Quantitative Ingredient Declaration (QUID) On Food Labelling --

Promoting Consumer Health and Preventing Unfair Trade Practices

The International Association of Consumer Food Organizations

Center for Science in the Public Interest
The Japan Offspring Fund
The Food Commission UK

(Revised 2005)
The International Association of Consumer Food Organizations

The International Association of Consumer Food Organizations (IACFO) is an international association of non-governmental organizations that represent consumer interests in the areas of food safety and nutrition policy. IACFO was formed in 1997 in recognition of the growth in the international food trade and the globalization of the food industry. The founding members are the Center for Science in the Public Interest, the Japan Offspring Fund, and the Food Commission UK. IACFO is recognized as an official observer by the Codex Alimentarius Commission, which is sponsored by the United Nations Food and Agriculture Organization and World Health Organization. All members of IACFO are independently funded and do not accept funding from the food industry.

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Center for Science in the Public Interest
The Center for Science in the Public Interest (CSPI), a non-profit consumer organization with offices in the United States and Canada was formed in 1971. CSPI’s twin missions are to conduct innovative research and advocacy programs in the areas of health and nutrition and to provide consumers with current, useful information about their own health and well being. CSPI is supported by almost 1 million subscribers to its Nutrition Action Healthletter and foundation grants.

The Japan Offspring Fund
The Japan Offspring Fund (JOF) is a non-profit organization devoted to research and education on matters involving the safety of daily life, including chemical residues in foods and food-related diseases. JOF is supported by more than 5,000 members in Japan and publishes a newsletter, Safety of Our Food and Life in Japanese and English.

The Food Commission UK
The Food Commission, a non-profit public interest organization in the United Kingdom, was formed in 1989. The Food Commission aims to promote public health and education through research and publication activities in the areas of food production, distribution, consumption and nutrition. The Food Commission relies primarily on funds raised through the 10,000 readers of its journal, The Food Magazine.
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### Executive Summary
Quantitative ingredient declaration (QUID) on food labelling is becoming increasingly important as consumers world-wide consume more processed, prepackaged foods – as distinct from whole and home-made foods – whose composition cannot be readily determined by traditional visual inspection.

The value of QUID is clear:

- **QUID helps consumers make healthier food choices** by informing them of the percentage of healthful or unhealthful ingredients that a food contains. For example, QUID may reveal that one breakfast cereal contains 30% fruit while another only contains 6% fruit. Such requirements are necessary to address policy recommendations regarding food labelling and scientific conclusions concerning disease etiology made by the World Health Organization in its *Global Strategy on Diet, Physical Activity, and Health* and *Technical report 916*.

- **QUID facilitates product comparisons on the basis of quality** by informing consumers which product contains the greatest amount of desirable ingredients. For example, QUID labels inform consumers that one type of canned tomatoes contains 70% tomatoes, while another type contains only 60%.

- **QUID helps consumers avoid economic adulteration** by informing them of the percentage of water or other inferior ingredients in a product. For example, QUID labels inform consumers in Thailand that a can of blueberries actually consists of 49% water.

- **QUID helps remedy deceptive claims on food labels** that imply that a food contains significant amounts of desirable ingredients. For example, pictures on the front label of a snack product may highlight the product’s yogurt content, but QUID informs consumers that the product only contains 1.5% yogurt.

- **QUID encourages the development of higher quality food products.** Studies show that requiring food companies to disclose product information enhances competition and provides incentives for companies to produce better products.

Major multinational companies, as well as smaller domestic firms, are already obliged to comply with QUID disclosure rules in various nations throughout the world. An improved international standard would serve to further encourage the provision of such information in countries
that do not require it, facilitate the development of such requirements by national governmental
authorities, and provide for uniform national standards throughout the world.

