

E-forum on implementation of the Global Strategy on DPAH

Comments from the International Dairy Federation (IDF)

1 - Does the Codex Alimentarius Commission have a role in the implementation of the Global Strategy DPAH?

Yes, the Codex Alimentarius Commission could have a role in the implementation of the Global Strategy/DPAH by determining compositional standards and by providing nutrition and health information about foods, but only to the extent that is mandated, and as provided for in the purpose, scope and nature of the Codex Alimentarius - that is in the provisions in food standards for food labelling (including health claims).

Codex needs to adopt high-level guidelines rather than prescribing food composition, labelling, and claims criteria in relation to implementation of a global diet strategy. The role of Codex should comply with the key WHO recommendations for diet and health and to support the WHO outcomes, but may not play a wider role in implementation per se. We do not agree that Codex should be developing regulations to implement a nutrition and health strategy.

If yes, describe what the role should be?

It appears more compelling that Codex as an organisation maintains a commitment to promote health and nutrition through its activities, policies and programmes, and this shapes the specific outcomes of each committee rather than there being a specific focus on diet and chronic disease, as this is handled more effectively at a country level. The role for Codex could be to provide a framework for various governments to produce legislation that is conducive to best practice in DPAH, but mainly around the diet and health areas. In addition, because currently, there are many organisations sending out messages globally related to DPAH and the message may not be united, effective and in the best interest of health for all people. Further, while the issues may be country specific the development of a framework needs to take into account the need for individualisation of health issues combining diet, physical activity, environment and genetic influences. Codex could also play a role in harmonisation of these messages and the means for promoting them. Codex is related to foods and it may not be positioned to advise on implementing strategies related to physical activity? Codex definitely has a role in the provisions in food standards for food labelling (including health claims), although guidelines and standards need to be defined in terms of the total diet.

What topic areas are relevant : – food composition standards?

If the current emphasis on development of horizontal standards continues, then there appears to be less need to develop complexity in the food standards for individual products to allow for new varieties related to diet and health, eg low fat/calorie/salt/sugar versions or fortified products eg higher fibre, plant sterols, bioactives, vitamins/minerals. It would be difficult to implement promotion of health messages by influencing food composition standards and may create added criteria for trade. Is it envisaged that changing the food compositional standards will have an impact on global health? Rather than composition, it is more likely to be education and labelling that are more important to health than the composition itself (Unless it is envisaged that Codex would consider banning certain foods, which also has anti-trade implications). Also specifying threshold levels for compliance with minimum levels of nutrients considered to have negative health consequences such as salt,

sugar, would be another way that Codex could indirectly promote health through good food choices by mandating healthy limits of certain nutrients, but again this appears to be counter to fair trade and assumes all populations have the same diet-related health concerns.

- provision of nutrition and health information about foods to facilitate informed choice by consumers?

This may be very difficult to implement as every country has its own specific DPAH issues. What could be helpful in one country may be harmful in another. This information could be targeted at specific countries that don't have the resources to educate on specific nutritional issues related to that region (information needs to be customised). The present strategy under discussion appears to be mainly based around the global obesity (and related syndrome) epidemic, but there should be a broader coverage of diet related health issues that affect a wider range of populations.

2- Are the following issues pertinent to Codex Committees' activities related to the implementation of the Global Strategy DPAH?

a. Scientific advice about the nature of the evidence to support the use of health claims.

Were the Codex Committee to undertake implementation of the Global Strategy/DPAH, then most certainly it would require the very best scientific advice about the nature of the evidence needed to support the use of health claims.

It is not a good idea for Codex to be involved in approving health claims as it take long enough for a single country to approve health claims and the approved claims may not be applicable to all regions/ethnicities. However, it would be useful for Codex to provide a framework for the approval process including substantiation. Consideration should be given to updating the Codex General Guidelines on Claims CAC/GL 1-1979 (Rev. 1-1991) to investigate health claims more specifically and provide guidance that could be adopted globally to impact on health.

