

456

Crane, Nancy T

From: Spangler, David [DSpangler@chpa-info.org]
Sent: Monday, August 19, 2002 2:38 PM
To: Crane, Nancy T
Subject: CCNFSDU proposed draft vit./min. guidelines comments

02-022N
02-022N-456
David C. Spangler



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CHPA comments on CCNFSDU proposed draft guidelines for vitamin and mineral supplements follow.

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David Spangler

CHPA



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CONSUMER HEALTHCARE PRODUCTS ASSOCIATION®

August 19, 2002

Dr. Elizabeth A. Yetley
HFS-450
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740-3835

Re: Codex Committee on Nutrition and Foods for Special Dietary Uses, Docket No. 02-022N

Dear Dr. Yetley:

The Consumer Healthcare Products Association welcomes the opportunity to comment on the U.S. government's position concerning proposed draft guidelines for vitamin and mineral supplements at the next meeting of the Codex Committee on Nutrition and Foods for Special Dietary Uses. CHPA is the 121-year-old trade association representing manufacturers of nonprescription, or over-the-counter medicines and dietary supplements, including well-known brands such as Centrum vitamins and One-a-Day vitamins, among others. CHPA members manufacture and distribute dietary supplements both in the U.S. and other countries around the world, and therefore have an interest in the CCFNSDU proposed draft guidelines.

In general, we concur with the U.S. government draft position circulated for the July 30 U.S. stakeholder meeting. It appropriately notes the importance of consumer choice and access to safe vitamin and mineral supplements that are labeled in a truthful and non-misleading manner, and appropriately stresses that any maximum levels should be based on safety assessments and not arbitrary application of a percentage of recommended daily intake. We urge the U.S. government to maintain that position.

Within 5. Labelling, we suggest that 5.9 (“[All labels should bear a statement that the supplement should be taken on an advice of a nutritionist, a dietician, or a medical doctor.]”) be deleted in its entirety. Such a label recommendation is inconsistent with the consumer choice principle of the guideline preamble and purpose.

We appreciate the opportunity to submit these comments, and thank you for considering our views.

Sincerely,

David C. Spangler
Vice President – International
& Assistant General Counsel

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