In sum, QUID is important because it enables consumers to make better purchasing decisions
by identifying more healthful foods, facilitating product comparisons, revealing economic
adulteration, preventing deception, and encouraging the development of higher quality food products.
Action on this matter by the Codex Alimentarius Commission’s (Codex) Committee on Food
Labelling (CCFL) is thus necessary to fulfill Codex’s mandate – protecting the health of consumers
and ensuring fair practices in the food trade.
I. INTRODUCTION

Quantitative ingredient declaration (QUID) on food labelling is becoming increasingly important as consumers become more dependent on processed, prepackaged foods because the composition of such products cannot readily be determined by visual inspection. For example, when consumers buy a packaged food product that contains fruit, it is often difficult, if not impossible, for them to determine how much fruit is contained in the package. By contrast, when consumers purchase fresh fruit, they can easily see what they are buying. When QUID is provided, however, consumers can make better purchasing decisions; they can more easily make product comparisons on the basis of health and quality and avoid economic adulteration. QUID also helps rectify, and may even help prevent, deceptive representations on food labels, and creates incentives for manufacturers to develop higher quality products.

Various types of QUID requirements are in force, or being developed, in nations around the world. The European Union (EU), for example, has a limited QUID requirement for emphasized or characterizing ingredients, while Thailand has a more comprehensive QUID requirement for all main ingredients. Australia and New Zealand also have QUID requirements.

Since 2000, the CCFL has been considering proposed amendments to the Codex General Standard for the Labelling of Prepackaged Foods that would expand QUID requirements.¹ CCFL should identify the best QUID requirements from around the world and incorporate them into the proposed draft amendment. The draft amendment should then be forwarded to the full Commission for approval in order to fulfill Codex’s mandate, which is “protecting the health of the consumer and

¹ Joint FAO/WHO Food Standards Program, Proposed Draft Amendment to the General Standard for the Labelling of Prepackaged Foods: Quantitative Declaration of Ingredients, CX/FL 04/7. The 47th Session of the Executive Committee subsequently approved this proposal as new work (ALINORM 01/3, para. 43 and Appendix III).
ensuring fair practices in the food trade.”

II. BENEFITS OF QUANTITATIVE INGREDIENT DECLARATION (QUID)

A. Making Healthier Food Choices

1. Recent reports published by the World Health Organization

The Report of the Joint WHO/FAO Expert Consultation on Diet, Physical Activity, and the Prevention of Chronic Diseases (hereinafter, Technical Report 916) published in April 2003 recognizes that diet-related diseases are now responsible for an enormous burden of disability and premature death in both developing and developed countries, placing additional tolls on already strained national health budgets. The report states:

During the past decade, rapid expansion in a number of relevant scientific fields…has helped to clarify the role of diet in preventing and controlling morbidity and premature mortality resulting from noncommunicable diseases (NCDs)…The Consultation provided an opportune moment for FAO and WHO to draw on the latest scientific evidence available and to update recommendations for action to governments, international agencies and concerned partners in the public and private sectors. The overall aim of these recommendations is to implement more effective and sustainable policies and strategies to deal with the increasing public health challenges related to diet and health. [at 1-2]

The report also specified several foods that are commonly used as ingredients in processed-food products for which there is convincing or probable evidence of a causative or protective effect on risks for chronic diseases (see appendix). The food ingredients identified by Technical Report 916 include:

Protective Effects: fruits, vegetables, whole grain cereals, non-starch

polysaccharides (from whole grains, fruits and vegetables), legumes, fish, fish oils, unsalted nuts (in moderation); water (as an indicator of energy density) and
Causative Effects: free sugars, preserved and red meat, salt-preserved foods; salt (as distinct from sodium), hydrogenated oils, Chinese-style salted fish,

It is essential that the Codex standard for QUID require the disclosure of the amounts of these ingredients in processed food products regardless of whether a claim is made about the ingredient. Without the disclosure of such information, it is impossible for consumers to follow the advice of the World Health Organization (WHO) by identifying processed foods that contain the highest amounts of the healthful ingredients and the lowest amount of the unhealthful ingredients.

