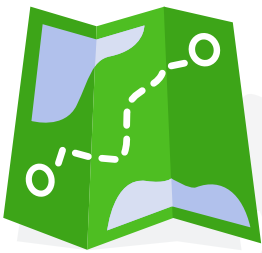




**REPLACE**  
TRANS FAT



REPLACE ACTION PACKAGE

# MODULE 1: **REVIEW**

**How-to guide for landscape assessment and roadmap  
development for elimination of trans fats**



**World Health  
Organization**

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Design and layout by Hicksdesign Ltd

Printed in Switzerland

# CONTENTS

Acknowledgements	3
REPLACE action package	4
<b>1.</b> Background	6
<b>2.</b> REPLACE country roadmap	6
<b>3.</b> Dietary sources of TFA	7
<b>4.</b> Policy environment	9
<b>5.</b> Stakeholder landscape	10
<b>6.</b> Costs and availability of oils and fats	13
<b>7.</b> Goals and objectives	15
<b>ANNEX 1.</b> Stakeholder sample interview questions	16

## WEB RESOURCES

- › REPLACE Roadmap Outline
- › Stakeholder Tracking Tool
- › Policy Tracking Worksheet
- › Oils and Fats Worksheet

## ACKNOWLEDGEMENTS

The REPLACE modules benefited from the dedication, support and contributions of a number of experts from the World Health Organization (WHO); Resolve to Save Lives (an initiative of Vital Strategies); Vital Strategies; Global Health Advocacy Incubator (a programme of the Campaign for Tobacco-Free Kids); and the United States Centers for Disease Control and Prevention. WHO thanks the contributing organizations and individuals for their technical inputs to the development of the modules of the REPLACE action package. WHO also thanks the numerous international experts who contributed their valuable time and vast knowledge to the development of these modules.



## REPLACE ACTION PACKAGE

Elimination of industrially produced *trans*-fatty acids (TFA) from the global food supply by 2023 is a priority target of the World Health Organization (WHO). The REPLACE action package provides a strategic approach to eliminating industrially produced TFA from national food supplies, with the goal of global elimination by 2023. The package comprises:

- › an overarching technical document that provides a rationale and framework for this integrated approach to TFA elimination;
- › six modules; and
- › additional web resources to facilitate implementation.

The REPLACE modules provide practical, step-by-step implementation information to support governments to eliminate industrially produced TFA from their national food supplies. To achieve successful elimination, governments should implement best-practice legal measures (outlined in modules 3 and 6). Strategic actions outlined in the other modules are designed to support this goal, but it may not be necessary to implement each module.

The modules will be most useful to national governments, including policy-makers, food control or safety authorities, and subnational government bodies that advocate for, and enforce, policies relating to nutrition or food safety. Other audiences that may find these modules and accompanying web resources useful include civil society organizations, academic and research institutions, nutrition scientists and laboratories, and food industry associations and food companies.

## MODULES OF THE REPLACE ACTION PACKAGE

SIX STRATEGIC ACTION AREAS	OBJECTIVE
<p><b>RE</b></p> <p><b>REVIEW</b> dietary sources of industrially produced TFA and the landscape for required policy change</p>	<p>Introduce the REPLACE action package, and provide guidance on initial scoping activities and drafting of a country roadmap for TFA elimination. Initial scoping activities rely on information that is already known, or can be obtained through desk review or discussions with key stakeholders, with reference to other modules as needed</p>
<p><b>P</b></p> <p><b>PROMOTE</b> the replacement of industrially produced TFA with healthier oils and fats</p>	<p>Describe oil and fatty acid profiles, and available replacement oils and fats, including feasibility considerations and possible interventions to promote healthier replacements</p>
<p><b>L</b></p> <p><b>LEGISLATE</b> or enact regulatory actions to eliminate industrially produced TFA</p>	<p>Describe policy options and the current regulatory framework to eliminate industrially produced TFA. Provide guidance on assessment steps to guide policy design, and development of regulations suitable to the country context or updating of the existing legal framework to match the approach recommended by the World Health Organization</p>
<p><b>A</b></p> <p><b>ASSESS</b> and monitor TFA content in the food supply and changes in TFA consumption in the population</p>	<p>Describe the goals and methods for TFA assessment. Provide guidance on designing and carrying out a study of TFA in food and human samples</p>
<p><b>C</b></p> <p><b>CREATE</b> awareness of the negative health impact of TFA among policy-makers, producers, suppliers and the public</p>	<p>Describe approaches to advocacy and communications campaigns to support policy action. Provide guidance on key steps to design and implement effective advocacy and communications campaigns, and evaluate progress</p>
<p><b>E</b></p> <p><b>ENFORCE</b> compliance with policies and regulations</p>	<p>Describe TFA policy enforcement approaches, offences and roles. Provide guidance on mapping existing and creating new enforcement powers and mechanisms, public communications, penalties, funding and timelines</p>

