URGENT ! URGENT !

Codex Attack on Vitamins

AND MINERALS, HERBS, AND ORGANIC FOODS

Share this information freely!

URGENT ! URGENT !

NOTE: We have received an updated version of this article from *Rima E. Laibow, MD.* and as we deeply appreciate her insight and comments, and because they show the situation to be even more grave than even we had expressed, we are posting them for your information. Our original article was researched from several sources, and we are grateful for this expert insight into their accuracy. Webservant - May 26/06

Both the Natural Solutions Foundation, www.HealthFreedomUSA.org , and I are deeply involved in the battle to preserve our health and our health freedom, and since so much of the current document is borrowed directly from our website,
www.HealthFreedomUSA.org and my other writings I am providing a corrected version of this otherwise useful and detailed summary. I hope you will either take the time to read this lengthy document or save it for reference.

My comments are underlined and in red to help them stand out from the document text.

Rima E. Laibow, MD

Medical Director

Natural Solutions Foundation

www.HealthFreedomUSA.org

An international cartel is working with a special EU/WTO subsidiary, called "Codex," and plans to do the following in our country:

(1) Limit the number of vitamins, minerals, and other nutrients which you can purchase. Will not limit the number you can purchase. You can purchase any number of them. The contents will be limited to a small number of components and the dosages will be limited to those which are so low that they have no impact whatsoever on the human body. Any discernable impact is considered an "Adverse Event".
(2) Of the few which will be permitted, the dosages will be so low as to render them

useless. Correct
(3) You will only be able to buy them through a physician's prescription. Not true. Since they are not tested as drugs are at a hundreds of millions of dollars per compound these unpatentable compounds will be simply forbidden. This is a crucial distinction.
(4) You will only purchase them in a drugstore. There is nothing in Codex which stipulates or even suggests this. You could buy them on a street stand for all they care.
(5) Only synthetic vitamins will be available. This is likely but not certain yet.
(6) Only approved drug companies will make them. There is nothing in Codex which stipulates this.
(7) You will pay very high prices for each tablet. That is very likely but not a Codex issue.
(8) It will become a crime to use any nutrients — even the permitted ones — in the treatment of any infirmity or disease. No one, including physicians, will be able to use them to "prevent, treat, or cure any condition or disease." Then how does No. 3 make any sense? This outcome will occur IF countries like the US "Harmonize" with Codex regulations. Right now Codex is an international trade system but there is another level of danger: that the countries who belong to Codex, including the US, will bring their domestic laws and regulations into accord with the Codex regulations, standards and guideline. The US has declared that its policy is to do just that (October 11, 1995, Federal Register).

An immense German, U.S., and British drug cartel is behind this. We believe this to be the case: we do not have evidence that this is so. It is important to distinguish between what we believe and what we know.

In addition, Codex is also working with some other groups:
(1) The chemical industry plans to require that all animals be treated with antibiotics and hormones. This is not accurate: Codex has already passed the regulations on this issue. The chemical and pharmaceutical industries will benefit, but this statement is not accurate as presented.
(2) The largest seed company in the world intends that only genetically modified crops be planted by farmers. This is also not accurate. Codex has thus far resisted the US bid to allow unlabeled GMO crops world wide to mimic the US policy. We are the only country in the world that allows unlabeled use of GMOs in the food supply. The rest of the world has defied our desire to replicate that state of affairs globally. However, GMO crops for animal feeding and human foods are permitted in many, many countries already. This is a huge problem. Monsanto has stated that it intends to control all food early in this century.
(3) The nuclear industry plans that all food plants and livestock be irradiated. This in inaccurate. Codex has already passed the irradiation standard which mandates irradiation of food for international shipment. Codex compliant countries are expected to, and are proceeding with plants to, irradiate all foods for international shipment. If nations change their domestic laws to comply, food in those countries will have to be irradiated, too.

The US is currently building 200 cesium irradiation plants to comply with these standards. Environmental and health dangers are immense in this policy.
(4) Truly "organic" foods will end. The Codex organic standards have already been ratified. They are very weak and do not protect food or consumers. The US standards are currently under attack and were recently softened AT THE URGING OF THE ORGANIC

INDUSTRY.

Are you interested? Read on. A large amount of information is here. Because this is so important, the following report is lengthy. If you do not have time to read it in detail, just scan the highlights, and pause to read what interests you. Hopefully, the facts will frighten you enough that you will want to immediately contact Congress and tell them whether you want Codex in America.

If you do not act, you will be sorry later.