Thus, the Codex standard should be amended to encourage national authorities to establish (if they see fit according to national public health priorities) mandatory QUID requirements for any of the above listed ingredients whenever present in multi-ingredient food products, regardless of whether a marketing claim is made concerning the amount present in the food.

QUID for these ingredients in processed foods is necessary because, as the WHO noted, it is the foods themselves, not the presence of specific nutrients in the foods, which may create the beneficial or detrimental effect on health.

Since the publication of Technical Report 916, international recognition of the urgent need to pursue public health reforms to improve diet and health has become manifestly clear. In May 2004, the World Health Assembly (WHA) approved the WHO’s Global Strategy on Diet, Physical Activity, and Health (hereinafter the Global Strategy). The WHO’s Global Strategy presents a blueprint for reducing the incidence of cardiovascular disease, certain types of cancer, diabetes, osteoporosis, obesity, and other diet-related diseases through various public policy initiatives.

In canvassing policy reforms for achieving public health gains, the Global Strategy
recognizes the importance of food labels. In particular, article 46(4) of the *Global Strategy* states, “Consumers require accurate, standardized and comprehensible information on the content of food items in order to make healthy choices.”

On the strength of this compelling scientific and policy justification for reform, IACFO urges that the Codex QUID standard be revised in a manner that encourages national governments to require QUID for all ingredients identified by the WHO as playing a key role in diet and health. The *Global Strategy* challenges the CCFL and the Commission to make the pursuit of public health a vitally important governing factor in setting standards. Codex has a duty to ensure that standards are revised in a manner that supports the policy reforms advocated by the WHO.

This responsibility is especially important given the growing burden of diet-related diseases in developing countries; the WHO has recognized that developing countries are simultaneously challenged by public health threats associated with under-nourishment, water and food borne pathogens and toxins, as well as non-communicable diseases caused by obesity and inappropriate diets. Thus, it is in the interest of developing countries to amend the Codex standard for QUID even more so than developed countries that, relatively speaking, are more financially prepared to bear to fiscal burden associated with rising rates of obesity and diet-related disease.

The WHO has called upon Codex to help implement the WHO’s *Global Strategy* and CCFL has a responsibility to do so. Section 4 of the WHA’s resolution (WHA 57.17) endorsing the *Global Strategy* specifically calls on Codex to help advance its objectives. It states:

> [The WHA] requests the Codex Alimentarius Commission to continue to give full consideration, within the framework of its operational mandate, to evidence-based\(^3\) action it might take to

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3 Note that the *Global Strategy* emphasizes that policy decisions should be made on the best available evidence, not the best conceivable evidence. See, for instance, Articles 27 (in “Principles for Action”) and 65 (in “Conclusions”) of the Annex to WHA 57.17, (May 22, 2004).
improve the health standards of food consistent with the aims and objectives of the strategy.

And paragraph 59 of the *Global Strategy* states:

Public health efforts may be strengthened by the use of international norms and standards, particularly those drawn up by the Codex Alimentarius Commission [citing WHA resolution 56.23]. Areas for further development could include: labelling to allow consumers to be better informed about the benefits and content of foods; measures to minimize the impact of marketing on unhealthy dietary patterns; fuller information about healthy consumption patterns, including steps to increase the consumption of fruit and vegetables; and production and processing standards regarding the nutritional quality and safety of products.

As a subsidiary body of the WHO, the CCFL is obligated to heed these calls and help facilitate the policy goals of the WHA and the WHO by requiring QUID for the food ingredients that the WHO identified in *Technical Report 916* as the key to good health.

### 2. Practical uses of QUID in the marketplace

There is no question that QUID can help consumers make healthier food choices in the marketplace. For example, QUID may reveal how much fruit is in competing brands of breakfast cereals. Neither the ingredient lists nor the nutrition labels (in countries that require them) provide such information. Although ingredients are listed in order of predominance by weight, the ingredient list does not inform consumers if the amount of a desirable ingredient in a food is trivial or significant. QUID is thus important for individuals who wish to increase their consumption of healthful ingredients, or decrease their consumption of unhealthful ones, in order to improve their health.

