

Case study: Brief

IMPLEMENTING AND ENFORCING TRANS FAT (TFA) ELIMINATION POLICY IN SAUDI ARABIA

TYPE OF POLICY: iTFA limit later replaced by PHO ban and total TFA content limit

DATE PASSED: 2017

IN EFFECT: 2020

TOTAL COVERAGE: 35.3 million people

ENFORCEMENT APPROACH: Regular post-marketing surveillance. Only PHO ban is enforced as of 2020.

LIVES SAVED PER YEAR: 4¹

Context and background

Saudi Arabia's trans fat policy is part of a "Healthy Food Strategy" that aims to reduce sugar, salt and fat in the diet and is supported by regular nutrition surveillance. In 2015, the Saudi Food & Drug Authority (SFDA) set a target of reducing population TFA intake to <1% of energy intake from all foods. Based on lessons learned from other countries, Saudi Arabia began its step-wise approach to TFA elimination with an limit of 2% industrial trans fat (iTFA) in fats and oils and 5% in all other foods, taking effect in 2017. In 2020, a partially-hydrogenated oil (PHO) ban was enacted to further align with WHO recommendations. The regulation was updated in 2021 to clarify that the PHO ban replaced the initial iTFA limits; additional limits were also set for total TFA content (natural and industrially produced) in fully hydrogenated oils, refined oils, ruminant products and infant formula.

Implementation

Lacking immediate capacity to adopt a best-practice policy but committed to reducing the national noncommunicable disease (NCD) burden through food policy, Saudi Arabia took a step-wise approach to TFA elimination. Industry was granted a two-year period for reformulation ahead of the 2017 iTFA limits; the SFDA published guidance on how to replace iTFA with healthier fats and worked

Key takeaways

- Seeking advice from countries with experience can help overcome implementation challenges.
- Authorities should work with the food industry as they are the main target for regulation; addressing barriers to compliance early enables success.
- Regular post-marketing surveillance and effective sanctions help ensure compliance.

with industry to build capacity. Another two-year transition period (2018-2020) was granted for the subsequent PHO ban; while many manufacturers had already stopped using or were in the process of phasing out PHO, some smaller companies needed additional training to achieve compliance. A public awareness campaign educated consumers about the ban.

Enforcement

Saudi Arabia's biggest enforcement challenge in 2017 was assessing TFA content in collected food samples; WHO supported with training on laboratory analysis and several organizations and academics advised on methodology. A 2018 monitoring campaign found that 94.7%

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



of sampled products complied with the iTFA limits. For non-compliant products, the SFDA ordered a stop in production until manufacturers could provide laboratory analysis showing compliance.

As of 2020, monitoring of the PHO ban is included in routine checks conducted by SFDA for all food legislation. If these checks reveal potential problems, targeted inspection campaigns will take place, with review of manufacturing techniques and food labels to start and laboratory analysis conducted in case of inconsistencies. The SFDA has set up a reporting mechanism for consumers to alert them to potential violations by phone or via social media. The results of the SFDA's monitoring and enforcement activities are reported to policymakers and published on their website.

Support for small businesses

The SFDA conducted capacity-building workshops and trainings for industry on how to replace iTFA with healthier fats, including hosting a workshop in which smaller companies could learn from the experience of members of the International Food & Beverage Alliance (IFBA), which had already removed iTFA from their products. Additional workshops trained smaller companies on replacing PHO.

Outcomes

In a 2020 inspection campaign, 7% of manufacturers and 20% of products were non-compliant; however, most of the non-compliant products did not contain PHO but rather violated TFA labeling rules. The SFDA found that most iTFA was substituted with palm oil, high in saturated fats; the SFDA plans to work on healthier replacement options going forward. The SFDA also plans to partner with the Ministry of Health to conduct an evaluation of the policy's impact on public health using the next National Health Survey, planned for 2026-2028.

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.²
- ✓ 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

2 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.