

European Community Position for the

JOINT FAO/WHO e-Forum

**WHO Global Strategy on Diet, Physical Activity and Health:
Role of Codex Alimentarius Committees**

The European Community and its Member States (ECMS) supported the adoption of the WHO Global Strategy on Diet, Physical Activity and Health (DPAH) in 2004. There is relevant action at the Community level and at national level to take forward initiatives that are compatible with Global Strategy on DPAH. Therefore, the ECMS welcome the consideration of the role of the Codex Alimentarius in the implementation of the WHO Global Strategy on DPAH taking into consideration the mandate of the Codex Alimentarius.

The context within which the ECMS have considered the question of the implementation of the Global Strategy on DPAH and the activities of the Codex Alimentarius has been within the framework of the following request in the World Health Assembly Resolution WHA 57.17 that the Codex Alimentarius Commission "... continue to give full consideration, within the framework of its operational mandate, to evidence-based action it might take to improve the health standards of foods, consistent with the aims and objectives of the Strategy".

The ECMS note that the overall goal, or aim, of the Strategy is "to promote and protect health by guiding the development of an enabling environment for sustainable actions at individual, community, national and global levels that, when taken together, will lead to reduced disease and death rates related to unhealthy diet and physical inactivity. With the following four main objectives:

- (1) to reduce the risk factors for noncommunicable diseases that stem from unhealthy diets and physical inactivity by means of essential public health action and health-promoting and disease-preventive measures;
- (2) to increase the overall awareness and understanding of the influences of diet and physical activity on health and of the positive impact of preventive interventions;
- (3) to encourage the development, strengthening and implementation of global, regional, national and community policies and action plans to improve diets and increase physical activity that are sustainable, comprehensive, and actively engage all sectors, including civil society, the private sector and the media;
- (4) to monitor scientific data and key influences on diet and physical activity; to support research in a broad spectrum of relevant areas, including evaluation of interventions; and to strengthen the human resources needed in this domain to enhance and sustain health."

To facilitate the consideration of the role of Codex Alimentarius and the implementation of the Global Strategy on DPAH, the Codex Alimentarius mandate and the terms of reference for the relevant Codex Committees, the Committee on Nutrition and Foods for Special Dietary Uses and the Committee on Food Labelling, have been included in the annex.

The ECMS responses to the questions raised in the WHO e-forum are as follows:

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

The Codex standards and other texts adopted by the Codex Alimentarius Commission may have a bearing on the implementation of the Global Strategy/DPAH. The main part of the operational mandate of the Codex Alimentarius (see annex) that could be relevant to the Global Strategy on DPAH is the promotion of coordination of food standards work and, protecting the health of the consumers and ensuring fair practices in the food trade.

The ECMS are of the opinion that the Committee on Nutrition and Foods for Special Dietary Uses and the Committee on Food Labelling should play central roles in any action taken by Codex Alimentarius within its current mandate. Their roles would be based on the conclusions of the Codex Commission regarding role of Codex in the implementation of the Global Strategy on DPAH.

a) If yes, please describe would that role should be? Please include in your consideration the topic areas that are relevant. Are the following areas pertinent: (i) food composition standards, and (ii) provision of nutrition and health information about foods to facilitate informed choice by consumers?

i) The existing Codex texts include, for example, standards, recommended codes of practice and guidelines. The vast majority of Codex standards are commodity standards. They include compositional provisions that characterise certain basic foods, such as fruit or vegetables, oils, or certain basic processed products, such as cheeses, milk products, canned or frozen products which can facilitate international trade. These standards concern individual foods and do not relate to the overall diet so such foods are not normally balanced themselves.

Codex commodity standards have just been simplified to focus on the basic characteristics of the most widely traded foodstuffs, in order to promote fair practices in the food trade and to ensure that they are not over-prescriptive in international trade. At the moment, the Codex Alimentarius Commission has almost reached the end of this revision process and plans to channel its limited resources away from the discussion on commodity standards towards matters pertaining directly to the protection of the consumers' health (food additives, contaminants, microbiological risk,...). Taking into account this strategy and the content of the existing standards, the ECMS believe that there would need to be a more detailed review of these standards to decide on whether they could be part of the considerations regarding the implementation of the Global Strategy on DPAH.

There are Codex standards related to foods intended for special dietary uses, for example foods intended for infants, or those intended for use in weight control diets, that may include specific requirements in relation to nutrition. In certain cases the food may be intended as the sole source of nutrition of an individual. The advice regarding an overall balanced diet and the specific nutritional requirements of the population group for whom the food is intended would need to be taken into account in these cases.

The specific compositional standards may include labelling requirements which are in addition to those in the general standards or guidelines on food labelling. For example there is a general standard for the Labelling and Claims for Prepackaged Foods for Special Dietary Uses.

ii) The Global Strategy on DPAH suggests to strengthen the international standards on labelling, in particular Codex Alimentarius standards, in order to better inform the consumer about the merits and the composition of foodstuffs (§ 59 of the Global strategy).

The ECMS believe that clear and easily understandable nutrition labelling provides important information for the consumers and can help them in choosing a healthy diet. Therefore, this area of activity within the mandate of the Codex Alimentarius is relevant in relation to providing the consumer with information on the nutrient content of foods. Such information, when put together with knowledge acquired through educational activities, can raise consumers' overall awareness and understanding of the influences of diet on health.

The CCFL can tackle three main areas of work: nutritional labelling, health and nutrition claims and advertising. Any new work to be undertaken within Codex Alimentarius, particularly in the area of nutrition and health claims, should have a sound scientific basis. The terms of reference of the CCFL should be clarified to allow an in-depth consideration of its role in the area of advertising of foods and to take into account changes in the information technologies relevant to consumer's information.

