



Brussels, 9 March 2011

Basil Mathioudakis
Food, Nutrition & Labelling Unit
DG SANCO
European Commission

200 Rue de la Loi
B-1049 Brussels

Re: EFSA Q-2009-0455: Thiamin and maintenance of normal neurological development and function (Article 14)

Dear Mr. Mathioudakis,
Dear Basil,

On 10th February the European Food Safety Authority (EFSA) published a positive Scientific Opinion on the substantiation of a health claim related to thiamin and maintenance of normal neurological development and function¹.

We have been informed that this Opinion has been subject to a discussion in the Working Group on Claims of 22 February as to a proposal of the Commission to extend the target population from infants and children up to 3 years to children up to 18 years of age, based on the EFSA opinion stating that, while the target population in the application was infants and children up to three years, the role of thiamin in normal neurological function is not specific to any population group.

We welcome and support this proposal of the Commission.

In this opinion, EFSA also notes that all essential nutrients, including vitamins and minerals, are required for normal development of infants and children. Based on this we would like to ask the Commission and the Member States to consider allowing for the claim that "*vitamins and minerals are required for normal growth and development of children*" for the target population of children aged 3 to 18 years. This claim should be permitted for the groups of essential nutrients as well as for each single vitamin and mineral (if acknowledged as essential).

The reason for this request is that such a claim would be easy to understand by the consumer, in particular when used in the context of multivitamin/mineral supplements, that would otherwise

¹ EFSA Panel on Dietetic Products, Nutrition and Allergies (NDA); Scientific Opinion on the substantiation of a health claim related to thiamin and maintenance of normal neurological development and function pursuant to Article 14 of Regulation (EC) No 1924/2006. EFSA Journal 2011;9(2):1980. [8 pp.]. doi:10.2903/j.efsa.2011

require claims on the function of every individual vitamins and minerals. We note that the EC has already approved such claim referring to essential fatty acids² and that a number of such health effects for vitamins and minerals had also been accepted by the UK Joint Health Claims Initiative at the time (e.g. contribution of vitamins and minerals to normal growth, development, reproduction, conception and body maintenance)³.

We feel that the general statement by EFSA would be sufficient for the EC and Member States to consider this and avoid that resources need to be spent on applications and assessments under article 14 of the Regulation, with ultimately the same result.

The approval of such a claim could even limit the number of further applications for children's claims (article 14) for individual vitamins and minerals, which are already supported by positive EFSA opinions under the Art 13.1 procedure.

We would be happy if the EC could positively consider this request.

Kind regards,



Petra Tiersch
ERNA Chair

² Regulation (EC) No 983/2009 of 21 October 2009 on the authorisation and refusal of authorisation of certain health claims made on food and referring to the reduction of disease risk and to children's development and health (Based on a positive EFSA opinion on Q-2008-079

³ Joint Health Claims Initiative. Final Technical Report. 17 December 2003.
http://www.food.gov.uk/multimedia/pdfs/jhci_healthreport.pdf