

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

AGENDA ITEM NO. 7

CX/FL 02/8

E

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:

**BRAZIL
CHILE
COLOMBIA
INTERNATIONAL SOFT DRINK COUNCIL (ISDC)
WORLD SUGAR RESEARCH ORGANISATION (WSRO)**

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

GOVERNMENT COMMENTS AT STEP 3

BRAZIL:

3.2. Listing of Nutrients

3.2.2. The Brazilian Delegation suggests:

- To exclude the brackets and to continue the text;
- To maintain the “trans fatty acids”;
- To substitute the expression: “fibre” for “dietary fibre”, to be coherence with the item 2.7 of this guideline.
- To substitute the term “saturated fat ”for “saturated fatty acids”.

The suggestions above are linked to the text below, with its modifications highlighted:

“3.2.2 Where one or more of the following ingredients: sugar, **dietary** fibre, **saturated fatty acids** ~~saturated fat~~ and sodium are declared voluntarily or because a nutrition claim for one of these nutrients is made or if a health claim is made then the nutrient declaration will consist of information on the sugars, **dietary** fibre, saturated fatty acids, trans fatty acids and sodium in addition to the requirements of 3.2.1 or”

- **3.2.3.** To exclude the brackets of the item, maintaining the text.
- **3.2.4.** To exclude the brackets of the item, maintaining the text.

CHILE:

Chile would like to make some comments and clarifications regarding the documents being consulted. We agree with everything except the following issues highlighted in bold:

Point:

- 3.2.1.2.** Where it says: (i.e., carbohydrates excluding dietary fibre).
We propose it should say: (i.e., **total** carbohydrates excluding dietary fibre)
- 3.2.2** We agree removing the square brackets and we propose modifying the wording of the text to look as follows:
- Where one or more of the following nutrients **or food factors**: sugars, fibre, saturated fat and sodium are declared voluntarily, **or are compulsory**

declared because a nutrition claim for one of these nutrients is made, then the nutrient declaration will consist of information on the sugars, fibre, saturated fatty acids **or** sodium in addition to the requirements of 3.2.1

3.2.3 We propose to include all and describe the types of fibre, to read as follows:

Where a claim is made regarding the amount or the type of carbohydrate, the amount of total sugars should be listed in addition to the requirements in Section 3.2.1. The amounts of starch and/or other carbohydrate constituent(s) may also be listed. When a claim is made regarding the dietary fibre content, the amounts of **total, soluble and insoluble** dietary fibre should be declared in addition to the requisites of section 3.2.1.

3.2.4 We propose to include all and make some amendments to read as follows:

Where a claim is made regarding the amount or type of **fats** or fatty acids or cholesterol, the amounts of saturated, **monounsaturated**, polyunsaturated and trans fatty acids should be declared **in addition to** the requisites of Section 3.2.1. The amounts of any other fatty acid constituent(s) may also be listed.

COLOMBIA:

	Conclusion
3.2.2 Where one or more of the following: sugars, fibre, saturated fat and sodium are declared voluntarily [or because a nutrition claim for one of these nutrients is made] then the nutrient declaration will consist of information on the sugars, fibre, saturated fatty acids, trans fatty acids and sodium in addition to the requirements of 3.2.1 or if a health claim is made].	We agree
3.2.3 Where a claim is made regarding the amount and/or the type of carbohydrate, the amount of total sugars should be listed in addition to the requirements in Section 3.2.1. The amounts of starch and/or other carbohydrate constituent(s) may also be listed. [Where a claim is made regarding the dietary fibre content, the amount of dietary fibre should be declared.]	We agree
3.2.4. Where a claim is made regarding the amount and/or type of fatty acids or cholesterol, the amounts of saturated fatty acids or cholesterol and of polyunsaturated fatty acids and trans fatty acids should be declared in accordance with Section 3.4.7 and 3.2.1. [The amounts of any other fatty acid constituent(s) may also be listed.]	We agree

INTERNATIONAL SOFT DRINK COUNCIL (ISDC):

The International Soft Drink Council is concerned at the increasing list of nutrients proposed in paragraph 3.2.2. Most soft drinks do not contain any fat and to require these products where fat is declared as “0” which make a health claim to have to declare both “saturated fatty acids” and “trans fatty acids” both as “0” is ineffective use of valuable label space. Therefore, we propose that categories of nutrients, whose category level is insignificant or zero, should be

exempt from having to declare the subcategories.

WORLD SUGAR RESEARCH ORGANISATION (WSRO):

The twenty-ninth session of the Codex Committee on Food Labelling (CCFL) had returned the Proposed Draft Amendment to Step 3 since no consensus could be reached on the text and several amendments had been proposed during the session.

