

EUROPEAN COMMISSION  
DG SANTE  
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MW/lü

***Iodized salt: Iodine Deficiency, labelling issues and lack of harmonization in the EU***

Dear Mrs. Kyriakides,

The signatories of this letter wish to draw the attention of the European Commission to the need to improve the iodine supply situation of the EU population and to recall that the European Commission has the means to bring about the necessary improvements. This is particularly true in the regulatory field, where users of iodized salt have been advocating further harmonization and easier labelling for years. We would therefore like to list the following problem areas below:

- Iodine supply in the EU in general
- Lack of harmonization
- Different interpretations of the Fortification Regulation
- Lack of labelling facilitation

**1. Iodine supply in the EU in general**

In Europe, it is generally assumed that iodine deficiency is a problem of the past. However, a recent pan-European study (EUthyroid) has shown that iodine deficiency is regaining ground and called policy-makers for action.<sup>1</sup> Pregnant women and children are particularly vulnerable populations in the face of IDD. Against this background we call for higher levels of harmonization between national health and nutrition policies across the European Union and for the diversification of the dietary sources of iodine to effectively and sustainably prevent iodine deficiency in Europe.

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<sup>1</sup> The **Krakow Declaration on Iodine**, 18 April 2018: <https://www.iodinedeclaration.eu>.

Two key solutions can ensure adequate dietary intake of iodine for all:

- Food fortification, adding iodine to salt and certain foods;
- Feed fortification, supplementing animal feed with iodine to secure adequate levels of iodine in animal products, such as dairy products, eggs and fish.

## 2. Lack of harmonization

Not all national policies recognize iodine deficiency as a public health concern, while measures on food and feed fortification are unevenly implemented across the EU. This lack of harmonization puts the health of European citizens at risk of IDD.

Depending on the type of iodide or iodate used in the salt, the food product (e.g. bread) can be barred from entering certain countries. **Harmonization of the levels and types of iodized salt** in food would ensure free trade by applying the principle of mutual recognition.

While the components to use for iodine fortification are harmonized in Annex II of (EC) No 1925/2006, the differentiation that countries apply to the permissible levels of these components, leads de facto to a patchwork of rules across the whole of Europe, varying from zero levels, pre-market authorisation or notification for specific products, or maximum levels that differ beyond a unified dosing in multiple countries. The EU could resolve this situation.

## 3. Different interpretations of the Fortification Regulation

A recent development in France concerning the interpretation of the Fortification Regulation (EC) 1925/2006 with regard to iodized salt is worrying, distorts competition and urgently requires clarification by the Commission. Apparently, French official bodies are of the opinion that the use of iodized salt as an ingredient in a processed product (e.g. a soup) should be considered as fortification of the processed product within the scope of the Fortification Regulation, with the consequence that the product manufactured using iodized salt should comply with the requirements of the Regulation.

This would have the effect that the product (in the example: the soup) would have to contain a significant amount of iodine. However, this legal interpretation contradicts the fundamental principle of iodine supplementation, according to which the iodine requirement of the individual should not be covered by a single foodstuff, but by the use of iodized salt in a wide range. In order to rule out an oversupply of iodine on the one hand and to ensure a uniform iodine supply across the board (different consumption patterns) on the other, iodized salt should reach the consumer via as many different input routes and small quantities in the food as possible. It is therefore downright absurd to demand significant quantities of iodine in products that have been manufactured using iodized salt.

Furthermore, the maximum permissible amount of iodine in iodized salt is usually laid down by law. It would hardly be compatible with the objectives of salt reduction if significant quantities of iodine were now to be required in further processed products. Many products

would be over-salted. It is precisely the reformulation efforts (salt reduction) that should result in iodized salt being used more "across the board".

In this regard, we believe that the Commission urgently needs to clarify that only the iodization of salt as such is subject to the Fortification Regulation, but not the use of iodized salt in further processed products.

#### 4. Lack of labelling facilitation

Finally, current food labelling laws are discouraging food manufacturers from using iodized salt in compound foods. According to Regulation (EU) No 1169/2011 on Food Information to Consumers, compound ingredients when used in processed foods need to identify all their ingredients, unless there are specific exemptions. Iodized salt is a compound ingredient consisting of salt and an iodine source. The latter has a chemical name, and these are always alienating consumers. Many food producers therefore chose plain, non-iodized salt. This situation can be addressed by establishing the simplified labelling term 'iodized salt' in the above mentioned regulation. This would provide consumers with all relevant ingredient information, enables them to make informed choices, and would present an incentive for industry to add iodized salt more often, to more products.

This problem could be resolved by a minor amendment to the Food Information to Consumers Regulation, by making it clear that iodized salt, when used as an ingredient in a further-processing product, does not require a breakdown of the individual ingredients and the declaration e.g. as "iodized salt" or "salt, iodized" is sufficient.

In our view, the lack of action so far is disappointing, especially as some of the issues raised could be resolved with little effort if there is a willingness to do so. We would therefore like to invite you to a personal meeting to discuss the topic and find possible solutions.

Please do not hesitate to contact us if you have any questions. We are looking forward to your feedback.

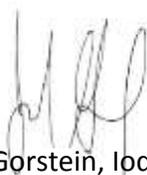
Yours sincerely,



(Markus Weck, Culinaria Europe e.V.)



(Adriana Nosewicz, European Salt Producers Association)



(Jonathan Gorstein, Iodine Global Network)



(Attilio Caligiani, World Iodine Association)