

COMMENTS FROM BESDESDER

Discussion Paper on the Setting of Maximum and Minimum Amounts of Vitamins and Minerals in Foodstuffs

BesDesDer, the Turkish Food Supplements Manufacturers and Importers Association, would like to express its support to the process opened by the European Commission. BesDesDer welcomes the opportunity to comment on its discussion paper as the first step towards the setting of maximum and minimum amounts for food supplements and fortified foods.

In line with the recently adopted Codex Guidelines for Vitamin and Mineral Foods Supplements and the 2002 EU Food Supplement Directive, BesDesDer supports the process of setting safe maximum amounts in food supplements based on a scientific risk assessment of vitamins and minerals.

In addition, BesDesDer would like to point out that it is necessary to consider setting different maximum levels for fortified food and food supplements on the basis of a common approach based on a case by case scientific assessment of vitamins and minerals.

The use of arbitrary multiples or fractions of RDAs/PRIs to set upper levels is no longer acceptable from the scientific risk assessment point of view, as according to Codex, or as an objective approach to risk management. RDAs can be considered as the lowest level of the safe intake range for each nutrient but cannot be used in risk assessment to establish upper safe levels. BesDesDer would therefore like to refer to the FAO/WHO Report on the Risk Assessment of Vitamins and Minerals issued this year, which provides guidance to governments on how to approach risk assessment for supplement ingredients when looking at introducing maximum levels.