For example, consumers in the UK who wish to select a cereal composed of a significant amount of fruit are informed that Nestlé Fruitful cereal contains 31.2% fruit, while Kellogg’s Apricot
Bites contain only 6% fruit. While only partial QUID labelling is required in the UK (and the rest of the EU), mandating such disclosures is a step in the right direction because it provides basic information to consumers about the fruit content of these cereals.\(^4\) Without such information, it would be difficult for consumers to ascertain the relative fruit content of these products. While the labels of these products list ingredients in order of predominance, such information, by itself, does not alert consumers to the fact that one product contains significant amounts of fruit while the other product does not.

\[\text{QUID labels in the UK inform consumers that Nestlé Fruitful cereal contains a total of 31.2\% fruit, while Kellogg’s Apricot Bites contain only 6\% fruit.}\]

Similarly, many health-conscious consumers may prefer to consume fruit drinks rather than soft drinks because they assume that fruit drinks are composed primarily of real fruit juice and are a

more healthful alternative to sugar-laden soft drinks. The truth is that many of those so-called “fruit”
drinks contain very little real fruit juice. Such information is not disclosed by the ingredient list. For
example, the labels of two competing brands of fruit drinks may both list their ingredients as “water,
fruit juice, sugar” but one may contain only 7% fruit juice, while the other may contain 45%.

Unfortunately, because QUID labelling is not required in many countries, consumers may not be
aware of such differences and cannot choose the more healthful product.

In the UK, where partial QUID labelling is required, consumers are informed that some flavors
of Procter & Gamble’s Sunny Delight and the Coca-Cola Company’s Five Alive “juice” drinks
contain only 5% fruit juice. In addition, while QUID is generally not required in the U.S., beverages
that purport to contain fruit or vegetable juice must disclose the percentage of juice that the beverage
contains. Thus, consumers in the UK and the U.S. can use QUID to select relatively more healthful
fruit juice beverages that contain more juice. However, consumers in countries where QUID is not
required may purchase certain brands of “juice” drinks, not realizing how little real juice they actually
contain.

In the UK, consumers can also compare the amount of healthful ingredients in canned foods,

5 The U.S. generally requires only that ingredients be declared on food labels in descending
order of predominance by weight. 21 C.F.R. § 101.4(a)(1).

6 21 C.F.R. § 101.30. In addition, the U.S. requires partial QUID labelling in a few other
cases: peanut spreads must indicate the percentage of peanuts in the spread; olive oil blends must
indicate the percentage of olive oil contained in the blend; and seafood cocktail must include the
percentage of seafood ingredients present in the cocktail. 21 C.F.R. §§ 102.23, 102.37, 102.54.
Such regulations were issued in accordance with the U.S. Food and Drug Administration’s
general common or usual name rules, 21 C.F.R. §§ 101.3(f), 102.5(b), but have not been
extended to other foods. The U.S. Department of Agriculture recently required QUID for the
such as the lentil content in different brands of lentil soups. For example, labels reveal that Campbell’s lentil soup contains 35% lentils, while Heinz lentil soup contains only 22% lentils. While UK authorities should require QUID labelling for the other ingredients in the product, at least some quantitative information is disclosed. Unfortunately, no such information is provided to American consumers on the labels of the same products sold by these American companies in the U.S.

In the UK, consumers can easily compare the lentil content in different brands of lentil soup. The labels inform consumers that Campbell’s lentil soup contains 35% lentils, while Heinz lentil soup contains only 22% lentils.

