

UNESDA COMMENTS
DG SANCO DISCUSSION PAPER
ON NUTRITIONAL AND FUNCTIONAL CLAIMS
(SANCO/1341/2001)

The European soft drinks industry, represented by UNESDA, welcomes the DG SANCO Discussion Paper on Nutritional and Functional Claims (SANCO/1341/2001) as a step forward towards harmonised rules on the use of claims on foodstuffs. The Paper presents a view on the issues that need to be considered and debated before introducing a legislative proposal for claims: definitions, conditions under which claims may be made (criteria) and type of evaluation and authorisation system for claims.

UNESDA strongly supports the CIAA comments on the Discussion Paper. Harmonised rules should be based on the principle that a claim may be made on any type of food provided it meets the following criteria:

- The manufacturer should be able to substantiate the claim.
- The substantiation should be proportionate, i.e. the level of the claim should be in line with level of substantiation available.
- Claims should be made in the context of the total diet.
- The claimed health benefit should be appropriately communicated so as to foster consumer understanding.

In addition to these criteria, UNESDA wishes to highlight that:

- a legislative framework on claims should deal with all types of nutrition and health related claims, i.e. health claims should be included; and
- no foodstuffs should be specifically excluded from using claims, provided they fulfil the necessary specific criteria.

UNESDA feels that a harmonised framework ensures consistent use, control and understanding of claims on foodstuffs.