. Besides, it is generally accepted that the **frequency** of sugars consumption, rather than the total amount of dietary sugars, might be associated with dental caries where oral hygiene and fluoride exposure are insufficient.
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases sets ranges of population free sugar intake goals below 10% of total energy intake. The report concludes that high intake of sugars increases the risk of developing dental caries. The Global Strategy on Diet, Physical Activity and Health recommends that the intake of free sugars should be limited.
EC	Increased risk of dental caries in children is associated with a high frequency (more than four times daily) of intake of cariogenic sugars. The evidence relating to high intake of sugars compared to high intakes of starch, to weight gain is inconsistent. However, there is some evidence that sugar-sweetened beverages do not induce satiety to the same extent as solid forms of carbohydrate, and that high intakes of sugars in the form of sugar-sweetened beverages might contribute to weight gain.
IADSA	Essential information for certain medical conditions e.g. diabetes
ICBA	No comment
Japan	Excessive intake level
Malaysia	Medium significance
Mexico	Source of energy, and under certain pathologic conditions, is important to declare its contents. A diet high in sugar content can lead to caries, diabetes and obesity.
Poland	Prevention of obesity
Singapore	Implication for increased risk of obesity when (free) sugars intake is in excess.
United States	

1.33 What are the practical issues with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	No comment
Australia	Issues relating to definition of the term 'free' sugars, as noted above. Australia notes that there are analytical problems in distinguishing between intrinsic and added/'free' sugars, which would lead to practical difficulties for both industry and enforcement in obtaining and assessing information in relation to 'free' sugars. If listing both available carbohydrate and free sugars, consideration should be given to how to declare these so that it is clear that free sugars are actually part of the total carbohydrate. For example, information for 'free' sugars could be 'nested' underneath the information for 'available carbohydrates'. We note that issues around presentation of nutrient information are currently being considered within the CCFL electronic working group to address legibility and readability, led by the US.
CEFS	No comment
Brazil	The declaration of sugars depends on direct analysis. However, this analysis cannot differentiate between natural sugars (naturally present in the ingredients) and added sugars.
EC	No comment
IADSA	Only essential for specific groups within the population
ICBA	No comment
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.

Malaysia	Not easy to analyze sugar in solid foods as extraction is required and high analytical costs involved (see below).
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of sugars are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	▪ Standardization of the definitions-total sugar or free sugar ▪ Whether other sweeteners such as sugar alcohols should also be considered as sugar Use of artificial sweeteners that may seem contradicting with the sugar declaration
United States	

1.34 What are the costs that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	No comment
Australia	We consider costs for declaration of 'free' sugars may be high given the analytical problems noted above. There could be other costs associated with: • building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; • costs to industry of changing the label; • costs to government of enforcement and monitoring; and • possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of sugars must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	An impact assessment report on the introduction of mandatory nutrition labelling prepared for the European Commission Health and Consumer Protection DG in 2004 indicated that obtaining information on sugars, saturated fats, and sodium increased costs of analysis on average by €200.
IADSA	Assay costs
ICBA	No comment
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	High analytical cost [equipment (HPLC), consumables (including solvents, standards, columns)].
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.35 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	Answer
Argentina	No comment
Australia	Consumers may not benefit greatly from inclusion of information as to level of 'free' sugars in foods as its meaning and significance may not be well understood.
CEFS	No comment
Brazil	The declaration of sugars can help consumers to limit sugar intake. It can stimulate the food industry to reduce the addition of sugar to foods.
EC	One of the public health messages for healthier eating is to encourage the public to reduce the frequency of consumption of sugars. The declaration of the sugars content of a food would enable consumers to more readily identify sugars containing products.
IADSA	Information for diabetes
ICBA	No comment
Japan	Provide information to the consumers who would already know their intake free sugar s level from other foods and would like to know total free sugar intake level for themselves
Malaysia	Medium benefits to the consumers.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of "healthier food products" and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the free sugar content helps consumers to ensure appropriate intake of the nutrient for their age, gender and specific health condition.
United States	

1.36 What are the enforcement and/or regulation issues that need to be considered?

Member/ Observer	Answer
Argentina	No comment
Australia	A requirement to label with nutrition information for 'free' sugars may be difficult to enforce given the analytical problems noted above.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	Sugars that are added to a product and those that are naturally present cannot be easily distinguished so the EC believes that it would not be possible to readily distinguish between the naturally present and added sugars in the nutrition labelling declaration. For official controls, tolerances around the declared value would need to be considered.

IADSA	See 1.15 above (Natural variation in the food(s) and processing and analytical tolerances)
ICBA	No comment
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	Need good laboratory facilities, not easy for enforcement agencies to establish such facilities.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.
United States	

1.37 What issues should be considered in addressing consumer understanding of the nutrient declaration?

Member/ Observer	**Answer**
Argentina	No comment
Australia	Consumers may need additional information and/or education about the difference between added/'free' and intrinsic sugars and their health impacts. As noted above, presentation of information may assist in this regard, for example through 'nesting' sub-categories of nutrients under overarching categories.
CEFS	Not only the declaration of the ("free") sugars content of foods would not provide consumers with relevant and meaningful nutrition information, but **it might even prove misleading**. It is often argued that the labelling of sugars will act as an incentive for the industry to reduce the sugars content of its products, and many consumers indeed associate food products with reduced sugars content with weight control and with foods that are low in calories or that have been altered to reduce calories significantly. However, it should be noted that **reductions in the sugars content of foods do not necessarily result in reductions in the energy content**. This is especially true for certain starchy foods (e.g. breakfast cereals, biscuits). It should be avoided that consumers are misled by "unhelpful" reformulations that mask the overall energy content of foods. Careful consideration of this issue is required before any labelling of ("free") sugars is recommended.
Brazil	Consumers should be informed about the importance to limit free sugar intake and the effect of different types of carbohydrates (complex and simple) on health.
EC	Consumers are generally aware of the concept of sugars so the EC does not foresee any particular issues of consumer understanding in relation to declaration of the content of sugars.
IADSA	See 1.16 above (Declaration should be on basis of portion or daily intake not 100g or 100ml)
ICBA	No comment
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves. Not all consumers understand the relationship between Carbohydrate and free sugars.
Malaysia	Not difficult to communicate role of sugars in daily diets. There could be some consumer misunderstanding about the role of sugars in the causation of certain diseases.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition

	information and apply the nutrient values according to individual needs. For free sugars, we suggest to clarify that total sugar content might not be a good indicator of sweetness especially for products using intense sweeteners and flavour enhancers.
United States	

