

Annex 5 - Criteria for the definition of “high in” nutritional descriptors for fats, sugars and sodium(salt)

PLEASE SEND YOUR RESPONSE TO:
Codex Contact Point for Canada at HC.Codex.Canada.SC@Canada.ca and
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by 29 JUNE 2018

To help inform the development of the CCFL Discussion Paper on this topic, we request Codex members to provide responses to the following questions about current practices, issues, and any potential role for CCFL on this topic. Please enter your name / contact details as requested below also when responding.

Name of Codex Member Country, Member Organisation, or Observer (and e-mail contact details):		European Union			
General Questions:					
1. Within your country / region, are there criteria for the definition of “high in” nutritional descriptors for fats, sugars and sodium(salt)? Is the criteria used or proposed (e.g. under development); mandatory/regulatory or voluntary?					
Name of current labelling and/or practice	Country or Region if applicable	Implemented (using) or proposed	Mandatory / Regulatory or Voluntary	Who developed the labelling? (Government, Industry, other organisation?)	Relevant references and/or web links. If relevant, what does the label look like on pack? (provide a picture if possible)
The EU legislation and in particular, Regulation (EU) No 1169/2011, does not request mandatory warnings such "High in" sugars, salt or fats and has not defined any criteria for its use. In order to inform consumers on nutritional values, Regulation (EU) 1169/2011 on food information to consumers provides for mandatory					https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1530180983115&uri=CELEX:02011R1169-20180101

<p>nutrition declaration on pre-packed foods. In addition, in order to help consumers identifying the essential nutrition information when purchasing foods, the Regulation allows the repetition on front-of-pack of the most important elements of the nutrition declaration: the energy value alone or the energy value together with the amounts of fat, saturates, sugars and the sodium content expressed as salt</p> <p>The Regulation also acknowledges that additional forms of expression and presentation of the nutrition declaration may help consumers to better understand the nutrition declaration and allows for different forms to be developed by Member States or food business operators on the basis of criteria established in Regulation (EU) No 1169/2011.</p>					
<p>2. Are you aware of existing international guidelines or other relevant work undertaken in other international fora on this topic? If so, please provide relevant reference(s) or website links to access this?</p>					
<p>Yes / No</p>	<p>Details of existing international guidelines or other relevant work in other international fora:</p>				
<p>No</p>					

3. What are the issues that you think need to be addressed by CCFL for this topic? Please give a reason(s) for your answer of why it is important.

Issue(s)	Reason(s) for answer
Purpose and scope	<p>CCFL should clarify the purpose of the work to develop a definition for 'high in' specific nutrients and how the definition would be used.</p> <p>This clarification should consider section 5 of the CODEX Guidelines on Nutrition Labelling (CAC/GL 2-1985) on supplementary nutrition information, stating that the use of supplementary nutrition information should be <i>optional</i> and the ongoing work at CODEX level to develop 'Guidelines on the Use of Front-of-pack Nutrition Labelling' and the potential inclusion and exclusion criteria as regards the definition of 'front-of-pack nutrition labelling (FOPL) that will be part of these guidelines.</p>

4. Please describe any nutrition policies/ dietary guidance in your country or region to help protect consumers from the risks of chronic diseases related to excess consumption of foods high in nutrients of public health concern. Please specifically identify which nutrients are part of this policy/guidance?

The European Commission supports its Member States in the implementation of the [2007 Strategy on Nutrition, Overweight and Obesity-related Health Issues](#). Some relevant actions are mentioned below:

In the area of **reformulation** of food, an **EU Framework for National Initiatives on Selected Nutrients** (on sugar and fats) has been agreed in 2011 by the Member States' representatives in the High Level Group on Nutrition and Physical Activity (a 2008 reformulation framework had been agreed earlier to reduce salt in food by 16% in 4 years). Work started on reducing fat by 5% until 2016 and by an additional 5% by 2020. In December 2015, an Added Sugars Annex to the EU Framework was agreed to promote a voluntary reduction of 10% in added sugars in processed food by 2020. The Framework and its Annexes are for voluntary application by Member States.

The Commission prepared in 2017 a report on **public procurement of food for health in the school setting**, a tool which offers operational guidance to schools for translating existing healthy school food standards into procurement specifications. This offers an opportunity to steer a procurement of EUR 80 billion per year towards healthier food options in schools.

In February 2014, a voluntary **EU Action Plan on Childhood Obesity 2014 - 2020** was agreed at EU level to curb the rise in childhood obesity by 2020. A mid-term evaluation report on its implementation will be delivered in the second half of 2018. Two projects will start in 2018: one on food reformulation (it will provide a baseline to help Member States monitor the removal of excess sugars, salt and fat from products that are bought every day in European

supermarkets) and one on reducing (digital) marketing of high in fat, sugars and salt foods to children.

