

# comisión del codex alimentarius



ORGANIZACIÓN DE LAS NACIONES  
UNIDAS PARA LA AGRICULTURA  
Y LA ALIMENTACIÓN

ORGANIZACIÓN  
MUNDIAL  
DE LA SALUD



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Tema 7 del programa

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## PROGRAMA CONJUNTO FAO/OMS SOBRE NORMAS ALIMENTARIAS

### COMITÉ DEL CODEX SOBRE NUTRICIÓN Y ALIMENTOS PARA REGÍMENES ESPECIALES

29<sup>a</sup> reunión

Bad Neuenahr-Ahrweiler, 12 - 16 de noviembre de 2007

### APLICACIÓN DEL ANÁLISIS DE RIESGOS POR PARTE DEL COMITÉ SOBRE NUTRICIÓN Y ALIMENTOS PARA REGÍMENES ESPECIALES

*Observaciones en el Trámite 3 del Procedimiento*

#### Observaciones de:

#### MÉXICO

Original Document	Comments from Mexico
<p><b>SECTION 2 – INTRODUCTION</b></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</p>	<p><b>SECTION 2 – INTRODUCTION</b></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 <del>including, but not limited to, the Joint FAO/WHO Expert Committee on Food Additives (JECFA)</del> are acknowledged as the primary source of <b>scientific advice for nutritional risk assessment purposes</b>. This role however, does not preclude the choice of alternative sources of scientific advice such as appropriate international</p>

<p>organizations if and when justified.</p>	<p>expert groups or organizations if and when justified.</p>
<p><b>SECTION 3 – SCOPE AND APPLICATION</b></p> <p>10. Other food constituents of interest in nutritional risk analysis include:</p> <ul style="list-style-type: none"> <li>▪ 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 associated with reduction of the risk of inadequacy or adverse health effects at low intake;</li> <li>▪ [nutrients that increase the risk of adverse health effects in a food potentially eligible to carry health claim].</li> </ul>	<p><b>SECTION 3 – SCOPE AND APPLICATION</b></p> <p>10. Other food constituents of interest in nutritional risk analysis include:</p> <ul style="list-style-type: none"> <li>▪ 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 associated with reduction of the risk of inadequacy or adverse health effects at low intake;</li> <li>▪ <del>[nutrients that increase the risk of adverse health effects in a food potentially eligible to carry health claim].</del></li> </ul> <p><b>Consideramos que la segunda viñeta que se encuentra encorchetada puede eliminarse pues es repetitiva de la primera.</b></p>
<p><b>12.</b> 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"> <li>▪ formulating general principles related to nutritional composition (e.g. principles for the addition of nutrients to foods);</li> <li>▪ [formulating general principles for assessing or managing risks related to foods potentially eligible to bear a health claim];</li> <li>▪ managing risks by labelling advice in relation to consumption of foods of certain nutrient-related composition, including foods for special dietary use; and</li> <li>▪ advising on 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.</li> </ul>	<p><b>12.</b> 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"> <li>▪ <b>Guide lines</b> formulating general principles related to nutritional composition (e.g. principles for the addition of nutrients to foods);</li> <li>▪ <del>[formulating general principles for assessing or managing risks related to foods potentially eligible to bear a health claim];</del></li> <li>▪ managing risks by labelling advice in relation to consumption of foods of certain nutrient-related composition, including foods for special dietary use; and</li> <li>▪ <del>advising on 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.</del></li> </ul> <p><b>Para la primera viñeta consideramos que la oración debe iniciar con la palabra <b>GUIDE LINES</b>. En el mismo punto, misma sección consideramos que la segunda viñeta que se encuentra encorchetada debe eliminarse, pues es muy confusa y ya existen directrices en cuanto a las alegaciones de salud. Lo mismo para la cuarta viñeta ya que consideramos que no es necesario un ejemplo.</b></p>

<p><b>SECTION 5 – PRINCIPLES FOR NUTRITIONAL RISK ANALYSIS</b></p> <p><b>PRELIMINARY NUTRITIONAL RISK MANAGEMENT ACTIVITIES</b></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><b>SECTION 5 – PRINCIPLES FOR NUTRITIONAL RISK ANALYSIS</b></p> <p><del><b>PRELIMINARY NUTRITIONAL RISK MANAGEMENT ACTIVITIES</b></del></p> <p><del>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.</del></p> <p>Consideramos que la definición “<i>Nutritional Problem Formulation</i>” de acuerdo al manual de procedimientos 16ª versión, en el principio 28 pie de página 29, se definen las <u>Actividades Preliminares</u>, que es un término más claro que el de “<i>Nutricional Problem Formulation</i>” ya que es confuso y consideramos que ya está definido en el manual de procedimientos. Por lo que debería eliminarse todo este párrafo.</p>
<p><b>NUTRITIONAL RISK MANAGEMENT</b></p> <p>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><b>NUTRITIONAL RISK MANAGEMENT</b></p> <p>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>Sugerimos se encorchete todo el punto hasta aclarar el contexto del mismo.</p>