Given several markets have made significant progress in reviewing the process for reviewing evidence supporting health claims, and the procedures for approving health claims, it is felt Codex is several years behind the leading thinking. However, if possible it would be a great advance on current procedures to have harmonisation of the process for reviewing scientific evidence, and standardisation of the level of substantiation needed to support new ingredients and health benefits, plus assessment of the safety of new ingredients. This would enable and facilitate trade in functional added value foods that may enhance the nutrition and health of consumers, as well as allow greater choice. In this case, substantiation of health benefits and of safety would need to relate to the additive ingredient, allowing individual countries to determine risk assessment processes for exposure, ie use of the ingredient in specific product types and at specified doses.

b. Scientific advice concerning consumer use and understanding of labelling and/or labelling approaches and formats.

Simplification of labelling on commonly traded food items may be a useful Codex target, keeping in mind that use of labelling and consumer understanding of labelling needs to be conducted at country level. The current Codex labelling guidance texts should incorporate changes that are determined to be for the benefit of the Global Strategy for DPAH. Codex

should also continue to seek appropriate support and advice to validate the underlying principles upon which labelling criteria and policies are based. Scientific advice concerning consumer use and understanding of labelling would be crucial.

c. Are there other areas where scientific advice would be pertinent?

Scientific advice would be most pertinent regarding authoritative statements about the role of diet in risk-reduction, especially as this advice relates to increased nutrient requirements. Codex should continue to acquire accurate, timely scientific consensus to underpin decisions related to health and nutrition outcomes. Codex could identify and prioritise health areas related to diet that could be implemented in specific at-risk countries (bringing preventable diet-health issues onto countries governmental agenda). Also in the development of standardised methods of analysis for nutrients and food components related to content and/or health claims.

i. Authoritative statements about the attributes of a diet in reducing risk of a diet-related disease, especially what impacts there would be on the health of consumers if the amount of energy/nutrients is increased or decreased

It is hard to see how this fits the Codex purpose, scope and nature. Codex could support developing countries with authoritative statements around diet-disease but these statements need to consider localised impact. Most developed nations for whom obesity, diabetes and other diet-related chronic health conditions have sophisticated infrastructure to provide public health advice and promotional activities to address the link between diet and health. Perhaps Codex could target its activities to developing standard material for adoption in less well developed countries where that infrastructure is less advanced, and/or the public health issues are still largely focussed on diseases more commonly linked to those countries, but for whom rates of obesity, diabetes etc are increasing at an alarming rate.

ii. Risk assessments for nutrients and related substances in relation to the Global Strategy DPAH

Codex could provide a framework for addressing these types of concerns looking at food toxicological and dietary modelling approaches. It needs to be clarified how this type of work would fit with the current scope of Codex.

3 - Given the importance of nutrition issues in general to the Global Strategy DPAH and the crosscutting nature of nutrition as a topic that cuts across the Codex system, what process could be used to manage and coordinate nutrition issues throughout the Codex system?

We would like to point out the influence that Codex can bring to bear on its member states, and the responsibility that therefore rests with Codex to ensure **that all recommendations are based on the best available scientific evidence.**

A balance is needed between food security issues, fair trade issues and issues related to overnutrition and its impact on global health

a. Respond within the context of the Terms of Reference of the Codex Committee on Nutrition and Foods for Special Dietary Uses and the Codex committee on Food Labelling.

Nutrition is key to both Committees' objectives (see below) and it may be necessary to form a third Committee (or sub-Committee) around this area involving members of the Codex Committee on Nutrition and Foods for Special Dietary Uses and the Codex committee on Food Labelling. Another approach is to add the Global Strategy on DPAH to the terms of reference of the Codex Committee on Nutrition and Foods for Special Dietary Uses and to involve the food labelling committee when necessary.

b. What role can Codex Committees play in the overall management of nutrition issues within the Codex Alimentarius Commission?

Codex should consider:

- How health claims are structured, approval processes, and then how they are regulated.
- Identifying and resolving disparities in nutrition messages globally.
- Providing nutrition support for developing countries.
- Flagging nutritional trade practices that are impacting on developing countries health.