
Contribution to the EC Roadmap “Initiative to limit industrial trans fats intakes in the EU”

November 2016

Introduction

Euro Coop welcomes the publication of the European Commission [roadmap “Initiative to limit industrial trans fats intakes in the EU”](#), and takes the opportunity to provide its feedback on the matter. Euro Coop also welcomes that the European Commission will carry out an **impact assessment** in order to weigh the expected results and impacts of the various policy options. This process will identify the best way to guarantee that the objective of reducing consumers’ intake of Trans Fatty Acids (TFAs) is achieved, while ensuring that stakeholders’ costs and burdens are kept at a minimum.

In June 2016, Euro Coop published a [Position on Trans Fatty Acids](#), which highlighted the dangers of consuming TFAs as well as the position of consumer co-operatives on this issue. This position paper underlined that **the consumption of TFAs increases the risk of heart disease more than any other micronutrient, and that its consumption should therefore be kept at a minimum**. Euro Coop firmly supports a need for **EU-wide regulatory action** on the matter as this type of measure will **limit market fragmentation** and **promote mandatory compliance** on the part of food business operators.

The paragraphs below give an overview of initiatives taken by consumer co-operatives in order to limit or eliminate the presence of TFAs in foods, as well as a more detailed insight into Euro Coop’s position as to why limiting the presence of TFAs in foods is the most preferable legal solution in this context.

Initiatives undertaken by Euro Coop members to limit TFA consumption

Although already mentioned in the previous position paper on TFAs published by Euro Coop, it is certainly worthwhile to reiterate the **actions that consumer co-operatives are taking** in order to limit TFAs consumption by their consumers.

The principle of **democratic member control** is at the heart of consumer co-operatives. This co-operative principle distinguishes consumer co-ops from other retailers in that consumers can be not only customers, but also members, and thus - owners. Therefore, consumer co-operatives focus strongly on **social responsibility** and favour a **sustainable approach** with regards to food production and distribution, taking into account the sustainable development of local communities, environmental concerns, and the health and safety of consumers; simply because the consumer-members, who are the owners, desire so.

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As such, **Euro Coop members have launched several initiatives aimed at reducing the consumption of TFAs within the EU population.** These initiatives generally aim either at informing the consumer about the presence or absence of TFAs in certain foods, or at reformulating products so as to minimize their TFA content. Particular attention is given to **own brand products**, which present an additional guarantee to consumers as to the care that is given to formulate that particular product.

- In 2009, our Spanish member **Eroski**¹ decided to remove TFAs from their own brand products given the negative effect of TFAs on cardiovascular health. Products which do not contain TFAs can be identified by consumers with the following message: "*without partially hydrogenated vegetable fat*".
- **Coop Italy** has removed the use of hydrogenated fats – which are an important source of TFAs – from the recipe of its own brand products.
- Our Finnish member **S Group** has limited the content of TFAs in their own brand products to a maximum of 2g per 100g².
- **Coop Sweden** encourages the consumption of organic foods given its many beneficial effects, one of which being that they do not contain chemically produced TFAs.
- Euro Coop's member in the UK, **the Co-op**³, has adopted the policy of prohibiting all hydrogenated fat and permitting a maximum level of 2% of naturally occurring TFAs in oils and fats used as an ingredient or in the preparation of Co-op products.

Limiting industrial TFAs content in foods

The previous paragraph highlighted initiatives whereby **consumer co-operatives are limiting, if not eliminating**, the presence of industrial TFAs in foods. *De facto*, Euro Coop members are **already applying** the second policy option proposed by the European Commission, namely to **establish a limit for the industrial trans fats content in foods**. As such, out of the four policy options⁴ proposed by the European Commission, **option 1 - the establishment of a limit for the industrial TFAs content in foods** is the most suitable, both for consumers as well as for food business operators.

As highlighted in a recent [European Parliament resolution on TFAs](#) (October 2016), "*most of the EU population (...) lack information about TFA's and the health consequences of their consumption*". Therefore, Euro Coop considers that consumers would not benefit from introducing the obligation to indicate the TFA content of foods in the nutrition declaration. As such, Euro Coop finds that the most effective measure is an EU-wide **mandatory upper legal limit** on the TFA content in foods. Such a measure would benefit the EU in multiple ways, including **improvement of citizens' public health, reduction of deaths from heart disease, tackling of inequalities in health across and within EU member states, and saving healthcare costs**.

To ensure consistency among food business operators, Euro Coop believes a **legally binding measure is preferable over a voluntary agreement** with the relevant food business operators when setting

¹ Eroski participates in Euro Coop through our direct member – HISPACOOOP.

² The European Food Safety Authority (EFSA) and the World Health Organisation (WHO) have recommended that TFAs intakes should be as low as possible, which means that food should not contain more than 2g of TFAs out of 100g of fats.

³ The Co-operative Group is an indirect member of Euro Coop via the direct member - Federal Retail Trade Services (FRTS), which is a collective body, comprised of all UK consumer co-operatives.

⁴ The four policy options proposed by the European Commission are: (1) no policy change, (2) establishment of a limit for the industrial trans fats content in foods, (3) introduction of the obligation to indicate trans fats content of foods in the nutrition declaration and (4) prohibition of the use of partly hydrogenated oils in foods.

the legal limit of TFA in foods. Therefore, Euro Coop members call for the adoption of policy **sub-option 1b which foresees the establishment of a legally binding measure**⁵ to limit the industrial TFAs content in foods.

Conclusion

Given the strong correlation between TFA consumption and the occurrence of cardiovascular diseases, Euro Coop calls for **EU wide regulatory action** in order to limit the consumption of TFAs in the European market. Specifically, and in line with the European Commission report, Euro Coop calls for a **mandatory upper legal limit on the TFA content of food**.

Given that the harmful health-effects of TFAs are known, Euro Coop would like to express that a measure in this regard should be taken in the near future so as to amount to a rapid resolution of the health threat represented by overconsumption of TFAs in the EU.

About Euro Coop

Euro Coop is the voice of the co-operative retailers in Europe. Our associations brings together the national associations of consumer co-operatives in **19 European countries**, which represent **5,000 local/regional cooperatives, employing 500,000 citizens** across Europe and operating **36,000 stores** which serve **32 million consumer-members** daily. Euro Coop's members together are Europe's second strongest retail force – accounting for € 76 billion in annual turnover from sales.

Euro Coop's Secretariat, based in Brussels since 1957, represents the interests of its members before the European Institutions and facilitates the inter-member exchange between the national associations. More information is available at www.eurocoop.coop.

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⁵ More specifically, sub-option 1b foresees “a legally-binding measure: the appropriate legal basis could be Article 8 of the Regulation (EC) No 1925/2006 of the European Parliament and of the Council on the addition of vitamins and minerals and of certain other substances to foods⁴³. Article 8 of this Regulation establishes that the Commission can adopt, by regulatory procedure with scrutiny, decisions concerning a substance other than a vitamin or a mineral, or an ingredient containing the substance, that is used in the manufacture of foods under conditions that would represent a potential risk to consumers. On the basis of Article 8, the Commission can include that substance and/or ingredient in Annex III of Regulation (EC) No 1925/2006 and, if a harmful effect on health has been identified, prohibit or lay down conditions for its use”.