# 1. BACKGROUND

The REPLACE action package serves as a roadmap for countries to implement actions to reduce and eliminate industrially produced TFA, and outlines six strategic action areas to support the prompt, complete and sustained elimination of industrially produced TFA from the food supply. This module introduces the REPLACE action package and describes how to begin collecting information needed to implement required strategic actions. This process includes reviewing existing country-level information on industrially produced TFA, mapping the stakeholder landscape, understanding the policy environment, and collecting information on replacement oils and fats. The ultimate goal is to pass and enforce best-practice legal measures to eliminate industrially produced TFA from the national food supply.

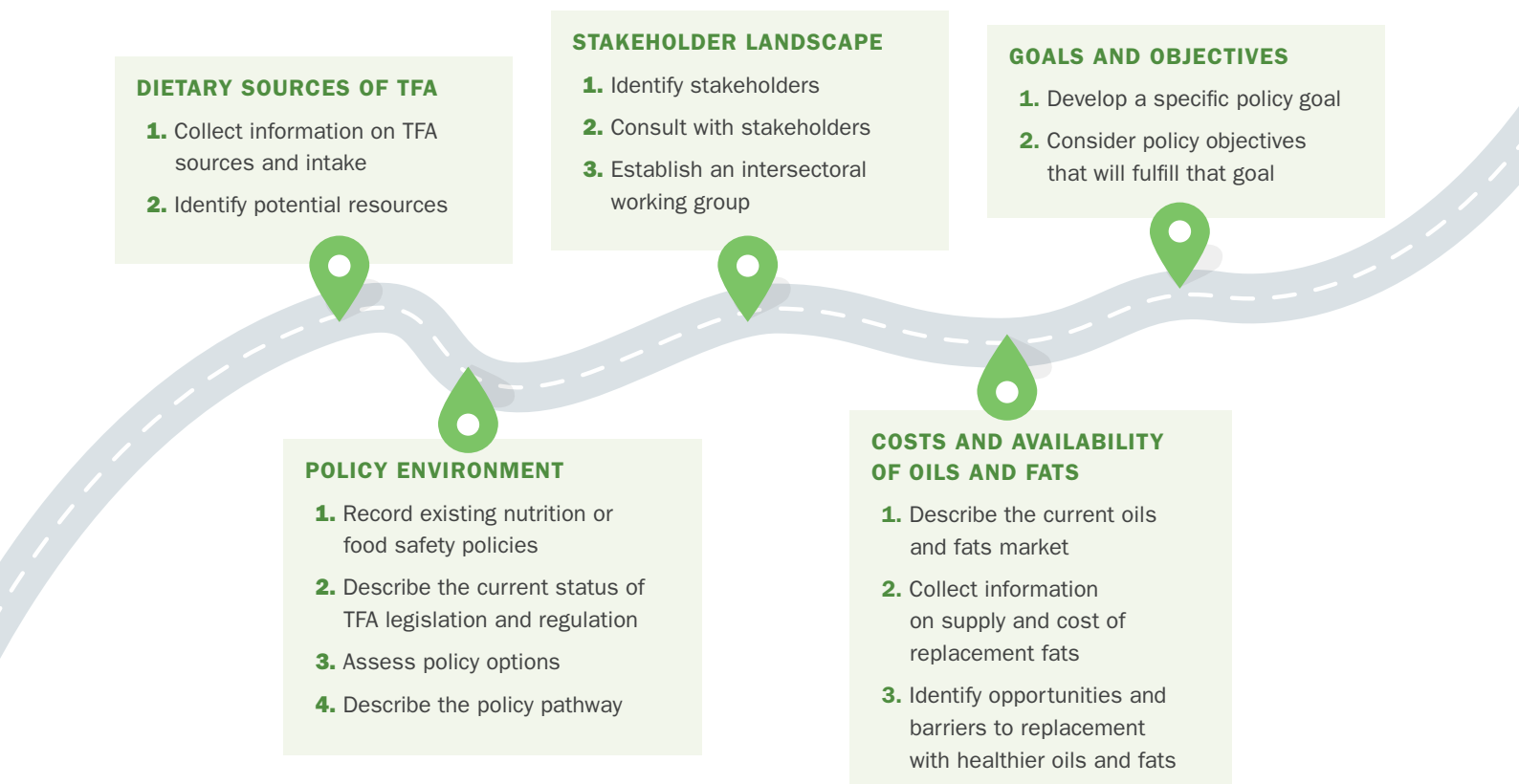
# 2. REPLACE COUNTRY ROADMAP

The REPLACE action package includes modules for each of the strategic action areas, giving details on how to fill scoping gaps and guide action.

This module guides the lead agency or organization through initial data collection to inform the development of a country-specific roadmap. The resulting roadmap will summarize the current state of knowledge in four areas and identify gaps that need to be addressed.

Each section of this module describes key steps to complete, notes possible data sources and, in some cases, includes tools for collecting information. The final section of the module, “Goals and objectives”, begins the process of identifying an overall strategic goal that is specific, measurable, achievable, relevant and time-bound.

## KEY STEPS TO INFORM A COUNTRY-SPECIFIC REPLACE ROADMAP



## 2.1 LEAD AGENCY

An effective leadership team is crucial for bringing together partners, convening an ongoing dialogue around shared goals, and ensuring that the work continues despite challenges. A ministerial appointee, legislator or other senior official from government may be the most effective person to organize the effort. If a government official is not able to lead the strategy, an officer from a public institution, such as a university or public health institute, may be able to develop the strategy, with support from a government official.

