

ISDI position

CCNFSDU40 Agenda Item 11: Proposal for New Work

Discussion Paper on Harmonized Probiotic Guidelines for Use in Foods and Dietary Supplements

ISDI is the leading international expert association on special dietary foods. It brings together national and international associations that are active in this food sector from more than 20 countries over 6 continents.

Position

ISDI acknowledges the initiatives of Argentina on the *Proposal for New Work on Harmonized Probiotic Guidelines for Use in Foods and Dietary Supplements* supporting the proposal made by the International Probiotic Association (IPA).

ISDI supports initiatives for harmonizing food legislation and welcomes the objective of Argentina *to help protect the health of the consumers and ensure fair practices in the food trade.*

However, ISDI calls the attention of CCNFSDU members on the following elements:

- Several Codex texts, elaborated by various codex committees (e.g. CCFH, CCCF, CCFL) along with the guidance provided by the FAO/WHO guidelines^{1,2} are already addressing this topic
- The safety and manufacturing requirements of probiotics as a food/food ingredient are elements already covered by several horizontal Codex-Standards, including among others:
 - the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995) or
 - the General Principles of Food Hygiene (CXC 1-1969) and
 - other relevant Codex texts.
- Communication on the health benefit of probiotics is already covered by a Codex document "Guidelines for Use of Nutrition and Health Claims – CAC/GL 23-1997" along with its annex regarding "Recommendations on the scientific substantiation of health claims"
 - The specific need for efficacy studies are clearly described in the FAO/WHO-guidelines (2002)²
- A number of countries have already developed national provisions based on the FAO/WHO^{1,2} guidelines

ISDI also calls on CCNFSDU members to consider this new work proposal in light of the request from CCEXEC75³ that CCNFSDU prioritizes its work, as many topics and draft Standards are currently in development.

Should this work proceed once the assessment of the current workload and other priorities of CCNFSDU is finalised, and in order to avoid duplication, ISDI recommends that such new work on probiotics should be limited to probiotics as an ingredient (description, characterisation) and not cover "food with probiotics" to avoid above mentioned duplication.

ISDI further recommends such a document to focus on general, manageable high level principles. These principles should not be too prescriptive in order to keep manufacturing freedom to operate according to already established international references and avoid potential trade barriers.

References

¹ Report of a Joint FAO/WHO Expert Consultation on Evaluation of Health and Nutritional Properties in Food including Powder Milk with Live Lactic Acid Bacteria, Cordoba, Argentina, 1-4 October 2001¹

² Report of a Joint FAO/WHO Working Group on Drafting Guidelines for the Evaluation of Probiotics in Food, London, Ontario, Canada, 30 April – 1 May 2002.

³ Report of the seventy-fifth session of the Executive Committee of the Codex Alimentarius Commission (REP18/EXEC2-Rev.1)