

1 September 2024

## CCNFSDU44: Discussion Paper on Harmonized Probiotic Guidelines For Use In Foods And Food Supplements

### ISDI comments on CCNFSDU44: Agenda Item 6- Add 1

ISDI would like to thank the EWG Chair, Argentina, and the EWG Co-chairs, Malaysia and China, for their extensive work in preparing the new work ([CX/NFSDU 24/44/6 Add1.](#)).

ISDI supports the development by Codex Alimentarius of science-based standards and guidelines to protect the health of consumers and facilitate trade.

We welcome that the EWG recommendation accepts the assessment of probiotics as food for use as ingredient in foods and food supplements (App 1. §14) and recognised the FAO/WHO Experts – “Probiotics in food Health and nutritional properties and guidelines for evaluation”. FAO and WHO convened an expert working group to develop these guidelines for the evaluation of probiotics in food (see App 1 §17).

The scope of the guidelines “would provide a harmonized framework to regulatory authorities for the evaluation of microorganisms for use as probiotics.” (App 1 §14). However, ISDI continues to believe in duplication of these potential guidelines with existing Codex texts (§16) elaborated by various Codex committees (e.g., CCFH, CCCF, CCFL) along with the guidance provided by FAO/WHO, are sufficiently addressing this issue:

- General Standard for Contaminants and Toxins in Food and Feed ([CXS 193-1995](#))
- General Principles of Food Hygiene ([CXC 1-1969](#))
- General Standard for Labelling of Prepackaged Foods ([CXS 1-1985](#))
- General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses ([CXS 146-1985](#))
- Guidelines for Use of Nutrition and Health Claims ([CAC/GL 23-1997](#)) along with its annex regarding, “Recommendations on the scientific substantiation of health claims”.

Furthermore, the “Guidelines for Use of Nutrition and Health Claims - CAC/GL 23-1997” along with its annex regarding “Recommendations on the scientific substantiation of health claims” apply when making claims of foods which contain probiotics.

ISDI continues to support the CCNFSDU to prioritise its work whereby the priorities should verify:

- To review existing standards and guidelines against latest scientific evidence
- To develop standards/guidelines, for which there are currently no international guidelines,

Consequently, we propose CCNFSDU **not to give priority this proposal.**

### References

1. Report of a Joint FAO/WHO Expert Consultation on Evaluation of Health and Nutritional Properties in Food including Powder Milk with Live Lactic Acid Bacteria, Cordoba, Argentina, 1-4 October 2001.
2. Report of a Joint FAO/WHO Working Group on Drafting Guidelines for the Evaluation of Probiotics in Food, London, Ontario, Canada, 30 April –1 May 2002.