1.38 What is your overall recommendation for the specific nutrient?	
Member/ Observer	**Answer**
Argentina	We believe free sugar content declaration **should not be mandatory** as there are no internationally recommended intake values.
Australia	Australia does not support the declaration of 'free' sugars. Australia currently requires mandatory disclosure of total sugars, defined as monosaccharides and disaccharides, from all sources, within the nutrition information panel.
CEFS	Total sugars (and a fortiori "free" sugars) **are not essential nutrients** to include in the list of nutrients to be always declared. As already required by the Codex Guidelines on Nutrition Labelling and the Guidelines for Use of Nutrition and Health Claims, their labelling should only be mandatory **whenever a claim is made on sugars**.
Brazil	To limit free sugar intake. We agree to include sugars in the list of nutrients that are always declared.
EC	The EC believes that the inclusion of sugars in the basic nutrition declaration will depend on the main aim of the provision of the nutrition declaration and whether there is a risk of information overload for the consumer. There is consumer interest in information on the content of sugars in foods and in the Health and Consumers Directorate General 2006 consultation it was the fifth most frequently mentioned nutrient.
IADSA	As for 1.10 above ((Information on energy is important for some food categories, but not all Energy declarations should only be mandatory for foods where the declaration has a relevance and, with the exception of some commodities, should be on portion and not 100g/100ml. For example, the daily consumption of food supplements has a very small impact on the daily energy consumption and a 100g could relate to a potential 2-3 months recommended intake)
ICBA	On a global basis, ICBA does not support the labeling of nutrient beyond energy, protein, available CHO and fat, plus any nutrient for which a claim is made. The labeling of additional nutrients should be determined at the national level. In all cases, total sugars, rather than free sugars should be labeled. Neither the body, nor methods of analysis distinguish one from the other. Rather than denigrating "free sugars," we support educational measures (which are outside the purview of Codex Alimentarius), as a means for informing consumers on the importance of consuming calories within their individual daily needs.
Japan	Current guideline on nutrition labelling (CAC/GL2-1985) would be sufficient.
Malaysia	Medium recommended
Mexico	Just to be stated whenever a nutritional claim (related to the nutrient) has been made. Giving out sole information of the free sugar content, may mislead the consumer, which is why it must be associated with a claim.
Poland	No comment
Singapore	Compulsory to label especially for relevant products such as sweetened foods.
United States	

SATURATED FATS

1.39 What is the public health significance of the nutrient?

Member/ Observer	Answer
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases
Australia	Saturated fat is of particular public health significance, particularly in Australia due to its relationship to coronary heart disease, and potential to contribute to other public health issues, such as overweight and obesity. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of saturated fats.
CEFS	No comment
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases sets ranges of population saturated fat intake goals below 10% of total energy intake. The report concludes that high intake of saturated fat increases the risk of developing cardiovascular diseases and probably diabetes type 2. The Global Strategy on Diet, Physical Activity and Health points out that elevated consumption of energy-dense foods, high in fat, is one of the factors that increase the risks of noncommunicable disease. It is recommended that the energy intake from total fats should be limited and that fat consumption should be shifted away from saturated fats to unsaturated fats.
EC	Diets high in saturated fats increase serum LDL-cholesterol which has been associated with an increased risk of cardiovascular disease. The average intake of saturated fats in many EU countries exceeds the recommended maximum levels of about 10 energy percent.
IADSA	Potential health concerns of over consumption in some developed countries
ICBA	No comment
Japan	Excessive intake level
Malaysia	Low public health significance. This is because individual fatty acids behave differently in terms of cholesterol raising effect and having total saturated fats on a label does not convey the correct message to the consumer.
Mexico	A diet with an excess in saturated fats has been associated with the development of non-transmissible diseases, such as obesity, diabetes, cardiovascular.
Poland	Prevention of obesity
Singapore	Increase risk of heart diseases and stroke.
United States	

1.40 What are the practical issues with declaring the nutrient?

Member/ Observer	Answer
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure

	that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health.
Australia	No significant additional issues in relation to this nutrient have been identified (other than the general issues identified above). We note that information around saturated fat content is readily available by analysis or sourced from databases or texts. We are not aware of any definition currently in use by Codex and suggest consideration could be given to development of one.
CEFS	No comment
Brazil	The declaration of saturated fat depends on direct analysis. If the label contains information about total fat and saturated and trans fatty acids the consumer can indirectly know the content of unsaturated fat in the product.
EC	No comment
IADSA	See 1.12 above (Natural variation in foods and consistency in analysis and reporting)
ICBA	No comment
Japan	None, as long as it is permitted as declared as comparative claim
Malaysia	It is difficult to analyse saturated fatty acids for some groups of food especially processed foods and involving high costs (see below).
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of saturated fats are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	None identified at this time
United States	

1.41 What are the costs that need to be considered with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	The control-related costs to be covered by the government in conducting routine analysis. Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	There could be costs associated with: ▪ building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; ▪ costs to industry of changing the label; ▪ costs to government of enforcement and monitoring; and ▪ possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of

	nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of saturated fats must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	An impact assessment report on the introduction of mandatory nutrition labelling prepared for the European Commission Health and Consumer Protection DG in 2004 indicated that obtaining information on sugars, saturated fats, and sodium increased costs of analysis on average by €200.
IADSA	See 1.6 above (Unless internationally recognised food composition tables are available, the calculations have to be based on assays of the food)
ICBA	No comment
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	High analytical cost [including equipment cost (GC), consumables (including standards, columns)].
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.42 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	The declaration of saturated fats is important information for consumers and public health, given the relationship to coronary heart disease, and other public health issues.
CEFS	No comment
Brazil	The declaration of saturated fat can help consumers to limit saturated fat intake and choose foods with higher content of unsaturated fat acids. It can stimulate the food industry to reduce the use of saturated fat in their products and exchange it for unsaturated fat.
EC	Evidence suggests that in the EU the contribution of saturated fat to the overall energy intake is higher than recommended. Therefore, public health messages for healthier eating often encourage the public to reduce their overall fat intake and in particular their intake of saturated fat. The declaration of saturated fat content of a food would enable consumers to more readily identify lower saturated fat products.
IADSA	Benefits are specific to certain economic areas/ countries. Not universal
ICBA	No comment
Japan	Provide information to the consumers who would like to reduce their saturated fats intake level and already know their intake level of saturated fats from other foods .
Malaysia	Low benefits to the consumers and may even create confusion, providing misleading information.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of “healthier food products” and discourage

	consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the saturated fat content provides useful information which is of health significance to consumers.
United States	

