

QSAI Technical Report

Revision of QSAI Special Meal Codes, Definitions & Interpretation Guidelines

Preview



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Executive Summary

Introduction. Passengers are increasingly expecting to customize their travel experience onboard, including their meal preference. Today, airline and railway carriers offer a selection of meals to accommodate passengers with specific dietary requirements for health purposes, religious purposes or other dietary preferences, i.e. Special Meals (“SPMLs”).

History. As a means of standardizing worldwide Special Meal definitions, the International Air Transport Association (IATA) developed recommendations for Special Meals. However, in 2015, IATA decided to no longer maintain Special Meal codes due to the emerging and changing regulations and the oversight required to upkeep Special Meal definitions. **Medina Quality Food Assurance Services (“MQ”), an IATA strategic partner, was therefore given the role to govern Special Meal requirements as part of its role in the Quality & Safety Alliance for In-flight Services (“QSAI”).** On January 01, 2016, Medina Quality published the *QSAI Special Meal Codes, Definitions & Interpretation Guidelines* (Version 1.0), which contain guidelines for the preparation of meals for passengers with specific dietary preferences. **The QSAI Special Meal Codes, Definitions & Interpretation Guidelines are the most relevant international reference within the airline and railway industry for the development of Special Meal menus.**

Challenges. In order to appropriately govern Special Meal definitions, MQ regularly conducts a global review of legislative, dietary and religious requirements to ensure harmony and international compliance. Since publication of the *QSAI Special Meal Codes, Definitions & Interpretation Guidelines* in 2016, QSAI airline and railway operators (“QSAI Participants”) and caterers audited under the QSAI Programme (“QSAI Catering Organizations”), when developing Special Meal menus, have submitted to MQ the challenges they face and **requests to modify Special Meal codes and requirements.**

Some challenges and queries regarding the use of the QSAI Special Meal Codes, Definitions & Interpretation Guidelines

- Clarification requested on the use, interpretation and calculation of nutrient content claims (i.e. on individual food items or complete service/tray set-up).
- Difficulty to develop varied and substantial Low Calorie Meals, Fruit Platter Meals and Vegetarian Raw Meals.
- Lack of legal framework to provide meals with implied health claims, i.e. Diabetic Meals and Bland Meals.
- Request to change Moslem meal into Halal meal.
- Absence of a toddler meal.

QSAI Technical Committee Objectives & Methodology. The main objectives of the QSAI Technical Committee are to set and improve industry standards and support the airline and railway industry in protecting their passengers through providing relevant and updated requirements for Special Meals. In order to achieve this, MQ started a Special Meal revision process in 2019. **During this revision process, food labelling, nutrition legislation and dietary guidelines from four (4) major jurisdictions (Canada, US, EU and Australia New Zealand), literature on religious & dietary practices, and expert & specialized associations' opinions were consulted.** Topics of the legal review include nutrient content claims including low salt, low fat, low sugar and low calorie claims; health claims; the use of the term healthy in labelling; meal replacement, weight loss and weight maintenance claims; claims referring to diabetic meals, glycemic index and glycemic load; claims regarding the restriction of certain allergens (gluten and lactose); religious labelling (Kosher, Halal, Hindu, Jain); vegan/vegetarian claims; and meals for babies and infants. The Technical Report includes detailed references of consulted regulatory, scientific and any other relevant sources.

Online Survey. In addition to the review of relevant literature and regulations, **MQ created an online survey to obtain information from QSAI Participants and QSAI Catering Organizations** regarding their experience with the use and application of each Special Meals covered by the *QSAI Special Meal Codes, Definitions & Interpretation Guidelines*. For each Special Meal, MQ collected feedback on:

- (i) Suggested changes to the code, use and description of the Special Meal;
- (ii) Suggested additions or deletions from the prohibited and acceptable food items lists;
- (iii) Specific questions that focused on certain aspects and challenges of the Special Meal requirements (only for certain Special Meals); and
- (iv) General comments to the Special Meal.

To obtain sufficient data regarding some of the most challenging Special Meals, responses to the questions on the Diabetic Meal (DBML), Gluten Friendly Meal (GFML), Low Calorie Meal (LCML) & Low Lactose Meal (NLML) were mandatory for participation in this survey. All QSAI Participants and 48% of QSAI Catering Organizations completed the online survey.

Market Analysis. Furthermore, the survey was used for a market analysis regarding the QSAI Participants and QSAI Catering Organizations' demand for Special Meals. Participants were also requested to provide names and codes of Special Meals that are currently not included in the *QSAI Special Meal Codes, Definitions & Interpretation Guidelines*, including Special Meals with nutrient content claims, with specific allergen restrictions, with highlighted or restricted ingredients, for religious purposes, with specific and different vegetarian claims, with other dietary preferences and for babies and children. **The results of the market analysis are included in the report, whereby all information is provided anonymously.**

Revision of Special Meal Requirements. After completion of the survey, MQ reviewed all comments, suggested amendments and any other information provided by the survey respondents (e.g. relevant literature or local legislation provided). This report is based on and summarizes the survey responses from

QSAI Participants and QSAI Catering Organizations and MQ's review of the literature and regulation. Recommendations for amendments to each of the Special Meals covered in the *QSAI Special Meal Codes, Definitions & Interpretations Guidelines* are based on the findings contained in the report.

