Your Voice In Europe: ROADMAP feedback for Initiative to limit industrial trans fats intakes in the EU

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Related document: Initiative to limit industrial trans fats intakes in the EU

Feedback:

The European Dairy Association (EDA) welcomes the opportunity to comment on the Commission inception impact assessment "Initiative to limit industrial trans fats intakes in the EU".

We welcome the fact that the Commission initiative will be "focused on industrial trans fats given that ruminant trans fats sources generally contribute in a limited way to the total daily energy intake and ruminant trans fats are naturally present in foods that are important in the EU diet and cannot therefore totally be avoided."

In this context, we would like to note that Option 2 concerning "Introduction of the obligation to indicate the trans fats content of foods in the nutrition declaration" should also include references included in the Commission Report on TFA of 2015 acknowledging that such labelling, if applied also to naturally occurring ruminant TFAs, could affect the consumption of dairy products. We would also kindly ask to include the reference to EFSA revised assessment of the scientific evidence on differences between ruminant and industrial TFA consumed in equivalent amounts on the risk of heart disease.

EDA would therefore recommend that the Commission inception impact assessment should also address the following relevant explanation from the Commission's Report on TFA of 2015 (page 12):

"TFA labelling would likely not distinguish between ruminant TFA and industrial TFA, given the European Food Safety Authority's evaluation that there is insufficient evidence to establish whether there is any difference between ruminant and industrial TFA consumed in equivalent amounts on the risk of heart disease. However, before a final decision on the matter would be taken, the European Food Safety Authority should be asked to review and if necessary update its opinion, in order to reflect the latest science. Depending on how TFA labelling could be designed on the basis of the advice obtained, it could also affect consumption of dairy and other ruminant-derived products."

We would also like to take this occasion to refer to EDA Questions and Answers on Trans Fatty Acids available on our website

http://eda.euromilk.org/fileadmin/user_upload/Public_Documents/Nutrition_Factsheets/EDA
-Nutrition_fact_sheet_O_A_On_Trans_Fatty_Acids.pdf

Thank you for consideration of our comments.

Feedback file: