

ORAF TI

Having read the document SANCO/1341/2001 on Nutrition & Functional Claims, I like to give you some comments.

Nutrition:

These seem to be pure nutrient content claims, and are perhaps better referred to as such.

Functional:

I am rather disappointed to see that, as stated in the introductory page of the document, the so called 'health claims' and 'disease risk reduction claims' are not dealt with in this paper. It is my opinion that these type of claims fit perfectly within the concept of functional foods, and as a consequence, within the concept of functional claims. This is a gap in the EC legislation that should be clarified as soon as possible. It is also in this regard that I am totally missing the reference to the ILSI FUF OSE Consensus document published in the BJN in 1999 (cfr. point 39).

Pt. 49: Is it advisable to suggest guidance with regard to the minimum effective dose of an ingredient for a certain health effect and the dose per portion of this ingredient (e.g. the unwritten 25% rule at the FDA)?

Pt. 46 Does this leave enough room for innovative claims based upon new concept interventional trials?

Thank you for taking these comments into consideration.

I am very interested to hear from you, if it can be reconsidered to include the so called health and disease risk reduction claims in this discussion.

And if not, can a timing be given when action plans can be put forward to do so. When initiatives are being taken on a national basis, this will not facilitate the harmonisation of these indeed rather complex issues, throughout the EC. I do believe that the FUF OSE Consensus Document provides a very solid basis to start from.

Sincerely,

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