1.43 What are the enforcement and/or regulation uses that need to be considered?	
Member/ Observer	**Answer**
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions
Australia	No significant additional issues in relation to this nutrient have been identified (other than the general issues identified above). We note that information around saturated fat content is readily available by analysis or sourced from databases or texts.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	For official controls, tolerances around the declared value would need to be considered.
IADSA	See 1.15 above (Natural variation in the food(s) and processing and analytical tolerances)
ICBA	No comment
Japan	None, as long as it is permitted as declared as comparative claim
Malaysia	Need good laboratory facilities; not easy for enforcement agencies to establish such facilities and build required capabilities.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.
United States	

1.44 What issues should be considered in addressing consumer understanding of the nutrient declaration?	
Member/ Observer	**Answer**
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	Consumers may need additional information and/or education about the different types of fat in order to make well informed and healthy decisions. We note that presentation of information may assist in this regard, for example through 'nesting' sub-categories of fats under the overarching category of 'fats'. We note that issues around presentation of nutrient information are currently being considered within the CCFL electronic working group to address legibility and readability, led by the US.
CEFS	No comment
Brazil	Consumers should be informed about the importance to limit saturated fat intake and the effect of

	different types of fats on health.
EC	In the European Community consumers are generally aware of the concept of saturated fat so for many countries there is not any particular issues of consumer understanding in relation to declaration of saturated fats. However, in the UK, the Institute of Grocery Distribution report on saturated fat communication, indicated that consumers do not have a clear understanding of what saturated fat is and are confused by the terms used. In addition, many consumers do not understand that saturates and saturated fat are the same and are a part of total fat.
IADSA	Consumer education on the relevance and interpretation of the information
ICBA	No comment
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves.
Malaysia	Difficult to communicate to consumers; may be misleading.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For saturated fats, we suggest to educate consumers on all types of fat and how they impact on health individually and synergistically.
United States	

1.45 What is your overall recommendation for this specific nutrient?

Member/ Observer	**Answer**
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of saturated fat content should be **mandatory**.
Australia	Supported. Australia requires mandatory disclosure of saturated fat content within the nutrition information panel. We note that saturated fat is required to be 'nested' as a sub-category under the category of 'fat' in order to enhance clarity for consumers.
CEFS	No comment
Brazil	To limit saturated fat intake and shift its consumption towards unsaturated fats. We agree to include saturated fat in the list of nutrients that are always declared.
EC	The EC believes that the inclusion of saturated fats in the basic nutrition declaration will depend on the main aim of the provision of the nutrition declaration. In the EU the high intake of saturated fats can be a risk factor for cardiovascular disease. There is a high level of consumer interest for information on the content of saturated fats in foods and in the Health and Consumers Directorate General 2006 consultation it was the fourth most frequently mentioned nutrient.
IADSA	Should not be mandatory
ICBA	On a global basis, ICBA does not support the labeling of nutrient beyond energy, protein, available CHO and fat, plus any nutrient for which a claim is made. The labeling of additional nutrients should be determined at the national level.
Japan	Labelling of saturated fat should be necessary only when nutrient content claim on saturated fat is made. Otherwise, labelling of fat content would be sufficient for the above purpose

Malaysia	Low recommendation
Mexico	Just to be stated whenever a nutritional claim (related to the nutrient) has been made. Giving out sole information of saturated fat content, may mislead the consumer, which is why it must be associated with a claim.
Poland	No comment
Singapore	Compulsory to label
United States	

TRANS FATTY ACIDS

1.46 What is the public health significance of the nutrient?

Member/ Observer	Answer
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases
Australia	There is compelling evidence that trans fatty acids, as well as saturated fatty acids, increases LDL cholesterol in our blood, a key indicator for heart disease. In addition, trans fatty acids may also decrease HDL ('good') cholesterol. We note that while the adverse effects on blood lipid profiles caused by comparable levels of trans fatty acids are greater than those posed by saturated fatty acids, the trans fatty acid intakes of Australians are generally lower than intakes of saturated fatty acids in other developed countries. Therefore, from a global perspective, the significance of trans fatty acids varies considerably. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of trans fatty acids.
CEFS	No comment
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases sets ranges of population trans fatty acids intake below 1% of total energy intake. The report concludes that high intake of trans fatty acids increases the risk of developing cardiovascular diseases. The Global Strategy on Diet, Physical Activity and Health recommends the elimination of trans fatty acids from diet. There are discussions going on in Brazil about the limitation of the use of trans fatty acids in industrialized products due to the negative health effects of trans fatty acids intake.
EC	Diets high n trans fatty acids (TFA) increase serum LDL-cholesterol, reduce HDL-cholesterol and increase the total cholesterol to HDL-cholesterol ratio, all of which have been associated with an increased risk of cardiovascular disease. Evidence from a number of EU countries indicates that the intake of TFA in the EU has decreased considerably over recent years.
IADSA	Public health issues possibly related to continuous consumption
ICBA	No comment
Japan	Average intake level of trans fatty acid is not high in Japan. (0.3 0.6% level of total intake energy value)
Malaysia	High public health significance
Mexico	Trans fats generated by hydrogenation processes have been associated with altered fat metabolism, that leads to cardiovascular diseases.
Poland	No comment
Singapore	Increase risk of heart diseases and stroke.

United States	

1.47 What are the practical issues with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health.
Australia	We note that Codex has already developed a definition for trans fatty acids, which could be used in this context.
CEFS	No comment
Brazil	The declaration of trans fatty acids depends on direct analysis. If the label contains information about total fat and saturated and trans fatty acids the consumer can indirectly know the content of unsaturated fat in the product.
EC	A definition of TFA has been included in the Codex guidelines on nutrition labelling. The definition of trans fats covers non-conjugated trans fatty acids from all source, both those naturally occurring and those from the processing or hydrogenation of fats and oils.
IADSA	Requires specific (and expensive) assays
ICBA	No comment
Japan	Trans Fatty Acids does not meet the key criteria for inclusion of nutrients that should be always declared (public health significance) in Japan..
Malaysia	Difficult to be analysed for some groups of food especially processed foods.
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of trans fats are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	In the absence of internationally recognised analytical method to determine trans fat content, different methods are being used and they each yield different results.
United States	

1.48 What are the costs that need to be considered with declaring the nutrient?	
Member/ Observer	**Answer**

Argentina	The control-related costs to be covered by the government in conducting routine analysis. Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	Australia suggests that non-regulatory measures, such as voluntary reduction of levels by manufacturers (for example: by switching to best practice oils), may be a less costly and effective means of addressing concerns around intakes of this nutrient. We also note that it would be important to ensure that any labelling requirement to declare trans fatty acids does not substitute for labelling of saturated fatty acids as this could potentially mask any subsequent increase in saturated fatty acids within the food supply. There could be costs associated with: ▪ building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; ▪ costs to industry of changing the label; ▪ costs to government of enforcement and monitoring; and ▪ possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of trans fatty acids must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	An impact assessment report on the revision of the nutrition labelling legislation prepared by the European Commission Health and Consumer Protection DG in 2008 indicated that the costs of analysis of analysis of total TFA would on average be around €50.
IADSA	See 1.6 above (Unless internationally recognised food composition tables are available, the calculations have to be based on assays of the food)
ICBA	No comment
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	High analytical cost [including equipment cost (GC), consumables (including standards, columns)].
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.49 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	The benefits to consumers may not be great within countries where consumption levels are relatively low.

