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CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 4 **CX/NFSDU 10/32/4 -Add.2**
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES
32nd Session

Santiago, Chile
1 – 6 November 2010

PROPOSED DRAFT ADDITIONAL OR REVISED NUTRIENT REFERENCE VALUES FOR LABELLING PURPOSES IN THE CODEX GUIDELINES ON NUTRITION LABELLING

- ***Comments at Step 3 of the Procedure*** -

Comments from:
BRAZIL
CANADA
CHILE
COLOMBIA
REPUBLIC OF KOREA

BRAZIL

Brazil supports the use of FAO/WHO references as main source of information in establishing NRVs, as it is recommended by the general principles document (Proposed Draft Annex to the Codex Guidelines on Nutrition Labelling: General Principles for Establishing Nutrient Reference

Values of Vitamins and Minerals for the General Population), therefore, we support the proposed NRVs values.

CANADA

Canada would like to thank the delegation of Korea for facilitating the work on Proposed Draft Additional or Revised Nutrient Reference Values for Labelling Purposes and appreciates the opportunity to comment on the draft circulated as Appendix IV to Alinorm 10/33/26. We have just a few comments at this time, set out in the order they arise in the text, and look forward to participating in the discussion at the physical working group and the committee.

1. Section 3.4.4: We suggest changing "on" to "of" in the 2nd line. Also, some of this text appears to be new and should be underlined. i.e. "…per 100 g or per 100 mL <u>of the ready to use product</u> or...." In the second sentence, information on protein is singular and the text should be changed to ".....may also be expressed as a percentage of...."
2. With regard to Footnote 3: for clarity we would suggest changing "should be kept under review" to "should be reviewed on a regular basis by the Codex Committee on Nutrition and Foods for Special Dietary Uses."
3. With regard to Footnote 4, we would just note that the Vitamin A activity of provitamin A carotenoids was evaluated by the Institute of Medicine resulting in a new measure known as the Retinol Activity Equivalents. These attribute less Vitamin A activity to dietary carotenoids than do Retinol Equivalents. Consideration should be given to adopting these equivalencies instead of those listed in the current footnote.
4. We would suggest deleting Footnote 5. Any of these nutrients may be more or less desirable as part of the nutrition labeling in an individual country depending on that country's overall nutritional status or the existence of national programs to address deficiency. The guidance regarding this that is in 3.2.6.1 is sufficient.
5. Consideration should be given to amending Footnote 6 to reflect the latest evidence that only the RRR-alpha-tocopherol and 2R-stereoisomeric forms of alpha-tocopherol contribute to meeting Vitamin E requirements in humans.

CHILE

Relevance and topicality. Assess whether the text proposed contributes with health measures aimed at having an effect on the problem. The problem is presented as a risk profile in the introduction.	This document is relevant for ministerial policies, in terms of providing reference values for nutritional labelling purposes. Information, directions or guidelines are then required to provide the consumer with better information, together with options for products that are actually healthier.
Another point of view would be to estimate whether the standard will improve or worsen the international exchange of this kind of foodstuff, in the medium and long term.	The document would help to inform the consumer, providing common ground which would assist national decisions in every way, and help to improve understanding among countries in order to respect differences, as well as providing common scientific factors in this area.

Consider whether the measures suggested in the preliminary study are feasible for application by developing countries. The review might consider technical complexity, available laboratory capacity and economic cost among other things.	It is feasible to implement, given the local situation, and above all given the studies and information available on the population. When we consider the national survey of food consumption we will be able to know more about the situation in the country, and therefore apply these principles properly, especially as regards finding out how to control certain nutritional content.
There should not be any duplication of existing regulations.	Reference values are also being developed on nutrients in terms of the presence of vital nutrients in foods for labelling purposes, which would form a supplementary document.
If there are deficiencies, such as aspects that are lacking, or exist but are insufficiently considered, suggest how this could be improved or complemented with national and regional contributions.	It is important for all countries to have reference values for vitamins and minerals, and to keep these up to date. For Latin American and Caribbean countries, the standard reference is FAO/WHO but the importance of keeping these values up to date must be stressed, independent of the references specific to each country, always considering the principles established by Codex. Correction: the beta-carotene conversion factor. The IOM says "1 µg retinol activity equivalent (µg RAE) is equal to 1 µg all-trans-retinol, 12 µg β-carotene, and 24 µg α-carotene or β-cryptoxanthin", so 1 µg de β-carotene = 0.083 µg RE and other carotenoids of provitamin A = 0.042 µg RE.
Proposal for national position	Use the document, but note the need to update the values by FAO/WHO.

