



A Not - For - Profit Health Freedom Organization

*National Health Federation's Response to the Report
of the CCNFSDU electronic Working group for the
revision and addition of Nutrient Reference Values
(NRVs) for food labeling purposes*

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2.1 Criteria for the establishment of NRVs.

What are the criteria in your country for the establishment of Nutrient Reference Values?

The NHF's criteria for the establishment of Nutrient Reference Values are that they should be based upon those amounts necessary to prevent disease, promote optimum health, and prolong lifespan in the majority of people. Moreover, in cases where such values can only be achieved via supplementation, we consider that it would be grossly irresponsible, and even morally questionable, for them to be established instead at lower levels comparable to those achieved via a modern dietary food intake.

2.2 Criteria for the establishment of different population groups

What is your country's recommendation in terms of:

2.2.1 The proposal to have only two sets of NRVs for food Labelling Purposes?

The NHF would prefer to see NRVs set for the comprehensive range of age groups outlined in our previous submission to this electronic working group of March 2004.

2.2.2 What is your country's recommendation and rationale for the cut-off age for the group for infants and young children?

2.2.2.1 Birth up to three years; or

2.2.2.2 Birth through 3 years

As we have indicated above, the NHF would prefer to see NRVs set for the comprehensive range of age groups outlined in our previous submission to this electronic working group of March 2004. If, however, the consensus in the working group is to have only two sets of NRVs for food labeling purposes, then we would recommend that the cut-off age for the group for infants and young children should be set at birth up to three years, on the grounds that birth *through* three years is an overly wide age range for which to formulate a single NRV for this section of the population.

However, we believe that for some nutrients (such as the electrolytes) neither the birth up to three years nor the birth through three years option would provide a safe and appropriate recommendation for the entire age range. As such, the NHF's NRVs for chloride, sodium and potassium shown in the table on page 4 are our recommendations for children aged 1 through 3 years. Our recommendations for younger children for these nutrients are as follows:

Chloride

0-6 mo	180 mg
7-12 mo	570 mg

Sodium

0-6 mo	120 mg
7-12 mo	370 mg

Potassium

0-6 mo	400 mg
7-12 mo	700 mg

2.2.3 Should pregnant and lactating mothers be included in the group for adults? If not, kindly provide the rationale for the decision.

If the group for adults is to be based upon the needs of a full grown man, then we believe that for some nutrients pregnant and lactating mothers could conceivably be included in the group for adults. Generally speaking, however, we believe that by far the best solution would be to have a separate set of NRVs for pregnant and lactating mothers. Our recommendations for these particular population groups can be found in our previous submission to this electronic working group of March 2004.

2.3 Criteria for the selection of nutrients

Does your country support the nutrients included in the list mentioned hereunder?

The NHF supports all of the nutrients included in the list mentioned hereunder with the exception of fluoride, which we believe should not be included on the grounds that there is insufficient scientific evidence to show that it is essential.

However, we would also like to see choline and inositol included in the list, as we believe that there is now more than sufficient scientific evidence that a dietary supply of these nutrients is of benefit at all stages of the life cycle. Our recommendation for both of these nutrients would therefore be to set an NRV of 200mg from birth up to three years, and an NRV of 1000mg for adults.

Nutrient Reference Values

NUTRIENT	UNIT OR MEASUREMENT	INFANTS AND CHILDREN Birth up to 3y	ADULTS
VITAMINS			
Vitamin A *	Mcg	500µg	1 800µg
Vitamin C or ascorbic acid	Mg	600mg	3000mg
Vitamin D	mcg	5µg	20µg
Vitamin E	mg TE	33.5mg	268mg
Vitamin K		90µg	600µg
Vitamin B ₁ or thiamine	mg	8mg	40mg
Vitamin B ₂ or riboflavin	mg	8mg	40mg
Nicotinic acid, nicotinamide or niacin	mg	30mg	200mg
Vitamin B ₆ or pyridoxine	mg	10mg	50mg
Folic acid or folate	mcg	155µg	800µg
Vitamin B ₁₂ or cyanocobalamin	mcg	20µg	100µg
Biotin	mcg	155µg	800µg
Pantothenic acid	mg	30mg	200mg
MINERALS			
Boron	mcg	0.5mg	3mg
Calcium	mg	350mg	1 200mg
Chloride	mg	1 500mg **	2 300mg
Chromium	mcg	40µg	200µg
Copper	mg	0.4mg	2mg
Fluoride	mcg	n/a	n/a
Iodine	mcg	100µg	150µg
Magnesium	mg	100mg	500mg
Manganese	mg	1 mg	5mg
Molybdenum	mcg	20µg	150µg
Phosphorus	mg	460mg	700mg
Potassium	mg	3000mg **	4700mg
Selenium	mcg	40µg	200µg
Sodium	mg	1000mg **	1 500mg

Vanadium	mcg	50 μ g	300 μ g
Zinc	mg	5mg	25mg

* Includes provitamin A carotenoids that are dietary precursors of retinol. Given as retinol activity equivalents (RAEs). 1 RAE = 1 μ g retinol, 12 μ g beta-carotene.

** The NHF's recommendations for Chloride, Potassium, and Sodium are for children aged 1 through 3 years, as described under 2.2.2 above.