

**IMACE welcomes the  
COMMISSION REGULATION (EU) .../...  
of 24.4.201, amending Annex III to Regulation (EC) No 1925/2006 of the  
European Parliament and of the Council as regards trans fat, other than trans  
fat naturally occurring in fat of animal origin  
- April 2019 -**

The European Margarine Association (IMACE) welcomes the adopted legislation by the European Commission (amending Part B of Annex III to Regulation (EC) No 1925/2006) *setting a legal limit in the content of industrially produced trans fats in food sold to retail\* and intended for the final consumer that shall not exceed 2 grams per 100 grams of fat in the final food.*

**IMACE members are pleased to see that the EU has finally consolidated the results of the longstanding margarine industry efforts. Over the past 20 years, in accordance with the IMACE Code of Practice on TFA, IMACE members have been driving the industry's initiatives to reduce trans fatty acids (TFA) in margarines and spreads, via reformulation, and optimisation of processes.**

As a result of the above-mentioned efforts, IMACE members comply with these legal limits for many years already. This has led to significant overall reductions in the industrial TFA content of food products sold to the final consumers and consequently, the intake of industrial TFA in the EU has decreased considerably in recent years to an extremely low level. This decrease was also highlighted by EFSA in its opinions of 2004 and 2009, based on data analysis at national level.

Due to the steep reduction in intake of industrial TFA in most Western EU Members States, up to 60-70% of the current TFA intake is now coming from animal sources.

As both industrial (i.e. non-ruminant) and animal (i.e. ruminant) sources of TFA have equal health effects and intakes of animal derived TFA in the EU are higher than intakes from industrially produced TFA, IMACE is of the opinion that specific measures are also needed to reduce the animal TFA intake. This would ensure that the public health issue concerning total TFA intake is addressed in its totality.

**Therefore, we would like to take the opportunity and call the European Commission to take immediately further action to also address the intake of TFA from animal sources. Firstly, by creating awareness to the consumer and secondly by developing relevant legislative measures.**

Furthermore, IMACE members are encouraged to continue to provide information on the TFA content of all their products provided for the EU food market to their B2B customers to enable them, where appropriate, to meet their obligations.

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**About the European Margarine Association:** IMACE is the voice of the European margarine and spread producers. The association, which represents more than 70% of the European sector, has led the industry's efforts towards nutritional improvements for decades. IMACE focuses on continuous improvement and communication on the areas of nutrition, sustainability, information to consumers and food safety.

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