New Zealand Comments to the e-Forum.

The Role of Codex in the Implementation of the Global Strategy on Diet, Physical Activity and Health

New Zealand believes the Codex Alimentarius Commission (CAC) does have a role in assisting the implementation of the Global Strategy on Diet, Physical Activity and Health (Global Strategy/DPAH). We believe that with support and guidance from the CAC, the relevant Codex Committees could add some support to the promotion of healthy dietary habits.

It is important for food regulations to be in line with the overarching philosophy and approach taken in the Global Strategy/DPAH. However New Zealand wishes to stress that food regulations are only one component of a broad, multifaceted solution to address such significant public health issues as obesity. If not supported by other strategies, food regulations alone will be ineffective.

We do not believe it is the responsibility of Codex to provide specific nutrition and health information about foods to facilitate informed choice by consumers. This is the responsibility of national authorities, as consumer needs in this area will vary from country to country and the information required will need to be pertinent to each country.

We believe it is the role of relevant Codex Committees to develop guidelines around the provision of information to consumers, which national authorities can build upon and make relevant in the context of their own public health environment. However Codex should not support the development of standards that undermine healthy nutrition messages.

New Zealand believes that the development of any standards, guidelines or related texts, by CCFL and CCNFSDU in particular, should be mindful of the potential implications for longer term public health.

New Zealand supports a role for Codex in providing guidance in specific areas of composition and labelling such as the level of scientific evidence required to support the use of health and nutrition claims and the criteria for making such claims. Health and nutrition claims should consider the wider public health implications. We also believe Codex has a role in providing guidance on consumer use and understanding of labelling and/or labelling approaches and formats.

New Zealand strongly supports the progression of work on the development of guidelines for nutritional risk analysis within the CCNFSDU. Such guidelines will need to consider potential risks to long term human health. This also does raise the need for a commitment from the WHO to provide assistance with nutrition risk assessment work including evidence based assessments around issues such as obesity and food regulation.

It is New Zealand’s view that regulations should be based on scientific evidence where possible, and that such statements should form the basis of the food regulatory systems interface with public health.
Additional comments

New Zealand supports the establishment of a group of experts competent in nutritional risk assessment to meet on an ad hoc basis with the purpose to support the work of the CCNFSDU and CCFL. We propose that such a group would focus on the science of nutritional risk assessment, enabling the CCNFSDU and CCFL to focus on the broader issues without being consumed by the detail and science of risk assessment.

The findings of such a group could then feed into the CCNFSDU and CCFL deliberations in areas such as the establishment of minimum and maximum levels of nutrients and related food components in infant formula, the identification of safe and biologically available nutrient compounds for use in foods for infants and young children, criteria for the establishment of maximum levels in vitamin-mineral food supplements and consideration of the safety and bioavailability of the nutrient sources, food fortification principles, and food safety considerations for nutrients and other substances that are the subject of health claims.

New Zealand believes this is a specialist area, and therefore warrants the establishment of a specialist group.