

IMACE

International Margarine Association of the Countries of Europe

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In the framework of the EU Commission's discussion paper on Nutritional and Functional Claims, the European Margarine Association would like to express major concerns about the approach of "absolute" claims.

For certain products, specific product claims are well justified . The compilation of existing legislation in the annex of the discussion paper omits the provisions of Council Regulation 2991/94 on yellow fats. "Reduced fat" may be used for fat spreads containing 41-62% fat, whereas " low fat" and "light" may be used for products below 41% fat.

Besides the specific "reduced" or "low" fat claims, the margarine industry has been using already for many years claims related to (high) unsaturates, (low) saturates and (low) cholesterol content for products with clear benefits in terms of fat composition. For your information, I enclose a copy of the IMACE Code of Practice on nutrition claims of 1992.

Application of the absolute conditions of the Codex Guidelines would deprive consumers of the possibility to make meaningful choices between the various products within this product category.

Innovation in significant product improvements and truthful communication of important dietary recommendations will loose its incentive if the EU would pursue the absolute claim approach.

We also would like to emphasize the food industry's general request that the future harmonized framework should also address the issue of disease risk reduction claims.

Confident that you will give due notice to our comments, I remain,

Sincerely yours,

I.Herreman (Mrs)

Secretary General IMACE

Annex - IMACE Code of Practice on Claims (1992)

<p style="text-align: center;">IMACE NUTRITION CLAIMS SUMMARY</p>
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1. EU Yellow Fats Regulation (EC Regulation 2991/94)

1.1. Reduced fat

- at least 25% fat reduction
- 41% - 62% fat content

1.2. Low fat or light

- at least 50% fat reduction
- below 41% fat content

2. Industry code of practice (Dublin, October 1992)

For products with a total fat content above 20% fat and at least 70% of total fatty acids as cis UFA (Unsaturated fatty acids)

2.1. Reduced SAFA

- at least 25% SAFA reduction

2.2. Low SAFA

- below 25% SAFA

2.3. Reduced cholesterol

- at least 25% cholesterol reduction

2.4. Low cholesterol

- below 20 mg cholesterol/100 g
- below 25% SAFA

2.5. Cholesterol free

- below 5 mg cholesterol / 100 g

2.6. High in PUFA

- at least 45% PUFA

2.7. High in MUFA

- at least 45% MUFA