

Revised IMACE POSITION ON TFA LEGAL LIMITS¹

IMACE state of play

Over the past 20 years, IMACE members have been actively and successfully reformulating the vegetable fat based spreads to reduce non-ruminant TFA content. As a consequence, the intake of non-ruminant TFA in the majority of EU Member States is below the limits of public health concern.

IMACE views regarding the non-ruminant TFA focus of the suggested legislation

Both non-ruminant and ruminant sources of TFA have the same health effects and should therefore be treated in a non-discriminatory way. This would ensure that the public health issue concerning total TFA intake is addressed properly. Accordingly a regulation of non-ruminant TFA only, leaving ruminant TFA unregulated, would be insufficient.

IMACE views regarding regulatory measures on non-ruminant TFA

Regulatory measures limiting the intake of non-ruminant TFA should aim to significantly contribute to the TFA public health objective. In addition, a regulatory measure should be easy to implement in practice.

IMACE can support a 2% TFA ruling on fat basis in the final consumer products (i.e. the Danish approach) but IMACE will also clearly voice and illustrate the general limitations and potential disproportional effect of the Danish approach for products that contain low levels of fat in the final product (e.g. <3-4), to make the regulator aware of those specific issues and to consider specific measures for those specific products.

IMACE request for the deletion of the mandatory declaration of “partially-” and “fully hydrogenated vegetable oils/fats”

In addition, IMACE is of the opinion that the current mandatory “fully/partially hydrogenated” labelling, pursuant to Regulation (EU) No 1169/2011, will become obsolete, if legal limits for non-ruminant TFA are established. It has been demonstrated that the hydrogenation labelling is not appropriate in helping consumers make an informed and healthy food choice.

Therefore, the coming into force of a legal limit on non-ruminant TFA should be linked to the coming into force of the deletion of the mandatory labelling of “fully/partially hydrogenated”.

¹ For further information please refer to the document “IMACE Position Supporting Arguments”