

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - Fax: (+39) 06 5705 4593 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 5

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CODEX ALIMENTARIUS COMMISSION

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Geneva, Switzerland, 14-18 July 2014

COMMENTS ON PROPOSED DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION AT STEP 5

(Comments submitted by 6 June 2014)

Committee on Fish and Fishery Products Comité sur les Poissons Et Les Produits De La Pêche Comité sobre Pescado Y Productos Pesqueros

Proposed Draft Code of Practice for Processing of Fish Sauce (para. 93, Appendix IV)

Comments of Costa Rica

Costa Rica está de acuerdo con la adopción de la norma en el trámite 5.

Asimismo, quisiera realizar las siguientes recomendaciones:

En el Punto 3 Fermentación. Apéndice IV; Segundo párrafo, se habla del tiempo de fermentación entre 6 y 18 meses, sin embargo, Costa Rica considera que se debe indicar cuáles son las condiciones de temperatura, humedad, pH y control de microorganismos, para realizar una fermentación controlada.

El Punto 16 Tratamiento térmico. Apéndice IV; Costa Rica sugiere que se especifiquen las condiciones de tiempo y temperatura para un tratamiento, necesarios para inhibir microorganismos patógenos.

Committee on Nutrition and Food for Special Dietary Uses Comité sur la nutrition et les aliments diététiques ou de régime Comité sobre Nutrición y Alimentos para Regímenes Especiales

Proposed Draft Revision of the Codex General Principles for the Addition of Essential Nutrients to Foods (CAC/GL 9-1987) (para. 79, Appendix II)

Comments of Brazil, Canada, Chile, Costa Rica, Egypt, Malaysia, Nicaragua, Peru, Uruguay

BRAZIL

Brazil thanks for the opportunity to present the following comments about the matters for adoption by the 37th session of the Commission.

Brazil agrees to forward the Proposed Draft Revised Principles to Step 5 for adoption by the 37th Session of the Codex Alimentarius Commission.

CANDA

Canada is pleased with the significant progress made in revising the principles and supports their adoption as a draft by the Commission.

Proposed Revised Text in CX/NFSDU 13/35/5, Appendix II	Comments from Canada
<p>Footnote 2:</p> <p>² Different types of addition of essential nutrients for the purposes described in these Principles may be described by the term 'fortification' in certain Member Countries.</p>	<p>Canada suggests including this footnote in the introduction rather than in the definition section as the footnote should be placed next to the word or clause to which it refers. We would suggest adding it right after the mention of the term "Addition of Essential Nutrients to Foods" as follows:</p> <p>The Principles for the Addition of Essential Nutrients to Foods² (the Principles) are intended ...</p>
<p>[2.5 Mandatory nutrient addition is when National Authorities require food manufacturers to add specified essential nutrients to particular foods or food categories.]</p>	<p>Canada supports retaining this definition with minor edits.</p> <p>2.5 Mandatory nutrient addition is when competent national and/or regional authorities require food manufacturers to add specified essential nutrients to particular foods or food categories.</p>
<p>[2.6 Voluntary nutrient addition is when National Authorities permit food manufacturers to add specified essential nutrients to particular foods or food categories.]</p>	<p>Canada suggests deleting this definition since footnote 4 already provides information on voluntary addition.</p>
<p>3.1.1 Essential nutrients may be appropriately added to foods for the purpose of contributing to:</p> <ul style="list-style-type: none"> • preventing/reducing the risk of, or correcting, a demonstrated deficiency of one or more essential nutrients in the population; • reducing the risk of, or correcting, inadequate nutritional status or intakes of one or more essential nutrients in the population; ... 	<p>Canada suggests removing the comma after correcting in both the first and second bullet.</p>
<p>3.1.3 Specific provision may be made in food standards, regulations or guidelines that identify the food(s) and essential nutrients for addition and, where appropriate, the minimum and /or maximum amounts within which the essential nutrients should be present.</p>	<p>Canada suggests adding information related to consideration of overages in this principle as it is an important point to consider when setting regulations on addition of essential nutrients.</p> <p>3.1.3 Specific provision may be made in food standards, regulations or guidelines that identify the food(s) and essential nutrients for addition. and, where appropriate, this would include identification of the minimum and /or maximum amounts within which the essential nutrients should be present and indication of whether or not overages are included.</p>
<p>3.2.1 The addition of an essential nutrient, including the amount added, should be in line with one or more of the purposes identified in 3.1.1. The amount added should not result in either an excessive intake or an insignificant intake of the added essential nutrient(s), considering total daily intakes from all relevant sources including food supplements...</p>	<p>Delete 2 extra periods at the end of the sentence.</p>
<p>3.2.2 ...The maximum amounts mentioned above may be set taking into account</p> <p>a) upper levels of intake of essential nutrients established by scientific risk assessment based on generally...</p> <p>3.2.3 Where an Upper Level of Intake is not available, the scientific evidence to support the safe</p>	<p>Canada suggests the following changes for consistency in the use of the term "Upper Level of Intake" in 3.2.2, 3.2.3 and 3.2.4. We propose that it be capitalized and followed by the abbreviation the first time it is used and then the abbreviation should be used in the subsequent instances.</p> <p>3.2.2 ...The maximum amounts mentioned above</p>

