



26 October 2010

**PRINCIPLES AND CRITERIA FOR THE DEVELOPMENT OF NRVS FOR
LABELLING PURPOSES FOR NUTRIENTS ASSOCIATED WITH RISK OF DIET
RELATED NONCOMMUNICABLE DISEASES AT STEP 4**

ISDI COMMENTS ON THE PROPOSED DRAFT

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, Thailand and Chile, in developing the *Proposed Draft Annex to the Codex Guidelines on Nutrition Labelling: General Principles for Establishing Nutrient Reference Values for Nutrients Associated with Risk of Non-Communicable Diseases for the General Population. (CX/NFSDU 10/32/7)*. ISDI supports the updated draft prepared by the eWG.

GENERAL COMMENTS

1. ISDI agrees that both the NRV-NCDs and these general principles apply to the general population identified as individuals older than 36 months. Additionally, ISDI agrees with the eWG that the target population are healthy individuals and therefore supports proposed terminology of “intake recommendations for healthy populations” (section 3.2).,
2. 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 the relationship between the nutrient and noncommunicable disease risk.



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3. ISDI is also committed to collaborate in the development the principles that allow countries or regions to establish reference values for additional nutrients associated with risk of non-communicable diseases.

SPECIFIC COMMENTS

Section 2: Definitions

ISDI supports the definition of NRVs-NCD that includes reference to chronic disease and specifically excludes nutrient deficiency diseases as these additions clarify the nature of the diet related noncommunicable diseases. ISDI also supports the inclusion of the entire definition of Daily Intake Reference Values which includes reference to principles in Section 3 (text currently in square brackets) as it encompasses all relevant criteria for selecting reference values.

Section 3: General Principles for Establishing NRVs-NCD

Section 3.1 Criteria for Selection of Nutrients: ISDI agrees with the inclusion of all 3 criteria for the consideration in the selection of nutrients. ISDI believes that the level of evidence should be *convincing or probable* as it is not in the interest of public health to exclude those nutrients with probable evidence of a relationship with disease especially if randomized controlled clinical trials have demonstrated an association between exposure and disease.

Section 3.2 Selection of Suitable Data Sources to Establish NRVs-NCDs: ISDI agrees with the inclusion of data from independent review of science by authoritative bodies in addition to the NRVs provided by FAO/WHO. We support the second bullet which recognizes the primacy of evidence evaluated using a systematic review.