Amending the QSAI Special Meal Codes, Definitions & Interpretation Guidelines. While this report represents the recommendations from MQ to update existing special meal requirements based on the findings of the report, **changes to the QSAI Special Meal Codes, Definitions & Interpretation**

Major Changes to Special Meal Requirements

- The DBML code is no longer available for use as a Diabetic Meal, but for the provisioning of a Balanced Diet Meal, a consolidation of the prior Diabetic Meal with Low Salt and Low Fat Meals. While the 3 codes remain active, ordering a LFML, LSML or DBML will all result in receiving a Balanced Diet Meal.
- Low Calorie Meals are no longer an offered choice. Given the very restrictive allowed calorie contents for a low calorie meal, its offering is no longer considered an attractive meal option. Should carriers want to continue to provide the LCML code, it is recommended to direct the passenger to a Fruit Platter Meal or a Vegetarian Raw Meal.
- Meals restricting gluten or lactose are referred to as gluten-intolerant and lactose-intolerant meals, maintaining GFML and NLML codes. Emphasize is hereby made that such meals are focussing on the use of ingredients without gluten or lactose, but are prepared and served in the same environment as gluten-containing or lactose-containing food items and hence may contain traces of gluten or lactose.
- Child Meals, if advertised to include the age range of toddlers, from 1 to 3 years old, should have provisions to avoid choking hazards through the choice of age-appropriate food items and preparation techniques.
- The Bland Meal use and description have been revised to avoid being interpret to include an implied health claims, without otherwise changing the concept of the meal.
- The use of dairy products in an Asian Vegetarian – Hindu Vegetarian is now acceptable without restrictions. The non-vegetarian Hindu Meal, with code HNM, is now more clearly identified as a non-vegetarian meal option.
- While Muslim Meals are not certified halal, emphasize is put on the fact that Muslim Meals use halal meat and halal approved ingredients, and no pork, alcohol or doubtful (Mushbooh) ingredients;
- Vegetarian and vegan meals have been reworked although their concepts were not changed. Where applicable, guidance about their cooking style has been included.

Guidelines were made upon consulting through a joint task force with the Airline Catering Association (“ACA”), which had the objective to simplify some of the special meal offerings and remove, where possible, restrictive nutrition content claims. A summary of changes is listed below. Given the operational challenges airline and railway operators may encounter with changing Special Meal codes, **changes to Special Meal requirements did not entail any changes to Special Meal Codes.**

Access to the Report. The full Technical Report on Special Meals provides unlimited access to:

- All the comments and suggested amendments to Special Meal requirements obtained from QSAI Participants and QSAI Catering Organizations through the survey;
- Details of all regulatory and other relevant information sources consulted during the review of the Special Meal requirements;
- All MQ recommendations to modify Special Meals requirements (Sections 2 to 8 of the report); and
- Outcome of the market analysis on the demand of Special Meals and information regarding other Special Meal offerings from QSAI Participants and QSAI Catering Organizations (Section 9).

The preview version of the report provides one (1) example of the revision of the Special Meals requirements, i.e. the Low Salt Meal (LSML), which includes:

- The regulatory review of low salt and added salt claims;
- The online survey outcome and additional comments received from QSAI Participants and QSAI Catering Organizations regarding the meal; and
- MQ recommendations to amend the Low Salt Meal.

Included in Report	PREVIEW Report - LIMITED Access	FULL Report - UNLIMITED Access
Executive Summary	✓	✓
Review of QSAI Special Meals Codes, Definitions & Interpretation Guidelines	✓	✓
Revision of all Special Meals	✗	✓
Revision of <i>Low Salt Meal</i>	✓	✓
Market Analysis	✗	✓

Assessing the QSAI Special Meal Codes, Definitions & Interpretation Guidelines. QSAI Participants and QSAI Catering Organizations have unlimited access to the new version of the *QSAI Special Meal Codes, Definitions & Interpretation Guidelines* (Version 2.0). **Any changes to the Special Meal requirements compared to the previous version are highlighted with call out boxes.** To ensure that all Special Meals intended for a passenger with specific dietary preferences meet the requirements for that Special Meal, Medina Quality encourages all operators in the airline and railway industry to consult the QSAI Special Meal requirements. Contact Medina Quality to obtain a copy of the revised *QSAI Special Meal Codes, Definitions & Interpretation Guidelines*.

To obtain access to the full report and/or the updated version of the QSAI Special Meal Codes, Definitions & Interpretation Guidelines, contact info@qsaiinternational.com or visit www.qsaiinternational.com

1.0 Review of QSAI Special Meals Codes, Definitions & Interpretation Guidelines

1.1 INTRODUCTION

With the evolution of the airline & railway industry, Special Meals have become an important part of the airline & railway food service regime. Passengers increasingly expect their travel experience to be customized, including their meal preferences.