## 3. DIETARY SOURCES OF TFA

Country-level information about the sources of TFA in the diet and/or population TFA intake will inform the policy approach, the communications strategy and the need for additional assessment of TFA.

 **SEE MODULE 4 FOR MORE DETAILS**

### 3.1 STEP 1: COLLECT INFORMATION ON TFA SOURCES AND INTAKE

Some countries already have information on sources of TFA in the diet and/or on population TFA intake. In the absence of national data, consider using studies from subnational jurisdictions or neighbouring countries in the region for context.

#### **TFA content of foods**

Consider these sources of information on the TFA content of foods in the country:

- › peer-reviewed scientific literature;
- › researchers and academic organizations that have published or supported research on nutritional intake and/or cardiovascular disease;
- › food databases, such as those that collect information on packaged food ingredients or nutrient content;
- › multinational chains (for example, McDonald's, KFC), which may make information on ingredients and nutrient content public or available on request;
- › regional data on the presence of TFA in food, particularly for countries with similar dietary patterns or foods; and
- › data on sales of oils and fats containing TFA.

#### **TFA population intake**

To collect information on country-level population TFA intake, consider these sources of information:

- › government-led dietary intake surveys, such as 24-hour dietary recall linked to a nutrition database that includes TFA content of foods;
- › peer-reviewed scientific literature on TFA and saturated fatty acid intake; and
- › researchers and academic organizations that have published or supported research on nutritional intake and/or cardiovascular disease.

Having information on population TFA intake is useful to motivate action, but is not necessary if TFA levels in foods are known.

### Priority information to collect

Unless data are already available on the amount of TFA present in food, testing should be the first priority. See the module 4 for a description of the food categories that are likely to contain TFA, such as deep-fried foods and baked goods, and key food sectors that are likely to sell or serve foods high in TFA. Both food and population intake assessment can establish a baseline value, be used to monitor change over time, and raise awareness of the level of TFA in foods and the level of population intake of TFA.