CEFS	No comment
Brazil	The declaration of trans fatty acids can help consumers to limit trans fatty acids intake. It can stimulate the food industry to reduce the use of trans fatty acids in their products.
EC	There is increasing public interest in the TFA content of foods. The declaration of TFA would enable consumers to identify those products that have higher TFA content.
IADSA	Possible public health benefit in certain countries where there could be potentially high consumption
ICBA	No comment
Japan	Provide information to the consumers who would need to reduce their trans fatty acids intake level and already know their intake level of trans fatty acids from other foods
Malaysia	Medium benefit to the consumers
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of "healthier food products" and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the trans fat content provides useful information which is of health significance to consumers.
United States	

1.50 What are the enforcement and/or regulation issues that need to be considered?

Member/ Observer	**Answer**
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions.
Australia	Australia considers that issues related to trans fatty acids are best addressed at a national, rather than global, level. This approach is mindful of significant variation between countries in the level of trans fatty acids found in the food supply and the associated level of consumption and health risk. Australia does not believe there is a difficulty in reconciling the recommendation of the Global Strategy regarding reducing intakes of trans fatty acids and an approach which recognises labelling as a strategy which could be considered at a national level. We also note that reduction in trans fatty acid intakes can be achieved by means other than labelling regulation, for example by voluntary reduction of levels by manufacturers.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	For official controls, tolerances around the declared value would need to be considered.
IADSA	Natural variation in foods, analytical methodology, processing and analytical tolerances
ICBA	No comment
Japan	Need to revise our regulation
Malaysia	Need good laboratory facilities; not easy for enforcement agencies to establish such facilities and build required capabilities.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.

United States	

1.51 What issues should be considered in addressing consumer understanding of the nutrient declaration?	
Member/ Observer	**Answer**
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	Consumer understanding of trans fatty acids and their impact on health may be low.
CEFS	No comment
Brazil	Consumers should be informed about the importance to limit trans fatty acids intake and the effect of different types of fats on health.
EC	TFA can be present in food due to the hydrogenation of fats or oils during processing or naturally present in the fats of ruminant animals. It is possible through reformulation of food to decrease the level of TFA from processing of fats and oils but it is difficult to modify the natural content of TFA in animal fats. The EC believes that food manufacturers and retailers should be encouraged to reduce trans fats levels where possible, without raising saturated fat levels. The focus on TFA can lead to consumer food choices being driven by the TFA content of a food instead of taking into account the total fat and saturated fat content of the product. It is important that information on TFA does not distort food choice or food composition that could have a negative impact on overall fat, in particular saturated fat, intake.
IADSA	Consumer information on the interpretation and relevance of the information
ICBA	No comment
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves. Japanese consumers need to understand that we have more serious nutritional problem than trans fatty acids, although these are not declared, such as excessive sodium intake level.,
Malaysia	Difficult to communicate. Need great deal of nutrition promotion / education to consumers.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For trans fatty acids, we suggest to educate consumers on all types of fat and how they impact on health individually and synergistically.
United States	

1.52 What is your overall recommendation for the specific nutrient?	
Member/ Observer	**Answer**
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of trans fatty acids fat content should be **mandatory**.
Australia	Not supported. Australia does not support a universal requirement for trans fatty acid labelling because the importance of this risk increasing nutrient is affected by national differences in consumption levels,

	the effectiveness of non-regulatory measures and the cost-benefit of imposing any mandatory labelling or compositional requirements.
CEFS	No comment
Brazil	To limit the intake of trans fatty acids. We agree to include trans fatty acids in the list of nutrients that are always declared.
EC	The EC believes that the inclusion of TFA in the basic nutrition declaration will depend on the main aim of the provision of the nutrition declaration. It is important to consider whether the information on TFA will have an overall favourable impact on food choices or whether there is a risk of information overload. In the EU TFA are of decreasing public health significance as intakes in the EU have declined considerably and other nutrients are of greater importance to public health.
IADSA	Should not be mandatory
ICBA	On a global basis, ICBA does not support the labeling of nutrient beyond energy, protein, available CHO and fat, plus any nutrient for which a claim is made. The labeling of additional nutrients should be determined at the national level.
Japan	Labelling of saturated fat should be necessary only when nutrient claim on trans fatty acid is made. Otherwise, labelling of fat content would be sufficient for the above purpose
Malaysia	Medium recommendation
Mexico	Just to be stated whenever a claim has been made. However, if the product is derived from a hydrogenation process, it will be mandatory, since Mexico signed the agreement for the Americas Free of Trans Fats (Acuerdo de las Américas Libre de Grasas Trans)
Poland	No comment
Singapore	Compulsory to label
United States	

SODIUM

1.53 What is the public health significance of the nutrient?

Member/ Observer	**Answer**
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	In Australia, sodium is of public health significance due to its relationship to hypertension. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of sodium.
CEFS	No comment
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases sets ranges of population sodium intake below 2 grams. The report concludes that high intake of sodium increases the risk of developing cardiovascular diseases and that high intake of salt preserved foods and salt probably increases the risk of developing stomach cancer. The Global Strategy on Diet, Physical Activity and Health recommends the limitation of salt (sodium) consumption from all sources. Salt should be iodized.
EC	The major adverse effect of high dietary sodium intake is elevated blood pressure. High blood pressure is an acknowledged risk factor for ischaemic heart disease and stroke. Mean daily sodium intakes of many populations in ECrope range from about 3-5 g (about 8-11 g salt) and are well in excess of recommended intakes.
IADSA	Correlated with hypertension in susceptible individuals
ICBA	No comment
Japan	Excessive intake level
Malaysia	High public health significance especially in relation to high blood pressure, a major problem in many communities.
Mexico	Sodium is an important electrolyte which interferes in the equilibrium (electric, acid-base, osmotic, etc.) as well as a cofactor for certain enzymes. An excess of sodium is being correlated with

	cardiovascular disease.
Poland	Prevention of hypertension
Singapore	High blood pressure, which is a risk factor of heart diseases and stroke.
United States	

1.54 What are the practical issues with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health.
Australia	No significant additional issues in relation to this nutrient have been identified (other than the general issues identified above). We note that information around sodium content is readily available by analysis or sourced from databases or texts.
CEFS	No comment
Brazil	The declaration of sodium depends on direct analysis. However, it does not differentiate among natural sodium present in foods, added sodium from salt and added sodium from other sources such as additives.
EC	Whether the declaration should be as sodium, or salt equivalents.
IADSA	No significant issues provided consistent analytical methodology is used
ICBA	No comment
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	No major practical issue related to obtaining the data for label; method is well established.
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of sodium are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	Many food products currently available in the market are actually high in sodium. Even though these products do have the sodium content declared in their labels, consumers are not given many choices of healthier alternatives that are low in sodium.
United States	

1.55 What are the cost that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The control-related costs to be covered by the government in conducting routine analysis.

	Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	There could be costs associated with: ▪ building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the nutrition information; ▪ costs to industry of changing the label; ▪ costs to government of enforcement and monitoring; and ▪ possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of sodium fats must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	An impact assessment report on the introduction of mandatory nutrition labelling prepared for the European Commission Health and Consumer Protection DG in 2004 indicated that obtaining information on sugars, saturated fats, and sodium increased costs of analysis by on average €200.
IADSA	See 1.6 above (Unless internationally recognised food composition tables are available, the calculations have to be based on assays of the food)
ICBA	No comment
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	Medium analytical cost. Atomic absorption can be used for analysis of multiple elements in food.
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.56 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	The declaration of sodium is important information for consumers and public health, given the relationship to hypertension. Consumers may need additional information and/or education about sodium in order to make well informed and healthy decisions.
CEFS	No comment
Brazil	The declaration of sodium can help consumers to limit its intake. It can stimulate the food industry to reduce its level in their products.
EC	The diseases associated with high sodium intakes are important factors in the reduction of life years or healthy life years in the EU. The declaration of sodium or salt can encourage consumers to purchase products with lower levels of sodium or salt. Consumer research has shown growing interest in the salt content of foods in line with education about the public health implications of eating a diet with a high salt content.
IADSA	Important in countries where hypertension and CVD are prevalent
ICBA	No comment
Japan	Provide information to the consumers who would like to reduce their sodium intake level and already know their intake level of sodium intake level from other foods.
Malaysia	Highly beneficial.

Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of "healthier food products" and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the sodium content provides useful information which is of health significance to consumers.
United States	

1.57 What are the enforcement and/or regulation ussies that need to be considered?

Member/ Observer	**Answer**
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions.
Australia	No significant additional issues in relation to this nutrient have been identified.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	For official controls, tolerances around the declared value would need to be considered.
IADSA	See 1.15 above (Natural variation in the food(s) and processing and analytical tolerances)
ICBA	No comment
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	No major issue as most enforcement agencies would be able to establish laboratory facilities for this analysis.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose
United States	

1.58 What issues should be considered in addressing consumer understanding of the nutrient declaration?

Member/ Observer	**Answer**
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	Terminology – consideration should be given to whether the term 'sodium' or 'salt' is most appropriate given consumer recognition of the former, more technically correct term may be low.
CEFS	No comment
Brazil	Consumers should be informed about the importance to limit sodium intake.
EC	Important to ensure consumer understanding of the chosen terminology - sodium or salt – and the terminology should correspond to the public health messages on healthy eating
IADSA	Consumer information on the interpretation and relevance of the information is essential

ICBA	No comment
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves.
Malaysia	Not difficult to communicate. Need more public awareness / education on different sources of sodium, not just from salt.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For sodium, we suggest to clarify the connection between salt and sodium, so as to eventually encourage consumers to reduce intake of sodium rather than salt per se.
United States	

1.59 What is your overall recommendation for this specific nutrient?

Member/ Observer	**Answer**
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of sodium content should be **mandatory**.
Australia	Supported. Australia requires mandatory disclosure of sodium content within the nutrition information panel.
CEFS	No comment
Brazil	Limit salt and sodium intake. We agree to include sodium in the list of nutrients that are always declared.
EC	The EC believes that the inclusion of sodium (or salt) in the basic nutrition declaration will depend on the main aim of the provision of the nutrition declaration. The evidence suggests that current levels of sodium consumption in Europe contribute to increased blood pressure in the population, and a consequent higher risk of cardiovascular and renal disease.
IADSA	Should not be mandatory
ICBA	ICBA would support consideration of whether sodium should always be declared when a nutrient declaration is made.
Japan	In Japan, as people tend to intake excessive sodium due to its traditional diet, declaration of sodium is considered highly important from the viewpoint of public health.
Malaysia	Highly recommended.
Mexico	El contenido de sodio debe incluirse en la etiqueta obligatoriamente para ayudar a limitar el consumo de este nutriente; sin embargo, se debería considerar contenidos máximos de otros nutrientes que se vean impactados al tratar de disminuir el contenido de sodio, en particular el potasio.
Poland	No comment
Singapore	Compulsory to label
United States	

DIETARY FIBRE

1.60 What is the public health significance of the nutrient?

Country	Answer
Argentina	Nutritional labelling would make it easier for consumers to know the nutritional properties of food, contributing to proper food intake. We believe that information provided with nutritional labelling complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	Adequate dietary fibre is essential for proper functioning of the gut and has also been related to risk reduction for a number of chronic diseases including heart disease, certain cancers and diabetes. Australia suggests that an appropriate risk assessment process could be used to determine the relative global public health significance of nutrients.
CEFS	No comment
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases recommends the consumption of fruits, vegetables and whole grains to achieve at least 25 grams of dietary fibres. The report concludes that high intake of dietary fibres decreases the risk of developing obesity and probably decreases the risk of developing cardiovascular diseases and type 2 diabetes. The Global Strategy on Diet, Physical Activity and Health recommends increase consumption of fruits and vegetables, and legumes and whole grains which are sources of fibers.
EC	High dietary fibre consumption is related to optimal bowel function and reduction of cardiovascular disease risk. An adequate dietary fibre intake is also associated with weight maintenance and sustained weight reduction in overweight subjects, because of its satiating effect. Average intake for dietary fibre in Europe varies between 16-26 g/day in adults and is generally lower than the recommended intake of about 25 g/day.
IADSA	General health benefits from adequate fibre intake
ICBA	No comment
Japan	Insufficient intake level
Malaysia	High public health significance e.g. physiological and metabolic effects of dietary fibre on gut microflora, gut function and large bowel function
Mexico	Dietary fiber is made up of carbohydrate which are not metabolize but enter to the digestive track, in which they absorb water which increases the volume of fecal matter and this leads to an increase in peristaltic movements of the intestine, facilitating the transit, the intestinal distension and consequently, defecation. In addition, it contributes to the diminution of cholesterol levels. Nevertheless, an excess in fiber consumption can cause that the individual eases. It has to be kept in mind that the recommendation has to be always associated with the suitable consumption of liquids.
Poland	Prevention of obesity and other non communicable diseases
Singapore	Implication for reduced risk of heart disease and some cancers if fiber consumption is inadequate especially with regard to whole grains, fruit and vegetables consumption
United States	

