

CODEX ALIMENTARIUS COMMISSION



**Food and Agriculture
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AGENDA ITEM NO. 7

CX/FL 11/39/14-ADD.1

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON FOOD LABELLING

Thirty-ninth Session

Quebec City, Canada, May 9 - 13, 2011

PROPOSED DRAFT DEFINITION OF NUTRIENT REFERENCE VALUES PROPOSAL AND REPLIES TO CL 2010/21-FL

COMMENTS AT STEP 3

COMMENTS FROM:

BRAZIL
EUROPEAN UNION
JAPAN
UNITED-STATES OF AMERICA

BRAZIL

Brazil understands that CCFL should approve a definition on NRVs as this term is actually used in the Guidelines on Nutrition Labelling.

In response to CL 2010/21-FL, Brazil supported the proposed definition for NRVs as forwarded by CCFNSDU with the extension of the definition to include the basis on which NRVs are determined:

“Nutrient reference values are a set of numerical values established and used for purposes of nutrition labelling and are based on scientific data on nutrient requirements or nutrient levels associated with risk of diet-related noncommunicable diseases”.

However, the comments forwarded by other delegations in relation to the proposed definition were mainly concerned with the inclusion of the basis on which the NRVs are determined. It was mentioned that this inclusion could create confusion about the purpose of NRVs and could impose some unnecessary restrictions.

An important point was also made that CCNFSDU is working on two documents about principles for establishing how the NRVs should be derived by Codex and by members. In this context, the Delegation of Canada clarified that CCFL may need to determine in the future if NRVs will be listed in the Guidelines on Nutrition Labelling according to the basis for their derivation.

Thus, it does not appear adequate to include the basis on which NRVs are determined in its definition. After the work of CCNFSDU on NRVs is finished and the relation of this work with the Guidelines on Nutrition Labelling is made clearer, the definition of NRVs could be amended to include its basis of derivation, if appropriated.

Thus, Brazil proposes the following definition of NRVs:

Nutrient Reference Values (NRVs) are a set of numerical values established by Codex Alimentarius for purposes of nutrition labelling.

EUROPEAN UNION (EU)

The European Union (EU) thanks the Canadian delegation for preparing the document CX/FL 11/39/14.

In its reply to Circular Letter 2010/21-FL, the EU, representing the views of 27 members of the Codex Alimentarius Commission, supported the short definition for NRV: *"Nutrient reference values are a set of numerical values established and used for purposes of nutrition labelling"* as proposed by the 31st session of the CCNFSDU. The EU continues to believe that a short definition is appropriate.

The EU is surprised that the option for a short version of a definition has not been retained as an option in CX/FL 11/39/14 despite the level of support for this option. The document only notes that there was "some support" for this option. The EU supported this option and this position was provided on behalf of 27 members of the Codex Alimentarius Commission. Therefore, a consensus was clearly not reached, the EU requests the Committee to consider not only the options proposed in the document but also the following option:

"Nutrient reference values (NRVs) are a set of numerical values established by Codex Alimentarius for purposes of nutrition labelling".

The EU does not consider that it is necessary to extend the definition with the statements that further explain the basis or principles that might underlie the identification of the nutrient reference values themselves. The EU considers that the extension of the definition would make it unnecessarily complicated and potentially restrictive.

JAPAN

Japan thanks Canada for preparing the proposed draft document. We are pleased to submit the following comments on the proposed draft definition of Nutrient Reference Values.

In dealing with these 2 types of values, the levels of nutrients associated with nutrient requirements and the levels of nutrients associated with reduction in the risk of diet-related noncommunicable diseases, it is important to take into account differences in public health needs in countries. For this reason, wording of “scientific data on levels of nutrients” may be more appropriate, and thus, Japan supports the proposed definition of Option 1.

Option 1: “Nutrient Reference Values (NRVs) are a set of numerical values established by Codex Alimentarius and used for purposes of nutrition labelling. These include two types of values, those based on scientific data on levels of nutrients associated with nutrient requirements (NRVs) and those based on scientific data on levels of nutrients associated with reduction in the risk of diet-related noncommunicable diseases (NRVs-NCD).

UNITED-STATES OF AMERICA (USA)

The United States is pleased to provide comments in response to CX/FL 11/39/14 with regard to a proposed draft definition for the term “Nutrient Reference Values”. The U.S. thanks Canada for facilitating discussion on the definition.

Proposed Definition of Nutrient Reference Values

As noted in CX/FL 11/39/14, the CCNFSDU proposed text for consideration by the CCFL in developing a definition for Nutrient Reference Values, and Canada has presented two options for the definition based on comments received in response to CL 2010/21-FL.

The U.S. supports the first option in CX/FL 11/39/14 for defining Nutrient Reference Values with the following edits for consideration:

Option 1: “Nutrient Reference Values (NRVs) are a set of numerical values established by Codex Alimentarius for purposes of nutrition labelling **[and conditions for certain nutrient content claims]**. These include two types of values, those based on scientific data on levels of nutrients associated with nutrient requirements (~~NRVs~~) and those based on nutrient levels associated with reduction of risk of diet-related noncommunicable diseases (~~NRVs-NCD~~). **General principles for establishing these values are provided in Annex [#]**.

U.S. Comments:

- We support identifying the bases for both types of values in a concise, general way in this definition, and including a reference to the general principles for more specific information.
- The Committee may wish to clarify whether nutrient content claims are included in the reference to “nutrition labelling”. If not, then the bolded underlined text could be added in the first sentence to encompass the use of NRVs in conditions for a claim that a food is a “source” of or “high” in protein or specific vitamins and minerals as presented in Sec. 8.6 of the Codex Guidelines for Use of Nutrition and Health Claims. We further note that the two sets of general principles for establishing NRVs (at Step 8 and Step 3) refer to the establishment of NRVs for “labelling purposes” or “food labelling purposes”.
- The U.S. suggests removing the abbreviations in the second sentence that refer to specific types of NRVs given that the abbreviations do not appear necessary. However, if the Committee decides to include abbreviations for the two specific types, then a unique abbreviation for NRVs associated with nutrient requirements would be required (e.g., NRVs-NR).
- The U.S. supports the first option which refers to the values being based on scientific data. We do not support the second option which introduces a new term “daily intake reference values” which the CCNFSDU has not yet defined (but a draft definition for the term is under consideration as part of its work on establishing general principles for NRVs-NCD). Moreover, we note that the proposed definition of “daily intake reference values” in option 2 does not appear to take into account the draft definition under discussion by the CCNFSDU.