



EUROPEAN DAIRY ASSOCIATION  
ASSOCIATION LAITIÈRE EUROPÉENNE  
EUROPAISCHER MILCHINDUSTRIEVERBAND

Mrs Barbara Moretti  
European Commission  
DG SANCO/D4  
200, rue de la Loi  
B-1049 Brussels

Brussels, 28 August 2001

2001-0507/LAB/cw

**Re: Sanco paper 1341/2001**  
*Nutrition Claims and Functional Claims*

Dear Mrs Moretti,

EDA, who represents the entire European Dairy Industry, would like to make a few observations on the above mentioned discussion paper. This document constitutes a first step towards a more consistent approach within the European Union, especially at a moment where international Codex discussions on this matter are progressing well.

Taking into account the fact that the EU Commission recognised the need for further consultation on health claims -that are not covered in this document-, we would very much welcome the latter being dealt with in an integrated approach for regulating claims on a harmonised level.

We assume that foodstuffs intended for particular nutritional uses are not covered, since they are regulated in a specific EU legislation.

We would also like to draw your attention to Council Regulation 2991/94/EC concerning spreadable fats which already describes the conditions under which specific claims related to the fat content can be used. The value for low-fat claim listed in the annex of the Commission paper refers to a maximum fat content of 3g/100g and is therefore inconsistent with the provisions in the Regulation 2991/94/EC which should be maintained.

Finally, we do not share the opinion that « only x% fat » claims can be misunderstood and thus potentially mislead the consumer. Such claims can actually be easily understood while giving factual information on the product. For instance, this is the case for semi-skim milk which has a regulated fat content of 1.5 to 1.8%.

Thank you in advance for considering this matter.

Yours sincerely

Christophe Wolff  
Legislation Officer

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