In that framework, WSRO would like to draw attention to the written and verbal comments that were submitted to CCFL in May 2001 regarding Sections 3.2.2 and 3.2.3 (see Conference Room Document CX/FL 01/09 – CRD.24.).

Summarising this, WSRO would like to provide the following comments on **Section 3.2.2** and **Section 3.2.3**:

It is WSRO's view that the core information in the existing Guidelines on Nutrition Labelling, whereby energy value, protein, available carbohydrate and fat and the amount of any other nutrient for which a nutrition claim is made must be declared, provides the consumer with adequate general dietary information.

Principally, sugars should only be listed on the nutrition label when a nutrition claim is made specific to sugar(s) – such as “low in sugar(s)” or “no sugar(s) added”. In all other cases a declaration of total carbohydrate is sufficient.

WSRO does not support **Section 3.2.2.** of the proposed draft amendment which would require the declaration of “sugars” in addition to carbohydrate when a claim is made for one or more of fibre, saturated fat and sodium because such labelling is not supported by current scientific research on sugars and health and there are no scientifically based public health reasons for a quantitative labelling of sugars. Therefore, this Section contradicts the *Statements of Principle concerning the Role of Science in the Codex Decision-Making Process*.

The *1998 Report of the Joint FAO/WHO Expert Consultation on Carbohydrates in Human Nutrition* concluded that “there is no evidence of a direct involvement of sucrose, other sugars and starch in the etiology of lifestyle-related diseases”, including obesity, diabetes and cardiovascular diseases.

Concerning dental caries the FAO/WHO report concludes, “more and more populations are characterised by a decreasing caries prevalence in the young generation, mostly independent from intake of sugars and other carbohydrates.”

WSRO does not support **Section 3.2.3** which states that sugars content would have to be declared when any claim is made about the amount and/or type of carbohydrate, because this is also not supported by scientific evidence and, therefore contradicts the *Statements of Principle concerning the Role of Science in the Codex Decision-Making Process*. There is no public health reason to specifically declare sugars when a claim is made on carbohydrates.

To conclude, WSRO does not support amendments to the Codex Guidelines on Nutrition Labelling that trigger the quantitative labelling of sugars when claims are made for other nutrients (sodium, fibre or fatty acids) and carbohydrates. The totality of current scientific evidence shows that there is no causal association between the quantity of sugars consumed and the etiology of lifestyle- related diseases nor is there any basis to distinguish sugars from other carbohydrates in the overall maintenance of health.

Thus, there are no scientifically based public health reasons for quantitative labelling of sugars as distinct from total carbohydrate.

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

AGENDA ITEM NO. 7
CRD.24

CX/FL 01/09-

ENGLISH ONLY

E

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD LABELLING
TWENTY-NINTH SESSION
OTTAWA, CANADA, 1 - 4 MAY 2001

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

GOVERNMENT COMMENTS AT STEP 3

COMMENTS FROM:

WORLD SUGAR RESEARCH ORGANISATION (WSRO)

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

GOVERNMENT COMMENTS AT STEP 3

WORLD SUGAR RESEARCH ORGANISATION (WSRO):

The World Sugar Research Organisation (WSRO) is an international scientific organisation dedicated to the monitoring and communication of accredited scientific research on the role of sugar in nutrition and health. Our comments on the latest developments regarding Nutrition Labelling are set out below.

Background

At the 22nd Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), the Committee introduced a new section (3.2.2) in square brackets proposing the additional nutrient declaration of sugars, fibre, saturated fatty acids and sodium when a claim is made for any one or more of these nutrients. Such a requirement would trigger the quantitative labelling of sugars if a claim is made for sodium, fibre or fatty acids. However, the Committee did not provide any specific public health rationale for such a requirement.

The Committee acknowledged the divergent opinions and that there was no consensus to advance this revised text to Step 5 and agreed to return the proposed draft, as amended, to Step 3 for further comments and consideration at the next session. It should also be noted that the proposed amendment is different from the position taken by the CCNFSDU at its 21st Session in Berlin two years ago, when the Committee recognised that there was general support for retaining the existing provisions of the Codex Guidelines for Nutrition Labelling.

WSRO Views

WSRO would like to provide specific comments on the above proposed amendment (Section 3.2.2) and Section 3.2.3.

[Section 3.2.2 Where one or more of the following: sugars, fibre, saturated fat and sodium are declared voluntarily [or because a nutrition claim for one of these nutrients is made] then the nutrient declaration will consist of information on the sugars, fibre, saturated fatty acids and sodium in addition to the requirements of 3.2.1].