Also consider the most critical information that is needed to advance the policy priority. For example, TFA intake in children may tie in to a larger discussion on childhood health and nutrition, or the TFA content of a popular food may be startlingly high. Discuss what information is most relevant to politicians, lawmakers and other influential figures, and consider how it relates to key messages as they are developed for the communications strategy.

## 3.2 STEP 2: IDENTIFY POTENTIAL RESOURCES

Once the most important information to collect has been identified, gather information on potential sources of funding for future data collection and identify laboratories that are able to analyse food samples.

### Funding

Potential sources of funding for TFA assessment include:

- › government agencies, particularly if there is an existing survey on food composition that could be modified to include TFA content, or an existing survey on population intake that could be modified to include TFA intake;
- › academic organizations, such as research centres that conduct research on nutritional intake and/or cardiovascular health globally or regionally;
- › civil society organizations, as part of their commitment to eliminate intake of TFA; and
- › global public health organizations.

### Laboratory capacity

Identify laboratory capacity to analyse TFA in food, and/or analyse blood sera or plasma.

Potential sources of information about laboratories include:

- › government agencies that conduct surveillance of the food supply or biological sampling (such as blood or urine collection) – agencies may have their own laboratory or contract out to a vendor;
- › authors of scientific papers on the TFA content of foods in the country; and
- › authors and research organizations that have published scientific research that relies on analysis of the fatty acid composition of foods or the composition of fatty acids in blood samples.

Although laboratories may analyse food composition, they may not be qualified to analyse TFA content of foods. Analysis of TFA in food requires using gas chromatography with a flame ionization detector (GC-FID), and analysis of TFA exposure requires gas chromatography with mass spectrometry (GC-MS) to assess the level of TFA in blood sera or plasma (See “Criteria for selecting a laboratory to conduct TFA analysis” in module 4).



## 4. POLICY ENVIRONMENT

Documenting the existing nutrition policy environment and understanding whether current policies address TFA is the first step towards developing potential policy options and, ultimately, choosing a policy priority.

 **SEE MODULE 3 FOR MORE DETAILS**

### 4.1 STEP 1: RECORD EXISTING NUTRITION POLICIES

Using stakeholder interviews and meetings with lawmakers and their staff, collect information on existing food and nutrition-related laws and regulations that do not include TFA but have the potential to be amended to include TFA. These may include laws and regulations that affect the list of ingredients, nutrient content labels and front-of-pack labelling systems on packaged foods. To ensure a thorough review, consider government agencies with authority over food manufacturing, restaurants, imports/exports, trade/commerce, agriculture and institutions that serve food (for example, agencies that oversee education, the armed forces and correctional facilities).

Use the Policy Tracking Worksheet to collect information on each law or regulation, noting the government agency that approved the policy, what nutrients are currently addressed, and whether and how the policy could be amended to include TFA. This may provide a feasible policy option to pursue as a first step.

### 4.2 STEP 2: DESCRIBE THE CURRENT STATUS OF TFA LEGISLATION OR REGULATION

Collecting information about existing policies that affect TFA will help inform the overall policy approach by identifying stakeholders who were champions of previous policies, and key themes that were used by proponents and opponents of other policies. Add this information to the Policy Tracking Worksheet.

**National policies** to consider include:

- › limits on TFA or partially hydrogenated oils (PHO) in certain food products (for example, restrictions on TFA in infant formula);
- › requirements for ingredient labelling on packaged foods (for example, PHO);
- › requirements for labelling the trans fat content on packaged foods, per 100 g or per serving;
- › restrictions on claims (for example, TFA threshold for using the label “0 grams trans fat” or “trans fat free”); and
- › front-of-pack labelling systems that include trans fat content in the criteria.

**Municipal or provincial policies** to consider include:

- › requirements to restrict or label TFA in restaurant food; and
- › limits on the TFA content of food served in schools, hospitals or other institutions.

Potential online data sources include the WHO Global database on the Implementation of Nutrition Action (GINA), and parliamentary or legal libraries. Other sources are decision-makers, technical leaders and legal experts. To collect information on local policies, contact local or regional government agencies with authority over food manufacturing, restaurant sanitation inspections, retail grocery locations, and institutions, such as schools and hospitals.

