

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
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ORGANIZATION



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Agenda Item 4

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Twenty-third Session
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PROPOSED DRAFT GUIDELINES FOR VITAMIN AND MINERAL SUPPLEMENTS *- Comments at Step 4 of the Procedure -*

Comments from:

- CHINA
- CUBA (E, F, S)
- NORWAY

CHINA

1. SCOPE

We suggest that the square brackets in 1.1 [if and where necessary] be removed.

2. DEFINITIONS

We suggest that the square brackets in 2.1 [They serve to supplement the daily diet with these nutrients in cases when the intake from food is insufficient or where the consumers consider their diet requires supplementation.] be removed.

3. COMPOSITION

We suggest that the square brackets in 3.1.2 [FAO/WHO or Pharmacopoeias and national legislation] be removed.

We suggest that the square brackets in 3.1.3 [limited] be removed.

We suggest that 3.2.2 [The maximum level of each nutrient contained in a vitamin and mineral supplement should not exceed [the Upper Level] of the DRIs.] be deleted.

We propose that the square brackets 3.2.3 [Supplements may contain vitamins and minerals up to a level that is considered safe on the basis of science-based risk assessment considerations, as determined by appropriate risk analysis methodology, taking into account all sources of nutrients in the diet.] be removed.

We propose that the guideline should be applicable to herbs and other botanicals.

CUBA

We agree that the elaboration of the guidelines needs to be continued. As reported by some countries, these products are widely available on the market, and in order to avoid misleading consumers, it is necessary to regulate them and to develop general guidelines.

In our opinion, in "**SCOPE**", the square brackets around "if and where necessary" should be deleted.

In "**DEFINITIONS**", the square brackets in or around 2.1 and 2.2 should be deleted.

In "**COMPOSITION**", the square brackets in or around 3.1.2, 3.1.3 and 3.1.4 should be deleted.

CONTENTS OF VITAMINS AND MINERALS

We continue to support the opinion already expressed that the minimum level of each nutrient should be 30%. The estimated safe daily intake should not be taken as a basis.

Paragraph 3.2.2. should remain in square brackets until further information is available.

Paragraph 3.2.3. should remain in square brackets.

LABELLING

5.2 - The name of the product shall be "vitamin and mineral supplement", with an indication of the nutrients contained therein.

5.3 - The square brackets should be deleted.

5.8 - The square brackets should be deleted.

Nous sommes d'accord pour continuer l'élaboration des directives, étant donné que ces produits, comme plusieurs pays l'ont expliqué, sont largement diffusés sur le marché, et qu'il est nécessaire, pour éviter d'induire en erreur le consommateur, de réglementer ces produits et d'élaborer des directives générales.

Nous considérons que dans le **CHAMP D'APPLICATION**, il convient de supprimer les crochets enserrant "si et où nécessaire".

Dans **DEFINITIONS**, éliminer les crochets aux sections 2.1 et 2.2.

Dans **COMPOSITION**, éliminer les crochets aux sections 3.1.2, 3.1.3 et 3.1.4.

TENEUR EN VITAMINES ET SELS MINÉRAUX

Nous restons d'avis que la teneur minimale en éléments doit être de 30 %. Il ne faudra pas se baser sur l'apport quotidien jugé sûr.

La section 3.2.2 doit rester entre crochets jusqu'à plus amples informations.

Laisser la section 3.2.3. entre crochets.

ETIQUETAGE

5.2 : La désignation commerciale doit être "complément en vitamines et sels minéraux" avec indication des éléments nutritifs contenus.

5.3 : supprimer les crochets.

5.8 : supprimer les crochets.

Estamos de acuerdo con que se continúe la elaboración de las directrices, ya que como se plantea por varios países estos productos están ampliamente difundidos en el mercado y para evitar inducir a errores al consumidor es necesario regularlos y elaborar directrices generales.

Consideramos que se debe eliminar los corchetes del **ÁMBITO DE APLICACIÓN** referente a la frase (siempre y cuando sea necesario).

Eliminar corchetes en **DEFINICIONES**. 2.1 y 2.2

Eliminar corchetes de **COMPOSICIÓN**. 3.1.2, 3.1.3 y 3.1.4.

CONTENIDO DE VITAMINAS Y MINERALES.

- Mantenemos el criterio emitido anteriormente de que el límite mínimo de nutrientes sea de 30%. No utilizar la ingesta diaria estimada inocua.
- Mantener entre corchetes el 3.2.2. hasta que se aporten más elementos.
- Mantener el 3.2.3. entre corchetes

ETIQUETADO.

Debe quedar: "Complemento de vitaminas y minerales " con una indicación de los nutrientes que contiene. 5.2

Eliminar corchetes. 5.3

Eliminar corchetes. 5.8

NORWAY

PREAMBLE

Norway agrees with the proposed preamble.

1. SCOPE

1.1 The square brackets should be deleted to be in accordance with the wording in the preamble.

1.3 The square brackets should be deleted and the statement be included in the guidelines.

2. DEFINITIONS

2.1 The square brackets in the second sentence should be deleted. The wording should be: "*Vitamin and mineral supplements are concentrated sources of those nutrients alone or in combinations, marketed in capsules, tablets, powders, solutions etc. not in conventional food form and do not provide a significant amount of energy*".

The last sentence in this paragraph is superfluous as it is already included in the preamble. Therefore, it should be removed.

2.2 Norway proposes to delete this paragraph.

3. COMPOSITION

3.1.2 The square brackets should be deleted. The wording should be: "*The selection of admissible ingredient sources of nutrient or compounds should be based on criteria such as safety and bioavailability of the FAO/WHO or Pharmacopoeias and national legislation.*"

3.1.3 The square brackets should be deleted: The wording should be: "*The use of individual vitamins and minerals in supplements can be limited for reasons of health protection and consumer safety, taking into account regional or national peculiarities concerning the supply situation of the population.*"

3.1.4. Norway proposes to keep the first section and delete the section in square brackets.

3. 2 Contents of vitamins and minerals

3.2.1 Requirements for the minimum level must be established to prevent practices, which may mislead or deceive the consumer. Norway proposes to delete the square brackets. The square brackets around [15%] should be retained. Norway considers 15 % of the recommended daily intake to be too low, and suggests that

[15%] should be replaced by [25%]. The wording should be: “*The minimum level of each nutrient contained in a vitamin and mineral supplement should be [25%] of the recommended daily intake or the estimated safe and adequate daily intake*”.

3.2.2 There is for the time being no internationally agreed upon method for establishment of upper safe levels for vitamins and minerals which includes all risk related to these compounds e.g. interactions, catalysis of risk related reactions (e.g free radicals) or formation of undesirable metabolites. Until such a method has been established, Norway purposes to delete the square brackets in this section. The square brackets around [100%] should be retained. The wording should be: “*The maximum level of each nutrient contained in a vitamin and mineral supplement should not exceed [100%] of the recommended daily intake or the estimated safe and adequate intake per daily dose*”.

As a consequence, the following paragraph 3.2.3 should be deleted.

5. LABELLING

5.2. Norway proposes that the name of the product should be “*vitamin and mineral supplements*” The wording should be: “*The name of the product shall be “vitamin and mineral supplement” with an indication of the nutrients contained therein*”. The rest of this paragraph should be deleted.

5. 7. The wording should be: “*The label must contain a warning statement such as “store out of reach of children” and “Should only be used by pregnant women after consulting a doctor or a health visitor*”. The rest of the text should be deleted.

The paragraphs 5.8 and 5.9 should be deleted.