

Danish Dairy Board Comments on the Discussion Paper on Nutrition claims and functional claims, SANCO/1341/2001

Danish Dairy Board welcomes the discussion paper. We find it a good paper and appreciate that efforts are made to harmonise this area within the EU.

We assume that the discussion paper covers common foodstuffs and not foodstuffs intended for particular nutritional uses, for which special rules apply.

Point 9

We very much agree with the view that defining what is a reasonable nutritional profile could be difficult. Some have argued that claims may not be made for e.g. cheese and this argument cannot be rationally founded taking into view that low-fat cheese is very important in relation to for instance calcium intake.

Point 17

Danish Dairy Board does not agree. We find that the definition of nutrition claims should also comprise for instance lactic bacteria, i.e. also other substances than nutrients.

Point 28

It is stated that "x% fat free" or "only x% fat" claims can be misunderstood. Danish Dairy Board does not agree that the expression "only x% fat" can be misunderstood. In principle this claim is an easily understood factual piece of information.

Point 30

For the sake of good order Danish Dairy Board wants to point out that the term "low-fat" has been defined in Council regulation no. 2991/94 of 5 December 1994 laying down standards for spreadable fats as follows:

"The term "low-fat" or "light" may be used for products with a fat content of 41% or less." The background for this is that normally butter has a fat content of 80%.

Consequently it is not correct to limit the expression "low-fat" to products with no more than 3g fat/100g.

Best Regards

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