

Nutrient Profiles Fitness Check

Position Paper
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EuSalt welcomes the Fitness Check of the Health & Nutrition Claims Regulation to ensure European legislation best address imbalances of European diets. To address this issue, consumption patterns must be modified thanks to reliable nutrition information to consumers. This also means the possibility to look at restriction of certain nutrients and at optimal intake of nutrients such as folic acid, iodine and fluoride. EuSalt is pro-actively participating in the debate to bring in the latest scientific development and achieve accurate nutrient profiles.

SUMMARY

1. Importance of salt fortification to face Europeans' health imbalances

To inform consumers about the beneficial effects of nutrient intakes, salt producers and food operators need to be able to communicate about the presence of nutrients in their products. This is why the use of nutrition and health claims is essential and shouldn't be prohibited by the nutrient profiles dispositions for fortified salts and food products using. Salt fortification has been supported as a way to fight micronutrient deficiencies and related diseases/health problems since the 19th century, including by national health policies. For example, today, WHO recognises that iodine deficiency is the leading cause of preventable mental retardation.

2. This is why EuSalt think claims for fortified salt is a public health tool to tackle deficiencies

When classifying food products as eligible for claims, the main scientific consideration is the potential adverse effect on the dietary balance. As a matter of fact, salt can be a public health tool to ensure that dietary imbalances, leading to nutrient deficiencies, are addressed and ultimately prevent deficiencies. It is estimated that one-fifth of those cases are in Europe. Using salt as a vehicle for iodine, folic acid and fluoride is thus the most reliable, easily controllable, inexpensive, quick and efficient solution to help ensure optimal levels of consumption of these nutrients.

Recommendations

In order to be able to communicate about the beneficial effects of folic acid, iodine and fluoride and allow well-informed choices, EuSalt asks for:

- fortified table salt to be exempted from nutrient profiles,
- and for food products using fortified salt to benefit from appropriate conditions.

1. Importance of salt fortification to face Europeans' health imbalances

Iodine, folic acid and fluoride deficiency widely affect European countries and can have serious health consequences. At the moment in Europe, there is a lack of public awareness about it. This is the reason why international organizations such as WHO¹ and UNICEF have adopted strategies promoting salt as a good carrier of these nutrients.

For example, insufficient iodine intake can result in iodine deficiency disorders (IDD), for instance thyroidal problems, goitre, lower cognitive development. Especially in pregnant women and foetuses, IDD can result in stillbirth, congenital anomalies, mental and growth retardation². The protective effect of folic acid supplementation before conception and during early pregnancy has been proven for many years now. In particular, it has shown to decrease the development of neural tube defects (NTD) in newborns, and other chronic disease. Finally, though dental health is continuously improving, dental cavities are still a major concern in many sections of society³. Fluoride prevents cavities effectively, acting in several different ways.

- As a way to fight those nutrient deficiencies, international organisations have been recommending salt fortification for the past 20 years. The choice of salt as the basis for iodisation and fluoridation campaigns isn't random. On the contrary, it offers practical advantages acknowledged globally: The use of salt as a carrier guarantees folic acid and/or iodine and/or fluoride intakes from all the population, with no discrimination of certain social classes. Salt is indeed universally consumed on a daily basis, and independent of dietary preferences.
- It is also an ingredient that can be used in specific processed food resulting to an easy control of nutrient intakes and avoidance of any risk of over-exposure. A meal can't be tasteful if too much salt is added.
- Salt fortification guarantees balanced and stable intakes of iodine and/or folic acid and/or fluoride. Medical studies have recorded the stability of salt intakes within populations over time: individuals consume from 6 up to 12 grams of salt per day depending on climate, age, sex, eating habits, and so on,

For all these reasons, EuSalt supports the recommendations from the WHO 2008 Report⁴ for salt fortification and promotes the use of salt as carrier of essential nutrient.

This being said, EuSalt also acknowledges that the use and promotion of fortified salt is not in contradiction with EU policies aiming to reduce salt intake. The two objectives are not mutually exclusive, since the promotion of iodised/fluoridated salt does not lead to a higher salt consumption. This has likewise been recognised in WHO policy papers on the topic.