1.61 What are the practical issues with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	The purpose of the guidelines is to provide the consumer with information about food so that a wise choice of food can be made, to provide a means for conveying information of the nutrient content of a food on the label, to encourage the use of sound nutrition principles in the formulation of foods which would benefit public health, to provide the opportunity to include supplementary nutrition information on the label. To ensure that nutrition labelling does not describe a product or present information about it which is in any way false, misleading, deceptive or insignificant in any manner and to ensure that no nutritional claims are made without nutrition labelling. Argentina believes it is appropriate to include reference to providing the consumer with information to reduce risk factors for noncommunicable diseases and to permit the dietary management of noncommunicable diseases of public health significance. Although labelling cannot replace medical advice related to these diseases and doctors should guide their patients in connection with noncommunicable diseases by indicating what food is better, inclusion of nutrition information and its implication on risk factors for noncommunicable diseases associated with eating habits is one of several elements (education and advertising, among others) that can help change "popular" behaviours and thus help consumers to make good, informed choices about the food they need to be in good health.
Australia	An internationally agreed definition would be required to facilitate global declaration – we note that this issue has recently been progressed by CCNFSDU and will be considered by the Commission in 2009.
CEFS	No comment
Brazil	The declaration of dietary fibres requires direct analysis. Actually, there is discussion about the most appropriated definition of dietary fibre and there are different analytical methods that can be used.
EC	The definition of dietary fibre and the associated analytical methods.
IADSA	Currently, analytical differences and differences in the definition of dietary fibre
ICBA	No comment
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	Many practical difficulties in the analysis of dietary fibre in wide variety of foods; analytical method is tedious and time consuming.
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of fiber are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	▪ Definition of dietary fibre- whether dietary fibre is a part of carbohydrate ▪ Detection and labelling of soluble and insoluble fibre
United States	

1.62 What are the costs that need to be considered with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	The control-related costs to be covered by the government in conducting routine analysis. Regarding changes in labels, the related costs are absorbed in the adaptation period normally set by national standards.
Australia	There could be costs associated with: ▪ building the additional capacity in laboratories and appropriately trained personnel to provide

	the necessary analysis required for the nutrition information; ▪ costs to industry of changing the label; ▪ costs to government of enforcement and monitoring; and ▪ and possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of sodium must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	An impact assessment report on the introduction of mandatory nutrition labelling prepared for the European Commission Health and Consumer Protection DG in 2004 indicated that obtaining information on dietary fibre increased costs of analysis by on average €100.
IADSA	Unless internationally recognised food composition tables are available, the declarations will have to be based on expensive assays of the food
ICBA	No comment
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	High analytical cost as equipment and chemicals.
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.63 What are the benefits that need to be considered with declaring the nutrient?

Member/ Observer	**Answer**
Argentina	The information provided with nutritional labelling would complements governmental health policy strategies in consumer health protection given the prevalence of noncommunicable diseases.
Australia	Consumer information.
CEFS	No comment
Brazil	The declaration of dietary fibre can help consumers to increase its intake and choose foods with higher content of dietary fibre. It can stimulate the food industry to use more ingredients that are source of dietary fibre in their products.
EC	Intakes of dietary fibre are in general below those recommended for healthy overall diets. The inclusion of fibre in the nutrient declaration could help consumers identify higher fibre options.
IADSA	Important in those countries / populations where adequate intake of dietary fibre is not easily achievable
ICBA	No comment
Japan	Provide information to the consumers who would like to increase their dietary fibre intake level, and encourage them to pay attention to their intake level.
Malaysia	It is beneficial for consumers to understand dietary fibre content of foods.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs. Always specify that the benefits are proportional to the quantity of water ingested.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of “healthier food products” and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the fibre content helps consumers to ensure appropriate intake of the nutrient for their age, gender and specific health condition.

United States	

1.64 What are the enforcement and/or regulation issues that need to be considered?	
Member/ Observer	**Answer**
Argentina	MERCOSUR GMC Resolutions Nº 44/03, 46/03, 47/03, 31/06 and 48/06 and Argentine Food Code provisions.
Australia	Validated methods of analysis. The CCNFSDU has recommended that the list of methods presented in Appendix II of ALINORM 08/31/26 requires updating. We note that an electronic working group under CCNFSDU will start work in this area in 2009.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	Defining methods of analysis. For official controls, tolerances around the declared value would need to be considered.
IADSA	See 1.15 above (Natural variation in the food(s) and processing and analytical tolerances)
ICBA	No comment
Japan	None, as long as it becomes mandatory on foods only where a nutrition claim is made.
Malaysia	Need good laboratory facilities; not easy for enforcement agencies to establish such facilities and build required capabilities.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.
United States	

1.65 What issues should be considered in addressing consumer understanding of the nutrient declaration?	
Member/ Observer	**Answer**
Argentina	Newsletters, training courses, seminars, workshops, posters, print material in general, agreements with NGOs.
Australia	No significant additional issues in relation to this nutrient have been identified.
CEFS	No comment
Brazil	Consumers should be informed about the importance of dietary fibre to health and should be stimulated to include in their diet foods that are sources of this nutrient, such as fruits, vegetables and whole grains.
EC	Need to ensure that consumer understanding of the term “fibre” matches the definition.
IADSA	See 1.44 above

	(Consumer education on the relevance and interpretation of the information)
ICBA	No comment
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves.
Malaysia	No major issue, but need to emphasise on different sources of dietary fibre.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For dietary fibre, we suggest to communicate the health impacts of high fibre diet.
United States	