## 4.3 STEP 3: ASSESS POLICY OPTIONS

Consult government agencies, lawmakers and advocacy organizations for their recommendations on the most effective and feasible route for restricting or eliminating TFA in the food supply, as well as the expected time frame. Identify alternative potential policies, if the first policy approach is not successful or the time to achieve the priority approach is more than 2–3 years. Consult the Policy Tracking Worksheet for ideas about possible amendments to existing policies; amendments may be valuable for educating lawmakers about the health impact of TFA intake and building support for broader action.

Policy options may include government agency rule-making, regulation, changes in tariffs or subsidies, and legislation. For each policy, consider the strength of the evidence, the public health impact, the political feasibility, and agency capacity to support and execute the policy. Consider ranking policy options to identify the priority policy and alternative policy options. Information on articulating a specific policy objective(s) is described in section 7: “Goals and objectives”. A legal assessment of the policy options is described in module 3.

## 4.4 STEP 4: DESCRIBE THE POLICY PATHWAY

Although there may be many potential policy paths, prioritize collecting information on the most promising policies (See “Decision guide for selecting a TFA policy” in module 3). For each government body, note the key decision-makers, and map their positions in terms of power and support. To understand decision-makers’ level of power and support for potential policies, use information on past regulatory and legislative action on nutrition and health issues; voting records; and public statements on TFA, cardiovascular health and nutrition.

# 5. STAKEHOLDER LANDSCAPE

Understanding the stakeholder landscape can broaden the network of potential collaborators and resources. It also provides an opportunity to leverage expertise and skill sets to help strengthen a policy and marshal the support needed to pass a policy.

## 5.1 STEP 1: IDENTIFY STAKEHOLDERS

Creating regulations or passing legislation is more likely when a group of organizations work together towards a common goal. Collaboration is valuable because it can help to reach a wider set of decision-makers and influencers, increase resources, strengthen legitimacy of a policy with target audiences, and add necessary skill sets and expertise to select a policy approach that best meets country needs.

In developing a plan, it is critical to understand key supporters and possible concerns relating to elimination of industrially produced TFA. Only in that way can strategies be developed that take advantage of all available assets and address stakeholder concerns. Many groups may have a stake in industrially produced TFA, including:

- › government officials, including ministers of health and finance, and officials handling food regulation, trade and commerce;
- › lawmakers, especially party leaders and key committee members;
- › consumer advocates and civil society groups that focus on health and nutrition;
- › community leaders, parents and other members of the general public;

- › professional bodies, such as medical associations and nutrition societies;
- › international, regional or national nongovernmental public health agencies (for example, WHO);
- › oil, fat and food manufacturers, and the industry groups representing them;
- › restaurant owners and investors;
- › academic institutions, researchers and economists; and
- › media companies, especially those covering health issues or partially funded through food advertisements.

Use the Stakeholder Tracking Tool as a starting point to collect contacts, organizational positions, areas of expertise, relevance to data collection, interest in participating in an intersectoral working group and potential concerns.

## 5.2 STEP 2: CONSULT WITH STAKEHOLDERS

Stakeholders can be a crucial source of information, particularly in the early stages of data collection and identification of potential collaborators.

When arranging and conducting stakeholder consultations, keep in mind the following:

- › Consult a wide range of organizations, including some that are perceived to be neutral or have concerns with the proposed solution.
- › Use the consultation process to inform the Stakeholder Tracking Tool, particularly stakeholders' level of interest and influence, and identify potential resources.
- › Develop a standard questionnaire to guide stakeholder conversations (see Annex 1: "Stakeholder sample interview questions").
- › Prioritize key questions and keep consultation to less than one hour.
- › Start the consultation with the objective of the meeting, and then describe the policy proposal and justification for taking the proposed policy action.

As stakeholders are identified and information is collected (see Box 1), note key agencies and organizations, as well as organizational contacts, that could lead work on, or contribute to, achieving the objectives of the REPLACE modules.

