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July 25, 2002

Food Safety Inspection Service (FSIS) Docket Room  
U.S. Department of Agriculture  
Food Safety and Inspection Service, Room 102, Cotton Annex  
300 12<sup>th</sup> Street SW  
Washington, DC 20250-3700



RE: Docket 02-022N  
AHHA Position Paper #2

02-022N  
02-022N-3  
Suzan Walter, President

The American Holistic Health Association (AHHA) submits this document to be considered when drafting the United States' position related to the **Preamble and 3.0 of the "Proposed Draft Guidelines for Vitamin and Mineral Supplements"** that will be discussed at the 24th Session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) to be held in Berlin, Germany, November 4-8, 2002.

The PREAMBLE of the "Proposed Draft Guidelines on Vitamin and Mineral Supplements" states:

"Most people who have access to a balanced diet can usually obtain all the nutrients they require from their normal diet. Because foods contain many substances that promote health, people should therefore be encouraged to select a balanced diet from food before considering any vitamin and mineral supplement. In cases where the intake from the diet is insufficient or where consumers consider their diet requires supplementation, vitamin and mineral supplements serve to supplement the daily diet."

The technical content of the "Guidelines" document appears to be based on the position that supplementation is to make up for deficiencies in obtaining the basic levels of vitamin and minerals to sustain life.

The American Holistic Health Association urges the U.S. delegation to take an active role in bringing the "Guidelines" up to date to reflect the more advanced research now available. Today it is acknowledged that vitamins and minerals are important for **two** different reasons.

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- (1) Insufficient levels of certain nutrients in the body will result in deficiency diseases.
- (2) Adding certain nutrients to the body helps prevent many chronic diseases and supports the immune system to work more effectively in resisting the invasion of bacteria and virus.

The "Guidelines" document does not appear to be including any allowance for the technical advances being documented by the American Medical Association, Council for Responsible Nutrition, and others that nutritional supplementation has a preventive role.

A concern has been stated that international Codex standards and guidelines will be slow to be updated to reflect current research advances. During the development of these Guidelines it is a vital that the latest research is reflected in the final document.

As our lead representative at Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), the Food and Drug Administration (FDA) has a responsibility to present and aggressively promote positions that will protect the rights of the people of the United States under the Dietary Supplement Health and Education Act (DSHEA).

The American Holistic Health Association presents the position that the Preamble to the "Proposed Draft Guidelines on Vitamin and Mineral Supplements" needs to be revised to reflect the multiple roles of nutritional supplements in today's world. Combining this with establishing the "Guidelines" as a set of **OPTIONAL** guidelines (presented in a separate position paper) will require revision of Section **3.0** of the document. The new focus could then be supporting the original purpose of this Committee - to create guidelines for use by those countries that need the World Health Organization (WHO) to compile and conduct research findings to guard against misuse of nutritional supplements.

If these things do not happen, and the "Guidelines" are ultimately implemented as an international standard enforced by the World Trade Organization (WTO), the U.S. will be required to select one of the three Acceptance Options. In-depth analysis of these reveals that each will remove some degree of our sovereign rights. Particularly with Section **3.0** essentially as it is now, the Acceptance Options 1 and 2 would allow the WTO to force the U.S. to reverse our rights granted under DSHEA.

We respectfully encourage the U.S. delegation to enact our recommendations.

Submitted by:  
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