

**CODEX COMMITTEE ON NUTRITION AND FOODS FOR
SPECIAL DIETARY USES**

Bad Soden am Taunus, Germany, 23 – 27 November 2015

European Union Comments on

Agenda item 7:

**PROPOSED DRAFT NRV-NCD FOR EPA AND DHA LONG CHAIN
OMEGA-3 FATTY ACIDS**

*European Union Competence
European Union Vote*

The European Union (EU) would like to thank the Russian Federation and Chile for their work as chairs of the related Electronic Working Group and the preparation of this agenda item. The EU has the following comments:

The EU supports the setting of an NRV-NCD for DHA+EPA at the proposed level of 250mg. The EU believes that the criteria for the Selection of Nutrients and Appropriate Basis for NRVs-NCD laid down in section 3.2.2 of Codex Guidelines on Nutrition Labelling are fulfilled.

More particularly:

- The EU believes that the available scientific evidence is convincing regarding the relationship between DHA+EPA intakes and cardiovascular health. This evidence is convincing for the relationship between fish and fish oils (EPA and DHA) and the risk of cardiovascular diseases, as mentioned in the WHO/FAO 2003 report¹. This evidence is also qualified as convincing in the WHO 2010 report² for lowering the risk of fatal coronary heart disease events, and in the joint FAO/WHO Expert Consultation.
- The EU believes that the scientific evidence linking DHA+EPA intake to cardiovascular health and the gap between current intakes of DHA+EPA and recommended intakes justify the setting of an NRV-NCD from a public health point of view. In the EU, cardiovascular diseases are the first cause of death and account for 40% of deaths³. Intakes of EPA and DHA are often low and below the recommended levels.

The EU therefore believes that the criteria referred to in 3.2.2.1 are fulfilled.

¹ Diet, nutrition and the prevention of chronic diseases - Report of the joint WHO/FAO expert consultation - WHO Technical Report Series, No. 916 (TRS 916)

² World Health Organisation (2010) Fats and fatty acids in human nutrition

³ European Cardiovascular Disease Statistics 2012 edition- European Heart Network and European Society of Cardiology, September 2012 <https://www.bhf.org.uk/~media/files/research/heart-statistics/european-cardiovascular-disease-statistics-2012.pdf>

Furthermore, the EU believes that the DHA and EPA Adequate Intake set by EFSA in its scientific opinion on dietary reference values for fats can be used as a basis for an NRV-NCD. The EU notes that EFSA conclusions are expressed for oily fish consumption and dietary n-3 long chain polyunsaturated fatty acids supplements. It should also be noted that similar recommended levels are mentioned in the other mentioned consultations (WHO 2010 and Nordica Council of Ministers/ Norwegian Scientific Committee⁴).

The EU therefore believes that the criteria 3.2.2.2 to 3.2.2.6 are also fulfilled.

The EU therefore supports the setting of a NRV-NCD for DHA+EPA with the proposed level of 250mg.

The EU also agrees with the proposed wording amending section 3.4.4.2 of the Guidelines on Nutrition Labelling and the corresponding footnote.

⁴ Evaluation of negative and positive health effects of n-3 fatty acids as constituents of food supplements and fortified foods, Opinion of the Steering Committee of the Norwegian Scientific Committee for Food Safety, 2011