

Finnish Heart Association`s comments to the Discussion paper on Nutrition Claims and Functional Claims (SANCO D4), ANNEX: Claims and conditions warranting the claims for different nutrients (and other substances), p. 11

We agree with the EHN`s recommendations of the types of claims which should be permitted.

As to Claims and conditions warranting the claims for different nutrients (and other substances), p. 11 we would like to suggest the following:

Our comments:

- For nutrition claims the Directive should contain specific criteria for each product group based on the Codex Alimentarius. It is not sufficient to divide the products into liquids and solids as many products have (and ought to have) naturally different and/or higher fat contents as fat is a natural part of the product (such as cheese, sausage, oil, margarine). The most important message for consumers is which products in each product group are nutritionally better choices.

Finnish Heart Association together with Finnish Diabetes Association has created a food labelling system, Heart Symbol, which takes into consideration the different nutritional contents of product groups and their relevancy to public health. This system is tailor-made to meet with the Finnish conditions. In other words, the criteria the products have to meet to be admitted into this system takes into consideration e.g. the most important sources of the nutrient in question, the selection of food available in Finland and the possibilities in production. This system was launched at the beginning of last year and has proven very successful. Enclosed criteria for this Heart Symbol-system.

- The criteria should take into consideration not only the quantity of fat but also the quality of fat i.e. the quantity of both saturates and unsaturates and not only the quantity of saturates. The heart organisations in particular should emphasise this fact as it is commonly known that unsaturates are relevant to heart health as well as that mere reducing saturates does not guarantee sufficient intake of unsaturates. The fat content of food differs naturally and there are some products which are clearly important sources of unsaturates even though they contain saturates as well. For example margarine may contain more than 20 g/100 g of saturate but the proportion of saturates is less than 30 % of the total fat content (i.e. it is of good quality).
- The sodium criteria of Codex is not functioning as it should. In other words it does not guide consumers towards products with low salt content. Sodium content of products is different for natural reasons. The sodium content of fresh food is 0 - 200 mg/100g (natural sodium). It is not relevant for the total sodium intake to classify these products. It is more important to create sodium limits for products with added salt. The current criteria of Codex Alimentarius is suitable only for such products as for example soft drinks.

Otherwise we agree with the EHN:s recommendations on health claims

If you need more information on these comments please contact

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