

CAOBISCO feels that the harmonisation of legislation on fortification of foodstuffs will create a single market for these fortified products, which will allow consumers to choose out of a wide variety of products. Consumers will be fully informed about the nutritional content by labelling, which supplies the list of ingredients of the product and, if it is fortified, by nutritional labelling which gives the foodstuff's content in macronutrients, vitamins and minerals. This information will permit consumers to distinguish between fortified and unfortified products.

CAOBISCO products have their place in a balanced and varied diet

Surveys of Member States' markets show a responsible consumer who makes sensible food choices based on various purchasing motives: practice, pleasure, price, safety and health.

The principles motivating the purchase of CAOBISCO products are mainly based on pleasure, taste and convenience. Nutritional concerns tend to be of less importance, despite them making contributions to the European diet.

All foodstuffs have their place in a balanced and varied diet. There are no good or bad foods, but only balanced or unbalanced diets. Clear labelling and claims enable the consumer to prioritise between the general principles, such as the importance of a variety of foodstuffs, and specific points, such as the presence of vitamins and minerals.

CAOBISCO products are foods enjoyed by large sections of the population in a balanced and varied diet. All foods have the potential to make a specific contribution to the micronutrient balance of the population.

Therefore, there is no rationale for discriminating against any food for fortification.

CAOBISCO supports the CIAA position that the opportunity should be available for all manufactured foodstuffs to be fortified in a responsible and safe manner.

The market share of fortified CAOBISCO products is low in countries where fortification is authorized

According to the available data, the market share of CAOBISCO fortified products has remained low, even in countries where legislation is liberal and where these products have been for many years on the market¹.

Percentage of fortified CAOBISCO products in EU Member States in relation to the percentage of total fortified products on the market

United Kingdom	Germany	Netherlands	Italy	Belgium	France	Austria
3%-4% of total products	No concrete figures for the all are available but the market share might be around 2% (mainly sugar confectionery : hard boiled candy and gums)	2 % of total products	2% of total products	5% total products	0%-1% total products	Fortified chocolate bars represent 2.4% of the market

This data shows that the percentage of CAOBISCO products which are fortified is very low compared to the total market of these products. CAOBISCO believes that the presence on the market of fortified products widens the consumer's choice and does not replace the so-called "conventional" products to any great extent. Neither is there any evidence for fortification leading to an increase in total consumption (fortified and unfortified) as in countries where food fortification is practised most, there has not been significant increase in the consumption of CAOBISCO products.

The consumption of sugar confectionery in the United Kingdom is stable². In Germany, consumption of sugar confectionery has fallen by 19.8% since 1993³.

The consumption of CAOBISCO products will not raise problem of food safety

¹ UK, Germany

² CAOBISCO 1998 Statistical Bulletin

³ CAOBISCO 1998 Statistical Bulletin

Some studies carried out in Great Britain and France¹ have shown that food fortification has not raised any problems in terms of food safety. Upper safe levels have not been reached even in countries where fortification is more widely practised. Furthermore, CAOBISCO fortified products represent only a very small proportion of fortified products on the market.

Some CAOBISCO products are rich in carbohydrates; thus, their consumption is self-limiting, due to the known satiety effect induced by carbohydrates; therefore an excessive intake of vitamins and minerals from the intake of CAOBISCO products is unlikely to occur.

Nevertheless, CAOBISCO supports the proposal to establish maximum levels on foodstuffs for certain nutrients, if required, following advice from the Scientific Committee for Food on upper safety limits for vitamins and minerals. These maximum levels would of course be fixed on the basis of the totality of enriched foods including food supplements.

Additional reasons for allowing fortification of CAOBISCO products

In fact, there are further reasons why CAOBISCO products can provide essential nutrients to population groups:

Portion control allows adequate intakes. Most of the products have defined portion sizes, and come in serving-size packagings, so there is less chance of overconsumption of fortified products due to ill-defined portion size.

Good stability and long shelf-life leads to high convenience so that the product delivers micronutrients in various situations where other foods are less convenient, e.g. outdoor activities, for physical activity and other snack occasions.

The safety and quality of fortified foodstuffs will be guaranteed by CAOBISCO manufacturers' mastery of technologies. Modern processing technologies and good manufacturing practices, as an integral part of quality assurance, contribute to minimising nutrient losses. The addition of vitamins and minerals is carried out at specific steps of the manufacturing process depending on the chemical and physical characteristics of the nutrient (sensitivity to heat, solubility etc..) in order to achieve and guarantee the desired nutrient content.

Where CAOBISCO products are fortified, there is no evidence for the consumer eating these instead of other foods which naturally contain nutrient, e.g. vitamin C fortified sugar confectionery is not marketed to replace fruit, but can provide additional source of vitamin C for those who eat little fruit.

There is not one food being better than another, because all foods do contribute to the nutrients intake. This means that it is not a question of eating vegetables instead of CAOBISCO products, but perhaps including both in the diet for different nutrients they provide. This is all about providing the balance of nutrients from a varied selection of foods.

¹ Methode et Analyse d'une simulation de l'enrichissement des aliments en vitamines et minéraux, AFSSA (2000)

Conclusion

Aside from the nutritional contribution, CAOBISCO products are also associated in consumers' minds with the idea of pleasure and when choosing CAOBISCO products the consumer is motivated by taste, texture, freshness, quality, cost and/or nutritional quality. If fortification can be achieved without loss of these attributes, these products have the potential to improve the nutritional intake of those consumers who choose to eat them.