

Case study: Brief**IMPLEMENTING AND ENFORCING TRANS FAT (TFA) ELIMINATION POLICY IN THAILAND****TYPE OF POLICY:** PHO Ban**DATE PASSED:** July 2018**IN EFFECT:** January 2019**TOTAL COVERAGE:** 69 million people**ENFORCEMENT APPROACH:**

Supply chain monitoring; Post-market enforcement based on health risk

LIVES SAVED PER YEAR: 2,517¹**✓ Key takeaways**

- Oils and fats can be reformulated or replaced with affordable alternatives to facilitate implementation.
- Partnership between government, academia, civil society and industry supports successful implementation.
- Accurate data on trans fat in the food supply allows for targeted enforcement.

Context and background

On July 13, 2018, the Ministry of Public Health banned the production, importation and sale of partially hydrogenated oils (PHO) in Thailand.² The ban was adopted as a preventative measure; traditional Thai foods and cooking oils (palm, coconut) do not usually contain TFA, but imported foods high in industrial trans fat (iTFA) were growing in popularity. A PHO ban was determined to be the most cost-effective policy for both the government and industry to protect the population.

Implementation

The Thai FDA is responsible for implementing and enforcing the PHO ban. Using a supply chain approach, the FDA worked with the three largest domestic PHO producers to ensure that they made PHO-free oils and fats available to domestic food producers. They also issued compliance guidelines³ for both food manufacturers and importers and arranged meetings to clarify those guidelines. Fat and oil producers already had the necessary capabilities to reformulate using oil blending

techniques and locally available, affordable tropical oils with naturally high levels of saturation.

Thai authorities also used social media and infographics to increase consumer understanding of the difference between iTFA (PHO) and natural TFA.⁴

Enforcement

The Thai FDA has a number of options for enforcement, including sampling and testing; inspection of production and importation sites, examination of labels and review of importation documents.

Due to the high costs of sampling, only products posing a high health risk — identified during a baseline assessment — are tested.

Violators may be fined or imprisoned for six months to two years, though no fines or prison sentences have been issued to date. Imported products in violation of the PHO ban can be blacklisted and prevented from entering Thailand. Business licenses may be suspended and product

1 Wang, Q., Afshin, A., Yakoob, M. Y., Singh, G. M., Rehm, C. D., Khatibzadeh, S., ... & Mozaffarian, D. (2016). Impact of nonoptimal intakes of saturated, polyunsaturated, and trans fat on global burdens of coronary heart disease. *Journal of the American Heart Association*, 5(1), e002891

2 For information on the development of the PHO ban, refer to Chavasit & Garg (2018) and the case study on Thailand in NCD Alliance (2019).

3 Announcement of the Thai FDA re: Explanation of the Notification of the Ministry of Public Health No. 388 B.E. 2561, available in Thai at http://food.fda.moph.go.th/law/data/announ_fda/388_trans_fat.pdf; and Handbook on Compliance with Notification No. 388 B.E. 2561, available in Thai at https://www.fda.moph.go.th/sites/food/FileNews/manual_388.pdf.

4 Available in Thai only: Facebook posting by Thai FDA, <https://www.facebook.com/FDAThai/posts/2440529506014197/>, and website by the Thai FDA containing health information on products, https://oryor.com/%E0%B8%AD%E0%B8%A2/detail/media_printing/16307fbclid=IwAR3-gIL7rWM0-KYvZliPRv0u286s9KYh1R98la1XwIRQ5BpjdRDQeu4trT4



Partnership with civil society

The Foundation for Consumers in Thailand, a powerful voice for consumers that plays a strong role in influencing the food industry to comply with regulations, played a key role in passing and monitoring the PHO regulation. When the Foundation tested donuts (a known source of iTFA) in 2018 and shared its findings — up to 4.59 grams of TFA per donut — producers and supermarkets responded immediately, committing to reformulating the offending products.

The PHO ban took effect in January 2019 — just six months after the regulation was announced. This short transition period was proposed based on the urgency of eliminating TFA engendered by the Foundation's work. Public hearings and focus groups of the Thai FDA and industry, hosted by academics, showed the readiness of industry to reformulate and the feasibility of a six-month transition.¹

1 Chavasit V., Photi J., Dunkum P., et al. (2020). Evolution of Trans-fatty acid consumption in Thailand and strategies for its reduction. *J Clin Hypertens* 22(8):1347–54. DOI: 0.1111/jch.13921.

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Outcomes

The Thai FDA has conducted one monitoring campaign for iTFA since the PHO ban took effect. Working with the Foundation for Consumers and the Nutrition Institute at Mahidol University, the FDA measured iTFA in a variety of baked goods. Of the 46 domestic products sampled, all had complied with the PHO ban and showed a substantial reduction from baseline. The Thai FDA continues to track and analyze TFA content in packaged and non-packaged food, while the Foundation for Consumers has planned a TFA monitoring campaign for 2022.

✔ Why eliminate trans fat?

- ✔ Industrially produced *trans*-fatty acids (iTFA) man-made compounds still used in some countries as a substitute for butter or lard in fried food, deep-fried food, baked goods and spreads estimated to cause 500,000 deaths per year.⁵
- ✔ iTFA can be eliminated and replaced with healthier alternatives, and many governments have already successfully protected their people.
- ✔ Countries that do not ban iTFA are at risk of having products containing iTFA dumped on their market.
- ✔ Since all people in all countries must be protected from the risks of iTFA consumption, the World Health Organization has called for the global elimination of iTFA with the REPLACE initiative.



Read the full report: [Implementing and Enforcing Trans Fat Elimination Policies](#), with case studies including Thailand, Chile, Singapore, Denmark, Saudi Arabia and the European Union.

5 Wang, Q., Afshin, A., Yakoob, M. Y., Singh, G. M., Rehm, C. D., Khatibzadeh, S., ... & Mozaffarian, D. (2016). Impact of nonoptimal intakes of saturated, polyunsaturated, and trans fat on global burdens of coronary heart disease. *Journal of the American Heart Association*, 5(1), e002891.