

CODEX ALIMENTARIUS COMMISSION



**Food and Agriculture
Organization of
the United Nations**



**World Health
Organization**

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

AGENDA ITEM NO. 7

CX/FL 11/39/14-ADD.2

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

Thirty-ninth Session

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

COMMENTS AT STEP 3

COMMENTS FROM:

AUSTRALIA
IDF

AUSTRALIA

Australia wishes to provide the following comments with regard to the Proposed Draft Definition for Nutrient Reference Values (CX/FL 11/39/14).

Australia's preference for the definition of Nutrient Reference Values (NRVs) is option 1 with the following suggested modifications:

*Option 1: "Nutrient Reference Values (NRVs) are a set of numerical values established by Codex Alimentarius and used for purposes of nutrition labelling **and for providing the basis for conditions of certain nutrient content claims. These include two types of values, those They are derived from daily intake nutrient values** based on scientific data on levels of nutrients associated with either nutrient requirements (NRVs) and those based on scientific data on levels of nutrients associated with **reduction in the or reduced** risk of diet - related non-communicable diseases (NRVs - NCD).*

Comments

Australia considers that the reference to 'two types of values' is not necessary and could be deleted in the interest of shortening the paragraph.

Australia notes that the US response has identified for insertion in their amended paragraph the **[conditions for nutrient claims]** and agrees this is relevant, however consider the wording could be clarified by the addition of the words 'for providing the basis for...'

Australia acknowledges reference to 'daily intake nutrient values' links this to a source of values on which to derive nutrient reference values, and to the work currently under consideration by the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU). On this basis we suggest CCFL be mindful of the iterative relationship of this work with that of CCNFSDU, and we suggest the exact words used, and any related acronyms, should be consistent with those being developed by CCNFSDU under its work on General Principles for Establishing Nutrient Reference Values for Nutrients Associated with the Risk of Non-communicable Diseases, as being developed by CCNFSDU within a Proposed Draft Annex to the Codex Guidelines on Nutrition Labelling.

The proposed Annex also provides principles for appropriate and scientific derivation of values therefore; we consider explicit reference to 'scientific data' is not necessary in the definition.

Australia also notes the acronym NRV used after 'nutrient requirements' is incorrectly used and so have deleted it.

Australia does not support the footnote as proposed in Option 2, but suggest consideration could be given to a similar reference, in Option 1, to the Annex as described above.

INTERNATIONAL DAIRY FEDERATION (IDF)

The International Dairy Federation (IDF) appreciates the opportunity to provide comments on the definition of Nutrient Reference Values (NRVs).

IDF agrees to the first part of proposed definition option 1 and option 2: "Nutrient reference values (NRVs) are a set of numerical values established by Codex Alimentarius and used for purposes of nutrition labelling".

IDF opposes differentiating between two different types of values, i.e. NRV and NRV-NCD, and opposes having values based on scientific data on levels of nutrients associated with reduction in the risk of diet-related noncommunicable disease (NRVs-NCD). Therefore, IDF does not agree with adding the second sentence in options 1 and 2. IDF considers that the extension of the definition would make it unnecessarily complicated and potentially restrictive.

The definition of Nutrient Reference Value should be a general definition. IDF is in favor of having one definition of NRV whether it is an NRV for vitamins or minerals or an NRV for another nutrient.

IDF agrees to use only one term, "NRVs", on the food label, while recognizing the value in retaining the term "NRVs for nutrients associated with risk of diet-related non communicable diseases (NRV-NCD)" for use in the general principles for deriving these NRVs.

Another reason why IDF opposes having 'NRVs for nutrients associated with reduction in the risk of diet-related noncommunicable disease' on the food label is that this statement is much too complex for consumers to comprehend and too long to put in a nutrition fact table, especially for countries that require the information on the label to be provided in more than one language.