



20 August 2010

Subject: Position on the proposal for a Regulation of the European Parliament and of the Council on the provision of food information to consumers - COM (2008) 40

Dear Mr Mathioudakis,

In the context of the current discussion in the European Commission and the Council on the proposal for a Regulation of the European Parliament and of the Council on the provision of food information to consumers, the members of the European Basic Foods Platform, representing the interests of several dairy and vegetable oil companies, would like to express their position on several issues that are of particular importance for consumer food information and choice as well as for the sectors of vegetable oils and dairy products.

Article 29 – Content of the nutrition declaration

Paragraph 1

The European Basic Foods Platform is in favour of the proposal of the Working party on Foodstuffs included in the Council document of 9 July 2010 with the exception that we strongly recommend that sodium and not salt be indicated.

In other words, the mandatory nutrition declaration should include:

- (a) the energy value and
- (b) the amounts of fat, saturates, carbohydrates, sugars, protein and sodium.

Justification

*Please refer to the annex of this letter for a more detailed justification.
If nutrition labelling requires an “added salt” figure, it will be representative of less than 70% of the real intake from a diet. Moreover, the conversion of sodium content into salt would lead to the labelling of salt on*

products not containing salt (e.g.: vegetables). Finally, people suffering from hypertension and sensitive to sodium are looking for sodium content and not salt content of foods.

Article 32 – Expression on a per portion basis

The European Basic Foods Platform supports in its totality the proposal for article 32 of the Working party on Foodstuffs included in the Council document of 9 July. This proposal allows to express the nutrient declaration per portion or consumption unit easily recognizable by consumers in addition to the “per 100 g or per 100 ml” declaration.

Justification

The information per portion is particularly relevant for foods which are consumed in much lower amounts than 100 g, e.g. vegetable oils which daily intake is ± 20 g or cheese which daily intake is less than 50 g. Providing the information per 100 g could then mislead the consumer and divert the consumption of these foods which consumption is recommended in national food based dietary guidelines.

Article 34 (4) – Expression on a per portion basis

We suggest to amend the initial proposal to include, in addition to the possibility to replace the indication in the nutrition table of the amounts of nutrients present in negligible amounts by a statement “Contains negligible amounts of...”, the indication of absent nutrients in a statement indicating “Contains no ...” in close proximity to the nutrition declaration.

Justification

It is not relevant to indicate “negligible” amounts when the nutrient is known to be absent in the food, e.g. sugars or sodium in vegetable oils.

Article 9 – Country of origin or place of provenance

The European Basic Foods Platform is in favour to keep the current rules. These exist for many years and are sufficient for protecting consumers from misleading information about the origin or provenance of food products. Calling for the mandatory indication of the country of origin for dairy products and single-ingredient products as requested by the European parliament in its first reading seems non proportionate.

Justification

The characteristics of raw materials (e.g. milk, seeds, grains and fruits used to produce vegetable oils) are standardized across Europe (according to specific trade quality rules and EU legislations). Indicating the origin of raw materials is also non-sense for consumers as they are transformed in finished products. In addition, such indication would be contrary to the free movements of goods in the EU.

If you have any questions related to the EBFP position on the above amendment, do not hesitate to contact me.

Yours sincerely,



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Annex

EBFP is in favour of the labelling of the SODIUM content of foods and not of the “salt” content

1 Introduction

Sodium is found in plant and animal based foods and also in drinking water. Sodium is added to foods, commonly as sodium chloride, during processing, cooking and immediately prior to consumption, but also in other forms, for example as sodium nitrate, sodium phosphate or sodium glutamate. The main reasons for the addition of salt during the processing of foods are for flavour, texture and preservation.

The sodium content of natural foods varies from around 2 to 70 mg/100g, with fruits containing ~2 mg/100g, vegetables ~7 mg/100g, and meat, fish or eggs ~70 mg/100g. The content of sodium as sodium chloride in foods may be much higher: bread ~450 mg/100g, cheese ~1,000 mg/100g, salted butter ~1,200 mg/100g, and lean raw bacon ~1,900 mg/100g. It is difficult to obtain reliable information on the sodium chloride content of foods as consumed, because of variable practices in terms of processing, food preparation and personal preferences.

The main source of sodium in the diet is from elaborated foods, and it is estimated that this nondiscretionary consumption comprises about 70-75% of the total intake in most European countries. Naturally occurring sodium in other foods contributes about 10 to 15% of total sodium intake. Discretionary sources of sodium added during cooking and at the table comprise about 10 to 15% of total intake (Sanchez-Castillo *et al*, 1987).

Based on a Food Consumption and Behaviour Survey in France (CCAF 2007, Crédoc), bread and cereal products were estimated to contribute 23% of total sodium consumption, while 12% were estimated to come from prepared meals, 11% from meat and meat products, 8% from soups, and 7% from cheese.

Milk

Milk naturally contains low amounts of sodium, which vary according to the natural composition of raw milk (up to 45 mg/100ml). Some dairy products, such

as coffee milks, contain sodium up to 120 mg/100ml, because the milk in those dairy products is concentrated.

Cheese

During cheese production, it is necessary to add salt (mainly sodium chloride) for technological purposes to achieve the specific properties of cheese: it is necessary for food safety reasons (shelf life, microbiological safety and to avoid food borne diseases), it regulates the water activity (aw), contributes to draining of whey, contributes to rind formation, increases the sensorial properties of the final product (flavour), and is essential for textural quality (firmness of soft, semi-hard and hard cheeses) and good cutting and slicing properties. Certain processed cheeses require during their production the use of emulsifying salts, which contain additional sodium.

Butter and milk fat based spreads

Dairy fat spreads result from an emulsion of aqueous phase within a lipidic/oil phase. When salt is added, sodium (Na) is integrated in the aqueous phase. There is an important shift between the quantity of salt (NaCl) present in the aqueous phase of a solid fat food and the perception of the salty taste, which results from it. This variation of perception of "salty" is related to the stability of the emulsion water/oil, which is carried out. Thus, the more the fat content of a food is reduced, the more the emulsion needs to be stabilised, and the more the product needs to be salted to be perceived equivalent to its whole referent. In some EU regions, consumers traditionally eat mostly salty dairy fats spreads. For example in France, "salted dairy fats spreads" can contain up to 1,600 mg of sodium, even though the majority of products contain around 1,000 mg of sodium, representing an effort from the industry as it is the inferior limit for palatability.

2 Sodium and added salt

2.1 Added salt

As it is mentioned previously, some surveys highlight the fact that only 70% of dietary sodium is due to processed foods, and not exclusively under a sodium chloride source.

15% of dietary sodium comes from naturally occurring sodium in foods and the rest (15%) from the addition by the consumer himself.

If the nutrition labelling only requires an "added salt" figure, it will be representative of less than 70% of the real intake from a diet.

2.2 Sodium versus “converted salt”

If it is considered that all the dietary sodium should be labelled, by using a conversion factor of 2.5 (quantity of sodium*2.5 = “salt”), a lot of products (for instance vegetables) would have to label “SALT” in the nutrition table, when in fact, NO SALT is present in the food. This would confuse and mislead the consumer.

2.3 Education of the consumer

Maintaining the current rule on the labelling of sodium in the nutrition table will open a great opportunity for consumers to find the sodium content of foods. This is the information that people suffering from hypertension and sensitive to sodium are looking for. These people are not looking for “salt” content of foods.

3 Conclusion

Thus, EBFP is favourable of maintaining the current rule, *i.e.* labelling of SODIUM in the nutrition declaration.