As a means of standardizing worldwide Special Meal definitions, the International Air Transport Association (“**IATA**”) developed specific recommendations for Special Meals as outlined in “Recommended Practice 1773” of IATA’s Passenger Services Conference Resolutions Manual. IATA’s Special Meal definitions and codes have been the main reference used by airlines & railway operators and their suppliers and caterers globally. However, as of June 1st, 2015, IATA has no longer been maintaining Special Meal codes due to emerging and changing regulations, and the oversight required to upkeep Special Meal definitions.

In the major absence of the IATA Special Meal definition and codes, Medina Quality (“**MQ**”) established the QSAI *Special Meal Codes, Definitions & Interpretation Guidelines* (“**SPML DIGs**”) and committed to oversee QSAI Special Meal requirements designed to reflect changing legislative and dietary requirements.

The QSAI Special Meal DIGs are now the most important reference within the airline industry for the development of Special Meal menus worldwide. As part of MQ’s plan to govern the Special Meal definitions and codes, MQ decided to review the QSAI SPML DIGs in 2019 through a QSAI Technical Committee Special Meal Revision Process, with the objective to gather information from QSAI Participants and QSAI Catering Organization about current practices and their suggested changes, and to review relevant regulations.

While both the updated version of the QSAI SPML DIGs and this report were ready for publication after the COVID-19 pandemic, the Airline Catering Association (“**ACA**”) launched the initiative to review the definition of a number of special meals, which lead to the establishment of a joint task force between both MQ and the ACA with the objective to simplify the special meal offer and where possible, remove restrictive nutrient content claims.

1.2 QSAI SPECIAL MEALS CODES

The twenty (20) Special Meal codes included in the QSAI *Special Meal Codes, Definitions & Interpretation Guidelines*, Version 1.0, January 01, 2016 are listed in the following table.

However, not all QSAI Participants nor QSAI Catering Organizations currently offer each of these 20 Special Meals to their respective customers. As such, the survey questioned both QSAI Participants and QSAI Catering Organizations about their current offering and demand. It is in this context important to note that the data were gathered during the period the survey was available for QSAI Participants and QSAI Catering Organizations. The data therefore provide insights into passenger preferences from before September 5, 2019, i.e. the end date for submissions of the survey. Details on the demand (highest and lowest) of Special Meals are provided in *Section 9.1.2*. An overview of Special Meal codes provided by QSAI Participants and QSAI Catering Organizations that are currently not included in the QSAI *Special Meal Codes, Definitions & Interpretation Guidelines* are further presented in *Section 9.2 Other Special Meal Offerings*.

Meal Code	Meal Name	Meal Code	Meal Name
AVML	Asian Vegetarian Meal – Hindu Vegetarian Meal	LFML	Low Fat Meal
BBML	Baby Meal	LSML	Low Salt Meal
BLML	Bland Meal	MOML	Moslem Meal
CHML	Child Meal	NLML	Low Lactose Meal
DBML	Diabetic Meal – Low Sugar Meal	RVML	Vegetarian Raw Meal
FPML	Fruit Platter Meal	SFML	Seafood Meal
GFML	Gluten Friendly Meal	VGML	Vegetarian Vegan Meal
HNML	Hindu Meal	VJML	Vegetarian Jain Meal
KSML	Kosher Meal	VLML	Vegetarian Lacto-Ovo Meal
LCML	Low Calorie Meal	VOML	Vegetarian Oriental Meal

1.3 QSAI TECHNICAL COMMITTEE OBJECTIVE & PROCESS

1.3.1 Objective & Process

Since the introduction of the QSAI Special Meal DIGs on January 01, 2016, Medina Quality - as part of its role in consulting and managing QSAI - has received feedback from both airline and railway operators and caterers regarding the specifics of certain Special Meals. However, to provide the opportunity to *all QSAI participating airline and railway operators* and to *all catering organizations audited under the QSAI Programme* to comment on and suggest amendments to, the Special Meal requirements, a Technical Committee Special Meal Revision Process was established.

The main objectives of the Technical Committee Special Meal Revision Process are to:

1. Set and improve industry standards through the establishment of harmonized Special Meal requirements that can be used by airline and railway operators and by catering organizations in an international network of operators; and
2. Protect passengers through improved compliance of all operators within the airline and railway industry with Special Meal requirements.

The revision of Special Meal requirements is mainly based on the following components:

1. Comments and suggested amendments received from QSAI Participants and Catering Organizations audited under the QSAI Programme regarding current Special Meal requirements (i.e. Version 1.0) through an online survey;
2. Regulatory review of Special Meal requirements by Medina Quality (for more details, see *Section 1.4*);
3. Relevant literature that provides details on Special Meal requirements; and
4. Expert information and information obtained from specialized associations, including national dietary guidelines.

