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DG-SANCO DISCUSSION PAPER ON THE SETTING OF MAXIMUM PERMITTED LEVELS

Solgar Vitamin and Herb is a global food supplement manufacturer and distributor with a significant business interest in the EU turning over tens of millions of Euros per annum, and employs and provides for several hundreds of jobs in the EEC.

As a member of the Health Food Manufacturers Association (HFMA) in the UK, and associate members of many related associations throughout the EEC, Solgar Vitamin and Herb completely and confidently endorses the position outlined in the HFMA submission in response to the above discussion paper. The natural products that Solgar manufactures have been available for sixty years and have been a choice for millions of people to freely purchase.

Solgar Vitamin and Herb strongly supports the notion of consumer choice throughout the EU and we are horrified to think that political machinations could leave the consumer in a position where they are unable to take responsibility for their own health and are unable to make informed choices about which food supplements they would like to take. The UK market is one of the most liberal in the EU in relation to food supplement levels and despite this, there is no evidence that nutrient levels in the UK population are undesirably high, or that supplements which have been available on the UK market for many years are causing health problems relating to nutrient excess. Solgar is in its sixtieth year of business and the product is purchased by millions of consumers every year. In fact food supplements including Solgar's have an exemplary safety record, a fact bourn out by the complete lack of serious adverse events reported. Our own complaints logging system that goes back 15 years to when Solgar first arrived in the EU supports this standing along with the lack of serious adverse event reports on food supplements around the rest of the world where Solgar is available.

VITAMINS
MINERALS
HERBS
AMINO ACIDS



Solgar therefore supports the setting of maximum permitted levels only based on evidence-based scientific risk assessment. Most importantly this should take into account all of the available evidence, including the UK Government-sponsored report by the Expert Group on Vitamins and Minerals (EVM). This approach provides the best basis for arriving at MPLs that will harmonize the EU marketplace whilst maintaining consumer choice.

It is noted that the discussion paper makes reference to the fact that there is a need to avoid ‘undue constraints of business’, and ‘unnecessary overregulation’ and these points are welcomed. However, the paper does not recognize the rights of consumers to choose which supplements they use and does not acknowledge the proactive role of the UK industry and Government in implementing label advisory statements for supplement levels where evidence is not currently supportive of lifetime supplementation, but is perfectly safe and appropriate over shorter time periods.

In Summary, Solgar Vitamin and Herb is supportive of the HFMA position in relation to the discussion paper on the setting of maximum permitted levels but would like to stress the importance not only of achieving a unified market, but also of maintaining the rights of consumers who choose to use food supplements in the hope of promoting their health. The setting of maximum permitted levels should therefore be a risk assessment based on relevant scientific evidence.