Examples of measures at national level:

1. UK

The UK Government launched *Childhood Obesity: A Plan for Action* in August 2016. Our plan will help children and families to recognise and make healthier choices and be more active. Key measures in our plan include the soft drinks industry levy, the sugar reduction and wider reformulation programme and helping children to enjoy an hour of physical activity every day. The plan is available at:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/546588/Childhood_obesity_2016_2_acc.pdf

Product reformulation:

- Sugar Reduction Programme – this voluntary programme challenges all sectors of the food and drink industry to reduce sugar in their products by 20% by 2020. Sugar reduction guidelines were published in March 2017 and the first progress report was published in May 2018.
- Calorie Reduction Programme – this voluntary programme challenges all sectors of the food and drink industry to reduce calories in their products by 20% by 2024.
- Salt reduction targets – voluntary targets were set for 76 categories of food and industry was expected to meet them by December 2017. A progress report is expected towards the end of 2018.

Documents for the wider reformulation programme in the UK can be found here:

<https://www.gov.uk/government/collections/sugar-reduction>

Dietary guidance / Consumer campaigns:

- **Eatwell Guide** (UK) - The Eatwell Guide aims to assist the population in choosing a varied and balanced diet to meet latest Government dietary advice. It reflects the most up to date recommendations including those from the Scientific Advisory Committee on Nutrition on the consumption of sugars and fibre. The guide is suitable for everyone over the age of five years.
- **5 a day** (England) - The 5 A Day message encourages people to consume at least 5 portions of fruit and vegetables every day and is communicated throughout public health consumer campaigns.
- **Change for Life** (England) – ‘Change4Life’ encourages families with primary school aged children across England to ‘eat well and move more’. The latest Change4Life healthy eating campaign launched in January 2018, highlighting the surprising amounts of sugar in children’s snacks and helped parents take action by introducing a new simple tip – ‘Look for 100 calorie snacks, two a day max.’ Other recent Change4Life healthy eating campaigns include: Sugar Swaps (2015), Sugar Smart (2016) and Be Food Smart (2017).
- **One You** (England) - The One You campaign encourages adults, particularly those in middle age, to make changes to improve their health by getting more physically active, eating more healthily, quitting smoking, reducing alcohol consumption and regularly checking their health.

Scottish Government

Scottish Dietary Goals describe, in nutritional terms, the diet that will improve and support the health of the Scottish population. They are set at the Scottish

population level. They indicate the direction of travel, and the extent of the dietary change needed, to reduce the burden of obesity and diet-related disease in Scotland. Goals are set for population intakes of calories, fruit and vegetables, fats, free sugars, salt, dietary fibre, total carbohydrate, red meat, oily fish.

2. Greece

- In 2017, Greece issued new Nutritional Guidelines for general population and specific age groups (infants, children, adolescents, adults, pregnant women, breastfeeding women, elderly).
According to the guidelines:
 - Adults and adolescents (>14y) should consume 4-5 servings of added lipids, olives and nuts per day (1 serv/d for children 1-2y, 1-2 serv/d for children 2-3y, 2-3 serv/d for children 4-8y and 3-4 serv/d for children 9-13y). Olive oil should be the main added lipid. Consumers are advised to limit animal fat intake and to avoid consumption of trans fat, mainly found in commercial products (i.e. biscuits, sweets, prepared sauces, fast-food).
 - Adults are advised to limit salt intake to less than 5gr per day (equivalent to 1 teaspoon) and enhance the flavor of foods by adding herbs and spices. Children should limit salt intake to less than 2gr/d (1-3y), 3gr/d (4-6y) and 5gr/d (7-18y).
 - Adults and children are advised to limit added sugar intake by avoiding consumption of beverages, commercial juices, energy drinks and non-alcoholic drinks with added sugars. Moreover they are advised to consume sweets occasionally and in moderation.
 - Consumers are advised to read food labels and choose foods with the lowest possible amount of added sugars.

- In 2012, Ministry of Health in cooperation with the Hellenic Food Authority issued a leaflet to inform consumers about the consumption of salt. Among others, the leaflet informs that “if a food has more than 0,6gr sodium/100gr or 1,5g of salt / 100gr that means that it is **high in sodium/salt**”

- Ministry of Health, in cooperation with other stakeholders (Hellenic Food Authority, General Chemical State Laboratory, Food Industry) has formed the National Action Plan on Food Reformulation. The Action Plan targets in the reduction of salt, sugars and trans fatty acids in industrialized foods. Action Plan also contains the Strategy for Reduction of Salt 2016-2020, issued by Hellenic Food Authority.