<p>addition of ...</p> <p>3.2.4 The severity of the adverse effect on which the upper level of intake (UL) is based ...</p>	<p>may be set taking into account</p> <p>a) Upper Levels of Intake (ULs) of essential nutrients established by scientific risk assessment based on generally...</p> <p>3.2.3 Where an Upper Level of Intake is not available, the scientific evidence to support the safe addition of ...</p> <p>3.2.4 The severity of the adverse effect on which the upper level of intake (UL) is based ...</p>
<p>3.2.3 Where an Upper Level of Intake is not available, the scientific evidence to support the safe addition of an essential nutrient should be considered including evidence for intakes that are unlikely to result in adverse health effects including consideration of the Highest Observed Intake⁵.</p>	<p>Canada proposes the following edits as per stated above and for better clarity. Also, an edit is proposed to clarify that while the HOI is one type of value that can be used, other values such as guiding levels can also be used.</p> <p>3.2.3 Where an Upper Level of Intake is not available, the scientific evidence to support the safe addition of an essential nutrient should be considered including evidence for intakes that are unlikely to result in adverse health effects such as including consideration of the Highest Observed Intake⁵.</p>
<p>3.2.5 When competent national and/or regional authorities establish minimum amounts for the addition of essential nutrients to foods they should ensure that these amounts are significant and in line with the intended purpose as identified in 3.1.1. In determining significant amounts, they may also consider conditions of use for a 'source' claim in the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997).</p>	<p>-Canada notes that there are superfluous dashes between "minimum" and "amounts" and between "foods" and "they" that should be removed. We suggest adding a comma after foods.</p> <p>-We also suggest adding "applying the" before "conditions" in the second sentence.</p> <p>3.2.5 When competent national and/or regional authorities establish minimum amounts for the addition of essential nutrients to foods, they ... "In determining significant amounts, they may also consider applying the conditions of use for a 'source' claim in the Guidelines for Use of Nutrition and Health Claims..."</p>
<p>3.3.1 The selection of foods to which essential nutrients may be added should [be in line with the intended purposes of nutrient addition as identified in 3.1.1, dietary patterns, socioeconomic situations and the need to avoid any risks to health.</p>	<p>Delete superfluous bracket before "be".</p>
<p>[3.5.2 The assessment of the impact of the addition of essential nutrients should use an equivalent methodology.</p> <p>OR</p> <p>Monitoring of total nutrient intakes should in principle use the same [method]/[approach] as used in deciding the addition of essential nutrients unless otherwise necessary for the specific nutrient concerned].</p>	<p>Canada supports the deletion of this principle since monitoring can involve purposes and approaches different from those used to gather evidence to inform decisions on the need for and amount of nutrient addition. If this principle is retained, Canada prefers option 2 with use of the word "approach" rather than method.</p>
<p>4.1.1 Where there is a demonstrated public health need for increasing the intake of an essential nutrient in the population, competent national and/or regional authorities may decide that this may be accomplished by mandatory addition of essential nutrients. This need may be demonstrated by evidence of clinical or subclinical deficiency,</p>	<p>Canada suggests adding "causally linked to the nutrient" at the end of the second sentence for clarification.</p> <p>... "This need may be demonstrated by evidence of clinical or subclinical deficiency, suboptimal or inadequate nutritional status using biochemical</p>

suboptimal or inadequate nutritional status using biochemical indicators, estimates indicating inadequate or potentially inadequate intake of nutrients, or evidence related to another health outcome....	indicators, estimates indicating inadequate or potentially inadequate intake of nutrients, or evidence related to another health outcome <u>causally linked to the nutrient</u> . While most...
4.1.2 The food(s) selected as a vehicle for the added essential nutrient(s) should be habitually consumed in sufficient amount by the target population.	Add an "s" after amount. 4.1.2 The food(s) selected as a vehicle for the added essential nutrient(s) should be habitually consumed in sufficient amounts by the target population.
4.1.3 The amount of the essential nutrient added to the food should aim to be sufficient to meet the public health need. when the food is consumed in habitual amounts by the population at risk.	Canada supports the deletion of the end of the sentence and suggests adding a space between "meet" and "the public health need".
4.1.4. The intake of the food selected as a vehicle should be stable and uniform and the lower and upper levels of intake distribution of the population intake of the food including <u>the lower and upper percentiles</u> should be known.	Canada agrees with the proposed changes to the text and suggests adding two commas in the sentence: 4.1.4. The intake of the food selected as a vehicle should be stable and uniform and the distribution of the population intake of the food, including the lower and upper percentiles, should be known.
4.1.5 The cost effectiveness of the addition of essential nutrients to foods [for the intended consumer] should be considered.	Canada supports retaining the text and removing the brackets. If the consumer cannot afford the fortified food then the public health objective will not be accomplished.
[4.3.3 Where there is a clear public health reason to moderate the intake of a specific nutrient, the level of this nutrient need not be equivalent.]	Canada supports retaining this principle and removing the brackets. A substitute food may not need to be equivalent in fat content (i.e. increasing the fat content of the substitute food to make it equivalent to its counterpart).