Disclosing the relative amounts of ingredients that a food contains is particularly important to help consumers determine the healthfulness of food in countries where complete nutrition labelling is not required. But even in countries where full nutrition labelling is required, QUID is important.
because the amount of healthful ingredients cannot always be ascertained by reading the nutrition information panel. In the UK, for example, while complete QUID labelling is not required, consumers can at least compare the whole grain content of various cereals. Food labels inform consumers that whole grain Nestlé Cheerios cereal contains a total of 76.5% whole grains while Kellogg’s Honey Loops whole grain cereal contains a total of 62% whole grains. Neither the ingredient list nor the nutrition labels – even in nations that require fiber content to be disclosed – provide consumers with this information.

The label on a package of Kellogg’s Honey Loops, purchased in the UK, informs consumers that the cereal contains a total of 62% whole grains, while the label of Nestlé Cheerios indicates that this product contains a total of 76.5% whole grains.

QUID can also help alert consumers to the presence of large amounts of unhealthful ingredients. For example, in Thailand (which administers comprehensive QUID labelling requirements) the label of Kellogg’s Frosties cereal reveals that it is composed of 39% added sugars, i.e., more than one-third of the box is filled with added sugars. In the U.S., where QUID is not
required, the nutrition label of Kellogg’s Frosted Flakes (a similar product) states that a serving contains 12 grams of sugars, and the ingredient list names sugar and high fructose corn syrup as the second and fourth ingredients, respectively. But neither the U.S. nutrition label nor the U.S. ingredient list of this product informs consumers that more than one-third of the box is filled with added sugars.

The label of Kellogg’s Frosties sold in Thailand discloses that the cereal contains 39% added sugars.

QUID is therefore necessary – even in countries that require nutrition labelling – so that consumers can choose products with greater amounts of healthful ingredients and avoid products with significant amounts of unhealthful ingredients, as identified by the WHO in Technical Report 916.

B. Facilitating Comparisons of Product Quality

QUID is necessary to clearly indicate the proportion of ingredients in processed foods, thereby allowing consumers to make more accurate value comparisons and to select the product with the greater amount of desirable ingredients. Without QUID, it is often difficult, and sometimes impossible, for the consumer to determine the amounts of desirable ingredients in similar products and compare the quality of competing brands.
Consumers in the UK, for example, can compare the tomato content of various types of canned tomatoes.

Consumers in the UK can easily compare the tomato content of different types of canned tomatoes. The labels indicate that the Cirio chopped tomatoes contain 70% tomatoes, while Heinz whole peeled tomatoes contain 60% tomatoes.

A can of Cirio chopped tomatoes, for instance, contains 70% tomatoes, but a can of Heinz whole peeled tomatoes contains only 60% tomatoes.

Furthermore, in Australia, a package of Arnott’s Country Cheese Cracker Biscuits indicates that the snack contains 17% cheese, while a package of Cheezels Genuine Cheese Snacks informs consumers that the snacks are made of only 2.7% cheese.
This package of Arnott’s Country Cheese Cracker Biscuits indicates that the snack contains 17% cheese while the package of Cheezels Cheese Snacks informs consumers that the crackers contain only 2.7% cheese.

Similarly, in Thailand, the label of Nabisco Ritz Bits Cheese Sandwiches reveals that they contain 3% cheese, while the label of Pretzel Pete’s Garlic and Cheese Nuggets indicates that they contain only 0.23% Parmesan cheese. 

7 Ideally, any reference to cheese in a product that contains so little cheese should be prohibited outright, or in the alternative, such products should be labelled as “cheese flavored.”
The label of Ritz Bits Cheese Sandwiches informs consumers that the snacks are made of 3% cheese, while the label of Pretzel Pete’s Garlic and Cheese Nuggets indicates that they contain only 0.23% Parmesan cheese.

QUID therefore provides consumers with the information necessary to make product comparisons and to purchase the higher quality product.

