

AIJN

Association de l'Industrie des Jus et Nectars de Fruits et de
Légumes de l'Union Européenne

Association of the Industry of Juices and Nectars from Fruits
and Vegetables of the European Union



AIJN Comments on the Discussion Paper on Nutrition Claims and Functional Claims (SANCO/1341/2001)

**Prepared by the Directorate General Health and Consumer Protection
(SANCO D4), European Commission**

AIJN is the European trade association representing the fruit juice and nectar industry of the EU. In 1994 AIJN established the European Quality Control System (EQCS), a general safety and authenticity assurance system that is probably one of the first in the European food industry.

Based on the types of products produced our industry has a high interest in the opportunities of using on an harmonised basis nutrition and health related claims. Our commitment to high product quality, as demonstrated in the establishment of the EQCS, also underlines our commitment to the responsible use of health claims.

AIJN therefore applauds the initiative of the European Commission to the presentation of the Discussion Paper on “Nutritional and Functional Claims” and agrees with many of the points included therein. Especially the principle of harmonisation is seen as desirable provided the standards to be developed meet the needs both of consumer and of industry.

However, there are a few points where additional perspective is required, as is the intention of such a discussion paper. Many of the comments are included in the information provided by CIAA in a separate document which has been drafted with input from AIJN. There are, however, some more specific comments which are of particular importance for the fruit juice and nectar industry in Europe, without being in conflict with the overall food industry position.

These points relate to the following:

1. The discussion document is limiting itself to nutrition and nutrient function claims, which are already permitted and used in most countries of Europe as well as covered in Codex Alimentarius documents. It does not address those claims, which are of particular interest both for the food industry and the consumer, i.e. “enhanced function” and “disease risk reduction” claims. These types of claims have been found as in principle supportable by science in the consensus document resulting from the EU Concerted Action on Functional Food Science in Europe (FUFOSE) (Diplock et al. 1999). Especially in the case of fruits and vegetables, and juices prepared from them, there is strong evidence for significant health benefits. It is in the interest of the consumer and the industry to communicate such health benefits appropriately.

2. The experience in the field of fruits and vegetables underlines the need to consider such health related claims not only for individual substances but also for total foods. Based on appropriate scientific information it must be possible to present such claims e.g. for individual fruit juices as well as for individual components contained in these juices.
3. All health and nutrition related claims must be supported by adequate scientific evidence both for the generic information and its application in a specific product. However, the requirements for claim support should be proportional to the strength of the claim made. There should also be some consideration for the resources available to individual manufacturer wishing to make such claims: very high requirements for the level of support would essentially mean that only very large companies could afford to make such claims whereas small and medium size companies would not have the resources to develop such support. This is of particularly high interest for the fruit juice industry, which is essentially made up from small and medium size producers. This is not to say that there should be a double standard for claim support, but that the requirements overall should be such that they allow also small and medium size producers to be innovative and make innovative claims. The basic requirement that information for the consumer must not be misleading remains of course valid.

The European Fruit Juice and Nectar Industry will actively observe the discussions on this topic and will make every effort to help with the development of harmonised rules across Europe.
