



SAAFoST

SOUTH AFRICAN ASSOCIATION for
FOOD SCIENCE & TECHNOLOGY

National Secretariat:
PO Box 4507 Durban. 4000
Tel: (031) 368 8000 Fax: (031) 368 6623
E-mail: Viroshab@turnergroup.co.za
Website: www.saafofst.org.za
013-075 NPO

The Director General of Health
Attention: The Director, Non-Communicable Diseases,
Private Bag X828
Pretoria 0001
South Africa
!0 October 2012

Dear Sirs,

Comments on Regulations Relating to the Reduction of Sodium in Certain Foodstuffs and Related Matters

The South African Association for Food Science and Technology, the Association for food and related science and technology professionals in South Africa, with some 2,000 individual and company members countrywide, wishes to comment on the Department of Health draft, "Regulations Relating to the Reduction of Sodium in Certain Foodstuffs and Related Matters".

The Association gratefully acknowledges the opportunity to be able to do so and also appreciates the invitations received to participate in the Department of Health's Consultative Meetings on the Reduction of Salt that were held on several occasions at the DoH. The Association participated fully in all of these and is pleased to have been able to provide, to the committee, a large amount of information, including articles and opinions on salt reduction and also, impartial and scientifically correct material prepared by the Institute of Food Technologists of the USA (IFT), the International Union of Food Science and Technology (IUFoST), the International Food Information Council in Washington (IFIC) and other international organisations with which SAAFoST maintains close contact.

The Association further appreciates the fact that Prof Melvyn Freeman, Chairman of the Salt Reduction Committee, made himself available in January to address SAAFoST Members on this very important subject and again in February when he had discussions with members of the Food Legislation Advisory Group (FLAG) at the ARC in Irene. SAAFoST, based on evidence and a worldwide trend in this regard, supports the reduction of salt in the diet of South Africans and accepts the recommended level of consumption of 5-6g/day. This is in keeping with both the Association's Mission, part of which is to advance food science and related technologies for the supply of wholesome food and also in keeping with the SAAFoST Professional Code of Conduct, provisions of which require that due regard be given to public safety, public health and well-being and that consumers be kept reliably informed on matters of health, nutrition and safety. With regard to the latter, see: www.foodfacts.co.za and www.saafofst.org.za, for information and professional presentations on salt and sodium in food, freely available to the public, media and other interested parties.

The support for the reduction of salt to similar levels is also in step with several international authorities such as the World Health Organisation (WHO), the UK Scientific Advisory Committee on Nutrition (SACN), the US National Academies of Science Institute of Medicine (IoM) and other credible science oriented organisations. Because of the clear need to reduce the intake of salt by South Africans, this Association is keen to support a drive to improve the health of all South Africans but believes that it is imperative that the Department of Health carefully considers and gives the following matters particular attention.

Salt and Food Safety – in cases where the safety of products may be compromised, and the elimination of some risks may present others, the Department is urged to take particular cognizance of the comments submitted by food science and technology specialists employed by the manufacturers of such products and, if necessary, refer these comments to known independent experts and scientists in the field - SAAFoST can assist with this. This is particularly relevant to meat products, produced in a hot country and popularly consumed by individuals and families, many of whom may not be able to afford the addition of expensive salt replacing preservatives and who may have limited or no access to refrigeration and health care and where sickness and days away from work impact very heavily on households.

Salt and Technology - the Department is urged also to consider the technological role played by salt in certain products over many hundreds of years, such as in processed meat and pan bread and again to take particular note of concerns raised by

food science professionals and specialists in these fields to ensure optimum quality and to avoid price increases for those who can very least afford them.

Salt and Taste - because the use of salt in human food pre-dates recorded history, that saltiness is recognised as one of mankind's five basic tastes and that it is the most popular and widely used of all flavour additives, the Department is urged to consider a more gradual reduction over, say a period of a further five years, in order to change this age old habit. This is not an unreasonable request and is in keeping with the time taken in other countries to effect meaningful changes. It will give both producers and consumers time to adjust while allowing time to monitor the effect of the changes in a unique South African situation that may yield equally unique outcomes.

Enforcement of Salt Regulations - of concern to SAAFoST and to many members, is the Department of Health's capacity to actively and equally apply and enforce the regulations, and collect and analyse the many thousands of samples that will need to be taken on an ongoing basis to ensure continuous and widespread adherence to the law. Unless this is done routinely and fairly, those who abide by the law will be punished for doing so by losing business to and being demoralised by the law-breakers who appear to act with impunity. This is already a very widely heard complaint and deserves full and serious attention.

A Salt Reduction Campaign

As opposed to many Western countries where dietary sodium intake is largely attributed to processed food, said to constitute the greater part of those diets, the situation in South Africa is somewhat different because smaller quantities of such foods are consumed. Further complications are widespread hunger and a very serious lack of knowledge of matters relating to food and nutrition. High salt intakes in South Africa, especially amongst the poor, therefore suggest that a lot of salt is added to food by consumers at the point of preparation and or consumption. Salt as the most available and affordable food "flavourant" is the obvious, popular, satisfying and generously added ingredient of choice, most probably supplementing the country's preferred essentially salt free at point-of-sale staple, mealie meal.

While the regulations restrict the amount of salt added to certain processed foods, it's very significant discretionary use by consumers is not being addressed. This is a serious flaw. It is the opinion of this Association that if the intake of salt by the South African consumer is to be successfully reduced, it is going to need the support of a well prepared, professional, far reaching, long-running, multi-media salt reduction awareness and education campaign, that echoes in the kitchens and dining rooms of the nation. The central theme or watchword of the campaign might be along the lines of stressing that the absence of the taste of salt in food should be seen as a green light and good health signal and not a cue to reach for the salt cellar. An education campaign capable of changing the salt habit of all South African consumers and professionally adept in creating a demand for low salt goods will be a great leveler of the playing field. It will create the perfect environment for the food industry to latch onto and support the campaign and co-operate by developing and marketing a comprehensive range of products available to the entire spectrum of the population including young children and the elderly who are the most vulnerable.

SAAFoST feels that without education, only half of the problem is being addressed and only half of the population is being taken into account which is surely a blueprint for failure. The Association would be strongly in favour of a properly conceived and planned campaign, that it would like to be involved in developing, that it would like to see funded in suitable proportion to the expected savings in health costs brought about by reduced salt consumption and that would be of real and measureable benefit to everybody. SAAFoST further feels that an appropriate campaign would be sufficiently effective in reducing the salt consumption to render the regulation of salt unnecessary. A successful salt reduction effort will provide the ideal template for other health oriented campaigns which are necessary and which must follow.

The Association trusts that you will find these comments and suggestions constructive and helpful and looks forward to further co-operation in addressing a serious health issue.



Dr Gunnar Sigge
SAAFoST President (2010 – 2013)