



THE
HEALTH PRODUCTS
ASSOCIATION
OF SOUTHERN AFRICA

COMMENTS FROM HPA OF SOUTHERN AFRICA

Discussion Paper on the Setting of Maximum and Minimum Amounts for Vitamins and Minerals in Foodstuffs (European Commission, DG Sanco - June 2006)

The Health Products Association of Southern Africa (HPA) would like to comment on what it considers to be a major step towards establishing maximum and minimum amounts of vitamins and minerals in the European Union.

HPA appreciates the significant impact that the result of this process may have globally and therefore supports the approach that seems to be taken in the European Commission Discussion Paper i.e. to set safe upper levels in food supplements and fortified foods based on a scientific risk assessment of vitamins and minerals.

When looking at the texts recently adopted and developed by the global organisations affecting this process, the 2005 Codex Guidelines for Vitamin and Mineral Food Supplements and the 2006 FAO/WHO Report on the Risk Assessment of Vitamins and Minerals, it seems clear that the direction taken to establish maximum amounts for supplement ingredients is through a sound scientific risk assessment.

The HPA specifically notes and supports point 37 of the Discussion Paper of June 2006, which take into consideration the concept of optimum nutrition when setting nutrient levels.

Draft legislation establishing upper safe levels for food supplements and fortified foods in South Africa is on the table. This will soon be published for public comment. The HPA understands that, in this draft legislation, scientific risk assessment has been used by the Regulators to determine the maximum and minimum levels of vitamins and minerals in food supplements and fortified foods.

HPA very much hopes that this approach is also followed by the European Union when setting maximum levels for fortified food and food supplements and that a rational approach, based on science not politics, can be achieved that could become a model for other countries addressing this issue across the world.

In addition, HPA considers that the establishment of maximum levels for addition to foods and food supplements should be based upon the highest intakes in the population from all dietary sources on a nutrient-by-nutrient basis. For this, the nutrients should be categorised on a case-by-case basis. Taking appropriate measures for each of the groups is in our opinion a logical and practical method for risk management.

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