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**SANTÉ PUBLIQUE,  
SECURITE DE LA CHAÎNE ALIMENTAIRE  
ET ENVIRONNEMENT**

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**Animaux, Végétaux et Alimentation**

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VOTRE LETTRE DU 06/06/2006  
VOS RÉF. SANCO/E4/FDA/co/D540345 (2006)

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

NOS RÉF. 82.428/L.200/PDG

DATE **03 -10- 2006**

ANNEXE(S) -

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OBJET Discussion paper on setting maximum and minimum amounts for vitamins and minerals

Dear Madam/Sir,

The Belgian authorities would hereby like to give their comments on the "Discussion Paper on setting maximum and minimum amounts for vitamins and minerals in foodstuffs".

#### **Establishment of maximum amounts for food supplements and other foods**

For some vitamins and minerals the Scientific Committee on Food and later the European Food Safety Authority could not set a specific numerical tolerable upper intake level, due to the lack of systematic oral intake dose-response studies.

For some of those nutrients, there seems to be a low or non-existing toxicity even at high levels of intake. This would be the case for vitamin C. The opinion of EFSA on vitamin C states however that there has not been a systematic assessment of the safety of the long-term use of high dose vitamin C supplements. That is why Belgium means that even though a numeric UL could not be set for vitamins and minerals because, amongst others, they seem to be extremely low toxic, precautionary measures are necessary and maximum amounts should be established. In those cases the procedure of FAO/WHO, to take into account the highest observed intake level in setting maximum levels, could be used. After all, beyond this highest observed intake level no data are known, so one could not state that doses above this intake level are not toxic.

Maximum amounts for vitamins and minerals should be set separately for food supplements and fortified foods. In both cases a sufficiently large safety margin in regard to the UL should be taken into account, in order to avoid exceeding the UL at simultaneous ingestion of food supplements and fortified foods.

#### **Intake of vitamins and minerals from dietary sources**

In 2004 Belgium effectuated a National Food Consumption Survey. In this survey data were collected on the average consumption of a reliable study group of the population. The data gave an insight of the consumption of foods and the intake of micro- and macronutrients. That way the average daily intake of calcium, vitamin C and iron could be determined.

Belgium also disposes of a Food table that states for a number of foods the levels of a number of nutrients.

According to the opinions of SCF and EFSA for a lot of nutrients the UL for children up to approximately 10 years is half of the UL for adults. Therefore it would be appropriate to establish

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maximum amounts of vitamins and minerals for different population groups taking into account the different ULs and different dietary intakes.

#### **Reference intakes of vitamins and minerals**

An adequate and varied diet can, under normal circumstances, provide all necessary nutrients for normal development and maintenance of a healthy life in quantities which meet those established and recommended by generally acceptable scientific data. However it has been shown that this ideal situation is not always being achieved.

Food supplements and fortified food can make a positive contribution to overall intakes.

Existing models for nutrient risk assessment are mostly developed consistent with the characteristics of populations that are adequately nourished and generally healthy and that consume an array of fortified foods, formulated foods, functional foods and food supplements. The FAO/WHO expert group concluded that ULs set for adequately nourished (sub)populations may not be appropriate to use for inadequately nourished (sub)populations that are comparable in age/sex/lifestyle.

That's why quantities that are currently used in medicine to cure deficiencies, should not enter the food chain and why reference intake values of should play a major role in setting maximum levels for vitamins and minerals.

#### **Minimum amounts**

The consumer should at all times be as well informed as possible about foods.

If the minimum amount for the addition of vitamins and minerals to foods or food supplements is lower than the amount required for purposes of labelling and claims, it will be impossible to clearly inform the consumer about the nutrients that are present in the food.

Therefore it would be most logical to use the same minimum amounts.

For a certain number of foods, it might be necessary to foresee the possibility to add fewer minerals than the fixed amounts. This could be the case for sport drinks in order to become an isotonic solution. Those deviations should however only be possible after following a individual European derogation procedure.

Yours sincerely,

The head of Unit,

ir. Marc Leemans

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