

WOMEN'S FOOD AND FARMING UNION

- LINKING PRODUCER WITH CONSUMER -

WFU Response to

NUTRITIONAL AND FUNCTIONAL CLAIMS

The Women's Food and Farming Union are concerned about misleading claims about nutrition and function of food and welcome measures that ensure truth and consistency. WFU welcome harmonisation of rules at a national level, but doubt that harmonisation across Europe is practical or relevant to the vast majority of European consumers.

Specific points

Nutritional Claims:

18. How will legislation take account of a fluid and constantly evolving language as far as labelling is concerned? For example, the words 'light' or 'lite' has been used in a different context on labels in recent years.

Different types of nutritional claims:

- 23. WFU agrees that **comparative claims** are meaningless without baseline data.
- 24. WFU agrees that claims relating to dietary cholesterol only serve to consume customers without the knowledge to translate.
- 25. WFU questions the nutritional status of saturated and unsaturated fats. There is a large amount of conflicting evidence about the digestion and absorption of fats which makes the difference between them doubtful.

Criteria for making nutritional claims:

- 27. The expression 'functional foods' has no meaning to the majority of the population.
- 28. 'Fat Free' claims are designed to mislead less wary consumers and should not be used.
- 29. 'No added sugar' often equates to added sweeteners which are more offensive or unpalatable to many consumes than sugar. The addition of sweeteners should be as prominent as 'no added sugar' claims.
- 31. WFU agrees that RDA figures are useful, but have no views on significant percentage.

Criteria for the use of functional claims:

- 43. WFU agrees that the degree of elimination of particular substances should be controlled and that it should be demonstrated that the normal nutritional value has not been altered. This is particularly relevant in the case of milk products.
- 45. Consumer understanding of labelling should be improved and not compromised.
- 46. It is essential that functional claims should be based on sound scientific evidence.
- 47. WFU agrees that claims must be substantiated by acceptable scientific data. Scientific claims should be related to daily intake and acceptable dosages.
- 48. WFU recommend the most cost effective method to ensure uniform application of claims.