

PRE-READ BRIEF

**Enforcing Trans Fat Policies**

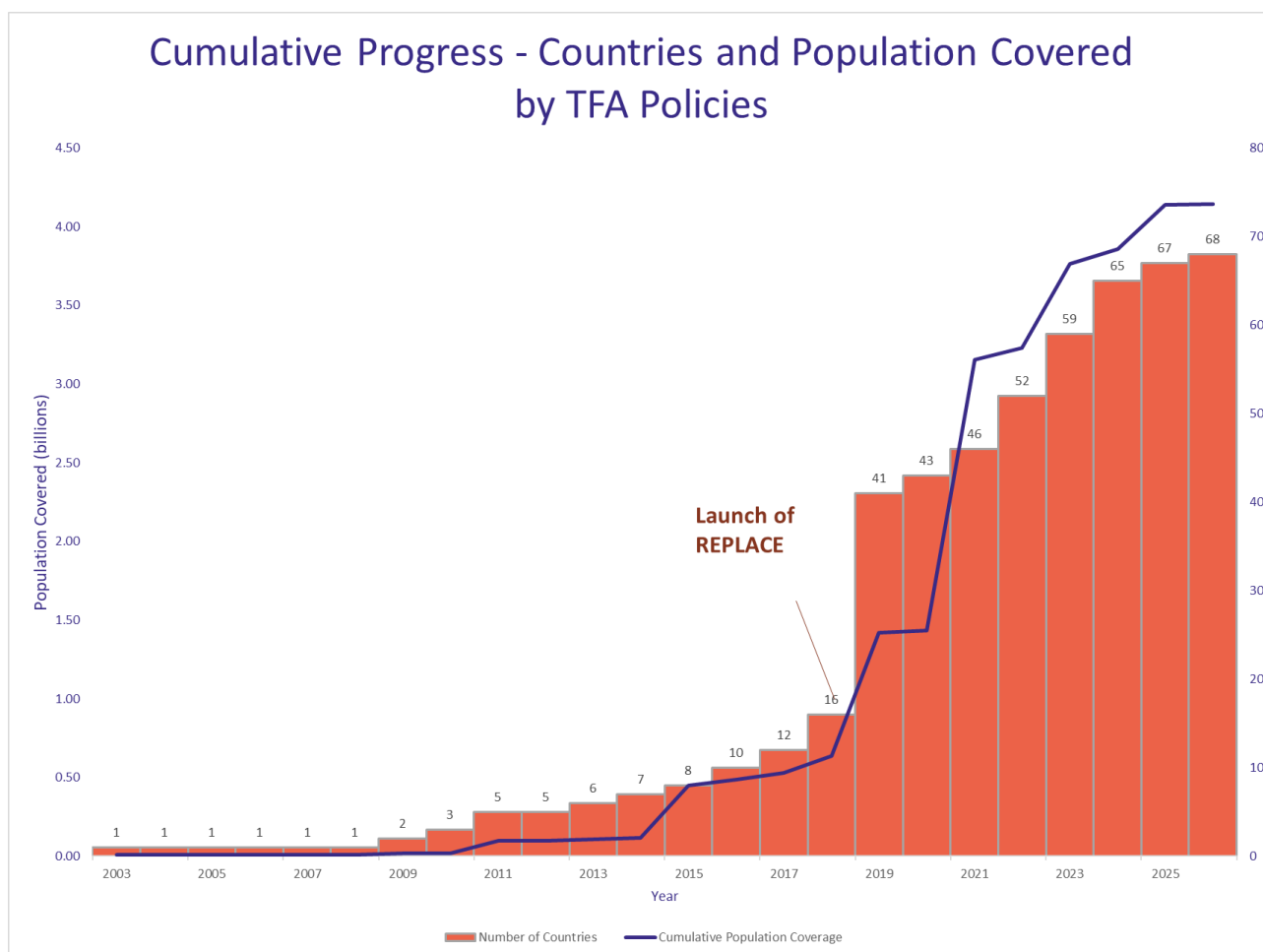
Cardiovascular Health Partner Convening 2026

This brief is a pre-read for the **trans fat elimination: enforcing trans fat policies** breakout group during the Write the Headline: Co-Creating the Future of CVH session on May 7<sup>th</sup>. It outlines how global efforts have driven significant progress in trans fat policy adoption, why enforcement remains the critical gap to achieving full health impact, and what approaches can strengthen implementation and compliance in the next phase of CVH partnership work.

**Setting the Scene: Trans fat elimination**

In 2017, as part of the cardiovascular health initiative funded by Bloomberg Philanthropies, Resolve to Save Lives, the World Health Organization, Global Health Advocacy Incubator, Pan American Health Organization and the NCD Alliance established a partnership to eliminate trans fat from the global food supply. At the time, an estimated 540,000 deaths per year were attributable to trans fat consumption. The launch of the REPLACE technical package in 2018 catalyzed global action on trans-fat elimination through the combination of global normative guidance and concerted actions by the partners at the global and national levels. Since then, the partnership has focused on research, evidence-based advocacy, capacity building, resource mobilization, and, increasingly, implementation support.