C. Avoiding Economic Adulteration

QUID labelling enables consumers to determine if a product has been economically adulterated, i.e., whether the amount of desirable ingredients in a product has been reduced by the addition of water or other undesirable ingredients. Simply listing ingredients in order of predominance often does not inform consumers whether significant amounts of water or other ingredients has been added to a product, thus reducing the amount of desirable ingredients. Without
QUID, consumers cannot easily ascertain the quality of the foods that they buy and avoid being cheated through economic adulteration.

For example, the label of S&W blueberries sold in Thailand states that the can contains 49% water. Consumers in Thailand are therefore informed that the product is almost half water. No such information is provided to consumers in the U.S., where the company is based.

Although water is listed on the label as the second ingredient, American consumers reading the U.S. label have no way of knowing that almost half the product consists of water. Even if the product’s ingredient list declared water as the first ingredient, but no QUID information was provided, consumers would have no way of determining whether blueberries compose a relatively small or large percentage of the product.

Similarly, in the UK, the label of Heinz Baked Beans states that it contains 49% beans, and the label of Campbell’s Cream of Mushroom soup discloses that it contains 8.5% mushrooms. While full QUID labelling is not required in the UK, consumers there are at least informed of the amounts of...
emphasized ingredients and can therefore make more educated decisions when choosing whether to purchase those foods. Unfortunately, consumers in the U.S. (where those companies are based), and in other countries where QUID is not required, may unknowingly pay inflated prices for low-quality products.

D. Preventing Deception

The provision of QUID on the principal display panel of food labels can also help remedy, and may even help prevent, deceptive representations about ingredient content. For example, a product called “Blueberry Waffles” should be required to disclose the percentage of blueberries contained in the product beside the name. Similarly, a brand of bread that claims to be made from “natural whole grain goodness” should be required to disclose the percentage of whole grains in the product in close proximity to that claim.

These requirements are necessary because labels often imply that a food contains significant amounts of desirable ingredients; yet those ingredients may be present in only trivial amounts, if at all. In the UK, for example, a package of Kellogg’s Nutri-Grain Twists highlights their fruit and yogurt filling on the front label by featuring prominent pictures of real fruit and yogurt, thus implying that the product contains large amounts of fruit and yogurt. QUID on the ingredient list, however, informs consumers that the bars actually contain only 5% fruit and 1.5% yogurt.
The front panel of a box of Kellogg’s Nutri-Grain Twists sold in the UK suggests that they are a good source of fruit and yogurt. However, the QUID label reveals that they contain only 5% fruit and 1.5% yogurt.

Thus, consumers could be immediately alerted to the fact that the product contains only small amounts of these desirable ingredients. Under such circumstances, the company may decide to forgo the use of such pictures on its label.\textsuperscript{8}

Because the purpose of the front label is to influence purchasing decisions, it is essential that

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\textsuperscript{8} Ideally, the company should be prohibited from highlighting the presence of yogurt, given the small amount of that ingredient in the product. In the absence of such enforcement action, a QUID requirement at least alerts consumers to the trivial yogurt content.
the QUID disclosure be included near relevant claims or pictures, not just in the ingredient list. QUID disclosures in the ingredient list alone (as is permitted in the UK and the rest of the EU) are insufficient by themselves to discourage the use of deceptive representations that appear on the front of food packages.

**E. Enhancing Competition to Improve Food Products**

Requiring food companies to disclose the relative quantity of ingredients will enhance competition on the basis of product merit and, thereby, provide incentives for companies to produce products that are higher quality, or more nutritious. By analogy, after nutrition labelling became mandatory in the U.S. in 1994, food manufacturers reformulated hundreds of products and introduced thousands of new foods. The U.S. Food and Drug Administration (FDA) studied the impact of the nutrition labelling regulations on market trends and concluded, “there have been impressive changes in the availability and market share of food products promoted on the basis of health and nutrition.”

Similarly, requiring food manufacturers to disclose the relative amounts of ingredients in their foods will likely encourage them to provide consumers with foods that are higher quality and more nutritious. Consumers who do not even read QUID labels would still benefit from those product reformulations.