To ensure all key stakeholders were sufficiently involved in the revision process, MQ further collaborated with the Airline Catering Association (“ACA”), which started working early 2022 in parallel on initiatives to update Special Meal Definitions for caterers. Together, QSAI and the ACA composed a task force of industry experts, including Medina Quality, to review Special Meal Codes. The ACA’s main objectives hereby were to reduce the special meal offer and to redefine certain Special Meal Codes by avoiding restrictive claims. In addition, MQ’s objective in revising Special Meal requirements were to ensure they fit within applicable regulatory frameworks, and protect the passenger by providing special meal descriptions that are clear - so that the passenger can make a well-informed choice when ordering a special meal - and truthful, hence verifiable. **The cooperation eventually led to the redefinition of certain special meals, including the consolidation of some, as well as to the conclusion that certain Special Meal codes and definitions may be outdated, and hence should no longer be offered.**

1.3.2 QSAI Special Meal Survey Participation

In order to gather feedback from QSAI Participants and Catering Organizations audited under the QSAI Programme, an online survey was created in 2019.

The survey included some general questions regarding the use of certain codes, as well as specific questions that focused on certain aspects of the Special Meal requirements. Survey participants were also invited to provide suggested additions or removals of acceptable and prohibited food items for each of the Special Meals. To guarantee sufficient data gathering regarding some of the most contentious Special

Meals, a response to the Diabetic Meal (DBML), Gluten Friendly Meal (GFML), Low Calorie Meal (LCML) & Low Lactose Meal (NLML) was made mandatory upon participating to this survey.

The survey data presented in this report were obtained from the participation of 45 respondents, i.e. 9 QSAI Participants and 36 QSAI Catering Organizations. All comments and suggested modifications have been included in this report without any changes. All feedback in the report has been included anonymously.

QSAI Participants (Airlines & Railway Operators):

Air Canada	Air France	Air Tahiti Nui	All Nippon Airways
Eurostar International	KLM Royal Dutch Airlines	Korean Air	Singapore Airlines
Virgin Atlantic			

QSAI Airline & Railway Catering Organizations

From the seventy-five (75) Catering Organizations, MQ received thirty-six (36) completed submissions (see table below), which corresponds to a response rate of 48%.

Air Algerie Catering	Abby's Catering	ANA Catering Services Co. Ltd.	Beijing Air Catering Co. Ltd.
BTA HRVATSKA d.o.o. / BTA CROATIA Ltd.	Cateringpor - Catering de Portugal, S.A.	Cathay Pacific Catering Services (HK) Ltd.	Cuba Catering
China Pacific Catering Services	DNATA Catering Australia	Dnata Catering Otopeni	DO & CO Poland SP. Z O.O.
Emirates Flight Catering Co. LLC.	Evergreen Sky Catering Corp.	E.W. Harvey Ltd.	Flamingo Inflight Services
Goddard Catering Group	Guangzhou Nanland Air Catering Ltd.	Gategroup	Honett Szerviz Kft Airline Catering
KLM Catering Services B.V.	LSG Group	MacroAsia Catering Services Inc.	Nagoya Air Catering Services
Newrest Group International	Noibai Catering Services	Oberoi Flight Services	Royal In-Flight Catering Co. Ltd.
SATS Catering Pte. Ltd.	Shanghai Eastern Air Catering Co. Ltd.	Sky Café Ltd. / Optimum Canada	Surair Catering Services
TajSATS Air Catering Ltd.	TG Catering BKK	Vietnam Airlines Caterers Ltd.	Wuhan Eastern Air Airport Catering Ltd.

1.4 REGULATORY REVIEW

1.4.1 Consulted Food Labelling and Nutrition Legislation

One of the main objectives for review of the special meal requirements is to ensure that they fit within existing regulatory frameworks and that the information provided to the passenger is clear and truthful. As a result, this report includes a review of food labelling and nutrition legislation relevant to the Special Meals described in the *QSAI Special Meal Codes, Definitions & Interpretation Guidelines* obtained from four (4) jurisdictions, namely the US, Canada, the EU and Australia New Zealand.

Consultation of food labelling and nutrition legislation covered includes:

- Nutrient content claims for low fat and low salt (sodium), as part of the revision of Low Fat and Low Salt Meals respectively
- Low calorie, meal replacement, weight loss and weight maintenance claims as part of a revision of Low Calorie Meals
- Health claims, as part of the revision of Diabetic and Bland Meals
- Glycemic index and low sugar claims, as part of the revision of Diabetic Meal
- Healthy claims, as part of a consolidation of Low Fat, Low Salt, Low Calorie and Diabetic Meals into a Balanced Diet Meal
- Allergen restriction claims for gluten and lactose as part of the revision of Gluten-Friendly and Low Lactose Meals
- Claims referring to meals prepared for specific religious groups, including kosher, halal, hindu and jain
- Vegetarian claims as part of the revision of Asian vegetarian & Hindu vegetarian meals, Lacto-Ovo Vegetarian Meals, Oriental Vegetarian Meals, Vegetarian Raw Meals (RVML) and Vegan Vegetarian Meals (VGML)

In some instances, legislation regarding a specific claim may not be covered by a jurisdiction. Although this may be the case, it is important to note that food legislation usually includes a section indicating that **the labelling of food must be truthful and may not be misleading. The labelling should also ensure that consumers can make an informed choice about the food they consume.**

The table below provides an overview of the legislation in the US, Canada, EU and Australia and New Zealand that mandates the truthfulness of labelling. In addition, jurisdictions also have consumer protection laws which provide a legislative framework to protect consumers in the event that they receive a food product whereby packaging and labelling is not compliant with its contents, or whereby the statements or claims on the food product are misleading or deceptive. An overview of consumer laws in the US, Canada, EU and Australia and New Zealand has however not been included in this report.