3. Italy

The Italian Ministry of Health in conjunction with national associations of food industries in 2015 initiated a common process specifically targeting children (ages 3-12), for the improvement of the nutritional characteristics of food products and the achievement of more responsible and correct marketing communications.

The overall goal of the practice was a monitoring exercise concerning the implementation of commitments undertaken in certain production areas (cereals confectionery and ice-cream, non-alcoholic beverages, dairy products) for which relevant producers committed to reduce sugar, saturated and trans fatty acids and salt, increase fiber content and reduce portion sizes.

The monitoring system assesses nutritional reference values calculated as an arithmetical average of top-selling products. Data processing is based on volume sales in the modern channel, performed by an external company that carries out market analyses. The results were very interesting and, in some cases, more than expected. The findings show a marked improvement of nutritional characteristics in the product's categories reviewed, compared to the recent past, in terms of sugar, saturated fat, and sodium reduction, fibre increase, and calories per portion decrease. Top players have eliminated trans fatty

acids issuing from fat dehydrogenation processes. This improvement exceeds the targets set for 2017, thanks to voluntary reformulation initiatives carried out by enterprises and to major market changes that have recently occurred and that further accelerated the pace of actions undertaken to meet consumer requirements.”

4. Belgium

NATIONAL FOOD AND HEALTH PLAN FOR BELGIUM

The aim of this policy document is to tackle the problems created by poor dietary habits and inadequate physical activity in Belgium. This policy document was launched in 2005.

Since December 2014, all actions of the Federal Nutrition and Health plan focused on the promotion of healthy food and primary prevention of non-communicable diseases were transferred to Communities and Regions: Flemish, French, German communities/regions and Brussels (with two different governments). Therefore, the Federal plan focuses now only on federal competencies (as food norms, food labelling, food reformulation, food surveys...).

REFORMULATION

From 2009 to 2012, there was a salt reduction programme (parallel with the EU framework on salt reduction). It included education for the population (by leaflets and a website) and a reduction of 10% of salt by a voluntary agreement with the industry.

Currently, a voluntary commitment with the industry has been made with respect to calorie reduction, portion size, sugar and fats. The agreement includes an appointment of 5% energy reduction by the end of 2017, and again another 5% reduction of the nutrients for the whole food supply chain (including catering) by the end of 2020.

Food innovation is also an important topic. For example, they are working on salt reduction, but keeping the same taste.

On salt:

- 2007: creation of a working group on salt reduction at the Ministry with the food sector, retailers, restaurants, caterers, frituristes, consumer organizations, academics.

A 2-years process of negotiations to achieve salt reduction in each food category and business.

- May 2009: signature of a common agreement in with the Federal Health Minister
- Results: - 10% of salt consumption in 2014.

On energy:

- 2012: creation of a working group on energy reduction (added sugars and fats, portion sizes) at the Ministry with the food sector, retailers, restaurants, caterers, frituristes, consumers organization, academics
- A 4-years process of negotiations to achieve energy reduction in each food category and business.
- June 2016: signature of a common agreement with the Federal Health Minister, the food industry and retailers
- Expected results: - 5 % of energy consumption by the end of 2017 compared to 2012.

Monitoring of the energy reduction strategy:

Main data sources:

- Data from our most recent food survey 2014
- Reporting from food industry and retailers of the nutritional content and market share of products between 2012 and 2017
- Results of the laboratory analysis made by the NUBEL association www.internubel.be for major food categories

5. Have national/regional standards/guidance been established to reduce consumption of foods high in nutrients of public health concern such as fats, sugars or sodium(salt) in your country or region? If so, please describe.

Besides the actions at EU-level listed under question 4, no specific standards have been developed at EU-level to reduce consumption of foods high in fats, sugars or sodium. Actions have been taken at Member State level.

6. Have threshold levels been established for high levels of fats, sugars or sodium(salt) in foods in your country or region? If so, please indicate the nutrient(s) and the established level(s). Please describe the approach for setting the thresholds.

As explained under question 1, no threshold levels have been established at EU-level for high levels of nutrients of public health concern (fats, sugars or sodium).

7. Are there any additional conditions that are assessed along with the thresholds when a food is required to be identified on a food label as being “high in” a nutrient of public health concern in your country or region? For example, consideration of the level of other nutrients or a nutrient profile. If so, please describe.

No existing thresholds for "high in" labelling for nutrients of public health concern at EU level (and thus no additional conditions).

8. Please identify if there any other considerations related to the criteria for the definition of “high in” nutritional descriptors fats, sugars and sodium(salt)for that have not been identified that you feel would be beneficial to be covered in the discussion paper.