CHILE

During the meeting of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) in Germany (2013), a revision of the General Principles for the Addition of Nutrients, Norway suggested in Section 3.3.2 that foods high in energy-dense and low in nutrients should not be added essential nutrients, as this may contribute to unhealthy diets being this one of the main causes of non-communicable diseases.

Chile supports this proposal and suggests that in addition to high energy –dense food, also high content of sodium, sugars, saturated fats and trans-fats food should be incorporated to this prohibition, because they are also related to non-communicable diseases and obesity.

Therefore based in the principle of Codex of "Protecting the health of consumers," Chile kindly request the possibility of reviewing this point during the meeting of 2014 .

COSTA RICA

Costa Rica está de acuerdo a que anteproyectos avancen al trámite 5.

EGYPT

Egypt agrees on the content of the above.

MALAYSIA

- Malaysia has no objection with the definition in 2.5 Mandatory nutrient addition. Therefore, Malaysia proposes to remove the square brackets and adopt the text as follows:

[2.5 Mandatory nutrient addition is when National Authorities require food manufacturers to add specified essential nutrients to particular foods or food categories.]

- Malaysia has no objection with the definition in 2.6 Voluntary nutrient addition. Therefore, Malaysia proposes to remove the square brackets and adopt the text as follows:

[2.6 Voluntary nutrient addition is when National Authorities permit food manufacturers to add specified essential nutrients to particular foods or food categories.]

- Malaysia prefers option 2 in monitoring of total nutrient intake that is:

~~[3.5.2 The assessment of the impact of the addition of essential nutrients should use an equivalent methodology.~~

or

Monitoring of total nutrient intakes should in principle use the same [method]/[approach] as used in deciding the addition of essential nutrients unless otherwise necessary for the specific nutrient concerned].

- Malaysia supports to retain principle in paragraph 4.3.3 and therefore, proposes to remove the square brackets as follows:

[4.3.3 Where there is a clear public health reason to moderate the intake of a specific nutrient, the level of this nutrient need not be equivalent.]

NICARAGUA

Se apoya la adopción de la propuesta en el trámite 5 de los principios generales para la adición de nutrientes a los alimentos, este documento es utilizado como referencia en la toma de decisiones como país para identificar cuales alimentos debemos fortificar, teniendo en cuenta los problemas de salud pública, así como patrones y hábitos alimentarios propios de nuestra población.

PERU

De acuerdo a lo trabajado en la reunión del 2 de noviembre de 2013, reunión previa a 36th. Sesión del Comité del Codex de Nutrición y Alimentos para Regímenes Especiales, no se ha considerado lo siguiente:

2. DEFINITIONS

2.3 Nutritional equivalence means that a substitute food is of similar nutritional value to its counterpart

Sin embargo en la reunión se consideró la siguiente definición:

Nutritional equivalence, addition of one or more essential nutrients to a substitute food for a nutritious value is similar to its equivalent in terms of quantity and quality of protein and in terms of quantity and bioavailability of essential nutrients.

3. GENERAL PRINCIPLES

3.5 Monitoring

3.5.2 Monitoring of total nutrient intakes should in principle use the same [approach as used in deciding the addition of essential nutrients unless otherwise necessary for the specific nutrient concerned].

4. PRINCIPLES FOR SPECIFIC TYPES OF ADDITION OF ESSENTIAL NUTRIENTS

Durante la discusión se acordó que el ítem 4.4 se incluyera en esta revisión, cuya redacción fue de la siguiente manera:

4.4 Addition of nutrients to foods for special purposes

May be added nutrients [] food for special purposes, when you want to ensure a proper content and sufficient nutrients [for its intended use], taking into account the nutritional needs [of the food target population] using [reference daily intake values] [relevant].

URUGUAY

Uruguay appreciates the opportunity to provide feedback about “Proposed Draft Revision of the Codex General Principles for the Addition of Essential Nutrientes to Foods (CAC/GL 9–1987) (para. 79, Appendix II)

2.6. Voluntary nutrient addition.	Uruguay agrees to delete this definition
3.5 Monitoring	Uruguay supports the current drafting of article 3.5.2 is removed and the proposed sentence is included as an alternative
4.1.3.	Uruguay agrees to refer only “public health need”
4.1.4	Uruguay agrees with the proposed change.