1.4.2 Informing the Passenger

Within the context of truthfulness of labelling and of ensuring passengers can make an informed choice about the food they consume, it is important mentioning that **it must be clear to the passenger onboard, either before or during service, to which food item(s) the claim of the pre-ordered Special Meal applies.** Many QSAI Participants as well as Catering Organizations have questioned over the past years whether a claim, and in particular whether a nutrient content claim (low fat, low salt, low calorie, low sugar claims) should be applicable to the main dish only, to each individual food item offered to the passenger or rather to all food items contained on a tray set up or served during a full service (i.e. the nutrient content claim applies to the entire tray set-up or full service whereby the content of the nutrient is calculated as an average of all food items combined). *Section 2.1.2 Regulatory Overview on the Use of Nutrient Content Claims* of this report provides some insight on the regulatory framework of expressing nutrient content claims.

US ¹	Canada ²	EU ³	Australia and New Zealand ⁴
<p>Misbranded food</p> <p>A food shall be deemed to be misbranded –</p> <p>(a) False or misleading label</p> <p>If (1) its labeling is false or misleading in any particular, or (2) in the case of a food to which section 350 of this title applies, its advertising is false or misleading in a material respect or its labeling is in violation of section 350(b)(2) of this title.</p>	<p>Deception, etc. regarding food</p> <p>No person shall label, package, treat, process, sell or advertise any food in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit or safety.</p>	<p>Protection of consumers' interests</p> <p>Art. 8. Food law shall aim at the protection of the interests of consumers and shall provide a basis for consumers to make informed choices in relation to the foods they consume. It shall aim at the prevention of:</p> <p>(a) fraudulent or deceptive practices;</p> <p>(b) the adulteration of food; and</p> <p>(c) any other practices which may mislead the consumer.</p>	<p>Truth in Labelling</p> <p>Fair trading laws and food laws in Australia and New Zealand require that labels do not misinform consumers through false, misleading or deceptive representations. In Australia, this legislation includes the Australian Consumer Law contained in the Competition and Consumer Act 2010, and state and territory Fair Trading Acts and Food Acts. In New Zealand, this legislation includes the Food Act 2014 and Fair Trading Act 1986.</p>

¹ Misbranded food. US Code (January 7, 2011), Title 21, Chapter 9, Subchapter IV, Sec. 343, p.75-91.

² Deception, etc. regarding food. Food and Drugs Act (July 1, 2020), Part I, Subsection 5(1), p. 8-9.

³ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety. Official Journal of the European Communities, L31, Art. 8, p. 9 & Art. 16, p. 11.

⁴ Truth in labelling, weights and measures and legibility (2017). Food Standards Australia New Zealand (Last modified in January 2017). Accessed online (September 1, 2020): <https://www.foodstandards.gov.au/consumer/labelling/truth/Pages/default.aspx>.

US	Canada	EU ⁵ (Cont'd)	Australia and New Zealand
		<p>Presentation</p> <p>Art. 16. Without prejudice to more specific provisions of food law, the labelling, advertising and presentation of food or feed, including their shape, appearance or packaging, the packaging materials used, the manner in which they are arranged and the setting in which they are displayed, and the information which is made available about them through whatever medium, shall not mislead consumers.</p>	

⁵ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety. Official Journal of the European Communities, L31, Art. 8, p. 9 & Art. 16, p. 11.

This preview version provides an example of Section 2 of the full report for the Low Salt Meal (LSML)



To obtain access to the full report and/or the updated version of the QSAI Special Meal Codes, Definitions & Interpretation Guidelines, contact info@medinaquality.com or visit www.qsaiinternational.com

2.3. Low Salt Meals

2.3.1 Regulatory Overview of Low Salt & No Added Salt Claims

(A). Low Salt Claims

US ⁶	Canada ⁷	EU ⁸	Australia New Zealand ⁹
<p>Low sodium Low in sodium Little sodium Contains a small amount of sodium Low source of sodium</p> <p>The food has (a) a reference amount customarily consumed greater than 30 g or greater than 2 tablespoons and contains 140 mg or less sodium per reference amount customarily consumed*; or (b) a reference amount customarily consumed of 30 g or less or 2 table-spoons or less and contains 140 mg or less sodium per reference amount customarily consumed and per 50g.¹</p> <p>The meal product or main dish product contains 140 mg or less sodium per 100 g.*</p>	<p>Low salt Low sodium Low in sodium Low source of sodium Little sodium Low salt Low in salt Low source of salt Little salt</p> <p>The food contains 140 mg or less of sodium per reference amount and serving of stated size and, if the reference amount is 30 g or 30 mL or less, per 50 g; or</p> <p>The prepackaged meal contains 140 mg or less of sodium per 100 g.</p>	<p>Low salt Low sodium</p> <p>The product contains (a) no more than 0,12 g of sodium, or the equivalent value for salt, per 100 g (b) no more than 0,12 g of sodium, or the equivalent value for salt, per 100 ml.</p>	<p>Low salt Low sodium</p> <p>The food contains no more sodium than – (a) 120 mg per 100 mL for liquid food; or (b) 120 mg per 100 g for solid food.</p>

* If the product meets this condition without the benefit of special processing, alteration, formulation, or reformulation to lower the calorie content, it is labeled to clearly refer to all foods of its type and not merely to the particular brand to which it attaches.