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 needed to support the use of health claims.

The CCNFSDU has been asked to provide advice on the scientific substantiation of health claims, therefore this is part of the ongoing activity of the Codex Alimentarius.

The Codex Guidelines for the use of nutrition and health claims indicate that health claims should be consistent with national health policy, including nutrition policy, and support such policies. The Global Strategy on DPAH urges governments to provide accurate and balanced information and, in particular in relation to health claims, notes that these must not mislead the public about nutritional benefits or risks. Therefore, the work of the Codex Alimentarius in relation to health claims is relevant to the activities in the Codex Member States, and the development of Codex guidance on the scientific substantiation of health claims would provide a common framework for Codex Members to evaluate such claims used in relation to food.

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

In general the Codex standards and guidelines indicate the information that should be included in the labelling either in all cases or on a voluntary basis. The Codex texts do not usually define the formats for the information that is provided. However, Codex Member States may define specific formats for such information.

It is not clear to the ECMS what role Codex might play in relation to scientific advice concerning consumer use and understanding of labelling, labelling approaches and formats. Such issues may be more pertinent for consideration at a national or regional level to take into account issues with respect to the literacy levels, communication barriers and local culture that are highlighted in the Global Strategy on DPAH. In that context it would be relevant to take into consideration available scientific evidence concerning consumer use and understanding of labelling when such labelling guidelines or standards are formed.

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

- 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.**

The ECMS consider that statements concerning the attributes of a diet in reducing the risk of a diet related disease would be outside the scope of the mandate of the Codex Alimentarius which is concerned with standards for certain categories of food not the diet overall. The scientific advice on the diet overall and its impact on health would be the responsibility of Member States governments or other international organisations, such as the WHO.

- ii) risk assessments for nutrients and related substances in relation to the Global Strategy/DPAH.**

The question of risk assessment for nutrients and related substances and the responsibility for such assessments is one of the issues raised in the Discussion paper on the Application of Risk Analysis to the Work of the CCNFSDU. Therefore, it is anticipated that the role of the CCNFSDU in the area of risk assessment of individual nutrients or groups of nutrients will be considered in the future by CCNFSDU.

In any case, it is important that there is liaison between Codex and the WHO/FAO scientific expert consultations in the area of nutrition to ensure that relevant and timely scientific advice can be taken into consideration by Codex Alimentarius when completing the work that falls within its mandate.

3) Given the importance of nutrition issues in general to the Global Strategy/DPAH and the cross-cutting 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?

- a) Please 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.**

The terms of reference of the CCNFSDU (see annex) gives the committee a horizontal role in nutrition related issues within Codex Alimentarius. In a similar way the terms of reference of the CCFL (see annex) gives it a horizontal role in the labelling related issues. Both terms of reference are within the context of the mandate of the Codex Alimentarius on the implementation of the Joint FAO/WHO Food Standards Programme.

There are already the processes within the Codex Alimentarius system for texts that have provisions relevant to horizontal committees to be referred for endorsement to these committees. Therefore, the existing system includes the mechanism for a common approach to nutrition or labelling related aspects when they are included in specific standards, codes of practice or guidelines. In addition, the Codex Alimentarius Commission has an overarching role and can make specific requests to the relevant Committees. Therefore, the ECMS believe that the existing system allows for the management and coordination of nutrition issues in the Codex Alimentarius system.

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

It is the responsibility of the Codex Alimentarius Commission to agree the work of the specific committees. The specific committees can respond to requests from the Codex Alimentarius Commission on nutrition related issues and can contribute to such work specified within their terms of reference. Depending on the overall work priorities individual committees could be asked to review if the standards that fall within their competence include provisions that are relevant to nutrition.

To facilitate the consideration of nutrition issues within Codex Alimentarius it may be useful for the WHO to regularly inform the Codex Alimentarius Commission and its subsidiary bodies, as appropriate, of the state of progress of the implementation of the overall Global Strategy on DPAH.

Mandate of Codex Alimentarius

The mandate of the Codex Alimentarius is the implementation of the Joint FAO/WHO Food Standards Programme, the purpose of which is:

- (a) protecting the health of the consumers and ensuring fair practices in the food trade;
- (b) promoting coordination of all food standards work undertaken by international governmental and non governmental organizations;
- (c) determining priorities and initiating and guiding the preparation of draft standards through and with the aid of appropriate organizations;
- (d) finalizing standards elaborated under (c) above and, after acceptance by governments, publishing them in a Codex Alimentarius either as regional or world wide standards, together with international standards already finalized by other bodies under (b) above, wherever this is practicable;
- (e) amending published standards, after appropriate survey in the light of developments.

Terms of reference for the Codex Committee on Nutrition and Foods for Special Dietary Uses:

- (a) to study specific nutritional problems assigned to it by the Commission and advise the Commission on general nutrition issues;
- (b) to draft general provisions, as appropriate, concerning the nutritional aspects of all foods;
- (c) to develop standards, guidelines or related texts for foods for special dietary uses, in cooperation with other committees where necessary;
- (d) to consider, amend if necessary, and endorse provisions on nutritional aspects proposed for inclusion Codex standards, guidelines and related texts.

Terms of reference for the Codex Committee on Food Labelling:

- (a) to draft provisions on labelling applicable to all foods;
- (b) to consider, amend if necessary, and endorse draft specific provisions on labelling prepared by the Codex Committees drafting standards, codes of practice and guidelines;
- (c) to study specific labelling problems assigned to it by the Commission;
- (d) to study problems associated with the advertisement of food with particular reference to claims and misleading descriptions.