

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 7

CX/NFSDU 07/29/7-Add.2
October 2007

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES 29th Session

Bad Neuenahr-Ahrweiler, 12 - 16 November 2007

APPLICATION OF RISK ANALYSIS PRINCIPLES BY THE COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

- *Comments at Step 3 of the Procedure* -

Comments from:

MEXICO

Original Document	Comments from Mexico
<p>SECTION 2 – INTRODUCTION</p> <p>6. Consistent with their important role in providing scientific advice to the Codex Alimentarius Commission and its subsidiary bodies, FAO and WHO and their joint expert consultations and expert bodies including, but not limited to, the Joint FAO/WHO Expert Committee on Food Additives (JECFA) are acknowledged as the primary source of nutritional risk assessment advice to Codex Alimentarius. This role however, does not preclude the choice of alternative sources of scientific advice such as appropriate international expert groups or organizations if and when justified.</p>	<p>SECTION 2 – INTRODUCTION</p> <p>6. Consistent with their important role in providing scientific advice to the Codex Alimentarius Commission and its subsidiary bodies, FAO and WHO and their joint expert consultations and expert bodies including, but not limited to, the Joint FAO/WHO Expert Committee on Food Additives (JECFA) are acknowledged as the primary source of scientific advice for nutritional risk assessment purposes. This role however, does not preclude the choice of alternative sources of scientific advice such as appropriate international expert groups or organizations if and when justified.</p>
<p>SECTION 3 – SCOPE AND APPLICATION</p> <p>10. Other food constituents of interest in nutritional risk analysis include:</p> <ul style="list-style-type: none">▪ nutrients that increase the risk of adverse health effects (e.g. saturated fatty acids) and that coexist in a food matrix with a nutrient(s) or related substance(s) of primary interest	<p>SECTION 3 – SCOPE AND APPLICATION</p> <p>10. Other food constituents of interest in nutritional risk analysis include:</p> <ul style="list-style-type: none">▪ nutrients that increase the risk of adverse health effects (e.g. saturated fatty acids) and that coexist in a food matrix with a nutrient(s) or related substance(s) of primary interest

<p>associated with reduction of the risk of inadequacy or adverse health effects at low intake;</p> <ul style="list-style-type: none"> ▪ [nutrients that increase the risk of adverse health effects in a food potentially eligible to carry health claim]. 	<p>associated with reduction of the risk of inadequacy or adverse health effects at low intake;</p> <ul style="list-style-type: none"> ▪ [nutrients that increase the risk of adverse health effects in a food potentially eligible to carry health claim]. <p>We feel that this second part that is within brackets can be deleted since it is a repetition of the first.</p>
<p>12. Nutritional risk analysis should be as quantitative as possible, although a qualitative risk-based approach drawing on the principles of nutritional risk analysis could assist the development of Codex texts in such situations as:</p> <ul style="list-style-type: none"> ▪ formulating general principles related to nutritional composition (e.g. principles for the addition of nutrients to foods); ▪ [formulating general principles for assessing or managing risks related to foods potentially eligible to bear a health claim]; ▪ managing risks by labelling advice in relation to consumption of foods of certain nutrient-related³ composition, including foods for special dietary use; and ▪ advising on risk-risk analysis (e.g. risk associated with a significantly reduced or entirely avoided consumption of a nutritious, staple food in response to a dietary hazard such as a contaminant present in that food. 	<p>12. Nutritional risk analysis should be as quantitative as possible, although a qualitative risk-based approach drawing on the principles of nutritional risk analysis could assist the development of Codex texts in such situations as:</p> <ul style="list-style-type: none"> ▪ Guide lines formulating general principles related to nutritional composition (e.g. principles for the addition of nutrients to foods); ▪ [formulating general principles for assessing or managing risks related to foods potentially eligible to bear a health claim]; ▪ managing risks by labelling advice in relation to consumption of foods of certain nutrient-related³ composition, including foods for special dietary use; and ▪ advising on risk risk analysis (e.g. risk associated with a significantly reduced or entirely avoided consumption of a nutritious, staple food in response to a dietary hazard such as a contaminant present in that food. <p>We feel that the first part of the sentence should begin with the phrase GUIDE LINES. Under the same point, same section, we feel that the second part that is within brackets should be deleted; it is very confusing and there are already directives regarding allegations of health. The same is true for the fourth part, as we feel that the example is not necessary.</p>
<p>SECTION 5 – PRINCIPLES FOR NUTRITIONAL RISK ANALYSIS</p> <p>PRELIMINARY NUTRITIONAL RISK MANAGEMENT ACTIVITIES</p> <p>18. Preliminary nutritional risk management activities should have regard to the particular sections in the Working Principles titled General Aspects of Risk Analysis, and Risk Assessment Policy.</p>	<p>SECTION 5 – PRINCIPLES FOR NUTRITIONAL RISK ANALYSIS</p> <p>PRELIMINARY NUTRITIONAL RISK MANAGEMENT ACTIVITIES</p> <p>18. Preliminary nutritional risk management activities should have regard to the particular sections in the Working Principles titled General Aspects of Risk Analysis, and Risk Assessment Policy.</p> <p>We feel that the definition “<i>Nutritional Problem Formulation</i>” as per the 16th version of the procedures manual, in ingredient 28 at the bottom of page 29, defines the <u>Preliminary Activities</u>, which is a more clear term than “<i>Nutricional Problem Formulation</i>” which is</p>

	<p>confusing, and which we feel is already defined in the procedures manual. Hence, this entire paragraph should be deleted.</p>
<p>NUTRITIONAL RISK MANAGEMENT 35. Nutritional risk management can be effected through quantitative measures or qualitative guidance elaborated in Codex texts. Such risk management could involve decisions about nutrient composition, consideration of the suitability of foods containing risk-increasing nutrients for certain purposes or (sub) populations, labeling advice intended to mitigate nutritional risks to public health, and formulation of relevant general principles.</p>	<p>NUTRITIONAL RISK MANAGEMENT 35. [Nutritional risk management can be effected through quantitative measures or qualitative guidance elaborated in Codex texts. Such risk management could involve decisions about nutrient composition, consideration of the suitability of foods containing risk-increasing nutrients for certain purposes or (sub) populations, labeling advice intended to mitigate nutritional risks to public health, and formulation of relevant general principles.]</p> <p>We suggest that the entire point be in brackets in order to clarify the context.</p>