



Nutrient & Health Claims of Food Products

Introduction and overall perspective

Protein Foods and Nutrition Development Association of India (PFNDAI)
November 8, 2017

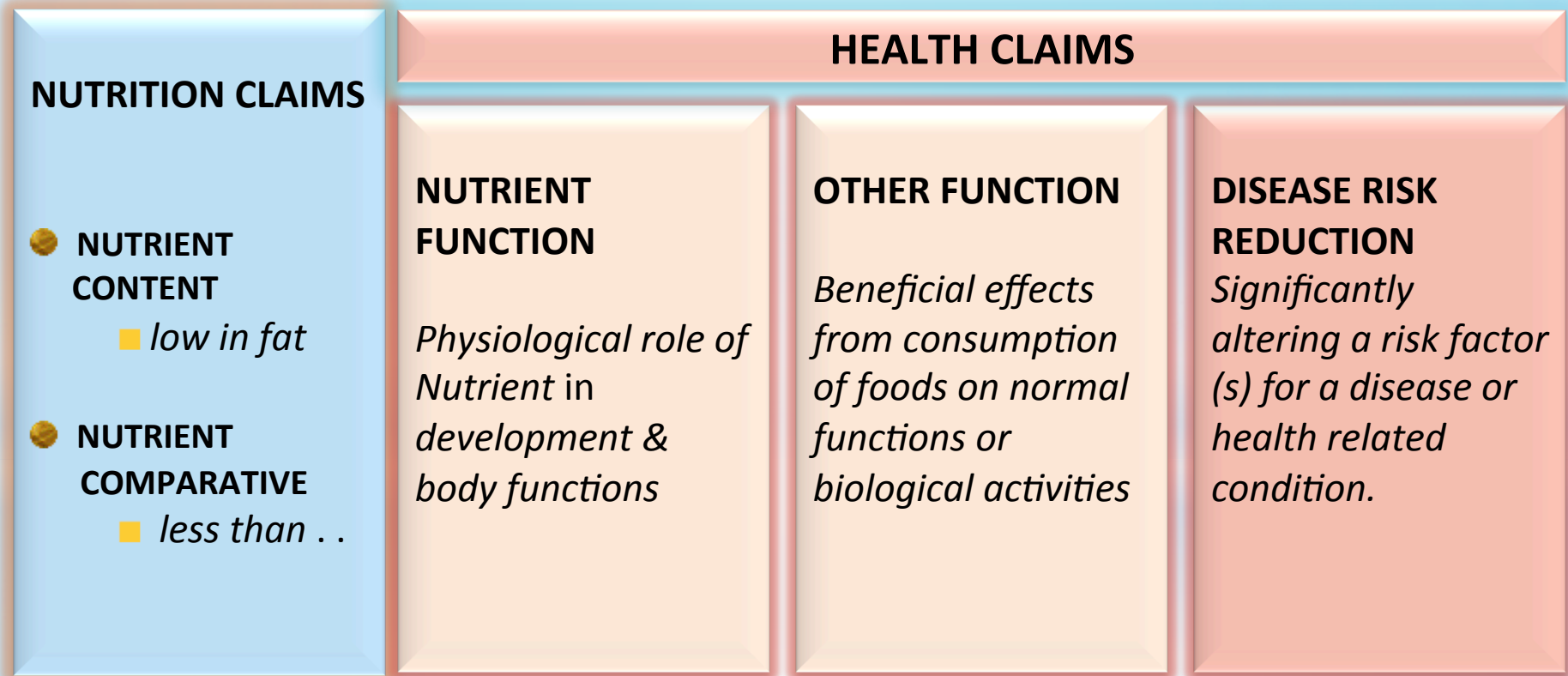
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* New claims regulation . . . time to plan

Response to a new regulation -

- coherent - based on principle, concept, context
- reduce ambiguity and
- make compliance consistent , predictable

Framework of Claims



GUIDELINES FOR USE OF NUTRITION AND HEALTH CLAIMS: CAC/GL 23-1997

Terminology

NUTRIENT FUNCTION

OTHER FUNCTION

DISEASE RISK REDUCTION



Structure/Function Claims

Dietary Supplement (DHSEA 1994)

Health Claims

NLEA 1990



Functional Claims

Nutritional & Health Claims EC 1924/2006 – Art 13

Disease Reduction Risk

Article 14



General Level Health Claim

Nutrition, Health and Related Claims 1.2.7

High Level Health Claim

Section 17



Nutrient Function & Other Function Claim

Draft Regulation 27.12.2012

Disease Risk Reduction

Similar but not the same

Claims Spectrum

1. Nutrient Content

Amount of nutrient with daily recommended values: low, high, source

2. Nutrient Comparative

Comparing nutrients: reduced, higher

3. Statement of Fact (not a nutrient content claim)

Amount of nutrient present: e.g. “0mg” or Omega-3: 250mg per serve

Cannot use defined terms such as low, source, high etc.

