

NUTRIENT COMPARATIVE CLAIMS

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NUTRITION CLAIMS



Nutrient Content Claims



It describes the level of a nutrient contained in a food, such as, “High calcium”, “Low fat”.

Usually 5 categories - “Free”, “Very low”, “Low”, “Source” and “High” claims.

Nutrient Comparative Claims



Rather than describing the nutrient level, it compares the nutrient levels of two or more similar food products, such as “Reduced fat - 25% less than XYZ”

Nutrient Function Claims



Describes the physiological role of a nutrient in growth, development and normal functions of the body

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- Disease reduction claims
- Health claims
- Nutrition claims
 - **Nutrient content claims**
 - **Nutrient comparative claims**
- Non addition claims
- **Nutrient function claims**
- Other functional claims



Inspiring Trust, Assuring Safe & Nutritious Food
Ministry of Health and Family Welfare, Government of India

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Definitions

- **Claim:** Any representation which is printed, oral, audio or visual and states, suggests, or implies that a food has particular qualities relating to its original, nutritional properties, nature, processing, composition or otherwise.
- **Nutrition Claim:** Means any representation, which states, suggests or implies that a food has particular nutritional properties including but not limited to energy value and to the content of protein, fat and carbohydrates, as well as the content of vitamins, minerals and other permitted listed nutrients
- **Nutrient content claim** is nutrition claims that directly or indirectly describes the level of a nutrient contained in a food (e.g. contains/source, high in, rich in, low in etc.)
- **Nutrient comparative claim”** a claim that compares the nutrient levels and/or energy value of two or more foods (e.g. reduced, less than, fewer, increased, more than etc.)
- **Nutrient Function claim:** is that which describes the physiological role of the nutrient in growth, development and normal function of the body. (e.g. nutrient A is known to XYZ. Food X is rich source of Nutrient A)

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Schedule I

NUTRITION CLAIMS

A claim that a food containing the nutrient mentioned in column (2) is likely to have the benefits as mentioned in column (3) or has the same meaning for the consumer may be made subject to the conditions as mentioned in column (4) below:

(1)	(2)	(3)	(4)
Sl. No	Nutrient/ component	Claim	Conditions
1.	Energy	Low	Not more than 40 kcal[#] per 100 g for solids 20 kcal per 100 ml for liquids. Table-top sweeteners (which have equivalent sweetening properties to 6g of sucrose (approximately 1 teaspoon of sucrose providing 24kcal) can bear this claim if they contain no more than 4 kcal (17kJ)/portion.
		Free	Not more than 4 kcal per 100 ml for liquids.
2.	Fat	Low	Not more than 3 g of fat per 100 g for solids or 1.5 g of fat per 100ml for liquids.
		Free	Not more than 0.5 g of fat per 100 g (solids) or 100 ml (liquids).

..... Total 18 Components

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Schedule II

Synonyms which may be used for claims defined in these regulations

Free	Low	Reduced/Less	Increased/More
Zero, No, Without, Trivial, Negligible Source, dietary insignificant source Of	Little, few (for calories), contains a small amount of, low source of	Lower, fewer (for calories)	Higher

CONDITIONS FOR THE COMPARATIVE CLAIMS



- Foods being compared shall be different versions of the “**SAME**” food or “**SIMILAR**” foods and should be easily identifiable [3.2(4)]
- Relative difference of the claimed parameters between the foods:
 - Minimum 25% in the energy value or (macro) nutrient content in Schedule-I
 - Minimum absolute difference equivalent to the figures defined for “Low” or “Source of”
 - Minimum 10% difference for RDA for micronutrients (other than sodium)
- **Comparative Claim or any synonymous claims may be made in accordance with conditions in Schedule I.**
- Synonymous claims may be made as per Schedule-II

NUTRIENT COMPARATIVE CLAIM (CODEX)



- When a Nutrient comparative claim is made, the food shall be **different versions of the same food or similar food being compared**
- For Energy, Macronutrients and Sodium: A relative difference of at least 25 between the compared foods and a minimum absolute difference in the energy value or nutrient content equivalent to the figure defined as “low” or as a “source” in the Table to these Guidelines.
- For Micronutrients [other than sodium]: A difference of at least 10% of the NRV (Nutrient Reference value) between the compared foods.
- The content of TFA should not increase for foods carrying a comparison claim for decreased SAFA

A brief look in to Nutrient content claim & Nutrient Comparative claim - Global

Nutrient/ Component	Claim	Codex	EU	USFDA	FSANZ
Nutrient (Protein, Fat, Carbohydrate Salt)	Reduced	Energy/ Nutrient content between compared foods must differ by at least 25%. Minimum absolute difference in the energy value or nutrient content > or = the value required for claim as “ source” or “low”.	The reduction content must differ by at least 30% compared to similar products. For sodium, or the equivalent value for salt, where a 25 % difference shall be acceptable.	At least 25% less of a given nutrient or calories than the comparison food	At least 25% less nutrient content/ energy than the reference food.
Fat	Free	Not more than 0.5 g per 100 g (solids) or 100 ml (liquids)	Not more than 0.5 g per 100 g (solids) or 100 ml (liquids)	Not more than 0.5 g of fat per reference amount customarily consumed and per serving,	The food contains no more fat than: (a) 3 g/100 g for solid food or (b) 1.5 g/100 mL for liquid food
Sugar	Free	Not more than 0.5 g per 100 g (solids) 0.5 g per 100 ml (liquids)	Not more than 0.5 g per 100 g (solids) 0.5 g per 100 ml (liquids)	< 0.5 grams of sugar per serving	The food contains no more sugars than: (a) 5 g/100 g for solid food ; or (b) 2.5 g/100 mL for liquid food.
Sodium	low	Not more than 120mg per 100 g of food	Not more than 120mg or the equivalent value for salt, per 100 g or per 100 ml	Not more than 140 mg or less per serving of food	The food contains no more sodium than: (a) 120 mg/100 g for solid food or (b) 120 mg/100 mL for liquid food
Energy	Low	Not more than (a) 40 kcal per 100 g (solids) or (b) 20 kcal per 100 ml (liquids)	Not more than (a) 40 kcal per 100 g (solids) or (b) 20 kcal per 100 ml (liquids)	Not more than 40 calories or less per serving	The *average energy content of the food is no more than: (a) 40.6kcal/100 g for solid food or (b) 19.1 kcal/100 mL for liquid food;



Thanks !