



Secretariat email : HSIAS@fespc.com
c/o 150 Orchard Road #07-07
Singapore 238841
Tel: (65) 6737 6883

Commissioner Markos Kyprianou
Health and Consumer Protection
Directorate-General of the European Commission

Comments on Discussion Paper on the setting of maximum and minimum amounts for vitamins and minerals in foodstuffs

Dear Commissioner *Kyprianou*,

We would like to take this opportunity to express our view that the EU should ensure that it maintains an approach to the setting of maximum levels that is scientifically credible and appropriate.

Within the ASEAN region, a few countries still maintain RDA based limits. However, following the adoption of the Codex Guidelines on vitamin and mineral food supplements in 2005, these low limits are gradually being replaced by higher limits or even done away with, based on more rational scientific approaches.

The market in health/food supplements in the ASEAN region has grown considerably - by double digits in percentage terms - over the past 5 years. Consumers now have access to a wide range of products at both the lower and higher levels of vitamins & mineral content, many of them manufactured in the EU.

Conversely, ASEAN companies are also increasingly marketing their products to EU consumers and it would be to detrimental, both to consumers and to manufacturers, if the available product ranges becomes very limited.

We trust that both EU and ASEAN companies will continue to be able to manufacture and market such products after the establishment of EU maximum levels and that the creation of barriers to trade between the Asia and Europe will be avoided.

Yours Faithfully



28/9/06

Daniel Quek
Chair
ASEAN Alliance of Health Supplement Associations

PS. One Specific Comment : RDA was developed primarily to prevent the development of gross malnutrition health problem and it does not equate to maximum level. The guideline for maximum level should be based on scientific evidence (e.g. population studies, toxicology studies, etc) and expert consultation.

Of course, caution must be attached as warning of side effects. e.g. even safe water-sol Vit C can cause diarrhea if more than 1 or 2g is consumed daily.

About the ASEAN Alliance of Health Supplement Associations (AAHSA)

Formed in July 2006, AAHSA is a member of the International Alliance of Dietary & Food Supplements Associations (IADSA).

The ASEAN Health Supplements industry is estimated at US\$1.5 billion market size (2006 est.) growing at CAGR of 10% for the past 5 years.

Organisational Structure:

Chair - Singapore

Health Supplements Industry Association of Singapore(HSIAS): Daniel Quek

Vice Chair - Indonesia

APSKI : Reginald Wuisan

Treasurer - Thailand

HSFA : Pisuth Lertvilai

Secretary – Singapore

HSIAS : Leng Leo

Secretariat based in Singapore

Role of AAHSA:

- To facilitate trade in quality products for the benefit of consumers.
 - Coordination and representation of the ASEAN health supplement industry in ASEAN harmonization process.
 - Providing regulatory, scientific, technical, market data to the harmonization process.
 - Building and strengthening national associations.
 - Organizing regional events
 - Building awareness of the ASEAN industry outside the region.
-