Trans Fat Elimination

Maximizing lives saved through policy implementation and enforcement

As of July 2026, 67 countries have adopted best-practice policies to eliminate toxic trans fat (TFA) from their food supplies, but implementation and enforcement of those policies is delayed or incomplete in many countries.

Effective TFA policy implementation and enforcement maximizes health gains by ensuring foods comply with adopted regulations, removing TFA from the food supply. To achieve this, countries with best-practice policies in place must be able to identify products likely to contain iTFA and have mechanisms in place to monitor and penalize noncompliance.

Monitoring systems

Successful monitoring systems have a defined approach for routine surveillance, appropriate resources to conduct inspections, and a process for evaluating progress integrated into existing food regulation systems.

Routine surveillance

Monitoring for compliance with TFA regulations ideally includes pre- and post-market surveillance.

- **Pre-market surveillance** can be conducted at border crossings or ports where food is imported, or oil refining or manufacturing facilities – before products reach the market.
- **Post-market surveillance** focuses on sampling products available in stores, supermarkets, food vendors once products are available to consumers.

Inspections and evaluations

Inspections can be conducted through lab methods, label analysis, facility investigations and/or review of documents and records. Approaches to inspections should align with primary sources of TFA and partially hydrogenated oil (PHO) in a country's food supply. If there is no local production of partially hydrogenated oils, customs inspections may be most useful; if there are, local factory inspections may be the most efficient option.

Monitoring can target high-risk food categories (shortenings, processed baked goods, margarines, puffed pastries, vanaspati) and/or manufacturers (facilities with hydrogenation capacity, fats and oils producers). Detailed guidance on approaches and assessments for inspection can be found in the REPLACE E Module and WHO Validation Technical Criteria.

Supporting activities to strengthen monitoring mechanisms:

- **Assess the system for regulation of food.** Identify points to integrate TFA monitoring into existing food safety/ food control systems, map gaps and limitations, and identify areas for system strengthening.
- **Understand the major sources of TFA in the food supply.** Depending on whether PHO is locally produced or imported, there are different implications for optimal structuring of the monitoring system. Where there is limited understanding of primary sources, a PHO market mapping can be a useful tool to map local markets and sources of TFA and help target surveillance activities.
- **Conduct a lab capacity assessment.** The ability to assess the amount of TFA in products is a critical, though specialized service. Assess existing government and private labs that provide services for food safety monitoring to identify which labs can be used for TFA monitoring and surveillance activities and what resources and training are needed to support this shift.
- **Capacity Building.** Based on identified gaps in lab capacity, facilities, and food control systems, support improvements, including trainings on TFA analysis and monitoring approaches, to improve infrastructure.
- **Design an appropriate inspection strategy.** The inspection strategy needs to identify agencies and stakeholders and their responsibilities, define coordination mechanisms and establish the process and schedule for inspections. Inspections should be prioritized for high-risk foods and facilities that manufacture or process partially hydrogenated oils (PHOs).

Enforcement mechanisms

Successful enforcement of violations requires countries to clearly define penalties for non-compliance. Additionally, there must be resources and capacity to follow through on violations identified through surveillance activities, and a system for tracking inspections and offences.

Enforcement of TFA regulations is best supported by:

- **Inspection reports** that are compiled in a database
- **Penalties** that are authorized by law and issued to non-compliers, e.g. fines, removal of products from the market, etc.

Supporting activities to help establish enforcement mechanisms:

- **Train food safety officers** and other authorities responsible for issuing penalties.
- **Organize coordinating bodies** to ensure that all relevant government authorities — such as regulatory bodies, standards authorities, and relevant ministries — are involved and communicating about monitoring and enforcement activities.
- **Establish a complaints line.** Provide a means for consumers, consumer organizations, whistleblowers or others to bring forth concerns.

Other complementary actions

Communicating and working with food manufacturers and stakeholders is also important to facilitate smooth implementation.

Complementary activities to help facilitate compliance:

- **Communicate regulations and enforcement timeline to relevant industry and stakeholders.** Inform manufacturers of the government's commitment to monitor for TFA and issue penalties for noncompliance to support industry compliance and provide channels for feedback and questions to help address industry concerns. Once producers understand that enforcement is certain, they identify ways to eliminate TFA. A small delay in enforcement – never more than one year – can improve compliance and reduce disruption.
- **Work with small and medium enterprises (SME) to find replacements for PHO and improve oil refining.** Global experience shows that food manufacturers can remove partially hydrogenated oils from their products without altering taste or cost. Small and medium enterprises may need more support in switching away from use of PHO. Where feasible, provide technical support to SMEs as they switch away from PHO to facilitate the transition. Technical assistance and guidance to oil processors will also contribute to reducing excess TFA created during oil refining.

Countries that can demonstrate effective monitoring and enforcement of TFA regulations can apply for the WHO TFA Validation Programme.

To achieve WHO Validation, a country must provide evidence that they have:

1. adopted a **best-practice trans fat elimination policy**
2. an **adequate monitoring** program in place; and
3. **mechanisms to enforce** violations

Countries that have received WHO's validation have successfully eliminated trans fat from their food supply and protected their people from a risk factor for non-communicable diseases.