⁶ Nutrient content claims for the sodium content of foods. US Code of Federal Regulations (April 1, 2019), Title 21, §101.61, p. 103-105.

⁷ Statement or Claims. Food and Drug Regulations (July 1, 2020), Section B.01.503, p. 157-158.

⁸ Corrigendum to Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods (2007). Official Journal of the European Union, L12, Annex, p. 16-18.

⁹ Nutrition, Health and Related Claims. Australia New Zealand Food Standards Code (2017), Standard 1.2.7 – Schedule 4. Accessed online (July 20 2019): <https://www.legislation.gov.au/Details/F2017C00711>.

(B). No Added Salt Claims

US ¹⁰	Canada ¹¹	EU ¹²	Australia New Zealand ¹³
<p>No salt added Unsalted Without added salt</p> <p>Claim may be used if: (i) No salt is added during processing; (ii) The food that it resembles and for which it substitutes is normally processed with salt; and (iii) If the food is not sodium free, the statement, “not a sodium free food” or “not for control of sodium in the diet” appears adjacent to the nutrition label of the food bearing the claim, or, if the nutrition label is on the information panel, it may appear elsewhere on the information panel in accordance with §101.2.</p>	<p>No added salt No added sodium Unsalted Without added salt No salt added No added salt Without added sodium No sodium added No added sodium</p> <p>Claim may be used if: (1) The food contains no added salt, other sodium salts or ingredients that contain sodium that functionally substitute for added salt. (2) The similar reference food does not meet the conditions set out in column 2 of item 32 for the subject “low in sodium or salt” set out in column 1 and contains added salt or other sodium salts.</p>	<p>No added salt No added sodium</p> <p>Claim may be used if the product does not contain (1) Any added sodium/salt or any other ingredient containing added sodium/salt and (2) The product contains no more than 0,12 g sodium, or the equivalent value for salt, per 100 g or 100 ml.*</p>	<p>No added salt No added sodium Unsalted</p> <p>Claim may be used if: (a) The food contains no added sodium compound including no added salt; and (b) The ingredients of the food contain no added sodium compound including no added salt.</p>

¹⁰ Nutrient content claims for the sodium content of foods. US Code of Federal Regulations (April 1, 2019), Title 21, §101.601, p.103-105.

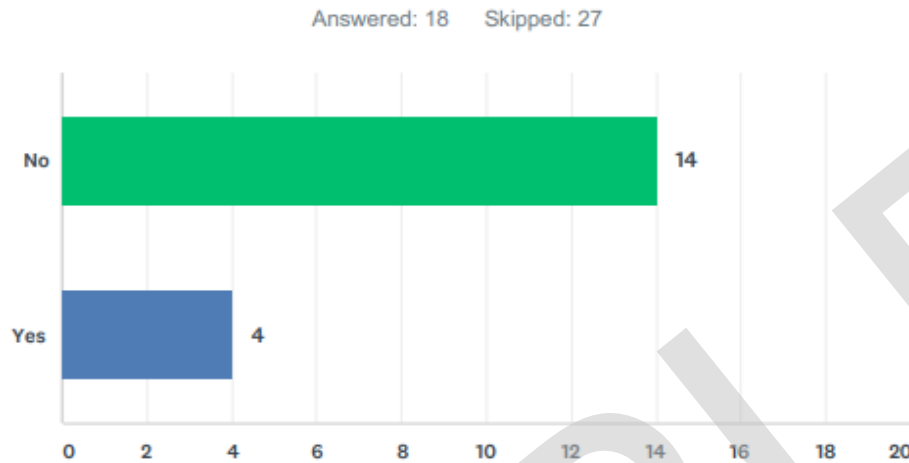
¹¹ Statement or Claims. Food and Drug Regulations (July 1, 2020), Section B.01.503, p. 157-158.

¹² Commission Regulation (EU) No 1047/2012 of 8 November 2012 amending Regulation (EC) No 1924/2006 with regard to the list of nutrition claims. Official Journal of the European Union, L310, p. 37.

¹³ Nutrition, Health and Related Claims. Australia New Zealand Food Standards Code (2017), Standard 1.2.7 – Schedule 4. Accessed online (July 20 2019): <https://www.legislation.gov.au/Details/F2017C00711>.

2.3.2 Online Survey Outcome

Q81. Any suggested changes to the code, use or description of the meal?