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9 Alan S. Levy & Brenda M. Derby, *The Impact of the NLEA on Consumers: Recent Findings from FDA’s Food Label and Nutrition Tracking System* (Washington, D.C.: Consumer Studies Branch, Center for Food Safety and Applied Nutrition, 1996), at 6. The FDA documented the market response in a number of product categories suitable for the introduction of fat-modified versions of traditional products: cookies, cheese, crackers, peanut butter, and tortilla/corn chips. In every case, the FDA found “impressive simultaneous increases in new product introductions and market share for the fat-modified products.”
III. CONCLUSION

Food labels should state the percentage of major ingredients that have important health implications – such as fruits, vegetables, and added (free) sugars – regardless of whether the amount of such ingredients is emphasized on the food label. This information is necessary in light of WHO recommendations and consumers’ increasing consumption of processed, pre-packaged foods (as distinct from whole and home-made foods) the composition of which cannot readily be determined by traditional visual inspection. In addition, QUID should be required when the presence of any ingredient is emphasized through express or implied claims.

Major multinational companies, as well as smaller domestic firms, already comply with QUID requirements in various nations throughout the world. An improved international standard would serve to further encourage the disclosure of such information by manufacturers in countries that do not require it, facilitate the development of requirements by national governmental authorities, and provide for uniformity in national standards throughout the world.

As demonstrated, QUID is important because it enables consumers to make better purchasing decisions by facilitating product comparisons on the basis of health and quality, which is a vitally important objective as stressed by the WHO Global Strategy. QUID also helps consumers avoid economic adulteration and helps prevent deception. Lastly, QUID provides incentives to manufacturers to develop higher quality food products. Such requirements are thus fully consistent with, and necessary to fulfill, Codex’s mandate, which is “protecting the health of the consumer and ensuring fair practices in the food trade.”

\[10\] Supra, note 3.
### Appendix


<table>
<thead>
<tr>
<th>Common processed food ingredients with non-nutrient health effects</th>
<th>Cancer</th>
<th>Cardiovascular Disease</th>
<th>Hypertension</th>
<th>Diabetes</th>
<th>Dental Caries</th>
<th>Obesity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fruits</td>
<td>X</td>
<td>X (81,89,90)</td>
<td>X (86)</td>
<td>X (75,77)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Vegetables</td>
<td>X</td>
<td>X (81,89,90)</td>
<td>X (86)</td>
<td>X (75,77)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Whole grain cereals</td>
<td>X</td>
<td>X (88, 90)</td>
<td>X (75, 77)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Non-starch polysaccharides (from whole grains, fruits, vegetable)</td>
<td>X (82, 90)</td>
<td>X (75, 77)</td>
<td>X (58, 63)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Legumes</td>
<td>X (89)</td>
<td>X (89)</td>
<td>X (77)</td>
<td></td>
<td></td>
<td>X (56 footnote “c”)</td>
</tr>
<tr>
<td>Free sugars</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X (109, 112, 114, 116, 118, 119)</td>
<td>X (57)</td>
</tr>
<tr>
<td>Preserved and red meat</td>
<td>X (96)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Salt preserved foods; salt (as distinct from sodium)</td>
<td>X (96)</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Fish</td>
<td>X (81, 88, 90)</td>
<td></td>
<td></td>
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<tr>
<td>Fish Oils</td>
<td>X (81, 88)</td>
<td></td>
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<tr>
<td>Unsalted nuts (in moderation)</td>
<td>X (82, 87, 88)</td>
<td></td>
<td></td>
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<tr>
<td>Hydrogenated Oils</td>
<td>X (89)</td>
<td></td>
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<td></td>
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<tr>
<td>Chinese-style salted fish</td>
<td>X (96)</td>
<td></td>
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<tr>
<td>Water (as an indicator of energy density)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>X (70)</td>
</tr>
</tbody>
</table>

N.B. Numbers in parentheses refer to pages in *Technical Report 916* where applicable conclusions are made.