As a result, in 2026 the number of countries with **best practice policies has grown from 14 to 54**, and **more than 4 billion people across 68 countries are now protected** by trans fat regulations. These countries account for approximately 70% of deaths attributable to trans fat consumption.



Key factors for policy success have been: the well-coordinated coalition of partners working in sync toward a shared goal at both global and national levels; research and evidence-backed advocacy to generate political will; clear normative guidance and the REPLACE technical package; and strong WHO leadership.

## Challenges, Gaps and Opportunities

Despite the significant progress in the number of countries with policies adopted, and overall population protected from trans fat, challenges remain on the road to removing industrially produced trans fat from the global food supply. Very few of the lower- and upper-middle income countries who adopted policies over the past 8 years have been able to fully maximize the health and economic savings potential of trans fat elimination policies. While campaign-based/spot surveillance have been used in some countries, and limited enforcement efforts have been reported, many recent adopters are facing barriers to comprehensive enforcement. These barriers include:

- **Limited political and resource prioritization for enforcement**
  - Experience shows that following up on policy action with implementation and enforcement is not guaranteed. In resource constrained environments, where there are multiple competing priorities, there has not been a strong emphasis on dedicating resources to enforcement.

- **Limited regulatory capacity and bandwidth to integrate trans fat into existing systems**
  - Engagement with governments and other partners on enforcement capacity in several countries has highlighted that the ability to integrate TFA policy enforcement into the existing food safety structure is a challenge; broadly, there does not seem to be a defined process to move from 'policy adopted' to 'policy enforced' in many countries.
- **Poor lab infrastructure and limited equipment, materials, and trained staff to conduct routine, quality analysis**
  - The gold standard trans fat analysis using GC-FID methods is perceived to be difficult and expensive to run and the maintenance of equipment is cumbersome and requires specialized expertise.
  - In most LMICs that RTSL and partners have supported, there are very few lab technicians with experience conducting TFA analysis (or fatty acid analysis more generally). Even where skills exist the low/limited demand for TFA analysis means skills are not well maintained.
- **Weak supply chains and procurement processes for lab equipment and consumables**
  - Equipment and materials are not always widely available, and even where they are, procurement and availability of critical materials (reagents, reference materials, internal standards, columns, etc.) are a major bottleneck. Procurement processes are slow, and the supply chain for many essential products is weak.
- **Gaps in data collection and reporting between surveillance and enforcement systems**
  - When surveillance is occurring, systems are not always in place to link non-compliance to enforcement actions; or to connect results of enforcement actions back to surveillance sampling. Globally and nationally, data is limited on trans fat in foods and partially hydrogenated oil (PHO) suppliers – making enforcement planning difficult.

Several of these enforcement barriers – particularly limited data and limited political prioritization – also impede policy adoption in small countries and LMICs. Industry interference continues to be a challenge, particularly in the many LMICs that have not yet adopted best practice policies, and we have seen industry continually try to delay enforcement actions to avoid complying with regulations.

Other challenges to trans fat elimination include the availability of healthier alternatives to PHO and the ability of small and medium enterprises to transition to new product formulations. In addition, there are outstanding technical questions that are perceived as barriers to enforcement or policy adoption, including:

- The lack of established method to determine ruminant TFA from industrially produced TFA
- Availability and use of healthier alternatives in LMICs
- Availability of alternate methods to conduct surveillance and analysis (Iodine Value, FTIR/spectroscopic methods)
- Whether a PHO Ban alone is sufficient to eliminate trans fat

## Looking ahead: Questions for discussion

Given the global progress in eliminating trans fat, and the fact that remaining burden of consumption and death lies across many small countries, RTSL and WHO have been increasingly focused on supporting large countries with policy implementation. The target of 90% of Global TFA burden is in reach but will require new approaches. Potential areas of new or expanding work to achieve this goal may include:

1. **Enforcement support:** Countries often require support in implementation and enforcement that can support integration of TFA policy into the local food safety structure.
  - *Questions for consideration: What does meaningful implementation support look like at scale?*
2. **Strengthening laboratory capacity:** This is one of the major challenges for enforcement and needs simple, feasible, and high-quality technical support.
  - *Questions for consideration: Can simpler, lower-cost methods (FTIR, handheld devices) realistically supplement GC-FID in LMICs? What would it take to build sustainable lab networks?*
3. **Data and surveillance:** This remains the key to sustained enforcement action.
  - *Questions for consideration: How do we close the loop between surveillance findings and enforcement action? What data gaps most limit our ability to target efforts?*
4. **Resolve technical issues:** Finalize guidance on analysis, enforcement, and outstanding technical questions.
5. **Industry Engagement:** Industry is a key component of the global food supply chain and successful implementation of TFA regulations requires effective and meaningful engagement with industry.
6. **Innovation and Technology:** Technology is a key element of TFA elimination efforts and simplifying resource intensive aspects on data and surveillance and testing methods could lead to significant acceleration of implementation and enforcement.
  - *Questions for consideration: Are there technologies (AI screening, alternative methods) that could be utilized to streamline enforcement, monitoring, and surveillance actions?*