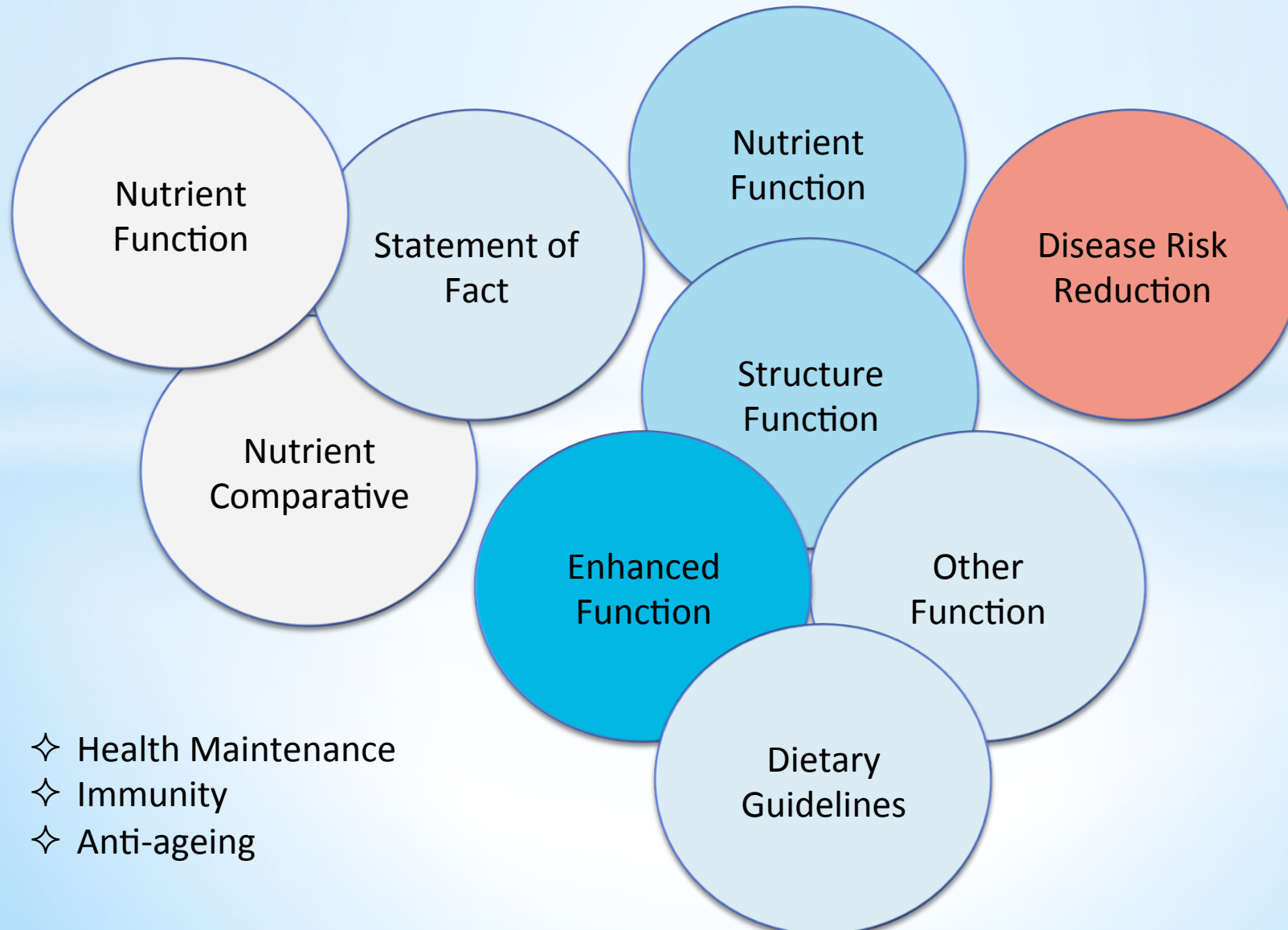
4. Dietary Guidelines: explains

Relationship e.g: fruits or vegetables or whole grains and health

Claims Spectrum

5. **Nutrient Function:** role of nutrient
6. **Other Function:** beneficial effect on normal body function.
7. **Disease Risk Reduction:** relationship between food and disease

* Distinctions between them



- ✧ Health Maintenance
- ✧ Immunity
- ✧ Anti-ageing

* Distinction without a difference ?

