

POSITION PAPER

ON

Mandatory Country of Origin Labelling (COOL) for Single Ingredient Products¹

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EuSalt supports that correct information is provided to the consumers on the true origin of food products, enabling the consumer to make well informed choices. Avoiding meaningless information on the food labels is in this respect also essential, as this would only add to the confusion of the consumers. As a result, an extension of mandatory country of origin labelling to single ingredients such as salt, would prove to be burdensome, complicated and with no added value to the consumer.

1. Salt as a single ingredient and/or unprocessed ingredient under COOL

The Regulation (EU) n°1169/2011, provides the possibility to extend mandatory country of origin labelling to other single ingredients, or unprocessed foods. Depending on the different European regulations that apply, or its application to the food processing and retail industries, salt may be categorized either as a single and/or unprocessed food ingredients. However, the nature of salt, its application and its production do not call for an inclusion under this extension of the Regulation.

2. Defining 'country of origin' or 'place of provenance' for single ingredient products

As far as salt is concerned, there would be two different ways of referring to its origin, namely: the country where the salt is extracted/harvested; and the country where the salt is packaged.

Traceability is key in assuring safe foods and is essential to providing information on the origin of products. Information related to the origin of certain products, however, does not guarantee full conformity with traceability requirements. The mandatory indication of the country of production or of packaging for salt would neither supplement nor guarantee full traceability of the product to the end consumer. Such labelling would thus have little added value.

3. Mandatory COOL for salt

The basic drive to install COOL for food products is to assure that correct and non-misleading information is provided to the end consumer to the extent that it should. An added value for the end consumer is enabling the latter to make well informed choices about the food products he is purchasing. Any requirement of mandatory country of origin labelling imposed on salt, either sold as a single ingredient or as main and essential ingredient in composite products would however not respond to that essential

concept, as it would not provide information that could be choice-altering. In addition to that, it will result in being financially and administratively burdensome procedures for salt producers, as well as food processors.

1. **Salt as a single ingredient and/or primary ingredient under COOL**

According to the definitions laid down in Regulation (EU) N° 1169/2011, salt may be characterized either as a single ingredient product or a composite food product of which the main ingredient constitutes of more than 50% of the end product. This applies to salt with or without the addition of nutrients or spices and herbs. In other specific vertical European Regulations, salt is referred to as being an unprocessed food ingredient.

In both concepts the mandatory country of origin labelling could be imposed if extension was made to all single ingredients or to other categories of unprocessed foods. This over-exposure to COOL is due to the multifaceted character of the product, but this should not directly imply that it should be included.

2. **Definition of 'country of origin' or 'place of provenance' for single-ingredient products**

Whether the different concepts of country of origin or place of provenance would contribute to providing non-misleading information on the true origin of the product to the end consumer is undoubtedly essential to making well informed choices regarding certain products. For other single ingredients such as salt or sugar for instance, indicating one of the aforementioned distinctions will not contribute to the consumers' better informed choices, as it will not impact the quality of the product.

Salt is mainly produced using three production methods: sea/solar salt works, mining of rock salt and salt resulting from an evaporation process of rock salt sourced brine. Regardless of the production method, the salt produced is in accordance with the Codex Alimentarius Standard for Food Grade Salt (CX-STAN 150-1985), and it will provide a qualitative food grade salt with high purity levels. However, despite having equal essential composition and overall food technological properties salt of different sources are not mixed. Depending on the different logistical needs, the origin of the salt can change and even be packed in a production facility different that of the sourcing without altering the food technological properties and/or the sourcing method. Moreover, even when such logistical needs have to be met, the process does not hamper the traceability requirements in view of guarantying the safety of the products. Essential in this for the end consumer will be the information on the specific source- whether it is sea/solar salt, rock salt or rock salt sourced brine- of the salt as used, but not the place of origin, the provenance or where it is packaged.

3. **Main Problems linked to mandatory COOL**

Implementing mandatory COOL for salt would be over-burdensome leading to complex logistics without any added value for the end consumer, and without improving food security or safety. Salt processes, such as mining and solar salt production sometimes depend on and are influenced by nature. This makes production not always perfectly predictable. Moreover, market fluctuations might lead to an imbalance between demand and supply. This is from a logistical point of view solved by

purchasing salt from the same source, but from different production sites either in the country itself or from abroad. These products are transported to the packaging site to overcome the shortages. Having to change labels in these situations in order to respond to the requirement of mandatory indications of origin would not allow for the flexibility to answer the markets' demands and would imply additional costs without any benefit for the end consumer.

Also, for salt which would be used for further processing either by retailers or in the food processing industry where salt is an essential ingredient, the application of mandatory origin labelling would for the same reasons be unmanageable and unfeasible.

An important conclusion and position of EuSalt is that the inclusion of salt in the extension of the scope of mandatory country of origin labelling would have no benefits for the end consumer, and so should not become a mandatory requirement.

EuSalt is a non-profit organization representing the common interests of salt producers located across Europe. The production of salt in Europe is estimated at 68 million tones, which represents nearly a third of the worldwide production. The vast majority of the salt produced is dedicated as primary source material in the production of many chemical industrial applications of which the production of Chlorine and Soda Ash are the largest applications.