

## ICGMA COMMENTS

Since the adoption of the Global Strategy in May 2004, the food industry has been a willing partner with the World Health Organization (WHO). The food and beverage industry has been moving aggressively to implement our part of the Global Strategy. Our effort is well underway at the national levels to ensure the success of the Global Strategy. Together, individual food and beverage companies have met and remain in dialogue with the WHO on the Global Strategy. Several food industry associations have submitted reports to WHO on industry initiatives on diet, physical activity, and health.

The overall goal of the Global Strategy on Diet, Physical Activity and Health 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.”

The food and beverage industry already has undertaken a host of initiatives consistent with the WHO recommendations. From the promotion of healthy lifestyles to the reformulation and introduction of products, the industry has demonstrated its commitment to seeking sustainable, comprehensive solutions to improve the health and wellness of all individuals, particularly youth.

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

Given that the Global Strategy is a relatively new initiative, time must be allowed for Member States to consider the initiative overall and to consider the ability to link it with existing and/or new Codex activities. In some areas, Codex is implementing the Global Strategy in part by the work they have already completed or have undertaken on the provision of nutrition and health information. If new work is considered by Codex, it should only be initiated if it is within the objectives and operational mandate of Codex. The Terms of Reference for CCNFSDU and CCFL already provide avenues for discussing certain nutrition issues.

### **(i) Food composition standards**

Codex has several food commodity standards many of which have compositional ranges or limits. Except for standards from CCNFSDU, they were not intended to set or limit the nutritional quality of foods. Instead, they were developed to assure consumers of food quality and food safety to facilitate trade. Trade is facilitated by providing an agreed upon definition of the commodity food to ensure that wherever you purchase the commodity food, you can be assured it meets the same standard globally.

We believe that Codex should not undertake a cumbersome and time-consuming process of reviewing each food commodity standard. CCNFSDU is currently working on proposed draft recommendations on the scientific basis of health claims. This work should become a high priority within CCNFSDU since these claims could compliment the existing standards and allow the development of alternative products with nutritional benefits for consumers, e.g. low fat, reduced calories. ICGMA believes that manufacturers should be allowed the flexibility in making changes in the levels of nutrients that have set values so that products maintain palatability and acceptability. Companies continue to research ways to make incremental but cumulative changes in nutrients without compromising the taste or quality consumers expect. ICGMA believes that food commodity standards should not inadvertently serve as an impediment when manufacturers wish to formulate 'healthier versions' of food products with, for example, lower levels of saturated fat or sodium.

### **(ii) Provision of nutrition and health information about foods to facilitate informed choice by consumers**

The food and beverage industry continues to be supportive of providing nutrition and health information about foods to facilitate informed choices by consumers. Since 2004, industry has continued – and in many cases intensified – its efforts to promote healthy diets and physical activity.

Codex Alimentarius has already provided important Standards and Guidelines in relation to nutrition labeling. CCFL recently finalized Codex standards for nutrition and health claims. The WHO can use these Codex standards as technical assistance for Member States implementing the Global Strategy. Member States should be encouraged to implement these Standards and Guidelines, which would be an important contribution towards achieving the goals of the Global Strategy.

ICGMA agrees that nutrition labeling provides important information about the nutrient contents of food and thus provides a useful tool for consumers to use in selecting foods that comprise a healthy diet. ICGMA supports providing nutrient information on products on food labels, websites, and in other avenues. The nutrition information should reflect national nutrition recommendations/guidelines. Providing this information enables the public to understand the relative significance of the nutrition information in the context of the total daily diet and empowers consumers to make informed choices. Any labeling format or approaches should be left up to national authorities to decide.

ICGMA would encourage the development of a mechanism for sharing results among Member States of the efforts that implement new Codex Standards and Guidelines in relation to nutrition labeling and nutrition and health claims at the national level. This type of clearinghouse could serve as a means of sharing information in a transparent way with Member States and to assist in providing examples where and when resources are limited. ICGMA encourages Member States to implement Codex Standards and Guidelines and share with other Member States their efforts and experiences at the national level.

