

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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AGENDA ITEM NO. 7

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

**CODEX COMMITTEE ON FOOD LABELLING
THIRTIETH SESSION
HALIFAX, CANADA, 6 - 10 MAY 2002**

**PROPOSED DRAFT AMENDMENT TO THE GUIDELINES ON
NUTRITION LABELLING
(SECTION 3.2 LISTING OF NUTRIENTS)
(ALINORM 01/22A, APPENDIX VII)**

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

CANADA

**PROPOSED DRAFT AMENDMENT TO THE GUIDELINES ON
NUTRITION LABELLING
(ALINORM 01/22A, APPENDIX VII)**

GOVERNMENT COMMENTS AT STEP 3

CANADA:

Section 3.2.2

Canada supports the proposal to require the declaration of sugars, dietary fibre, saturated fatty acids, *trans* fatty acids and sodium whenever one of them is the subject of a nutrition claim or the food carries a health claim or one of them is declared voluntarily as part of the nutrient declaration. The following wording is suggested for 3.2.2 to make the wording parallel that of Sections 3.2.3 and 3.2.4.

3.2.2 The amounts of total sugars, dietary fibre, saturated fatty acids, *trans* fatty acids and sodium should be declared in addition to the requirements of section 3.2.1 where:

3.2.2.1 the amounts of one or more sugars, dietary fibre, saturated fatty acids, *trans* fatty acids and sodium are declared voluntarily,

3.2.2.2 sugars, dietary fibre, saturated fatty acids, *trans* fatty acids or sodium are the subject of a nutrition claim, or

3.2.2.3 a health claim is made for the food.

Section 3.2.3

The proposal to require a declaration of the fibre content if a claim is made is already covered by section 3.2.1.3. The sentence in square brackets should be deleted.

Section 3.2.4

This section is not clear. As written it appears to require the declaration of saturated, *trans* and polyunsaturated fatty acids if a claim for fatty acids is made and the declaration of cholesterol and polyunsaturated and *trans* fatty acids if a claim for cholesterol is made. If a claim is made for cholesterol, saturated and *trans* fatty acids should be declared since these groups of fatty acids adversely influence serum cholesterol levels. We also question the relevance of the requirement to declare polyunsaturated fatty acids when a claim for cholesterol is made. Dietary advice on lowering serum cholesterol levels focuses on reducing saturated and *trans* fatty acids rather than on increasing the intake of polyunsaturates. Furthermore, the grouping of the n-3 and n-6 families of essential fatty acids together as

“polyunsaturated fatty acids” is not consistent with current scientific knowledge about the distinct metabolic functions of these fatty acids.

Section 3.2.4 should be re-worded as follows:

3.2.4 Where a claim is made regarding the amount and/or type of fatty acids or a claim is made regarding the amount of cholesterol, the amounts of saturated fatty acids and *trans* fatty acids should be listed in addition to the requirements of Section 3.2.1 and in accordance with the requirements of Section 3.4.7. The amounts of any other fatty acid constituents may also be listed.

Section 3.2.5

If section 3.2.2 is adopted, a consequential amendment to section 3.2.5 would be required to include reference to section 3.2.2.

Section 3.4.7

Section 3.4.7 should be amended in line with the above comments to delete reference to “polyunsaturated” and include *trans* fatty acids as follows:

3.4.7 Where the amount and/or type of fatty acids is declared, the declaration should follow immediately the declaration of total fat in accordance with section 3.4.3. The following format should be used:

Fat	...g
of which saturated	...g
and <i>trans</i>	...g