



Brussels, 16 January 2014  
Ref. 13NUT304

### **FEDIOL Position on TFA**

"*Trans* fatty acids (TFA)" refers to fatty acids with at least one non-conjugated (namely interrupted by at least one methylene group) carbon-carbon double bond in the trans configuration<sup>1</sup>. TFA in foods originate from three main sources and can be of animal or vegetable origin, as highlighted by the European Food Safety Authority (EFSA)<sup>2</sup>.

According to scientific studies, consumption of diets containing TFA consistently increase LDL cholesterol, decrease HDL cholesterol and hence increase LDL to HDL cholesterol ratio, which is associated with an increased risk of cardiovascular disease.

For EFSA, a difference between TFAs coming from ruminants and industrial TFAs has not been determined.<sup>3</sup>

Over the past 15 years, FEDIOL members have been supporting industry initiatives to reduce TFA in vegetable oils and fats. Thanks to these numerous industry actions, new low TFA vegetable oil and fat formulations are provided to consumers, enabling overall reductions in the TFA content of food products. Consequently, the intake of TFA in the EU has decreased considerably over recent years.

This decrease was also highlighted by EFSA in its opinions of 2004 and 2009, based on data analysis at the national level<sup>4</sup>.

---

<sup>1</sup> Annex I point 4 of Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004. *Official Journal L 304*, 22/11/2011 P. 0018 - 0063

<sup>2</sup> “- bacterial transformation of unsaturated fatty acids in the rumen of ruminant animals;  
- industrial hydrogenation (used to produce semi-solid and solid fats that can be used for the production of foods such as margarines, shortenings, and biscuits) and deodorization (a necessary step in refining) of unsaturated vegetable oils (or occasionally fish oils) high in polyunsaturated fatty acids;  
- during heating and frying of oils at high temperatures.”

EFSA opinion of the scientific panel on dietetic products, nutrition and allergies on a request from the Commission related to the presence of *trans* fatty acids in foods and the effects on human health of the consumption of trans fatty acids (Request EFSA-Q-2003-022) adopted on 8 July 2004.

<sup>3</sup> Ibid. "evidence is insufficient to establish whether there is a difference between ruminant and industrial TFA consumed in equivalent amounts on the risk of coronary heart disease."

<sup>4</sup> See footnotes 2 and 3. "Evidence from a number of countries indicates that the intake of TFA in the EU has decreased considerably over recent years, owing to reformulation of food products, e.g. fat spreads, sweet

To estimate the extent of this reduction for the vegetable oil and fat sector, FEDIOL undertook a data collection and analysis on the basis of which it was concluded that the average TFA content in vegetable oils and fat formulations has decreased over the last 15 years from 5.3 to 1% on fat basis, which corresponds to a relative decrease of 81%<sup>5</sup>. In bottled vegetable oils, refining practices also ensure that TFA levels are well below 2% on fat basis.

In light of the upcoming European Commission report on TFA expected by 13 December 2014<sup>6</sup>, FEDIOL would like to express the following points:

#### Limitation of TFA levels in food products

FEDIOL believes that voluntary initiatives are a good way forward to further reduce TFA intake for consumers. This has been demonstrated by continuous reduction of TFA in the last 15 years.

FEDIOL also understands the need to consolidate progresses made and set a level playing field applicable to food business operators across Member States due to the multiplication of national legislation. In this respect, introducing EU legislation setting a 2% TFA limit on fat basis could play a role.

#### TFA labelling on food products

Should a maximum level for TFA be set in EU legislation with the objective of helping consumers make healthier food choices, this would negate the need for TFA labelling.

#### Labelling of hydrogenation

In case the option for TFA legislation is chosen by the European Commission, FEDIOL believes that the current obligation to indicate whether vegetable oils or fats have been partially or fully hydrogenated would then be redundant, and should be deleted from Regulation (EU) No 1169/2011. Indeed, fully hydrogenated oils contain very low TFA levels according to expert knowledge.

Nowadays, the vegetable oil and fat industry relies less on partial hydrogenation and has switched to full hydrogenation, where possible, to achieve less than 2% TFA on fat basis in its products<sup>7</sup>. Hence, the obligation to label full hydrogenation would mislead and confuse consumers into thinking that the product contains substantial amounts of TFA while it actually does not.

Furthermore, a FEDIOL Code of Practice on refining was developed in which all the technical parameters have been specified to ensure the quality and safety of refined vegetable oils and fats. This ensures that during refining, no more than 2% TFA on fat basis will be formed, including in bottled vegetable oils.

---

*bakery products and fast food. More recent reported intakes in some EU Member States are close to 1 to 2 E% (EFSA, 2004). For example, in the UK the average intake of TFA has been halved to less than 1 E% (SACN, 2007). In France, intake data from 4079 individuals 3 to 79 years of age collected with 7-day food diaries and calculated with tables of TFA content of foods from 2008 show that TFA intakes have decreased by 40 % and are, on average, 1 E% in adults (1.4 E% at the 95th percentile), including 0.6 % for TFA from ruminant sources and 0.4 % for TFA from other sources (AFSSA, 2009). Average intakes of TFA in Denmark, Finland, Norway and Sweden have decreased to around 0.5 to 0.6 E% (Johansson et al., 2006; Lyhne et al., 2005; Männistö et al., 2003; Becker et al., 2005). “*

<sup>5</sup> Further information are available in FEDIOL document 09NUT242

<sup>6</sup> Article 30, See footnote 1.

<sup>7</sup> It should also be noted that partially hydrogenated oils can also be replaced by non hydrogenated vegetable oils and fats.