Additional comments:

1. Suggest to remove it from SPML list due to low demand (0,9% of our SPMLs).
2. Meal does not contain more than 0.3% salt per average service. For the purpose of this meal request, beverages are not included in the average of the service. Note: As Hypertension is often linked with Diabetes or high cholesterol/triglycerides, it would be recommendable that LSML would also follow other healthy eating principles, such as reduced intake of sugar and saturated fats.

Q82. Which food item(s) would you like to:

Add to the prohibited food item list?

- Salted butter, salted caramel, rolls with salt on top, ketchup, soya/BBQ/Worcester sauce.
- Cold meats.
- Amend under prohibited: Canned & packaged food with added salt (vegetables, fish, pickles). Salty cheeses (regular and processed cheese, cheese spreads, cottage cheese, cheese sauces).
- Bread with salt => all bread contains some salt. If meal service can be averaged, small portions of bread/rolls could be permitted.
- Alcohol.
- Meat & dairy products high in saturated fats. Salty snacks (e.g. crisps, salted crackers, pretzels).
- All types of fine, coarse, sea, rock salt, from all sources and all colours, in all its forms (crystals, liquid, injection, alone or in flavoured brine), Bread, rusks, sandwich bread, salted and sweet biscuits, aperitif products, Mature or fresh or grated or processed cheeses, Smoked meat, All delicatessen, "spreadable" products (hummus, tzatziki, etc.), Smokehouse (salted and/or dried fish), smoked fish, shellfish, fish condiments (anchovies), surimi, Canned vegetables and

industrial soups, Some flat or sparkling water and some soda, Olives, capers, mustard, soy sauce, nuoc-mam sauce, pickles, stock cubes, sauce bases, aromatic herbs mixed with salt, celery salt, preparation of herbs in mixtures in all formats, salted dried fruits.

Remove from the prohibited food item list?

- Bread with salt (as most bread recipes will require a small addition of salt). Remove 'canned food' as not all have salt added (e.g. fruit in syrup).
- Ketchup, mustard, soy sauce and bread with salt.

Add to the acceptable food item list?

- Vinegar, all fresh and frozen fruits.
- Salt-free bread, unleavened bread and raw oatmeal flakes
- Amend under acceptable: Lean meat, poultry or fish with no added salt. Mozzarella contains added salt above 0.3%. Unsalted bread & crackers: So far, we have not come across commercially available unsalted or low salt bread crackers. Can this be removed? Muffins contain raising agent which is high in sodium and saturated fat (not recommended for people with high blood pressure who would choose a LSML). Wholegrain rice, pasta... Limited sugar and saturated fats.

Remove from the acceptable food item list?

- No suggestions received.

2.3.3 Other Comments

Q83. Any other suggested changes?

1. Remove "no added salt".

MQ Response: *Added salt can be acceptable, provided that the total salt content of the meal is within the required limits.*

2. We would like to change the content of sodium from 120mg per 100g of food to 1.5g per one meal based on the Standard (6g per day) of Japan Society of Hypertension.

MQ Response: *Where a regulatory framework applies to a Special Meal, the regulation will be used in first place to set up a specific requirement. Given the fact that the regulatory requirements from the jurisdictions included in this report are much stricter than the proposed salt content from the Japan Society of Hypertension, the strictest requirement is being followed.*

3. It is hard to meet the threshold for salt in the current guidelines. Low salt is defined differently in Canada, with a higher threshold. The food contains: (a) 140 mg or less of sodium per reference amount and serving of stated size and, if the reference amount is 30 g or 30 mL or less, per 50 g; or (b) 140 mg or less of sodium per 100 g, if the food is a prepackaged meal.

MQ Response: *Annex I for EU Regulation 1169/2011 defines salt as follows: salt means the salt equivalent content calculated using the formula: salt = sodium x 2.5. As such, 120 mg of sodium equals 0.3 g of salt, whereas 140 mg of sodium equals 0.35 g of salt. Where different regulatory*

requirements apply and within the context of the international character of airline catering, preference is given to apply the strictest requirement.

4. Add a comment that the max. salt content is leading, meaning that the prohibited food items are allowed as long as the salt content is within the limits

MQ Response: *The use of food items from the prohibited list may be acceptable, provided the final salt content is within the regulatory limit.*

5. Suggest adding ideas for salt replacement: e.g. herbs & spices, lemon juice, vinegar

MQ Response: *Most of the food items indicated are already included in the LSML requirements.*

6. Please suggest weight of salt per 100g for ease of menu development

MQ Response: *The addition of a conversion factor of sodium to salt, i.e. salt = sodium x 2.5 is valuable and will be included.*

7. In the end, it has to be based on the entire TSU and not per individual item. We are not in the grocery store environment – we are offering an entire meal

MQ Response: *See Section 2.1.4 MQ Recommendation on the Use of Nutrient Content Claims.*

8. Ideally this would be merged with DBML, LCML and LFML to a “balanced choice”.

MQ Response: *See Section 2.10 Consolidation of Certain Special Meals Into a Balanced Diet Meal.*

