

September 7, 2009

Draft Common Position on EFSA Scientific Opinion “Consequences for the consumer of the use of Vitamin A in animal nutrition” - Question No EFSA-Q-2006-121*.

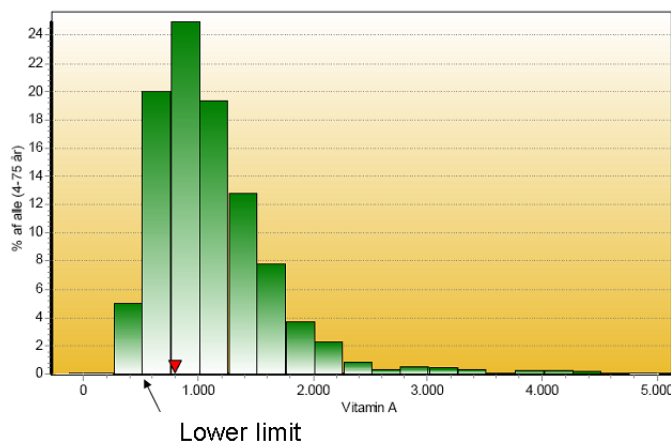
EFSA published on February 12th an opinion of its FEEDAP Panel on “Consequences for the consumer of the use of Vitamin A in animal nutrition”.

The Panel recommends as a measure for the protection of consumers

- The introduction of revised maximum vitamin A contents for feed for most food-producing animals
- The limitation of vitamin A in the daily ration by regulating complementary feedingstuffs
- The monitoring of preformed vitamin A in foods of concern after introduction of revised maximum contents
- The extension of advice to consumers to avoid excessive intake of preformed vitamin A.

The recommendations are based on the panel’s conclusion that between 1 and 6% of the population in the investigated EU member states has intakes of preformed retinol above the safe upper level (UL) on 3000 µg RE. The panel states that the risk of exceeding UL for preformed vitamin A is predominantly related to liver consumption but also to consumption of supplements containing vitamin A. The panel also mentions the fact that the intake of retinol shows a skewed distribution, which arises from the non-uniform distribution of retinol in the food supply.

However, the opinion does not consider the fact that significant parts of the population in various Member States (e.g. 16% in Ireland: O’Brien et al., 2001) have total vitamin A intakes (incl. beta-carotene) below the estimated average requirement (EAR) below which deficiency signs are likely to occur (O’Brien et al., 2001, Lavikainen et al., 2007, Lyhne et al., 2002).



Thus, 1-6% of the consumers with intakes above the UL for retinol have to be put into perspective to a significantly higher percentage of consumers with intakes of total vitamin A below the recommended daily allowance (RDA) and even below EAR. This is illustrated in a typical intake distribution curve which is shown in the Figure 28 (Lyhne et al., 2002).

Figur 28: Kostens indhold af vitamin A pr. 10 MJ (RE); frekvensfordeling samt anbefalet indhold (▼) ved planlægning af kost til grupper af personer af begge køn i alderen 6-60 år. Content of vitamin A per 10 MJ in the diet (RE); frequency distribution and recommended nutrient density (▼) for planning diets for groups of individuals of both sexes aged 6-60 years.

Further restrictions in feed (and food) legislation are likely to move the distribution curve to the left, not to amend its shape, resulting in an even larger part of the EU population not reaching the RDA and even the EAR of total vitamin A intake.

Conclusion

The food and feed sectors agree that the most appropriate measure to protect consumers from both too high as well as too low intakes of vitamin A is via general consumer information and advice, as also proposed by the FEEDAP panel. Furthermore, this is how the intake of other food items, such as saturated fatty acids are handled (<http://www.eatwell.gov.uk/healthydiet/fss/fats/satfat/>).

The consumer should be informed of the main sources of preformed and total vitamin A and of the risks of both, too high and too low intakes. An advice on an appropriate frequency of liver-meals could be made, as liver is a significant source of vitamin A. Likewise a recommendation not to simultaneously consume food supplements containing high dosages of preformed vitamin A, if liver is eaten frequently, could be made. Sensitive groups of the population should be addressed with more specific advice.

Using this approach the consumer is empowered to make an informed choice on his/hers vitamin A intake.

We hope that these facts and suggestions will be taken into account.

Associations supporting this position:

AFCA-CIAL (French premix association)

ERNA (European Responsible Nutrition Alliance)

Nutraceutisk Industri (Danish Association of manufacturers of dietary supplements and herbal medicines)

SYNPA (French association of feed additive, food additive and food ingredient producers)

The Danish Food and Feed Federation

Working Group Food Supplements within the BLL (German Federation for Food Law and Food Science)

*The associations supporting this position may have additional positions to the EFSA opinion published February 12, specifically referring to their area of interest.

References:

Lavikainen T, Karlström U, Bäckman C, Hirvonen T. Evira research report 2/2007. Intake of vitamin A, cadmium and lead via liver foods among Finnish women of fertile age – a quantitative risk assessment (2007).

Lyhne et al. DFVF publication no. 11. Danskernes Kostvaner 2000-2002 (2002).

O'Brien MM, Kiely M, Harrington KE, Robson PJ, Strain JJ and Flynn A. Public health nutrition, 2001, 4(5A), 1069-1079

Abbreviations:

EAR - Estimated average requirement (400 µg RE for women and 500 µg RE for men)

RDA - Recommended daily allowance (600 µg RE for women and 700 µg RE for men)

UL - Safe upper limit (3000 µg RE)