

**IACFO**

Founded 1997

International Association of  
Consumer Food Organizations

食品國際消費者機構

Association Internationale  
des Organisations de  
Consommateurs de Produits  
Alimentaires

Սննդի Ապահովական Կազմակերպությունների  
Միջազգային Անոցիացիա

Asociación Internacional  
de Organizaciones de  
Alimentos Para el  
Consumidor

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## **Request for Comments on Draft Action Plan for Implementation of the Global Strategy on Diet, Physical Activity, and Health**

The International Association of Consumer Food Organizations (IACFO) is pleased to submit the following comments on the WHO/FAO Draft Action Plan for Codex to implement the Global Strategy on Diet, Physical Activity and Health. The Action Plan calls for specific steps by the Codex Committee on Food Labeling (CCFL) and the Codex Committee on Foods for Special Dietary Use (CCFSDU) that would provide a very important mandate for Codex to focus its attention on the prevention of diet-related disease.

### **A. CCFL**

We support the recommendations in paragraphs 31, 32, and 48 (A)(3) of the Action Plan that call for the CCFL to develop standards for:

- Quantitative Ingredient Disclosure (QUID) of fruits, vegetables, whole grains and added sugar when any express or implied claims are made regarding the presence of such ingredients. We suggest that legumes and nuts be added to this list of ingredients in accordance with WHO dietary advice. We reiterate our support for the adoption of the entire amendment on QUID now pending before the CCFL (ALINORM 06/29/2 Appendix VI).

We support the recommendations in paragraphs 17, 20 and 48 (A)(1) of the Action Plan that call for CCFL to develop guidelines for:

- Mandatory nutrition labeling (regardless of whether a nutrition claim is made) and agree that the purpose of such labeling should be provide consumers with information they need to help reduce their risk of diet-related disease.
- Mandatory disclosure of the list of nutrients specified in sub-paragraph 48 (A)(1.3). However, we suggest that the list be amended to include “added sugars” and any other nutrients deemed by national authorities to be necessary for reducing the risk of diet-related disease.
- The development of "additional criteria for the presentation of nutrient [declarations] to enhance . . . consumer use and understanding of the information.” We suggest,

however, that the words “including the use of universal symbols on the principle display panel of the food package” be inserted at the end of sub- paragraph 48(A)(1.4).

- The development of Nutrient Reference Levels for nutrients which are associated with both increased and decreased risk of disease. We suggest, however, that the sub-paragraph 48(A)(1.5) be amended to state at the end “Nutrient Reference Values should appear on the nutrition label in immediate conjunction with the amount of each nutrient required to be disclosed.

We support the recommendations in paragraph 48(A)(2) that CCFL develop standards for:

- Restricting claims regarding the trans fatty acid content of foods that also contain saturated fat. Many such claims currently in the marketplace are misleading to consumers who are trying to reduce their risk of heart disease.

We support the recommendations in paragraph 30 of the Action Plan that CCFL continue new work to develop standards for:

- Consistent rules for health claims in food advertising and labeling. Such standards are necessary to prevent consumer deception and protect consumer health.

## **B. CCNFU**

We support the recommendation in paragraph 48 (B) that the CCNFU:

- Review the need for guidelines on the use of sound nutrition principles in the production and formulation of processed foods. We believe that the Committee should develop guidelines for the addition of sugars, salt, trans fatty acids, and saturated fat to processed foods which are in accordance with sound nutritional principles. We specifically agree with the statement in paragraph 40 of the Action Plan that “consideration should be given to the setting of limits on the content of industrially produced trans-fatty acids in foods.”

We further support the recommendations in paragraphs 48 (1) and 48(2) that the CCNFU assist the CCFL with the development of:

- Nutrient reference values for nutrients associated with an increased risk of disease and;
- Standards restricting trans fat claims for foods containing saturated fat.

## **C. Work by Other Codex Committees**

IACFO also calls upon the Codex Commission to consider how the ongoing work of the Committee on General Principles regarding the amendments to the Code of Ethics for the

International Food Trade may complement the work by the CCFL and the CCNFU in the areas specified in the WHO/FAO Action Plan. Such work may complement the efforts by CCFL and CCNFU, particularly with regard to the development of a Code for Marketing Food to Children.