ANH summary of key challenges to nutritional and botanical forms of natural healthcare, and the ANH's responses to these challenges

THE KEY THREATS TO ORALLY-INGESTED NATURAL (OR 'ALTERNATIVE') HEALTHCARE PRODUCTS

1. Nutritionally-based healthcare modalities

1.1 Key challenges - the EU's **Nutrition and Health Claims Regulation,** and the **Food Supplements Directive** including the determining of **maximum permitted levels** of vitamins and minerals

1.2 Our response - Given our limited resources, we will continue to watch closely how the major interests respond and will only take action if a) others fail to act and b) if we have the necessary resources to act.

Some key strategies implemented by the ANH to-date with regard to the Food Supplements Directive are:

- Judicial review undertaken in the High Court in London, which was in turn referred to the European Court of Justice (2003-5).
- Official petition in the European Parliament which questions the scientific methods of risk analysis being used by European Authorities
- Critical evaluation of risk analysis methodologies being used by European authorities for the proposed statutory limitation of vitamin and mineral doses EU-wide. These findings have been accepted for publication in the journal *Toxicology.*[i]
- Extensive lobbying and advocacy in the European Parliament, European Commission and EFSA.

2. Botanically-based healthcare modalities

2.1 Key challenges - EU **Traditional Herbal Medicinal Products Directive** (1924/2004) (THMPD), the **Novel Food Regulation** (No 258/97).

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2.2 Our response - We are preparing a judicial review of the THMPD which we aim to file in the High Court in London before the end of 2010, facilitating communications with the Chinese and Indian governments, supporting the efforts of the European-based Benefyt Foundation in trying to develop a strand of European medicinal law that applies specifically to herbal practitioners, and are working closely with European Members of Parliament.

3. Conclusions

The European model for food regulation is fast becoming the template for global regulation, as seen by the development of international recommendations, guidelines and standards under Codex Alimentarius.

There is a growing body of evidence that major food, drug and biotechnology corporations are the primary drivers of such regulation. It is becoming increasingly apparent that natural, sustainable and biologically-compatible healthcare approaches, that favour disease prevention, are not supported by these industries given that they would negatively impact their profits.

In our view, the sheer burden of chronic and infectious diseases on the global population means we need to strive to develop an alternative paradigm for human healthcare. We advocate that such a paradigm must be based on the principles of sustainability and intrinsic biological compatibility.

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[i] PubMed abstracts of two *Toxicology* papers by ANH Science Unit critiquing EU risk analysis methodologies, currently 'in press':
www.ncbi.nlm.nih.gov/pubmed/20035821
www.ncbi.nlm.nih.gov/pubmed/20188138
[full PDFs of these papers are available on request]