

28th September 2006

SANCO-VITAMINS-AND-MINERALS@EC.EUROPA.EU

The European Commission
DG Health and Consumer Protection
Brussels

Dear European Commission

The Council for Responsible Nutrition (CRN) is the UK trade association representing the leading manufacturers and suppliers of food supplements, such as vitamins, minerals, herbals and cod liver and other fish oils. Over 70% of all food supplements consumed in the UK, come from CRN member companies.

The CRN is pleased to submit our industry response to the discussion document in relation to the setting of maximum and minimum levels for vitamins and minerals. Our direct response to the Commission's nine questions is attached. We also offer the following brief clarifying remarks.

For over 25 years, the CRN has led the food supplements industry nationally and internationally in adhering to and promulgating the safe use of vitamins and minerals in accordance with scientific risk assessment and risk management. We believe this responsible approach has ensured wide consumer choice while protecting consumer health in a market where the majority of consumers take food supplements on a regular basis.

In all material representations over 25 years, the CRN has had the support of the UK government. However, due to political interference in response to demands from a vocal minority of UK consumers, the UK government has taken a position which does not have the support of the large majority of industry or of the major consumer organisations.

CRN strongly opposes the two tiered system adopted by the UK Food Standards Agency in September 2005. Such a system would raise barriers to trade, specifically for UK manufacturers actively marketing their products throughout the European Union and is not in the spirit of harmonisation, one of the objectives of the Food Supplements Directive.

CRN strongly opposes levels higher than those considered safe by scientific risk assessment, as represented in the EVM report.

CRN supports the findings of the EVM report which is the only scientific risk assessment that focuses on Safe Upper Levels and Guidance Levels for the vitamins and minerals contained in food supplements, as well as providing Upper Levels for many micronutrients in respect of total dietary intakes, i.e. from food supplements, conventional foods and fortified foods. For over two decades, CRN member companies have demonstrated the safe use of vitamin and mineral products at approximate EVM levels and continue to support EVM levels as a long term EU approach to the setting of maximum levels for vitamins and minerals.

Yours sincerely



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