

19 March 2024

**Hon. Pilar Marilyn M. Pagayunan**

Director IV, Center for Food Regulation and Research  
Food and Drug Administration

Dear Director Pagayunan,

The European Chamber of Commerce of the Philippines (ECCP) and its Food and Beverage Committee extend its sincere gratitude to the Center for Food Regulation and Research of the Food and Drug Administration for the opportunity to submit comments on the draft Circular on the Guidelines for the Classification of Vitamins and Minerals for Food/Dietary Supplements under Processed Food Product Repealing the Provisions for Food in the Office Order No. 22 s. 1991 entitled **“Guidelines for the Classification of Vitamins and Minerals as Drug or as Food”**.

Good nutrition is crucial for establishing a stable foundation for socio-economic development. Indicators for Sustainable Development Goals concerning malnutrition depict a complex scenario. Despite a decrease in stunting, which went down from 26.3% in 2012 to 22.3% in 2022, the pace of this reduction falls short of the global target and no region is currently on track to achieve it. Wasting affected 6.8% of children under 5 in 2022, and the prevalence of overweight children, at 5.6%, has remained stagnant over the past decade.<sup>1</sup> In the Philippines, overweight and obesity is a growing health concern affecting nearly 27 million Filipinos along with micronutrient deficiency and underweight as part of the “triple burden” caused by malnutrition in the country. With a score of 14.8 categorised as moderate level of hunger, the country ranked 66 out of 125 countries in the 2023 Global Hunger Index.<sup>2</sup>

The ECCP recognizes the expertise of FDA-CFRR in establishing the limit of vitamins and minerals in food/dietary supplements to ensure that the manufacturers use safe levels of the said items in their products. Furthermore, we share the same advocacy of the government and health authority on promoting health consciousness, making healthy food choices, and instilling healthy eating habits. As such, we are writing to **express our support to FDA’s decision to revise the guidelines determining the limit for vitamins and minerals to be classified as food supplements and call for the immediate implementation of the said circular**. Upon studying and reviewing the proposed guidelines, we believe that the revision is necessary to ensure that our guidelines remain relevant and in line with the international advances in energy and nutrient requirements.

We thank you in advance for the kind consideration and we look forward to a fruitful collaboration.



**Helen Grace Baisa**

Vice President, ECCP  
Chairperson, ECCP Food and Beverage Committee

<sup>1</sup> FAO. 2023. *Tracking progress on food and agriculture-related SDG indicators 2023*. Retrieve from <https://doi.org/10.4060/cc7088en>

<sup>2</sup> Global Hunger Index. (2023). *Global Hunger Index 2023: Philippines*. Retrieved from <https://www.globalhungerindex.org/pdf/en/2023/Philippines.pdf>