### BOX 1. ISSUES TO CONSIDER WHEN CHOOSING COLLABORATORS

**Consider the following:**

- › Which stakeholders are supportive, and which ones are likely to oppose elimination of industrially produced TFA?
- › What influence does each stakeholder have on elimination of industrially produced TFA?
- › What are their connections with key decision-makers?
- › What are each stakeholder's values and interests, and what is their public image and visibility?
- › Who can get the most media attention on TFA issues?
- › How do they mobilize the public — and decision-makers — to speak out on TFA issues?
- › Who has available funds or resources?
- › Which stakeholders have something to gain by collaborating?
- › How will each stakeholder be affected by the campaign?
- › Do they have conflicts of interest?
- › How will important stakeholders be handled that won't serve as collaborators?

## 5.3 STEP 3: ESTABLISH AN INTERSECTORAL WORKING GROUP

The lead agency should identify potential member organizations and contacts from organizations that can contribute to successfully designing a process to eliminate TFA in the food supply, and advocate for TFA elimination. Building a diverse, multisector, collaborative group that can exchange information and move the discussion forward will be critical in developing and executing the country-specific roadmap. Consider existing relevant intersectoral groups (for example, on noncommunicable diseases and nutrition), which could establish a subgroup to address TFA elimination. The group could include representation from at least two or three organizations that can inform and contribute to each of the components of the REPLACE strategy.

The key responsibilities of the members of the intersectoral working group are to:

- › agree on a shared goal to eliminate TFA in the food supply and a time frame for achieving the goal;
- › contribute to, and review, the country-specific roadmap;
- › support the execution of the roadmap through meetings, sharing of information and data, participation in events and supporting media campaigns, and support for completing the modules, as appropriate.

The lead agency should ensure that there is appropriate staffing for the administrative and technical needs of the intersectoral working group, such as scheduling meetings, preparing background materials, and following up with members to confirm that agreed steps were taken.

Designated staff can begin preparing a briefing document ahead of the first meeting, to build technical knowledge within the group and prepare members to make a significant contribution to the discussion. Briefing materials could include the REPLACE action package, REPLACE information sheet, REPLACE roadmap outline and key evidence, such as the Trans Fat

Elimination Annotated Bibliography (available on [www.linkscommunity.org](http://www.linkscommunity.org)). The first meeting may also include discussion of country-level data on TFA sources or intake, along with the Stakeholder Tracking Tool and suggestions for additional stakeholders to contact.

## 6. COSTS AND AVAILABILITY OF OILS AND FATS

Collecting information on the national, or regional, supply of edible oils and fats will inform the policy approach and the dialogue with the food industry.

 **SEE MODULE 2 FOR MORE DETAILS**

### 6.1 STEP 1: DESCRIBE THE CURRENT OILS AND FATS MARKET

As a first step, use stakeholder consultations with local processors of oils and fats, food industry trade associations, relevant government bodies, and restaurant owners and street food vendors to better understand the supply of PHO (which contains TFA) and potential replacement oils. Consider field visits to restaurants and street vendors to see the kinds of oils used for deep-frying and baking (see Box 2). Information may also be available on company websites, in annual reports or through trade association materials, such as those from the American Oil Chemists' Society (<https://www.aocs.org>). Collect this information on common oils and fats in the Oils and Fats Worksheet.

#### BOX 2. TYPES OF VEGETABLE OILS

**Types of vegetable oils that may be on the market include:**

- › canola/rapeseed oil
- › soybean oil
- › cottonseed oil
- › palm oil
- › palm kernel oil.

