

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 - E-mail: codex@fao.org - www.codexalimentarius.org

Item 13 (CRD 2)

NFSDU/40 CRD 8

Original language only

JOINT FAO/WHO FOOD STANDARDS PROGRAMME CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Fortieth Session

Berlin, Germany

26 – 30 November 2018

PROPOSAL FOR NEW WORK ON THE GENERAL REQUIREMENTS FOR PROTEIN SUPPLEMENTS INTENDED FOR BODYBUILDING

Comments of CRN

CRN – International Special Dietary Foods Industries

The Council for Responsible Nutrition (CRN) is the leading trade association for the dietary supplement and nutritional products industry, representing manufacturers of dietary ingredients and of national brand name and private label dietary supplements, many of which are multinational and market and sell ingredients, finished products and services globally.

CRN in consultation with its member companies, examined the project document prepared by Egypt on a Proposal for New Work on the General Requirements for Protein Supplements Intended for Bodybuilding; NFSDU/40 CRD/2 and have the following comments.

Duplication of existing Codex Guidelines

CRN notes that the development of a proposal for new work on the general requirements for protein supplements intended for bodybuilding by the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) is an unnecessary duplication of work already completed by Codex. As examples, there are principles and guidelines for microbiology (Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL21/2013)¹), safety and hygiene (General Principles of Food Hygiene (CAC/RCP 1-1969)²), contaminants (General Contaminants and Toxins in Food and Feed (Codex Standard 193/2012)³) and the Code of Practice Concerning Source Directed Measures to Reduce Contamination of Foods with Chemicals (CAC/RCP 49-2001)⁴), labeling (General Standard for Labelling of Prepackaged Foods (CODEX STAN 1-1985)⁵), claims (Nutrition and Health Claims (CAC/GL 23-1997)⁶), vitamins and minerals (Guidelines for Vitamins and Minerals Food Supplements (CAC/GL 55-2005)⁷.

These principles and guidelines are applicable to all foods/foodstuffs and thus dietary/food supplements, which would include new work on protein supplements. Codex energies need to focus on truly new work and not standards development for micro-segmentation of food categories.

Duplication with existing non-Codex organizations

Further, there are already organization(s) outside of Codex and WHO/FAO that have as their mandate to address issues related to unacceptable/fraudulent/criminal practices in protein contamination/adulteration, especially in the realm of sports/athletics and bodybuilding. For example, the World Anti-Doping Agency

¹ <http://www.fao.org/docrep/005/Y1579E/y1579e04.htm>

² http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCAC%252BRCP%252B1-1969%252FCXP_001e.pdf

³ www.fao.org/input/download/standards/17/CXS_193e_2015.pdf

⁴ http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCAC%252BRCP%252B49-2001%252FCXP_049e.pdf

⁵ http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCODEX%252BSTAN%252B1-1985%252FCXS_001e.pdf

⁶ <http://www.fao.org/ag/humannutrition/32444-09f5545b8abe9a0c3baf01a4502ac36e4.pdf>

⁷ www.fao.org/input/download/standards/10206/cxg_055e.pdf

(WADA⁸) was established in 1999 as an international independent agency composed and funded equally by the sport movement and governments of the world. Its key activities include scientific research, education, development of anti-doping capacities, and monitoring of the World Anti-Doping Code⁹, the document harmonizing anti-doping policies in all sports and all countries. In the United States, there is the U.S. Anti-Doping Agency (USADA¹⁰), the national anti-doping organization (NADO) for Olympic, Paralympic, Pan American, and Parapan American sport. The organization is charged with managing the anti-doping program, including in-competition and out-of competition testing, results management processes, drug reference resources, and athlete education. Additionally, USADA contributes to the advancement of clean sport through scientific research and education & outreach initiatives focused on awareness and prevention.

Conclusion

CRN at this time DOES NOT SUPPORT new work on the “Project Document – Proposal for New Work on the General Requirements for Protein Supplements Intended for Bodybuilding; NFSDU/40 CRD/2” at the November 26-30, 2018 Codex Committee on Nutrition and Foods for Special Dietary Uses because the document(s) prepared by Egypt is redundant to current Codex Standards that have been developed and appears to address activities already undertaken by other professional organizations.

⁸ <https://www.wada-ama.org/en/who-we-are>

⁹ <https://www.wada-ama.org/en/what-we-do/the-code>

¹⁰ <https://www.usada.org/about/>