ICGMGA supports the position that CCFL should recommend to the CAC that advertising is best regulated by national or local codes, which take into account legal, cultural, political, educational, and societal sensitivities. We strongly believe that the basic principles of the General Guidelines on Claims<sup>1</sup> and the Guidelines for Use of Nutrition Claims<sup>2</sup> can adequately address such claims when they are presented in advertising.

## **2. Are the following issues pertinent to Codex Committees' activities related to the implementation of the Global Strategy/DPAH?**

- **Scientific advice about the nature of the evidence needed to support the use of health claims.**
- **Scientific advice concerning consumer use and understanding of labelling and/or labelling approaches and formats.**
- **Are there other areas where scientific advice would be pertinent?**
  - **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.**
  - **Risk assessments for nutrients and related substances in relation to the Global Strategy/DPAH.**

### **Scientific advice about the nature of the evidence needed to support the use of health claims.**

CCNFSDU is currently working on proposed draft recommendations on the scientific basis of health claims. The work needed to complete this effort should become a high priority within CCNFSDU as this work is important for the successful implementation of the Global Strategy. Research has shown consumers are more responsive to positive messages in determining what foods they should eat and what foods they should limit. The absence of international science-based criteria undercuts the ability to come to conclusions about specific claims and may delay the ability to get messages to consumers about healthy dietary choices and the role of diet in the reduction of chronic disease.

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<sup>2</sup> CAC/GL 1-1979 (Rev. 1-1991)

<sup>2</sup> CAC/GL 23-1997

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

ICGMA supports the goal of science-based product claims to maximize the potential for consumer understanding and ultimately benefit consumer health. The whole concept of nutrition and health claims is to provide consumers with accessible information they can – and will – use to improve their diets. The goal of these claims which are based on sound science is to be communicated in such a way that consumers would more clearly understand the relationship between the claim and the product itself as a potential benefit, and thus be motivated to make dietary changes. Messages must not mislead the public, but communication about products healthfulness should be allowed and encouraged to get consumers to eat healthier. Nutrition and health claims on food labels can make a significant contribution to the public health. It is important to remember that labels can reach all consumers – even those who do not have access to other nutrition information and who carry the greatest burden of chronic disease risk.

### **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.**

National governments have been and continue to work on authoritative statements about the attributes of diet in reducing risk of a diet-related disease. (i.e. 2005 Dietary Guidelines for Americans - <http://www.healthierus.gov/dietaryguidelines/> and United States Department of Agriculture's MyPyramid <http://www.mypyramid.gov/> ; la Guia Alimentar para a População Brasileira and the "Promoción y Educación para la Salud en Materia Alimentaria – El Plato del Bien Comer- " from Mexico.

### **Risk assessments for nutrients and related substances in relation to the Global Strategy/DPAH.**

This work is being done by Codex in the CCNFSDU and will be useful to the Global Strategy. A current Joint FAO/WHO Nutrient Risk Assessment Project has an objective to the identification of internationally applicable principles and methods that may be used in the conduct of risk assessment for nutrients and related substances, with a focus on risk associated with excessive intakes. In collaboration with this project CCNFSDU is currently working on a "Discussion Paper on the Application of Risk Analysis to the Work of the Committee." The Joint FAO/WHO Nutrient Risk Assessment Project must keep CCNFSDU apprised of the work so that CCNFSDU can determine how Codex Committees can utilize this work. It is also anticipated that the outcome of this project will inform the development or revision of Codex texts that address nutrient risk. CCNFSDU is the Codex Committee that will coordinate this work.

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

CCNFSDU already serves as the coordinating Committee for all nutrition issues discussed within Codex. In addition, the Codex Committee on Food Labelling already has a mandate to consider issues relevant to nutrition labeling issues and claims and works together with CCNFSDU on these issues.

ICGMA would encourage the development of a mechanism for sharing information among Member States of the efforts that implement new Codex Standards and Guidelines at the national level. This type of clearinghouse could serve as a means of sharing information in a transparent way with Member States and to assist in providing examples where and when resources are limited. ICGMA

encourages Member States to implement Codex Standards and Guidelines and share with other Member States their efforts and experiences at the national level.