2.3.4 MQ Recommendations

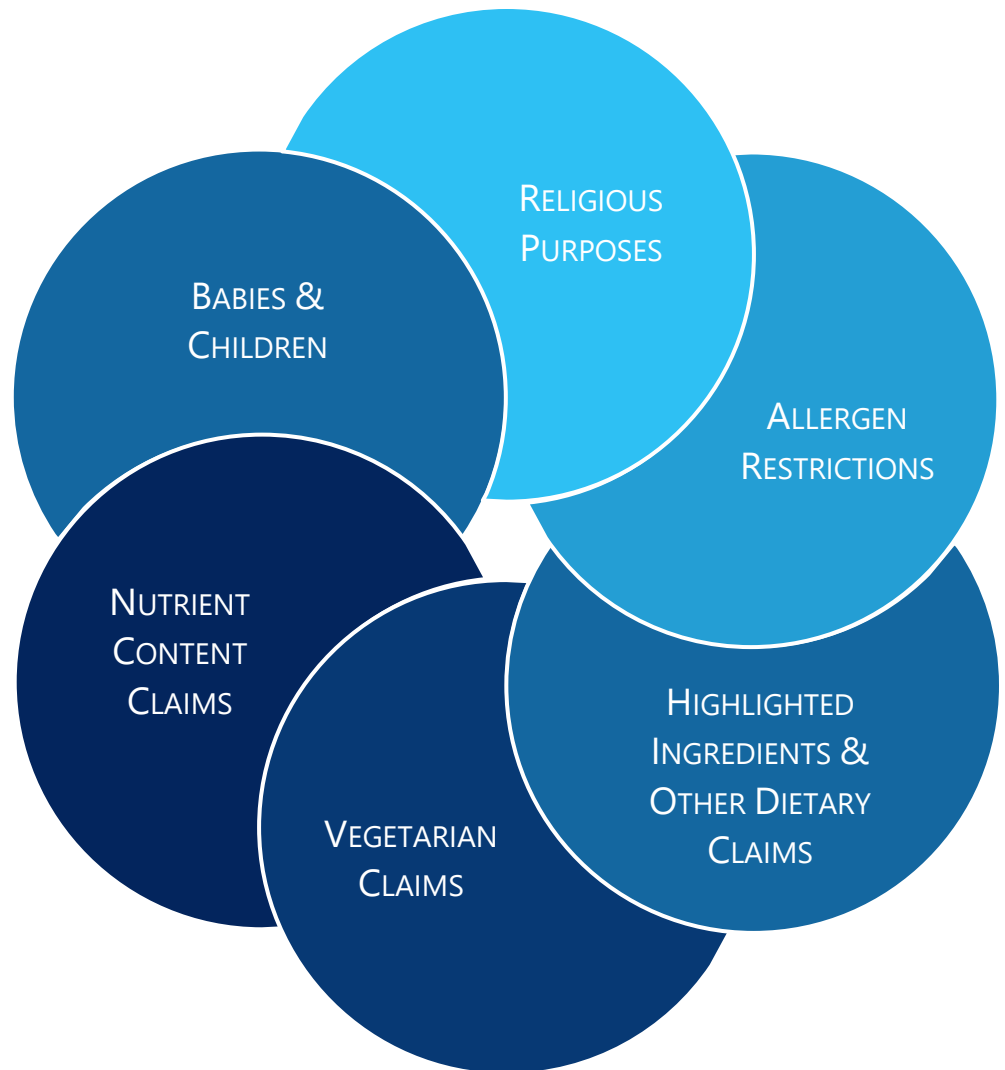
Based on the regulatory review and the feedback received from the survey, Medina Quality recommends the following modifications to be made to the Low Salt Meal code:

- **Keep the maximum sodium content of 120 mg of sodium per 100 g**, despite the higher quantities allowed in the US and Canada (up to 140 mg of sodium per 100 g of food) as an internationally harmonized limit. Where local regulation is stricter, local regulation must be followed.
- **Remove the “no added salt” requirement**, as the actual salt content of the food item or meal service is the main leading requirement. Salt may be added to a recipe, provided that the total salt content of the food item or meal service falls within the maximum limit of 120 mg of sodium (or the equivalent of salt) per 100 g of a food item or per 100 g of a meal product.
- **Allow for the use of prohibited food items**, provided the calculated salt content is below the quantitative threshold.
- Ensure **documented proof is available at the catering facility to show compliance with these requirements**.
- **Add a conversion factor** to convert sodium to salt is added, which is salt = sodium x 2.5, to increase comprehension of the quantitative requirement.
- **Allow low salt calculations to be made based on meal service**. The use of notice cards on the tray set-up, notifications on the menu or any other means should then be used to advise the

passenger which food item(s) of the meal service fall within the scope of the low salt content claim.

Similar to the discussion with the Low Fat Meal, suggestions have been made to consolidate the LSML code with other special meal codes. See *Section 2.10 Consolidation of Certain Special Meals Into a Balanced Diet Meal* for more details on the consolidation of special meals with nutrient content claims.

For unlimited access to the complete report,
including revision of special meals for:



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