

FEDERATION OF ASSOCIATIONS AND ENTERPRISES OF INDUSTRIAL  
CULINARY PRODUCT PRODUCERS IN EUROPE

VEREINIGUNG DER VERBÄNDE UND HERSTELLER KULINARISCHER  
LEBENSMITTEL IN EUROPA

**CULINARIA EUROPE e.V.**

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D-53113 BONN - REUTERSTRASSE 151 // B-1040 BRUSSELS, c/o FOODDRINKEUROPE, AVENUE DES ARTS, 43  
TEL +49/228/21 00 95 • FAX +49/228/22 94 60 • [info@culinaria-europe.eu](mailto:info@culinaria-europe.eu) • [www.culinaria-europe.eu](http://www.culinaria-europe.eu)

**To: Members of  
Culinaria Europe**

10 August 2012  
MW / lü

**CL 29/12**

### **Labelling of iodized salt in the EU**

Dear colleagues,

Since iodized salt can be regarded as a compound ingredient [Art. 2 (2) h) Regulation (EU) No 1169/2011] consisting of salt and sodium / potassium iodate, there is a tendency that German authorities demand the indication of "iodized salt" to be followed by a list of its ingredients (Annex VII Part E). Instead of "iodized salt" companies might have to label this ingredient by indicating e.g. "iodized salt (salt, potassium iodate)". This not only extends the list of ingredients, it also provides the consumer with a - presumably - useless information. Furthermore companies report that manufacturers of iodized salt sometimes switch between sodium and potassium iodate which could lead to the necessity to change the labelling in accordance to the particular composition.

The composition of iodized salt is not defined in current Union provisions. Since differing definitions in certain Member States create trade barriers a common definition would be helpful, but it would not solve all the labelling problems since especially dry products often contain more than 2 % iodized salt.

As a first step, CULINARIA EUROPE could propose to the Commission to add iodized salt to the list of foods which are not required to bear a list of ingredients [Art. 19 (1) food information to consumers regulation]. The Commission may, in exceptional cases, by means of delegated acts, supplement paragraph 1 of Article 19, provided that omissions do not result in the final consumer or mass caterers being inadequately informed. At the suggestion of the German association - Culinaria Germany - the German Federation for Food Law and Food Science has already approached the Commission.

We are looking forward to receiving your feedback on this topic.

Kind regards,



Markus Weck