

EUsalt - The European Salt Producers' Association<sup>1</sup> - calls on policy makers to recognise the importance of food fortification as a legitimate health policy by **exempting fortified table salt from nutrient profiles and allow food products using fortified salt to reference the fortification on their packages**. Front-of-pack (FOP) nutrition labelling should be used as a **complementary tool to help consumers make healthier lifestyle choices and opt for optimum nutrition**. FOP Schemes should be **supported by further education and training** on balanced diet. A **multidimensional, holistic approach considering a person's environment needs to be implemented**<sup>2</sup>.

**Nutrient Profiles: one of the tools to encourage consumers in the right direction and help ensuring public health**

Nutrient profiling helps classify or rank foods according to their nutrition composition, which should help prevent diseases and promote health. **EU salt members welcome the revision of nutrient profiles**. Indeed, consumers' attention should not only be put on 100g content of the product but also on the recommended Daily Reference Value of vitamins and minerals (e.g. iodine). Indeed, nutrient profiles can be used by policy makers as a useful tool to support public health, encourage consumers in the right direction and promote optimum nutrition throughout the EU. To achieve this, EU salt members firmly believe that **nutrient profiles should not prohibit the use of salt as a public health tool or minimise the importance of salt for a healthy and balanced diet**. The human body needs salt to function properly and salt is also a carrier for important nutrients such as iodine. However, as fortified table salt contains at least 97% of sodium chloride<sup>3</sup>, products containing fortified salt may exceed nutrient profile thresholds, thereby preventing food operators and salt producers to inform consumers (via nutrition claims) on the iodine present in a product.

This leads to a persistent lack of awareness throughout the European Union, contradicting various initiatives aiming to fight iodine deficiencies present in the Union.

**Nutrition & health claims for fortified foods**

To solve such an issue, it is crucial for nutrition and health claims to consider and explicitly state whether a food has been fortified with vitamins or minerals (e.g. iodine). Salt or other food producers need to inform consumers about the iodine content within their products. This will allow consumers to make a well-informed healthy food choice, it will pursue the continuous efforts to fight nutrient deficiencies and contribute to consumers' education. Communication on foods relies on labelling and **the possibility to resort to nutrition claims such as 'source of iodine and/or fluoride' are essential for a legitimate information exchange between the producer and its consumer**. Therefore, EU salt members **call for fortified table salt to be exempt from nutrient profiles, and for food products using fortified salt to be able to reference this fortification on their packaging**.

<sup>1</sup> **EU salt is a European industry association**, which has been acting on behalf of the interests of salt producers located across Europe and beyond. Our Association acts as an informative platform and facilitator for exchange, providing information to salt producers, as well as interested parties outside the salt industry. We aim to be the authoritative voice of the salt industry in Europe in advocacy and to educate and communicate the values and benefits of salt as an essential building block for the chemical industry, the energy sector and as a vital mineral for health, safety and nutrition. More information available [HERE](#).

<sup>2</sup> WHO, 2019, Essential Nutrition Actions: mainstreaming nutrition throughout the life-course. World Health Organization. Available at: <https://www.who.int/nutrition/publications/essential-nutrition-actions-2019/en/>

<sup>3</sup> CX STAN 150-1985, Codex Standard for Food Grade Salt, Amended 1-1999, 2-2001, 3-2006.

### **Front-of-Pack labelling oversimplifies nutritional information**

In its F2F Strategy, the European Commission (EC) announced its intention to propose a harmonized mandatory FOP nutrition labelling, with the aim of empowering consumers to make informed, healthy and sustainable food choices.

EUsalt agrees that EU consumers must have access to reliable information to improve their consumption patterns. However, EUsalt members are concerned that **FOP schemes distract consumers from looking for the comprehensive nutritional information provided on the back-of-pack** (which actually empowers them to select foods and drinks that best suit their dietary and personal needs). Particularly, concerns arise regarding the potential misleading nature of FOP schemes, which differently assess foods with similar nutritional properties. It could also lead to a higher consumption of salt substitutes, which aren't healthier than NaCl and aren't used as a vector for iodine.

### **FOP schemes used across Europe should be governed by the European Commission**

In the current context, FOP schemes are gaining importance. However, the market-led solution should not run out of the EC's control. The EC needs to ensure that across the EU any FOP scheme:

- Is a vector for reliable information to the consumer and does not merely focus on some nutrients but on the overall nutritional value of the product.
- Consumption pattern/regime of the products is also taken into consideration by appropriate exemptions, as already applied regarding nutritional profiles<sup>4</sup>.

- Does not take away the focus from public health authorities to promote and facilitate physical activity and education on nutrition and health.
- Takes into account the varying nature of European food needs. Depending on the individual and their environment, people have varying nutritional cultures. Similarly, depending on the country, Europeans receive varying iodine supplementation.

### **Front-of-Pack Nutrition Labelling can be a useful complementary tool**

FOP nutrition labelling can be a useful tool to encourage consumers in the right direction concerning health and should promote optimum nutrition. If supported by further nutrition education, FOP nutrition labels could be used as complementary tools in helping consumers make healthier lifestyle choices and opt for optimum nutrition. Policy makers and industry can work together to tackle key health issues such as lack of nutrients and lack of physical activity to guarantee a healthier life for Europeans.

**A multidimensional, holistic approach considering a person's environment needs to be implemented in order to fight obesity and illness linked to an unbalanced diet.** Therefore, if FOP nutrition labelling is to be used, it should respond to a systematic, transparent and logic methodological process, ideally agreed between the different sectors of each country or region involved.

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<sup>4</sup> Annex V of Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers. Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32011R1169>