

ELECTRONIC FORUM ON THE ROLE OF CODEX IN THE IMPLEMENTATION OF THE GLOBAL STRATEGY ON DIET, PHYSICAL ACTIVITY AND HEALTH (GLOBAL/DPAH)

COMMENTS FROM CANADA

Canada appreciates the initiative of the FAO/WHO in encouraging Codex members to propose ways that relevant Codex Committees could support the promotion of healthy dietary habits within the Codex structure and mandate and, in turn, assist the implementation of the Global Strategy on Diet, Physical Activity and Health.

Canada strongly supports the Global Strategy/DPAH and its call for concerted public health action to deal with the growing crisis of noncommunicable diseases. The Strategy supports a population health approach to health promotion and disease prevention and is consistent with the approach taken by the Government of Canada. Canada is strongly committed to efforts to reduce the global health, human and economic burden resulting from largely preventable noncommunicable diseases. Canada also believes that the WHO's contribution to the implementation of the Global Strategy is of critical importance. While each Member State will decide on what strategies are appropriate to national circumstances, the challenge is global and requires strong and effective international collaboration.

In response to the questions offered by the FAO/WHO, Canada proposes the following for consideration:

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

Yes. The stated Goal and Objectives of the Global Strategy/DPAH are in line with the purpose of the Codex Alimentarius in terms of the protection of the health of consumers. The goal of the Global Strategy/DPAH is to "promote and protect" health and one of the mandates and the priority area of work for the CAC is to elaborate food standards "to protect the health of consumers". Any work subsequently undertaken by Codex, however, must fall within its mandate and work priorities and would need to be globally appropriate

(a) please describe would that role should be? Are the following areas pertinent:

(i) food composition standards

Yes, the CAC could, in the elaboration of food composition standards and other texts and guidance, take into consideration the goals of the Global Strategy/DPAH. This would be consistent with the terms of reference for the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU):

- (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 in Codex standards, guidelines and related texts.

It is very important that the CAC emphasize that, since the primary purpose of food is to nourish, its standards must protect the nutritional health of consumers. In this regard, consideration must be given to the nutritional safety of foods as well as to their nutritional quality.

For example, a nutritionally safe food supply is one that would have a minimal impact on the risk of adverse effects due to insufficient or excessive intakes of nutrients (e.g., vitamins, minerals), energy (e.g. calories) and other dietary components that may affect health, both naturally occurring and introduced through processing and/or intentional addition. Nutritional safety relates to the food supply providing sufficient quantities of nutrients and related substances to prevent deficiencies, as well as limiting excessive amounts of nutrients or other components. Deficiencies of nutrients and related substances may increase the risk of developing a chronic disease or condition (e.g., osteoporosis) and in some instances an acute disease or condition (e.g., scurvy). Excesses of nutrients and other components (e.g. saturated fat, trans fat) also increase the risk of chronic diseases or other conditions (e.g. heart disease).

Nutritional quality can be said to refer to the ability of a food, through contributing essential nutrients and other related substances including bio-active substances, to not only meet the physiological needs for nutrients, but also provide additional nutritional benefits.

Both the nutritional safety and nutritional quality aspects of food are modifiable by industry.

Food composition standards can and should promote, not impede, the development of foods that are consistent with the Global Strategy/DPAH.

Since one of the terms of reference for the CCNFSDU is “to consider, amend if necessary, and endorse provisions on nutritional aspects proposed for inclusion in Codex standards, guidelines and related texts”, the CCNFSDU should, to ensure that aspects related to nutritional safety and quality are considered in the development of compositional standards, exercise its endorsement function by reviewing the compositional aspects of the standards that impact the nutritional safety and quality of foods. These are much broader than only those provisions that address specific nutrients (e.g. addition of vitamins and mineral nutrients) since all the ingredients of a food affect its nutritional safety and quality.

The CCNFSDU could consider reviewing, revising and re-establishing the Guidelines for the Use of Codex Committees on the Inclusion of Provisions on Nutritional Quality in Food Standards and Other Codex Texts (CAC Procedural Manual, 9th edition, 1995), or potentially developing a new set of guidelines in this regard. The guidelines would have to include consideration of nutrients and other related substances that should be in foods as well as those that should be minimized.

(ii) provision of nutrition and health information about foods to facilitate informed choice by consumers?

