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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(c)

CX/NFSDU 12/34/7

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES
Thirty-fourth Session
Bad Soden am Taunus, Germany
3 – 7 December 2012**

DRAFT NUTRIENT VALUES (NRVs)

(Comments at Step 6 of the procedure)

Comments from:

BRAZIL

COSTA RICA

JAPAN

NEW ZEALAND

PHILIPPINES

UNITED STATES OF AMERICA

BRAZIL

GENERAL COMMENTS

In the beginning of this year Brazil presented some comments on the “Draft Nutrient Reference Values” and on the “Draft Revision of the Guidelines on Formulated Supplementary Foods for Older Infants and Young Children (CAC/GL 8-1991)” in response of CL 2011/24-NFSDU. We do not have new comments on these topics. Thus, we would like to ratify the comments sent previously.

SPECIFIC COMMENTS

Brazil agrees with the proposed values of saturated fatty acids and sodium.

COSTA RICA

Costa Rica would like to express its gratitude for the granted opportunity. However, following a national analysis, it has been decided not to issue any further comments on this topic.

JAPAN

Japan considers that the value of 20g/2000kcal/day for saturated fatty acids (SFA) and that of 2000mg/day for sodium are appropriate as Codex NRVs-NCD.

However, it was informed by WHO at the last CAC session that NUGAG subgroup is assessing the thresholds of SFA for the prevention of the non-communicable diseases (REP12/CAC: para. 31), and further, the final adoption of these NRVs before the development of general principles for establishing NRVs-NCD could be inconsistent with the general agreement of the 30th CCNFSDU (2008) to select and prioritize nutrients for NRVs based on the agreed upon principles and criteria (ALINORM 09/32/26: para. 153).

Therefore, Japan is of the view that the final adoption of NRVs for SFA and sodium should be reconsidered after the establishment of general principles for establishing NRVs-NCD in the light of the outcome of the WHO work.

NEW ZEALAND

New Zealand agrees that saturated fat (SFA) and sodium both meet the criteria for selection of nutrients for NRVs-NCD for adults. New Zealand notes that the WHO Nutrition Guidance Expert Advisory Group Subgroup on Diet and Health has conducted systematic reviews of both SFA and sodium. In public comments released earlier this year the WHO NUGAG subgroup on diet and health noted that recommendations on sodium values for labelling were outside the scope of their review.

New Zealand supports the Committee’s advancement of the draft nutrient reference values for adoption at Step 6 provided no further information is provided from WHO at the Committee meeting on progress of the NUGAG group that could alter these values.

PHILIPPINES

POSITION

Nutrient	NRV-NCD
Saturated fatty acids	[20 g]
Sodium	2000mg

The Philippines supports the proposed Nutrient Reference Value (NRV) of 2000 mg sodium. However, we propose that the NRV of 20 g for saturated fatty acids be placed in square brackets until the results of the WHO systematic reviews to address health outcomes such as coronary heart disease, blood lipids, stroke, diabetes, cardiovascular diseases and all-cause mortality is available.

RATIONALE

Unless new evidence becomes available, we are of the opinion that the NRV-NCD for saturated fatty acids should include *only* those specific saturated fatty acids linked to increased risk of CVD. Following are the reasons:

- 1) The Joint FAO/WHO Report of 2008 indicates that individual saturated fatty acids within each broad classification of fatty acids have different effects on blood lipids and may exhibit unique biological properties and physiological effects. The Report acknowledges that further research and investigations are needed on the effects of different saturated fatty acids (SFAs) of varying chain lengths on CHD, diabetes, cancer and metabolic syndrome risk and endpoints and the influence of different saturated fatty acids of varying chain lengths on de novo synthesis of fatty acids and the implications for health outcomes. The current proposal for an NRV-NCD of 20 grams for all saturated fatty acids is not supported by the above findings of this Report.
- 2) Individual studies show that various saturated fatty acids have different metabolic properties (Wang et al, 2009; Schaefer et al, 1997; Papamandjairs, eta 1, 1982, Miettinen et al, 1982, Owen et al, 1982).
- 3) The recommendation to limit the intake of saturated fat is based on the assumption that saturated fats are linked to cardiovascular disease. This recommendation was based on the study of Keys (1980) and Keys et al. (1986) which linked the intake of saturated fat to incidence of cardiovascular disease. However, the six out of the seven countries in the Keys study consumed saturated fat mainly from animal products. On the other hand, studies from countries which consumed saturated fat from coconut did not show evidence of increased cardiovascular disease (Prior 1974, Prior et al. 1981).

The Keys hypothesis was based on their observation of a correlation between saturated fat and cardiovascular disease. However, the global data of WHO (WHO Global Infobase 2010) itself shows no such correlation.

- 4) Putting an NRV of 20 grams for all saturated fats could remove a major source of energy in the diet of countries where coconut oil is the major oil used in food preparations.

UNITED STATES OF AMERICA

The U.S. supports the Committee's advancement of the following draft Nutrient Reference Values (NRVs) for saturated fatty acids and sodium (as identified in REP 12/NFSDU paragraph 76 and Appendix III) for adoption by the 36th Session of the Commission at Step 8:

Saturated fatty acids 20 g
Sodium 2000 mg

Consistent with the Committee's decision to advance these NRVs to Step 5/8 at the 33rd (2011) CCNFSDU session, we agree that both these NRVs were established in accordance with all the proposed draft general principles in Appendix V, REP12/NFSDU. These principles include convincing scientific evidence for a relationship between these two nutrients and NCD risk, and agreement on the global public health importance of limiting their intake as identified in the WHO Global Strategy on Diet, Physical Activity and Health (WHA Resolution 57.17). The Codex Committee on Food Labelling (CCFL) further acknowledged their global public importance in the

recently adopted Codex provisions that added saturated fatty acids and sodium to the list of nutrients that should always be declared in nutrition labelling, and in the CCFL's referral of these two nutrients to the CCNFSDU for consideration of NRVs.

The U.S. acknowledges a delegation's view at the 2012 35th Session of the Codex Alimentarius Commission that the draft principles should be fully resolved before final adoption of the proposed NRVs. We note, however, that the main unresolved issue at the last session concerned whether "probable evidence" in addition to "convincing evidence" should be considered in establishing an NRV-NCD, and that this is not applicable to either saturated fatty acids or sodium because these nutrients have a convincing level of scientific evidence.