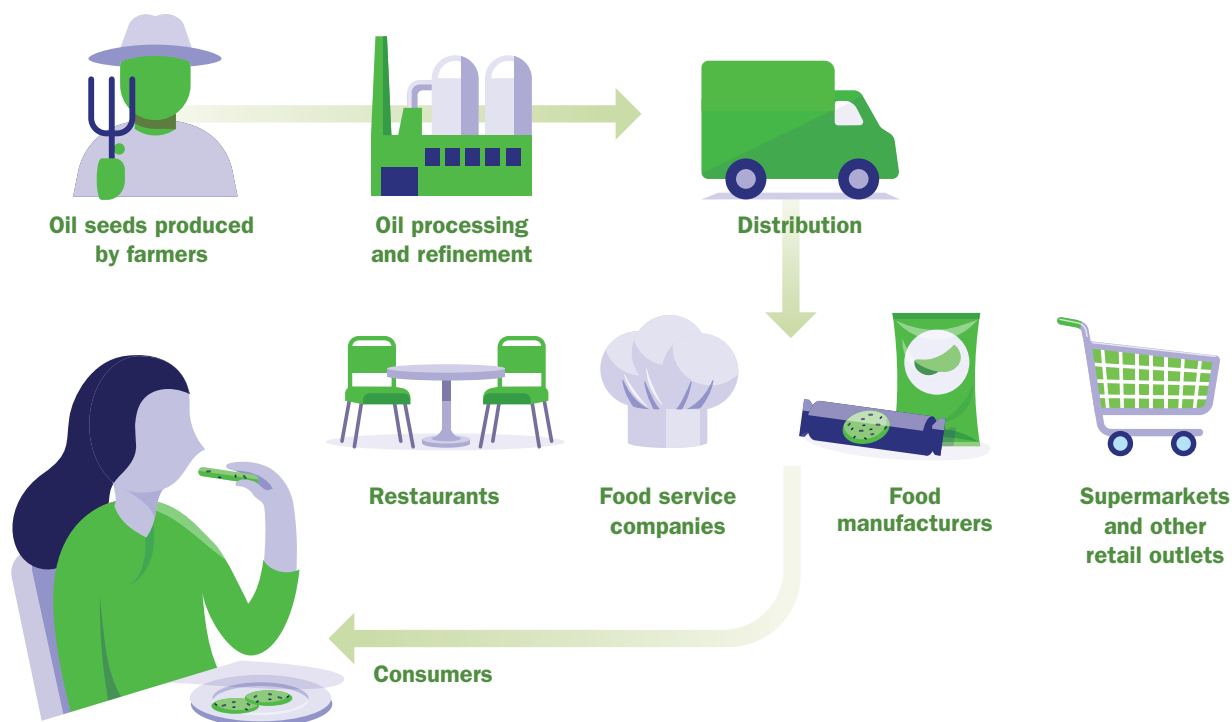
The main uses of PHO are for baking; as a butter, margarine or ghee product; for deep-frying; for icing cakes and other baked goods; as baking shortening for puff pastry; and as margarine for puff pastry.

Stakeholder conversations may also provide information on the edible oils and fats market, including:

- › market composition (for example, a few large companies, or mostly small and medium-sized companies);
- › types of oils (for example, soy, canola) that are often partially hydrogenated, and the percentage of the market for each oil type;
- › domestic companies that manufacture edible oils and fats, noting which process and/or distribute PHO;

- › companies that are large exporters or importers of cooking oils and fats; and
- › users of oils and fats containing TFA (for example, small and medium-sized enterprises, restaurants).

### EDIBLE OILS AND FATS SUPPLY CHAIN



## 6.2 STEP 2: COLLECT INFORMATION ON SUPPLY AND COST OF REPLACEMENT FATS

The relative costs of oils and fats will influence the types of replacements used. Although cost is the main driver, the oils and fats market may change in response to new legislation; for example, a restriction on oils and fats that contain TFA is likely to increase the supply of oils and fats that do not contain TFA, driving down the cost. Even in the absence of a new policy, the cost of oils and fats will depend on the volume of oils and fats purchased by a customer, so cost per unit volume will vary for the same type of product.

Use the information collected during stakeholder interviews to begin a preliminary assessment of the relative costs of PHO and potential replacement oils, even if information on absolute cost per volume is not available. The Oils and Fats Worksheet includes a column on cost; the relative cost information will help inform recommendations on replacement oils and will need to be updated over time.

## 6.3 STEP 3: IDENTIFY OPPORTUNITIES FOR, AND BARRIERS TO, REPLACEMENT WITH HEALTHIER OILS AND FATS

Identifying replacement oils includes considering performance, availability and cost. To develop specific recommendations to address barriers to replacing PHO, consider partnering with national and international food manufacturers, culinary schools or technical associations that

can provide detailed guidance on using replacement oils, including recipe modification. Another option is to convene focus groups by sector, with independent restaurants, food service companies, small and medium-sized enterprises, and street vendors to discuss the barriers to using replacement oils. Developing technical resources ahead of any policy action will provide an opportunity for communicating the harms of TFA intake and help prepare the supply chain for policy action.