COLOMBIA

Appendix IV was revised in Step 3 on the Reference Values of the directives for nutrition labelling, and it is proposed that we keep the Reference Values of Technical Regulation No. 288 dated 2008, which were adopted from recognised international sources. We attach our reference values proposal for consideration by the Committee.

Tab. Daily nutrient reference values

Resolution No. 288 dated 2008

Table: Energy and Nutrients

Energy/Nutrients	**Unit of Measure**	**Children over 6 months and less than 4 years old**	**Children over 4 years old and adults**
Energy/Calories	kcal	NS	2,000 kcal
Total fat	Grams	NS	65 g
Saturated fat	Grams	NS	20 g
Monounsaturated fat	Grams	NS	NS

Polyunsaturated fat	Grams	NS	NS
Cholesterol, Max.	Milligrams	NS	300 mg
Sodium, Max**.**	Milligrams	NS	2,400 mg
Carbohydrates	Grams	NS	300 g
Dietary fibre	Grams	19 g	25 g
Proteins	Grams	18 g	50 g

Table: Vitamins and minerals

Nutrients	**Unit of Measure**	**Children over 6 months and less than 4 years old**	**Children over 4 years old and adults**
Vitamin A	International Units	1332 IU	5,000 IU
Vitamin C/Acid Ascorbic	Milligrams	32 mg	60 mg
Calcium	Milligrams	385 mg	1,000 mg
Iron	Milligrams	12 mg	18 mg
Vitamin D	Micrograms/International Units	5 µg/200 IU	10 µg/400 IU
Vitamin E	Milligrams/International Units	3.85 mg/6.26 IU	20 mg/30 IU
Vitamin B_1/Thiamine	Milligrams	0.4 mg	1.5 mg
Vitamin B_2 /Riboflavin	Milligrams	0.45mg	1.7 mg
Niacin/Nicotinic Acid	Milligrams	5 mg	20 mg
Vitamin B_6 /Pyridoxine	Milligrams	0.4 mg	2 mg
Folic Acid/Folacin/Folate	Micrograms	115 µg	400 µg
Vitamin B_{12}/Cobalamin	Micrograms	0.7 µg	6 µg
Phosphorus	Milligrams	367 mg	1,000 mg
Iodine	Micrograms	110 µg	150 µg
Magnesium	Milligrams	77 mg	400 mg
Zinc	Milligrams	3 mg	15 mg
Copper	Milligrams	0.28mg	2 mg

Manganese	Milligrams	NS	2 mg
Chromium	Micrograms	NS	120 µg
Biotin	Micrograms	66 µg	300 µg
Pantothenic acid	Milligrams	1.9 mg	10 mg
Vitamin K	Micrograms	14 µg	80 µg
Molybdenum	Micrograms	NS	75 µg
Chlorine	Milligrams	NS	3400 mg
Selenium	Micrograms	20 µg	70 µg
Potassium	Milligrams	1650 mg	3 500 mg
Fluoride	Milligrams	0.7 mg	3 mg

NS: Not Specified for nutritional marking

REPUBLIC OF KOREA

GENERAL PRINCIPLES FOR ESTABLISHING VITAMIN AND MINERAL NRVs

A. Selection of suitable data sources to establish NRVs

We agree this principle because the objective of this agenda 4 is to establish principles for the legibility of NRVs about Vitamins and Minerals. We think that the FAO/WHO is one of the most scientific sources in establishing NRVs. Also, we support that relevant and recent values that reflect independent review of the science, from recognized authoritative scientific bodies other than FAO/WHO could also be taken into consideration.

B. Selection of the appropriate basis

We support above principle. The NRVs should be based on Individual Nutrient Level 98 (INL98). We think INL98 could cover the needs of as much of the population as possible.

In Korea, KDRI (Dietary Reference Intakes for Koreans, KDRIs, 2005) is determined by calculating the mean values for a chosen reference population group older than 48 months.

We agree choosing reference population group older than 36 months is scientific selection of establishing NRVs for as much of the population as possible.

For the purpose of establishing these NRVs, the values for pregnant and lactating women should be excluded because these are most likely to exceed the recommended maximum intake of some of the target group.(ex, iron content)

C. Consideration of upper level of intake

We agree this principle. In Korea, KDRI is taking into account upper level of intake established by recognized authoritative scientific bodies.