¹ http://apps.who.int/iris/bitstream/10665/136908/1/9789241507929_eng.pdf?ua=1

² B. De Benoist, G. Burrow, F. Delange, J. Gorstein, R. Houston, P. Jooste, N. Mangasaryan, E. McLean, E. Pretell, L. Rogers, K. Sullivan, J. Untoro, M. Zimmermann, *Assessment of Iodine Deficiency Disorders and Monitoring their Elimination*, WHO 2007

³ WHO *Global Policy for Improvement of Oral Health*, World Health Assembly 2007, *International Dental Journal* (2008)58, pp. 115-121.

⁴ Report of a WHO Expert Consultation, *Salt as a Vehicle for Fortification*, 2008; WHO *Global Policy for Improvement of Oral Health*, World Health Assembly 2007, *International Dental Journal* (2008) 58, pp. 115-121

To inform consumers about the beneficial effects of folic acid, iodine and fluoride intakes, salt producers and food operators need to be able to communicate about the presence of those nutrients in their products. This is why the use of nutrition and health claims is essential and shouldn't be prohibited by the nutrient profiles dispositions for fortified salts and food products using.

2. This is why EuSalt think claims for fortified salt is a public health tool to tackle deficiencies

Nutrient profiling is the science of classifying or ranking foods according to their nutritional composition for reasons related to preventing diseases and promoting health.

This is why salt is identified as a Public Health tool to provide essential nutrients that are deficient in Europe by WHO and UNESCO.

The issue with the current text is that nutrient profiles, while serving the purpose to help guide consumers to good dietary choices, today prohibit the use of salt as a tool. Indeed, products containing fortified salt may exceed the nutrient profiles thresholds. For example, fortified table salt contains at least 97% of sodium chloride⁵. It retrieves all possibility for food operators and salt producers to inform consumers about nutrient being present in the product they wish to buy. In addition, this outcome is threatening the different international initiatives to fight iodine and fluoride deficiencies.

Should nutrient profiles apply to fortified salt, it would have negative impacts on two levels:

- On fortified table salt: firstly, displaying nutrient profiles on table salt would be meaningless, as it is essentially composed of sodium chloride (97% at least) and doesn't contain any fat, sugar, and so forth. Besides, due to the high sodium content, salt producers won't be granted the possibility to communicate about the iodine and/or fluoride content of their product. And yet, we already record a lack of consumers' awareness about those nutrient deficiencies and health problems they may lead to.
- On food products containing fortified salt: if those products would exceed the thresholds to be established by the nutrient profiles regulation, they would be compelled to reduce their salt content in order to maintain their claims. In so doing, the iodine/fluoride intake through these foods would necessarily decrease, since it's proportional to the salt content. As a consequence, either the consumers will have to double their consumption of the product to reach the RDA of iodine and/or fluoride, or food producers will have to increase the iodine content of the salt used. This last option would hardly be feasible due to national legislations. As a matter of fact, governments specify the range for the iodine content of salt (generally around 20-40 mg of iodine per kg of salt, i.e., 20-40 ppm of iodine). There would therefore be a risk for food operators to exceed these requirements

⁵ CX STAN 150-1985, Codex Standard for Food Grade Salt, Amended 1-1999, 2-2001, 3-2006.

and to no longer comply with the national legislation.

Finally, there is no harmonisation between countries on that limit: this not only leads to great uncertainty for industries about which labels they can put on their product for which market, but also for consumers who can only be confused by the differences in the same products being labelled differently due to the lack of harmonisation of all health and nutrition claims.

Food producers need to inform consumers about the iodine and/or fluoride content of their products so as to allow them to make well-informed choices, to contribute to consumers' better education, as well as to pursue the continuous efforts to fight nutrient deficiencies. Communication on foods relies on labelling and the possibility to resort to nutrition claims such as 'source of iodine and/or fluoride' are here essential.

Therefore, EuSalt calls on for fortified table salt to be exempted from nutrient profiles, and for food products using fortified salt to benefit from special conditions.