WSRO does not support section 3.2.2 of the proposed amendment to the Guidelines on Nutrition Labelling as it is not supported by current scientific research on sugars and health, and there are no scientifically based public health reasons for a quantitative labelling of sugars. The core information, whereby energy value, protein, available

carbohydrate and fat must be declared when a nutrition claim is made, provides the consumer with adequate general dietary information.

Principally, sugars should only be listed on the nutrition label when a nutrition claim is made specific to sugar(s) – such as “low in sugar(s)” or “no sugar(s) added”. In all other cases a declaration of total carbohydrates is sufficient.

Section 3.2.3.

“Where a claim is made regarding the amount and/or type of carbohydrate, the amount of total sugars should be listed in addition to the requirements set out in Section 3.2.1.”

WSRO does not support section 3.2.3. as there are no scientifically based public health reasons to single out sugars when a claim is made on total carbohydrate or another component of carbohydrate (e.g. starch).

Current Scientific Consensus/Public Health Needs Do Not Justify Labelling of Sugars

Lifestyle related diseases

Current scientific knowledge does not justify the separate declaration of sugars in addition to the declaration of total carbohydrate. The most recent consensus document on the role of carbohydrates in human nutrition (*Report of the Joint FAO/WHO Expert Consultation of Carbohydrates in Human Nutrition, 1998*) concluded that, “there is no evidence of a direct involvement of sucrose, other sugars and starch in the etiology of lifestyle related diseases”. Thus, the international expert panel did not identify any public health basis for specific recommendations on sugars but rather defined an optimum diet of at least 55% of total energy from a variety of carbohydrate sources.

Energy balance and Obesity

The FAO/WHO report states “There are no data to suggest that different types of carbohydrates differentially affect total energy intake” and “diets containing at least 55% of energy from a variety of carbohydrate sources, as compared to high fat diets, reduce the likelihood that body fat accumulation will occur.” It goes on to state, “Much controversy surrounds the extent to which sugars and starch promote obesity. There is no direct evidence to implicate either of these groups of carbohydrates in the etiology of obesity.” “While there is substantial data suggesting that high levels of dietary fat intake are associated with high levels of obesity, at present there is no reason to believe that high intake of simple sugar is associated with high levels of obesity”. Thus, there is no scientific basis to distinguish sugars on the nutrition label for the public health prevention and management of obesity.

Cardiovascular Diseases

The FAO/WHO report concludes, “There is no evidence for a casual role of sucrose in the etiology of coronary heart disease. The cornerstone of dietary advice aimed at reducing coronary heart disease risk is to increase the intake of carbohydrate-rich foods, especially cereals, vegetables and fruits rich in non-starch polysaccharide, at the expense of fat.”

Non-Insulin Dependent Diabetes Mellitus (NIDDM)

It is now well recognised by experts that for the management of diabetes it is not necessary to exclude sugar from the diet. The FAO/WHO report indicates that the recommendation to avoid simple sugars “is based on the incorrect assumption, however, that sugars will aggravate hyperglycemia to a greater extent than other carbohydrates. Indeed there is evidence to the contrary.” In fact, the dietary management of diabetes is dependent more on the glycemic index of the digestible carbohydrate, than on its chemical structure (simple or complex). The report states that “avoiding obesity and increasing intakes of a wide range of foods rich in non-starch polysaccharide and carbohydrate-containing foods with a low glycemic index offers the best means of reducing the rapidly increasing rates of NIDDM in many countries.” The glycemic index and blood glucose response to foods cannot be determined by the sugars content of foods. For example, sucrose has a lower glycemic index than many starches. Thus, there is no scientific basis to quantify and label sugars to assist in the dietary management of diabetes.

Dental Caries

The FAO/WHO report concludes that, “More and more populations are characterized by a decreasing caries prevalence in the young generation, mostly independent from intake of sugars and other carbohydrates.” There is no scientific basis to distinguish sugars from other carbohydrate components as it is well recognised that all foods containing fermentable carbohydrates (sugars or starch) can produce acid and increase the risk of caries. Furthermore, the impact of these carbohydrates on dental decay is not significantly related to quantities consumed but rather the frequency of consumption and other factors including the type of food, degree of oral hygiene, availability of fluoride, salivary function and genetic factors. Therefore, quantitative labelling of sugars for dental reasons is not scientifically justified.

Summary

To conclude, WSRO does not support amendments to the Codex Guidelines on Nutrition Labelling that require the quantitative labelling of sugars when claims are made for other nutrients. Available scientific data and recent consensus reports evaluating that data have concluded that there is no casual association between the quantity of sugars consumed and the etiology of lifestyle-related diseases nor is there any basis to distinguish sugars from other carbohydrates in the overall maintenance of health. Thus, there are no scientifically based public reasons for the quantitative labelling of sugars as distinct from total carbohydrate.