✧ “Nutrient function claim” 4.(5).(i)*

" means a nutrition claim that describes the physiological *role of the nutrient* in the growth, development and normal functions of the body (CFIA)

✧ “Structure function claim” 4.(8).(vi, ix)*

describes the *role of a nutrient* or dietary ingredient intended to affect normal structure or function in humans (US FDA)

Example: *Calcium builds strong bones*

* Not Content Claim

- **Words or terms such as**
 - 'bitter sweet', semi sweet,
 - sweetened or unsweetened
- **Certain Labeling Declarations**
 - QUID – percentage labeling
 - High Caffeine: > 145mg
 - High Fructose Corn Syrup – (name of food)
- **No added sugars – *cannot be made***
 - Sugars means ' all mono- and di- saccharides
 - If sugar containing ingredients added e.g. honey, fruit juice, jam

* Shall not claim to prevent, cure

Nutrient	Claim Statement*
Vitamin A or D	<u>May</u> contribute to healthy immune function
Lutein, Zeaxanthin	<u>May</u> help maintenance of healthy vision
Calcium	<u>Helps</u> build strong bones
Plant stanols/sterols	<u>Helps</u> reduce cholesterol - a factor in heart disease

* Made in context of the diet

* Clarity of the Evidence Process

Claim acceptance process

Strength and consistency of Scientific Evidence



1. Authorized Claims: Significant Scientific Agreement

- Totality of available scientific evidence
- Relevant to the product
- Reviewed as new evidence becomes available

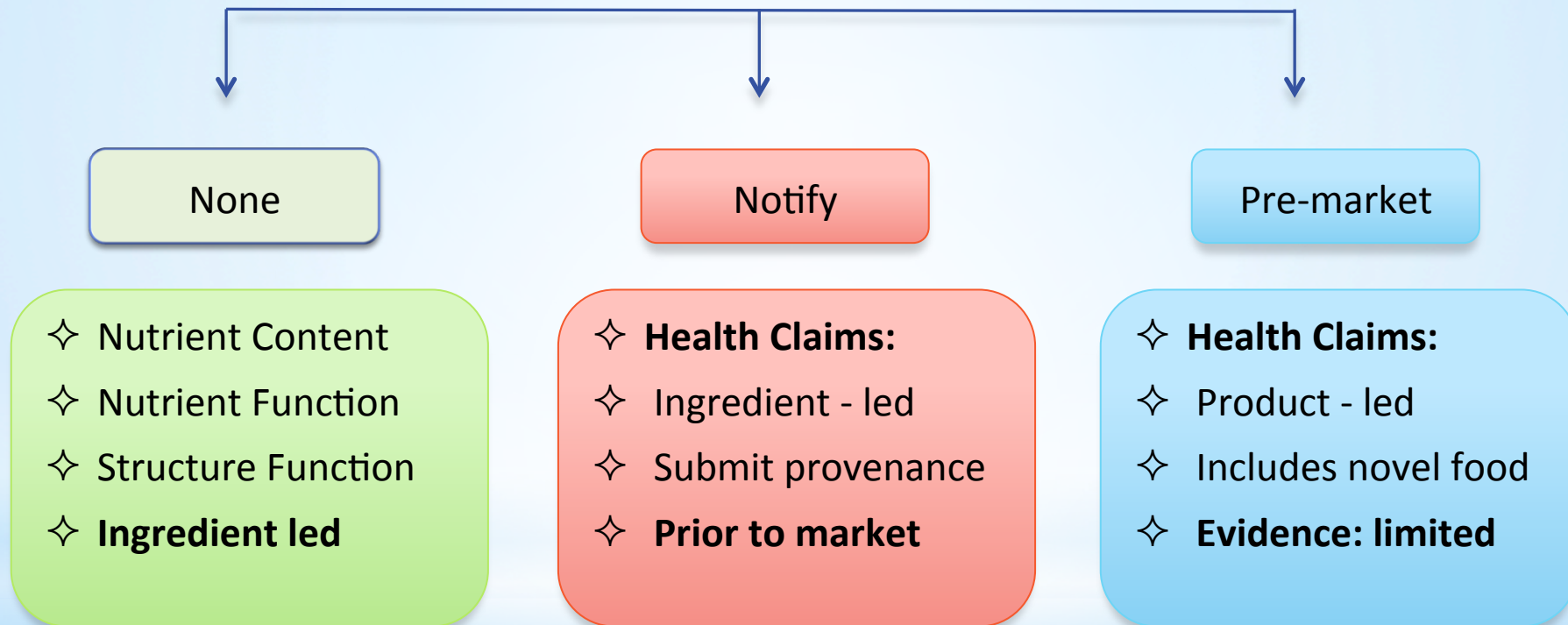
2. Authorized Statements: from certain scientific bodies

- Expedites scientific basis for claims
- Scientific bodies with official responsibility for public health
- The statement is published by the scientific body (not individual)

3. Qualified Health Claims: Interim Evidence Ranking System

- B. although supporting evidence - but not conclusive
- C. some scientific suggests - but limited and not conclusive
- D. Very limited evidence and preliminary

* Approval to market



Substantiation must be available at all times¹³

*Summary

- ❖ Regulatory quality - depends on stakeholder contributions
- ❖ Find common ground - prior to response
- ❖ Increase enablement of the Act - it's the law