The Oils and Fats Worksheet can be used as the basis for creating a technical document that lists recommended replacement products that do not contain industrially produced TFA and highlights products that have low saturated fat. In addition, interviews with oil processors, oil importers and food manufacturers can provide information on the use of PHO and the availability of replacement oils for food manufacturers, although specific cost and nutrition information may be more difficult to obtain.

## 7. GOALS AND OBJECTIVES

Develop a specific policy goal that will help to reduce TFA intake (see Box 3). The goal should be specific, measurable, achievable, relevant and time-bound – or SMART. The intersectoral working group is responsible for approving a country-specific goal for elimination of industrially produced TFA, aligning it with WHO’s call to eliminate industrially produced TFA from the global food supply by 2023.

Next, consider the policy objectives that will achieve that goal. A policy objective should contain:

- › a policy “actor” or decision-maker – that is, the person(s) or decision-making body with the power to make the desired change a reality;
- › a policy “action” or decision – that is, the specific action that the actor should take or decision they should make; and
- › a timeline for change – that is, the date by when the actor should act or decide, along with key steps to achieve the policy goal – for example:
  - Conduct a detailed legal analysis of policy to assess feasibility.
  - Collect data on sources of TFA.
  - Share data on TFA content with regulators and the public to encourage action.

### BOX 3. SAMPLE TFA POLICY GOAL AND OBJECTIVE

- › Goal: TFA is eliminated from [country’s] food supply by 2023.
- › Objective 1: [Government agency] passes and fully implements policies banning PHO or limiting TFA to 2% of total fat content in all foods by 2023.

# ANNEX 1.

## STAKEHOLDER SAMPLE INTERVIEW QUESTIONS

### ASSESSMENT OF INDUSTRIALLY PRODUCED TRANS FATS (TFA) IN THE FOOD SUPPLY

1. Based on your experience and expertise, are the current (or recent) levels of industrially produced TFA in the food supply and population intake of industrially produced TFA known? If not, are there suspected levels?
2. What are the main sources of industrially produced TFA in the diet (known or suspected), including food category, outlet, and imported or domestically produced foods?
3. What is the size of the unregulated food sector (for example, street food, informal markets)?
4. Are there subgroups in the population that are suspected to have higher intakes of industrially produced TFA (for example, specific provinces, regions, income levels, age groups)?
5. If you could design an assessment with unlimited resources, how would you approach it? What about if resources were very limited? Who would be the key partners, including laboratories, researchers and government agencies?

### POLICY ACTION

1. The strongest and simplest policy interventions are a ban on partially hydrogenated oils (PHO) or strict limits on industrially produced TFA across all foods (for example, 2 g TFA per 100 g total fat). Based on your experience and expertise, would there be a preferred approach? Why?
2. We are interested in learning about the government process for potentially regulating industrially produced TFA in the food supply. Could you give an overview of what this process would entail, including key agencies and their roles/responsibilities, and any legal requirements (for example, soliciting stakeholder feedback, publishing draft regulations for comments, notifying the World Trade Organization)?
3. Do you have any guidance on how to approach passing and enforcing a regulatory ban or limit on industrially produced TFA? For example, are there key pieces of evidence needed to accelerate the process? Are there key groups to get on board (for example, decision-makers, influencers, other avenues such as regional trade agreements or Codex Alimentarius)?
4. Once the law is enacted, how long do you anticipate it would take industry to reformulate products and cycle through current supply?

### INDUSTRY SUPPORT AND ACTION

1. In your opinion, is there likely to be support or opposition to efforts to reduce or remove TFA from the food supply? What would be the reasons for support or opposition?
2. Do you see some opportunities or barriers to ensuring the removal of industrially produced TFA from the food supply?
3. Are there many food companies involved in the oils and fats industry? Or a few large companies?
4. Is there a food industry trade association or group that works in, or coordinates activities of, the oils and fats industry in the country or imports into the country?
5. Can you identify the major importers and suppliers of PHO? Are there major users and sources of PHO (for example, particular fast food chains)? Or retailers?







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