1.66 What is your overall recommendation for this specific nutrient?

Member/ Observer	**Answer**
Argentina	We interpret the question as referring to whether the declaration of this nutrient should be mandatory. If so, we believe the declaration of dietary fibre content should be **mandatory**.
Australia	Not supported. Dietary fibre is not included in the list of nutrients associated with an increased risk of non-communicable diseases in the Global Strategy. Australia allows for voluntary declaration of dietary fibre, except where a claim is made in relation to either fibre, sugars, or any other carbohydrate, when it becomes mandatory. During its review of nutrition labelling requirements in 1999 Food Standards Australia New Zealand determined that these provisions were considered adequate, and that the mandatory declaration on all products where a panel is used was not necessary.
CEFS	No comment
Brazil	Increase consumption of fruits, vegetables and whole grains in order to achieve an adequate intake of dietary fibre.
EC	The EC believes that the inclusion of fibre in the basic nutrition declaration will depend on the main aim of the provision of the nutrition declaration and whether there is a risk of information overload for the consumer.
IADSA	Should not be mandatory for all foods
ICBA	On a global basis, ICBA does not support the labeling of nutrient beyond energy, protein, available CHO and fat, plus any nutrient for which a claim is made. The labeling of additional nutrients should be determined at the national level.
Japan	Current guideline on nutrition labelling (CAC/GL2-1985) would be sufficient.
Malaysia	Low recommendation
Mexico	Just to be stated whenever a nutritional claim (related to the nutrient) has been made. Giving out sole information of the fiber content, may mislead the consumer, which is why it must be associated with a claim. The recommendation should always be related to water intake
Poland	No comment
Singapore	Compulsory to label
United States	

CHOLESTROL

1.67 What is the public health significance of the nutrient?

Member/ Observer	Answer
Argentina	No comment
Australia	In Australia, the public health significance of cholesterol may be lower than other nutrients, such as saturated fat. Australia suggests that an appropriate risk assessment process be used to determine the relative global public health significance of cholesterol.
CEFS	No comment
Brazil	The WHO Technical Report 916 on Diet, Nutrition and the Prevention of Chronic Diseases recommends that cholesterol intake should not exceed 300 mg per day. The report concludes that high intake of cholesterol probably increases the risk of developing cardiovascular diseases.
EC	In dietary terms the intake of fats and the type of fats has a greater impact on blood cholesterol levels than dietary cholesterol.
IADSA	The relationship between cholesterol and cardiovascular disease (CVD)
ICBA	No comment
Japan	Excessive intake level
Malaysia	Low significance as exogenous cholesterol is not the main source of blood cholesterol levels.
Mexico	The scientific evidence indicates a positive correlation between the dietetic cholesterol ingestion and the levels of LDL, which contributes to a greater risk of suffering cardiovascular diseases. It is a precursor of gall bladder acids, hormones steroids and colecalciferol. The cholesterol is dispensable in the diet and for some people with genetic predisposition, its ingestion still in small amounts causes serious problems of health
Poland	Connected with public health significance of fat; food products rich in cholesterol are also a source of fat, especially saturated fatty acids.
Singapore	Increase risk of heart diseases and stroke.
United States	

1.68 What are the practical issues with declaring the nutrient?

Member/ Observer	Answer
Argentina	No comment
Australia	No significant additional issues in relation to this nutrient have been identified (other than the general issues identified above).
CEFS	No comment
Brazil	The declaration of cholesterol depends on direct analysis. However, as it is found only in animal products, it would not be necessary to conduct cholesterol analysis for foods that do not contain ingredients from animal origin.
EC	No comment
IADSA	See 1.12 above (Natural variation in foods and consistency in analysis and reporting)
ICBA	No comment
Japan	None, as long as it is permitted as declared as comparative claim
Malaysia	Analysis may be difficult for some foods, e.g. processed foods, composite foods.
Mexico	With the declaration of this nutrient, the population has come to realize how much percentage of the recommended daily amount of cholesterol are gaining by the ingestion of certain foods, and taking into account it for their diet, while the population it's being educated. Review point 3.5.2 of the Guidelines for nutritional labeling.
Poland	No comment
Singapore	None identified at this time
United States	

1.69 What are the costs that need to be considered with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	No comment
Australia	There could be costs associated with ▪ building the additional capacity in laboratories and appropriately trained personnel to provide the necessary analysis required for the NIP; ▪ costs to industry of changing the label; ▪ costs to government of enforcement and monitoring; and ▪ possibly increased costs to consumers if industry passes on additional costs of products.
CEFS	No comment
Brazil	Development of official database on nutrient composition of foods to help the implementation of nutrition labelling by small and medium businesses. To set exemptions and tolerance values can help to minimize the costs of nutrient declaration. The declaration of cholesterol must be linked to nutrition education materials and programmes to promote its correct use by the consumer.
EC	No comment
IADSA	See 1.6 above (Unless internationally recognised food composition tables are available, the calculations have to be based on assays of the food)
ICBA	No comment
Japan	Analytical cost borne by the industry and the inspection cost by the public administration
Malaysia	High analytical cost [including equipment cost (GC), consumables (including standards, columns)].
Mexico	In the national legal framework, whenever a nutritional claim is made, the nutrient should be declared, that is why regular surveillance should be done in order to have an accurate value. Size of the label, reformulation costs, changes in production lines, changes in presentation of the food, etc., should be considered before making any decisions.
Poland	No comment
Singapore	▪ Labelling costs ▪ Nutrient analysis cost
United States	

1.70 What are the benefits that need to be considered with declaring the nutrient?	
Member/ Observer	**Answer**
Argentina	No comment
Australia	The declaration of cholesterol content may of limited benefit due to possible lower public health significance, and a lack of understanding around the relationship between health, and cholesterol and the fatty acid profile of the diet. We note that when the possibility of mandatory declaration of cholesterol was raised during Food Standard Australia New Zealand's review of nutrition labelling in 1999 (Proposal P167) – submissions from consumers were largely not in favour of disclosure being required. This recognised the greater public health significance of fats, particularly saturated fats.
CEFS	No comment
Brazil	The declaration of cholesterol can help consumers to limit its intake. However, from a public health perspective it is more important to limit saturated and trans fatty acids intake than cholesterol intake.
EC	None have been identified
IADSA	Important information in relation to potential reduction of CVD
ICBA	No comment
Japan	Provide information to the consumers who would like to reduce their cholesterol intake level and already know their cholesterol intake level from other foods .
Malaysia	Low benefits to the consumers as exogenous cholesterol is not the main source of blood cholesterol

	levels. Indeed, labelling of cholesterol in foods may give misleading information to consumers.
Mexico	Public should be sensitized in order for them to realize the importance of the quantity ingested daily, information for people with special dietary needs.
Poland	No comment
Singapore	Nutrition labelling in general helps to encourage intake of "healthier food products" and discourage consumption of less healthy ones. It also promotes healthy competition among food manufacturers leading to the formulation of food products with improved healthier nutrition profiles. Declaration of the cholesterol content provides useful information which is of health significance to consumers.
United States	

