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SWEETENERS
ASSOCIATION
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POUR LES EDULCORANTS
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ISA comments to the Commission Discussion Paper on nutrition and functional claims (SANCO/1341/2001) addressed to sanco.foodclaims@cec.eu.int

Dear Sirs,

The International Sweeteners Association represents producers of low-calorie sweeteners and products containing them.

We would like to thank the Commission for the opportunity to comment on the Discussion Paper on nutrition and functional claims.

At this stage of the discussion, we would like to make the following comments:

General considerations:

1° We support the endeavour that claims should be **consistent** throughout Community legislation and, if possible, also between Community and Codex provisions.

2° We support the consideration that claims must be **based on scientific evidence and data**.

Different types of nutrition claims:

3° In order to avoid overloading the labels (and confusing consumers) we support the view that, for products containing sweeteners, the claim **"light" should be equivalent to "energy-reduced"**, without requiring additional labelling.

We believe that, only in cases where such claims apply to reductions of substances rather than "energy" or "calories", a qualification should possibly be added.

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We support the **25% reduction** as specified by Codex.

In the Sweeteners Directive 94/35/EC "energy-reduced" is defined as "at least 30%". The 25% reduction should be made consistent throughout all legal texts.

4° For products containing sweeteners, the claim "energy-reduced" should refer to an **equi-sweet reference product** containing sugar, even if such a reference product is not marketed.

5° The Sweeteners Directive 94/35/EC also provides for low-calorie sweeteners to be an additive "sold to the ultimate consumer" in form of **table-top sweeteners**. In this particular case, we would like to make the following comments:

5.a) Claims should always be related to the "**product as consumed**".

5.b) Table-top sweeteners are an example of a product which is diluted in the consumed final product. The claim "calorie-free" (or "low-calorie") applies to the dose unit, as compared to a serving of sugar of equivalent sweetness. The reference to weight (100g) or volume (100ml) (requested by some member states) is misleading to the consumer. Table-top sweeteners are used by the consumer according to the sweetness sought or portions (tablets). Hence, **for table-top sweeteners claims should apply to portions** rather than packages.

Thanking you for taking these comments into consideration, we remain,
Yours faithfully,



Antonietta Corti
Secretary General