

Session C Round Table Discussions

Nutrition and Product Identity Issues Regarding Vegetable Protein Legislation

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It is classic to say that the legislation of the foodstuffs must respond to two main goals: 1. the protection of the health of the consumers; 2. the protection of fair commercial transactions.

And to fulfill both those obligations, a number of problems have to be examined when a legislation is established: (a) composition of the foodstuffs as regards the eventual presence of antinutritional factors such as antitrypsin factors, anti acetylcholine esterase factors; (b) fabrication of the foodstuff, if new compounds are formed during the processing, compounds which could be harmful if present at a too high level; (c) use of additives, qualitatively and quantitatively; (d) presence of contaminants such as pesticide residues, heavy metals, and mycotoxins; (e) composition of the foodstuffs as regards their ingredients to prevent unfair competition (e.g., % fat in mayonnaise, in margarine). (f) in a number of cases, when the food takes part to the basic elements of the diet (such as bread, meat, dairy products, etc.) the composition of the foodstuff to assure the consumer as regards the nutritional properties of what he buys.

However, in recent years (sooner in U.S.A. than in Europe) other problems have been added to those classic goals: the information given to the consumer in two main ways, labeling (and these pertain to eventually nutritional labeling), and publicity.

To be complete, it must be said that other factors, even if they do not appear as such in the texts, play an important role in the elaboration of the legislations regarding foodstuffs. The first one is the protection of the eating habits of the populations. The perception of this element is not always very clear, but it is evident that, when the problem of regimentation for basic foodstuffs is examined,

nutritionists have always in mind maintaining, or at least not too rapid modification of the eating habits of the population.

There is a second factor, and that is the problem of the economical consequences of the introduction of a meat-like product on the market. Here also there is a trend, at least in some countries, to avoid too rapid changes in the agricultural and economical structures.

And finally, a more general problem. When a foodstuff is intended, even partly, to replace a basic food, is it not necessary to add this foodstuff the elements, such as vitamins, amino acids, and minerals, needed to give this food almost the same nutritive value as the other one? Is this necessary to avoid having the consumption of important amounts by a part of the population lead to a disturbance in the nutritive balance of this group of population? A classic example of this is the obligatory addition of vitamins A and D in margarine in some countries.

All those elements are involved, at different degrees, in the elaboration of the legislation regarding the vegetable proteins. And their combination with local and national factors such as different agricultural policies, different eating habits, and different philosophical approaches of the problem will probably lead to the elaboration of divergent legislations in the European countries. As Mrs. Brincker explained in Plenary Session C, we have just started in Europe with the elaboration of legislation regarding the use and purity criteria of vegetable proteins.

Let us hope that the excellent working paper prepared for the European Communities and that the establishment of a new Codex Committee on Vegetable Proteins will focus energies on this problem affording the possibility to the different countries to adopt not too divergent legislations on these kinds of products.

The United States Labeling Regulations for Vegetable Proteins: An Historical Perspective

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On July 14, 1978, the United States' Food and Drug Administration issued what it denominated a "tentative final order" to establish common or usual names for vegetable protein products and substitutes for meat, seafood, poultry, eggs, or fish which contain vegetable protein products as sources of protein. This tentative conclusion to a 1974 labeling proposal has its immediate roots in turn in a 1970 proposal to establish a standard of identity for a class of foods to be known as "textured protein products." That

proceeding had its antecedents in petitions first from separate companies and then jointly by two members of industry to establish standards of identity for those foods produced from vegetable proteins and intended either to substitute for or to "extend" meat food products. Thus, for over a decade, industry has been urging action to regularize the use of these nutritious foods.

The FDA tentative final order is both complex and ambiguous. Reading the explanatory material to the order,