1.71 What are the enforcement and/or regulations issues that need to be considered?

Member/ Observer	**Answer**
Argentina	No comment
Australia	No significant additional issues in relation to this nutrient have been identified.
CEFS	No comment
Brazil	Improvement of laboratories facilities and equipments and staff training to check for nutrition labelling compliance and accuracy. The regulation must establish a tolerance value to account for the inherent variability in amounts of nutrients and the variability in laboratory analysis. To set exemptions based on nutrient content of foods, place of sale and package size can help enforcement and reduce costs.
EC	For official controls, tolerances around the declared value would need to be considered.
IADSA	See 1.15 above (Natural variation in the food(s) and processing and analytical tolerances)
ICBA	No comment
Japan	None, as long as it is permitted as declared as comparative claim
Malaysia	Need good laboratory facilities; not easy for enforcement agencies to establish such facilities and build required capabilities.
Mexico	Legal national framework should be updated.
Poland	No comment
Singapore	Implementation of surveillance programmes to ensure proper labelling and standardization of analytical methods for enforcement purpose.
United States	

1.72 What issues should be considered in addressing consumer understanding of the nutrient declaration?

Member/ Observer	**Answer**
Argentina	No comment
Australia	Consumers would need to understand the relationship between the cholesterol and fatty acid profile of diet.
CEFS	No comment
Brazil	Consumers should be informed about the importance to control cholesterol intake and the effect of different types of fats on health.
EC	Consumers need to be aware of which dietary factors are important in relation to blood cholesterol levels. For most population groups dietary factors other than dietary intake of cholesterol are more

	important risk factors associated with raised blood cholesterol levels.
IADSA	Consumer education that the declared value does not differentiate between LDL and HDL cholesterol
ICBA	No comment
Japan	As a precondition, consumers should be aware of the appropriate intake level for themselves.
Malaysia	May mislead the consumers and result in consumers avoiding many nutritious foods, even for children.
Mexico	To consider to which sector of the population the product is directed, age. To associate the energy contribution with the values of carbohydrates, proteins and fats. The use of technical terminology could be changed by words of common use, to avoid confusions. The declaration of the nutrient should be by portion, which will have to perfectly be in favor identified and of the total content of the product in the packing. Education to the population.
Poland	No comment
Singapore	The main consideration should be to help consumers understand the importance of nutrition information and apply the nutrient values according to individual needs. For cholesterol, we suggest to address the confusion over the fact that plant based food such as coconut milk is a source of cholesterol. This has been further complicated by the use of 'cholesterol free' claim on plant based foods.
United States	

1.73 What is your overall recommendation for this specific nutrient?

Member/ Observer	**Answer**
Argentina	We believe the declaration of cholesterol content **should not be mandatory**.
Australia	Not supported as it is not included in the list of nutrients associated with an increased risk of non-communicable diseases in the Global Strategy.
CEFS	No comment
Brazil	We do not support of cholesterol inclusion in the list of nutrients that are always declared. It would be more important to guarantee the declaration of saturated and trans fatty acids.
EC	The EC believes that the inclusion of cholesterol in the nutrition declaration will depend on the main aim of the provision of the nutrient information. However, the EC believes that the provision of information on nutrients other than cholesterol is important and the issue of potential information overload should be taken into account when determining the nutrition declaration.
IADSA	Should not be mandatory
ICBA	On a global basis, ICBA does not support the labeling of nutrient beyond energy, protein, available CHO and fat, plus any nutrient for which a claim is made. The labeling of additional nutrients should be determined at the national level.
Japan	Labelling of cholesterol should be necessary only when nutrient content claim on cholesterol is made. Otherwise, labelling of fat content would be sufficient for the above purpose
Malaysia	Low recommendation
Mexico	Just to be stated whenever a nutritional claim is being mad, in order to avoid misleading. Note: Avoid misleading declarations such as in the cases where the product is naturally free of cholesterol. With aims to suitably orient the consumer, the nutritional claims must be clear and complete of such form that is denoted that the mentioned characteristic is attributable to other products or ingredients of the same nature.
Poland	No comment
Singapore	Compulsory to label
United States	

ANNEX III

Summary of Comments received in respect of the Executive Summary

Introduction
On 2 February 2009 New Zealand, as leader of the electronic Working Group on the revision of the Guidelines on Nutrition Labelling concerning the list of nutrients that should always be declared, despatched to the members of the eWG a discussion document on the overall position. Comments were sought from the members by 16 February 2009.

Comments
A summary of the comments received follows:

- Further discussion of criteria for identifying nutrients that should be declared where nutrient declaration is applied is necessary prior to determining the nutrients to be included in section 3.2.1.2 of the Guidelines.
- All of the nutrients for which no clear consensus or direction is apparent in country comments should either be placed in square brackets or be items for discussion. Accordingly trans fatty acids, dietary fibre and cholesterol should be placed in placed in square brackets for further deliberation.
- The text from the Global Strategy should be used to describe the importance of the nutrient to public health.
- "nutrition claims" should be added to "The declaration of nutrients needed" to make the legend more specific.
- Decisions on the labelling of saturated fat should be at national discretion.
- A definition of what constitutes saturated fat needs to be developed.
- Labelling of saturated fats should not be mandatory. Not all saturated fatty acids have the same biological effects, whether positive or negative.
- Trans fatty acids should not be a mandatory declaration. Research differentiates between the effects of naturally occurring and industrial trans fatty acids.
- Further consideration needs to be given to the labelling of sugars, including whether it should be at national discretion.
- The term should be "sugars" to reflect all sources of mono- and di-saccharides.
- If declared the declaration should be based on total sugars rather than "free" or "added" sugars.
- Neither total sugars nor free sugars should be declared and the text "sugar" in square brackets should be deleted; sugar is not directly linked to non communicable diseases and is only linked indirectly to obesity via over-consumption of energy intake, and energy is already required to be declared.
- If labelled the term used should be "sodium" not "salt", in line with Codex principles on nutrition labelling.
- Dietary fibre and trans fatty acids should be declared because they are important to the health of consumers.

Amendments

As a result of the comments received the discussion document has been revised in the following particulars:

- The text has been amended to use the word “support” and “consider” in place of “agree” and “agreement”.
- The text has been amended to substitute “nutrition claim” for “health claim”.
- Under the heading “Informing Consumers” the words “healthy or healthier food choices” and the suggested alternatives have been placed in square brackets.
- Where the importance of a nutrient to public health is described the wording from the Global Health Strategy is quoted.
- An introductory statement has been inserted under the heading “The Nutrients” to clarify that the nutrients considered by the eWG are only those related to the Global Strategy.
- The recommendations for trans fatty acids, dietary fibre, and cholesterol have been amended to that further discussions be held to determine whether their respective declarations should become mandatory.
- The proposed changes to the draft amended section are highlighted in bold.