



**ISDI COMMENTS ON THE  
DISCUSSION PAPER ON THE NUTRIENT REFERENCE VALUES  
(NRVS) FOR NUTRIENTS ASSOCIATED WITH RISK OF NON-  
COMMUNICABLE DISEASES  
CX/NFSDU 09/31/7**

The International Special Dietary Foods Industries (ISDI) represents at Codex Alimentarius the manufacturers of special dietary foods and has been actively involved in the development of relevant Codex standards and guidelines. ISDI is especially interested in contributing to work that is related to nutrition products for infants and young children. Within this context, ISDI expresses its interest in participating in the ongoing efforts, led by the delegations of the United States and Thailand, in developing the *Discussion paper on the nutrient reference values (NRVs) for nutrients associated with risk of non-communicable diseases (CX/09/31/7)*.

During the 30<sup>th</sup> session of CCNFSDU (see Alinorm 09/32/26 par. 152-154), it was agreed that the delegations of USA and Thailand would prepare a background document to be discussed at the 31<sup>st</sup> session. ISDI would like to provide general comments as summarised and explained below.

**SUMMARY**

1. Given its interest in assuring foods for special dietary use are providing safe and adequate nutrition, ISDI supports discussions on the development of nutrient reference values (NRVs) for nutrients associated with risk of non-communicable diseases, taking into consideration the most recent scientific evidence on nutrient requirements.
2. ISDI considers that specific questions are to be taken into consideration in order to guide and support this task. ISDI reflections are attached.
3. ISDI is committed to collaborate in developing NRVs for nutrients associated with risk of non-communicable diseases.

## EXPLANATION OF THE COMMENTS

During the 30<sup>th</sup> session of CCNFSDU (see Alinorm 09/32/26 par. 152-154), it was agreed that the delegations of USA and Thailand would prepare a background document to be discussed at the 31<sup>st</sup> session. ISDI would like to provide general comments as summarised and explained below.

### General Comments

ISDI supports developing NRVs for nutrients associated with risk of non-communicable diseases (NCD).

### Specific Comments

**Question A1:** For establishing principles and criteria for NRVs-NCD do you support a similar organization as for the vitamin and mineral NRVs with separate sections for a Preamble, Definition(s), and General Principles at a minimum?

ISDI Comment: ISDI supports a similar organization for establishing principles and criteria for NRVs-NCD as for the vitamin and mineral NRVs.

**Question A2:** Do you support the topics (identified in the discussion paper) under general principles or have other suggestions?

ISDI Comment: Yes, ISDI supports the topics identified.

**Question B1:** How would you describe the population(s) for which NRVs-NCD would be applicable? For example, do you support their applicability to the “general population”?

ISDI Comment: ISDI supports the applicability of NRVs-NCD to the general population. However, established NRV-NCD for the general population may not apply to all foods for special dietary use, depending on the specific nutrient and the identified health condition.

**Question B2:** If the answer to the second question above is “yes”, is there a need to further define an age range for the “general population”? If so, what criteria should be used for defining this age range?

ISDI Comment: ISDI believes there is a need to define an age range for the “general population” and suggests 36 months and older. However, depending on how the NRVs are expressed, it might not be appropriate to include growing children from 3 years of age in the age range for the “general population”.

**Question C1:** Do you agree that the purpose and use of NRVs-NCD should be addressed in a preamble in the development of general principles for these NRVs?

ISDI Comment: Yes, the purpose and use of NRVs-NCD should be addressed in a preamble in the development of general principles for these NRVs.

**Question C2:** If so, do you have comments on the above possible adaptation of text in the vitamin and mineral NRV preamble or other suggestions for text to describe the purpose and use of NRVs-NCD?

ISDI Comment: ISDI agrees with the proposed language in the preamble of Annex I in the Discussion Paper.

**Question D1:** Is there a need for a definition section in the general principles, and if so what term(s) should be defined?

ISDI Comment: ISDI believes a definition section is necessary, and that the term “non-communicable disease” should be defined.

**Question D2:** In the Annex to this paper, do you support option 1 or 2 or another option?

ISDI Comment: ISDI supports Option 2.

**Question E1:** Do you agree that the Committee should consider CCFL proposals for expanding the list in section 3.2 but also consider additional factors and criteria in proposing nutrients for NRVs-NCD?

ISDI Comment: Yes.

**Question E2:** Do you support including sodium and saturated fat in the scope of nutrients to be considered for NRVs-NCD?

ISDI Comment: Yes.

**Question F1:** What are your views about the use of the criteria (proposed in the discussion paper) for the development of NRVs-NCD?

ISDI Comment: ISDI supports criteria proposed in Annex I of the Discussion Paper are appropriate.

**Question F2:** Are there other criteria that are applicable?

ISDI Comment: Not at this time.

**Question F3:** What are your views about the use of the principles and criteria (proposed in the discussion paper) for selection of suitable data sources in the development of NRVs-NCD?

ISDI Comment: ISDI supports the proposed principles and criteria in Annex I of the Discussion Paper.

**Question F4:** Are there other principles and criteria that are applicable?

ISDI comment: Not at this time.

**Question F5:** Do you have suggestions for specific references that the Committee should consider based on the above criteria?

ISDI comment: No.

**Question F6:** Based on your responses to F1 through 5 above and consideration of any other relevant information, are there particular nutrients that should receive the highest priority for the development of NRVs-NCD?

ISDI comment: Consideration should be given to define NRVs for dietary fibre.

**Question G1:** With regard to daily intake reference values from recognized authoritative scientific bodies that are expressed as a percentage of caloric intake, do you support establishing a Codex NRV-NCD based on a reference diet of 2000 calories or another calorie level?

ISDI comment: A reference diet of 2000 kcal is not appropriate for growing young children from 3 years onwards..

**Question G2:** Do you agree that any single daily reference caloric intake selected for the Codex NRVs-NCD may not be applicable to all countries? If so, do you support: 1) indicating this in the general principles, and 2) including in any proposed table on NRVs-NCD not only the NRVs-NCD based on the single reference caloric intake (in milligrams or grams), but also daily intake reference values for the selected nutrients (as a percentage of calories) for governments to derive their own values based on another reference caloric intake?

ISDI comment: No comment.