

## WHO Global Strategy on Diet, Physical Activity and Health Response to Codex Discussion Papers

CX/NFSDU 05/27/2-Add.1

CX/FL 06/34/2-Add. 1

CX/NFSDU 05/27/2 – Add.2 CRD 23

CIAA, the Confederation of the Food and Drink Industries of Europe, is pleased to respond to the WHO e-Forum that has been established to address ways that relevant Codex Committees could support the promotion of healthy dietary habits within the Codex structure and mandate, and in turn, assist in the implementation of the *Global Strategy on Diet, Physical Activity and Health*, hereafter referred to as the Global Strategy.

European food and drink industries recognise the importance of diet and physical activity in achieving and maintaining good health and have already taken important steps in support of the Global Strategy at regional and national levels. Actions, to name but a few, include promotion of healthy lifestyles and the introduction of product innovations that provide consumers with a greater range of options from which to select a healthy diet.

The Comments that are provided below are framed within the context of important points made in the Discussion Papers presented to the Codex Committees on Nutrition and Foods for Special Dietary Uses (CCNFSDU) and Food Labelling (CCFL):

- It will take a broad coalition to ensure the success of the Global Strategy.
- The objective of the Global Strategy is to improve populations' nutritional states, which have taken many decades to develop. Time must be allowed for Member States to consider the initiative overall in the context of their national situations and to consider how to link it with Codex activities.

**1. Does the Codex Alimentarius Commission have a role in the implementation of the Global Strategy/DPAH?** CIAA acknowledges that the Codex Alimentarius Commission has, within its mandate and structure, a potential role in the implementation of the Global Strategy. However, any work that is undertaken must be carried out within the framework of the primary Codex Alimentarius objectives: "protecting health of the consumers and ensuring fair trade practices in food trade."

**a. If yes, please describe what that role should be? Please include in your consideration the topic areas that are relevant. Are the following areas pertinent?**

**(i) Food composition standards:** CIAA, in principle, does not oppose the review of existing food compositional standards in view of facilitating the objectives of the Global Strategy. The Codex Alimentarius Commission should provide guidance to ensure a coherent and efficient review process by all involved Committees.

In undertaking such reviews, the pursuit of one goal, e.g., a reduction in the

prevalence of obesity, must not work counter to the needs of populations that are under-nourished. It must also take into account the importance of some ingredients in preserving food, maintaining microbial safety and maintaining the sensory characteristics that consumers expect. Furthermore, nutritional improvements must be made within context of the food and its place in the total diet, which is often subject to cultural influences.

**(ii) Provision of nutrition and health information about foods to facilitate informed choice by consumers:** Codex Alimentarius has already provided important Guidelines in relation to nutrition labelling and nutrition/health claims. Member States should be encouraged to implement these Guidelines, which would be an important contribution towards achieving the goals of the Global Strategy. CIAA would like to stress, however, that it opposes the consideration of advertising by CCFL.

**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 appropriate use of nutrition and health claims would be facilitated by placing high priority on the completion of the *Draft Codex Guidelines on the Scientific Substantiation of Health Claims*, currently under development by CCNFSU. It is essential that the Guidelines provide a pragmatic and useful approach to scientific substantiation that is based on a "levels of evidence" approach, e.g., the PASSCLAIM approach developed by ILSI.

**b. Scientific advice concerning consumer use and understanding of labelling and/or labelling approaches and formats.** In our view, additional scientific advice on improving consumers' use and understanding of nutrition labelling would not be relevant within the international context. Rather, presentation of meaningful, understandable and useful nutrition labelling information must be considered in the local context, taking into account cultural aspects, education level, dietary patterns and relevant health issues.

**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.** Authoritative statements may not be appropriate or applicable at the international level, based on the need to consider national dietary patterns and health implications. It is also unclear whether Codex has sufficient resources to undertake such work. However, many national governments have already developed such statements, including the impact on health related to an increased or decreased intake of energy and nutrients. Governments should be encouraged to take advantage of the work that has already been accomplished, where it would be relevant to national diet and health issues.

**ii. Risk assessments for nutrients and related substances in relation to the Global Strategy/DPAH.** The concept of risk analysis, and its three parameters (risk assessment, management and communication), was developed to manage food safety issues, such as contaminants, additives and microbiological hazards. Under the traditional risk analysis approach, absence or reduction of a hazard is the goal.

The application of risk analysis principles to nutrition and health demands a new mindset. Nutrition and risk analysis experts must develop and test the feasibility of appropriate methodology.

**Other areas where scientific advice would be relevant:** CIAA supports the development of expert advice on specific nutrition and health issues to provide guidance for the work of all relevant Codex Committees, in particular CCNFSDU and CCFL. The Committees would benefit from access to expert scientific advice that is relevant to the strategic objectives of each.

Clearly defined terms of reference need to be established, from which expert nutrition/health advice can be developed. As such, consideration needs to be given to the availability of knowledge and data on which to base the advice. The scope, objectives and end use of the advice must also be taken into account, as well as its significance to public health and fair trade. Finally, any work that is carried out needs to be placed within perspective of its urgency for the general population and its relevance to the needs of developing countries.

Adequate resources must be ensured to provide such advice.

**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.** Both CCFL and CCNFSDU have, via their Terms of Reference, mandates to consider nutrition issues. The CCFL considers matters related to nutrition labelling and nutrition and health claims. The CCNFSDU considers matters related to nutrition and to foods for special dietary uses. The CCNFSDU is overloaded and is unable to cope with its current work programme.

To achieve a more efficient and effective approach to matters related to nutrition and health, consideration should be given to the workloads of both Committees, with work re-allocated, where relevant and feasible. Consideration should also be given to the increased use of pre-meeting working groups and to between-meeting electronic working groups.

**b. What role can Codex Committees play in the overall management of nutrition issues with the Codex Alimentarius Commission?** Nutrition issues may, for various reasons, come to the attention of many different Codex Committees, e.g., the Committees on Hygiene, Additives/Contaminants, Compositional Standards, as well as CCNFSDU and CCFL. All Committees should be encouraged to bring these issues to the attention of the Commission, so that they can be properly addressed within the mandate of Codex Alimentarius and the objectives of the Global Strategy.

## **Conclusion**

CIAA supports the appropriate involvement of Codex Alimentarius in helping to achieve the objectives of the WHO *Global Strategy on Diet, Physical Activity and Health*. We will continue to participate as part of the global food industry, to drive this work forward.