Yes. The terms of reference of the Codex Committee on Food Labelling (CCFL) include very broadly all aspects of food labelling including those that address the nutritional safety and quality of foods. Consumers are increasingly interested in selecting a nutritious diet to maintain or improve their health. In this regard it is therefore essential that consumers be provided with information on nutrition and on the nutrient composition of foods to enable them to make appropriate food choices for reducing the risk of developing chronic diseases and permitting dietary management of chronic diseases of public health significance. It is important to note, nevertheless, that a large proportion of the world's population do not access foods that are prepackaged and labelled.

In view of the specific recommendations in the Global Strategy/DPAH, consideration should be given to reviewing and revising as necessary the Codex Guidelines on Nutrition Labelling and potentially the Codex Guidelines for the Use of Nutrition and Health Claims. For example, the Guidelines on Nutrition Labelling should be reviewed to include in the mandatory core list all the nutrients that are the subject of recommendations in the Global Strategy/DPAH, for example sodium, saturated and trans fat, sugar and dietary fibre, and to determine whether there should be restrictions on the nutrient information provided (e.g. potential deletion of the 5 % rule for vitamins and mineral nutrients). Since nutrition information on labels will be useful to consumers only if it is understandable and legible, the format and method in which this information is presented is very important. Although some aspects related to the presentation of nutrition information need to be determined at the national/regional level, there are other aspects that contribute to the usefulness of nutrition information that could be the subject of the Guidelines on Nutrition Labelling, e.g. type size and contrast.

Since ingredients give important information on the nutritional quality of a food, the requirements for the listing of ingredients should also be considered in terms of legibility and readability.

Nutrition claims and health claims are known to be very powerful since they appear often to be used as the primary source of information in making a food choice. It is therefore essential that claims are based on recognized health and scientific criteria and are clear, consistent, accurate, and non-misleading.

In consideration of variations in consumer literacy, the CCFL could consider developing guidance on the use of symbols and other graphic means to guide healthy choices and to ensure that these are consistent and truthful and do not mislead.

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

Provision of scientific advice about the nature of the evidence needed to support the use of health claims is related to the implementation of the Global Strategy/DPHA and this is work that is currently ongoing in the CCFNSDU.

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

Nutrition and other related information (e.g. ingredient lists) on labels of foods will be useful to consumers only if it is understandable and legible. Although some aspect of the format and method in which this information is presented could be the subject of the Codex Guidelines on Nutrition Labelling, e.g. type size and contrast, other issues regarding the most appropriate way to declare nutrients or the language used in claims, would need to be determined at the national/regional level and provision of scientific advice in this regard are probably not appropriate within the terms of reference of the CAC. Please also see above for comments in this regard..

(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.

Consideration could be given to developing a set of nutrition messages or health claims, in line with the recommendations of the Global Strategy/DPAH regarding nutrients in foods and their relationship to health or to the reduction of risk of chronic diseases, where supporting authoritative evidence exists, that are universally applicable for use on food labels or in advertising

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

Risk assessment and risk analysis for nutrients and related substances have been undertaken recently by WHO/FAO and CCFNSDU. The WHO/FAO just published the report of a Joint FAO/WHO Technical Workshop, entitled "A Model for Establishing Upper Levels of Intake for Nutrients and Related Substances." The CCFNSDU has agreed to develop a discussion paper on the application of risk analysis in its work and emphasized the importance of this work.

OTHER COMMENTS REGARDING SCIENTIFIC ADVICE:

Consideration should be given to the establishment of a “Joint Expert Committee on the Nutritional Aspects of Foods”. Just as the work of Codex Committee on Food Additives and Contaminants is facilitated and supported by JECFA, so the work of CCNFSDU and CCFL should be supported by a committee that would provide, on request of the committees, expert scientific advice on nutrition issues. The expertise of the “Joint Expert Committee on the Nutritional Aspects of Foods” would vary depending upon the nature of the advice required but it could include scientific advice on the composition of foods for special dietary uses, scientific advice on nutrient reference standards, scientific advice on food labelling to enhance consumer understanding and usability of labels, and scientific advice on the relationship between diet and the reduction of risk of chronic disease. The latter could serve as the basis for a set of universal health claims that could be used world-wide. The Committee could, with the appropriate expertise, conduct risk assessments for nutrients.

Initially, because of potential financial constraints, consideration should be given to beginning with ad hoc expert consultations on scientific matters referred by the CCNFSDU and the CCFL.

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

- The CCNFSDU should actively pursue and expand its endorsement function (please see above).
- A strategic plan on the implementation of the Global Strategy/DPAH should be developed by CCNFSDU and CCFL with both Committees agreeing on the priorities so that their work can proceed in a coordinated manner.