

# 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:

*In response to the European Commissions' open consultation on the "Initiative to limit industrial trans fats intakes in the EU", IMACE would like to provide the following input:*

*1. Both industrial and ruminant sources of TFA have the same health effects; therefore they should be tackled in the same regulatory manner. If the selected regulatory approach is labelling, then all sources of trans fatty acids shall be labelled.*

*IMACE acknowledges the fact that "a legal limit on non-ruminant TFA" would allow to consolidate and maintain the voluntary progresses made concerning non-ruminant TFA and would ensure a harmonised non-ruminant TFA approach in Europe. However, IMACE is of the opinion that the proposed policy option, which is only applicable to one source of TFA (non-ruminant TFA), does not address the public health issue concerning the TFA intake properly.*

*Given the fact that both TFA sources are equally detrimental to public health, as also confirmed by the recent WHO Report, IMACE is of the opinion that, on the basis of non-discriminatory measures as provided for in the EU General Food Law, specific consumer information/education on TFA and/or specific measures to limit the total TFA intake should address both TFA sources equally and simultaneously as they are equally harmful, and as ruminant TFA have become the main source of TFA intake in Western Europe.*

*Due to a steep reduction in production and intake of non-ruminant TFA, in most Western EU Members States, up to 60-70% of the current TFA intake is now coming from ruminant sources.*

*- Intake data from 2008 shows that TFA intakes in France represent on average 1% total energy (EN) intake in adults, including 0.6% EN ruminant TFA and 0.4% EN non-ruminant TFA;*

*- In the UK, TFA intakes were estimated in 2008-2009 at, on average, 0.8% EN. Similar to France, the major contributors to TFA intake in the UK were mainly meat and meat products, butter and milk and milk products;*

*- In Germany, in 2009 already, 67% of TFA intake came from ruminant TFA (25% from butter, 24% from other milk products and 16% from meat and meat products).*

*IMACE is of the opinion that setting up a policy only impacting the vegetable oil and fat*

*sector, not addressing the same issue simultaneously in other concerned sectors, can be questioned from a better regulation perspective, being biased, incoherent and lacking sound evidence.*

*We consider that:*

*- Acting only on the non-ruminant sector implies also a potential risk of increasing further the intake of ruminant TFA due to the replacement of the regulated margarines and vegetable fats (lower than 2% TFA on fat basis) by the non-regulated butter (up to 5% TFA on fat basis, naturally present);*

*- Substitution of margarines and vegetable fats by butter will also have detrimental effects on the intake of saturated fatty acids, which poses an extra risk for cardiovascular health, when taken in excess;*

*- Ignoring the presence and potential effects of ruminant TFA is misleading the consumers, who cannot be aware of the harmful ruminant TFA content of butter, dairy and meat products in their diets, making it impossible to take an informed health choice concerning TFA intake. In addition ignoring these elements in combination may lead to increased intakes of ruminant TFA.*

*Hence, IMACE urges the adoption of a non-discriminatory policy (based on objective and scientific grounds) that is fit for purpose to address the issue of TFA from all sources based on the facts and concerns expressed above. Consequently, IMACE is in favour of labelling TFA from all sources.*

*2. Setting legal limits, as per the Austrian regulation, should also be considered (versus the Danish approach) when exploring the various already existing options*

*In our view, the Austrian staggered approach provides sufficient protection to the consumer and limiting the impact for B2B products. The Austrian approach may be favourable as it will take into account the negligible contribution of products with lower amounts of products and reduces the disproportional impact on these products of such a legislation. The Austrian approach for a TFA limit should also be explored an option as it is different to the Danish approach.*

*3. Deletion of mandatory declaration for “Partially-“and “Fully Hydrogenated Vegetable Oil”*

*Moreover, IMACE is of the opinion that the current full/partial hydrogenation labelling pursuant to Regulation (EU) No 1169/2011, does not bring any added value in helping consumers to make informed and healthy choices. Given the limited/wrong understanding of the consumers and the negative perception on the Partially Hydrogenated Vegetable Oils (PHVO)/Fully Hydrogenated Vegetable Oils (FHVO) information, the current mandatory labelling stigmatizes the margarines and spreads sector wrongfully. This is confirmed by the recent EU Commission Report.*

*In case a legal limit for non-ruminant TFA would be the policy measure preferred by the majority of the stakeholders, such measures (i.e. a legal limit for TFA) should be linked to the coming into force of the requested deletion of the mandatory labelling of PHVO/FHVO in the Regulation (EU) No 1169/2011. (Adaptation of FIC Regulation), as this labelling request will be totally redundant with any statutory measures on non-ruminant TFA.*

*4. Market Competiveness and Consumer protection*

*Setting up a legislation solely on non-ruminant TFA will not help consumers make informed food choices, as they will be unaware of the presence of ruminant TFA. In addition, it will lead to unfair competition for the vegetable spreads sector versus the dairy spread sector. Indeed, the vegetable spreads sector will be stigmatised as containing high levels of TFA, without any means of communicating on the reformulation efforts already carried out, while in parallel, butter and other dairy spreads will continue to be perceived as healthy alternatives.*

*Finally, please find attached a table with specific and detailed comments on the IIA.*

**Feedback file:**

[IMACEInputtoOpenPublicConsultation\\_IIAonTFA\\_7nov16.docx](#)