1 - BACKGROUND AND HISTORY

***Introduction*—Vitamin, mineral, and herbal supplements, along with whole herbs, Herbs are no longer part of the Codex mandate. They were handed off to the World Health Organization at the urging of the US delegate when restrictions on them were opposed strongly by many nations. are invaluable aids in the maintenance of health and the recovery from sickness. The drug industry has long recognized this fact, and wants nutritional supplements and herbs either forbidden or priced out of reach. When those valuable helps are no longer available in our chemically contaminated world, people become sicker and are willing to pay for more drugs, hospital visits, and operations.**

In Europe, the drug cartel has succeeded in enacting *Codex Alimentarius*, which will accomplish that objective on the European continent very soon. This is wrong. Codex is not enacted by any country. Its regulations are implemented by each country or, in this case, super-nation. What has been enacted in Europe is the European Food Supplements Directive (EFSD), a set of highly restrictive regulations which were challenged rather unsuccessfully in court last year.

Adopted in a secret meeting in the EU *(European Union)* in November 2004, it is scheduled to be finally voted on in June 2005, with a full European ban taking effect on August 1. This is inaccurate. The EFSD was set for implementation in the EU on August 1, 2005. The decision of the European Court of Justice was rendered on July 12, 2005 which allowed most of the provisions of the EFSD to go into effect. A few are still being settled but the major weight of success went to the EFSD, not to our side.

Because the U.S. belongs to the *World Trade Organization* (WTO), any changes approved in Europe are supposed to automatically become law in America, superseding our own laws. (Some believe we are no longer a sovereign nation.) This is factually inaccurate and bears no resemblance to the way the WTO works.

Failure to comply with these changes can lead to lawsuits which cannot be won, because they are settled in international courts which are based in Europe. If a country is perceived as creating a barrier to trade, a Trade Dispute is brought at the WTO. This is not a court. In fact, we won the latest trade dispute we were involved in before the WTO (unfortunately) in which the WTO decided that the EU must allow genetically modified crops and foods into the EU despite their strong wish not to.

These are stunning facts which you are unlikely to read in the regular media, because they receive a major part of $4 billion a year in advertising.

***Codex Alimentarius*—"*Codex Alimentarius*" refers to a set of strict regulations covering all aspects of food. "*Codex Alimentarius*" is Latin for "*Food Rules*" or Food Regulations. This collection of food rules in Europe dates back to food standards enacted, between 1897 and 1911, by the Austro-Hungarian Empire. They were used as a legal reference by the courts as a standard, although the Codex Alimentarius itself had no legal standing. The current Codex**

Alimentarius does not date back to the Austro Hungarian one referred to above: the IDEA for it does.

Modern Codex regulations are prepared by the *Codex Alimentarius Commission,* which (in this report, we will refer to this as "Codex") works with the EU and UN in an attempt to regulate every aspect of food production, packaging, preparation, preservation, and presentation of food "*from farm to fork.*" Codex also attempts to regulate supplemental nutrients and herbs. It even effectively eliminates "organic produce" standards! More on this later. Codex has more than 16,000 pages of working documents. Codex does not "Work with the EU and UN" as stated. Codex is a child of the UN which is administered and run by the World Health Organziation (WHO) and Food and Agriculture Organization (FAO). The driving force behind Codex is the US which, through its impact on world trade and economics, pushes the agendas of corporate interests. Most of the time the EU goes along with the US. On certain issues, like the GMO one, it opposes the US.

Codex probably has several hundered thousand pages of documents. This statement ("… more than 16,000 pages…") is taken directly from MY statement that, at the time I wrote it, I had read more than 16,000 pages of Codex documents.

Some of the changes Codex will impose*—Here are several features of *Codex:

• The plan is to ban all nutrients, except a few which are high-priced, low-dosage, synthetically made by drug companies, and only available in drugstores by prescription. See my comments at the beginning of this piece: we expect that they will only be available in their synthetic form but that is not yet certain. They will not be available by prescription whether they are sold in drug stores or not.

• *Codex* regulations will be binding internationally. Codex regulations are NOT binding internationally. They have no legal weight until they are enforced by the WTO through trade sanctions OR they are implemented as domestic law by nations seeking to become Codex compliant. Any nation which has entered into trade agreements with the EU will eventually be forced to adopt the *Codex* or receive heavy trade sanctions until it does. This is factually inaccurate. Codex compliance has nothing to do with having trade agreements with the EU or with any other country. Codex has no teeth unless a trade sanction is imposed by the WTO or a country passes a Codex standard into law and then enforces it

• All new types of supplements will be banned, unless *Codex* provides testing and approval. This is totally inaccurate. Codex does not provide testing and approval. This will be certain to be expensive. Such tests will also be inadequate. A favorite trick of drug and governmental authorities is to test such small doses of the supplement, so that it does not prove of any noticeable value. This is true, but irrelevant here. Codex does not test or approve anything.

• *Codex* regulations are not based on previous scientific or research findings. This is inaccurate. Codex regulations are based on selective science pushed by corporate interest (often funded by those same corporate interests) but it is not accurate to say that they are not based on previous scientific or research findings. The fact that they are based on junk science does not mean that they are not based on scientific or research findings. It would be more accurate to say that they are based on flawed scientific or research findings. Those regulations were developed by eleven persons, appointed by the EU with drug cartel approval. This is a preposterous statement. Codex has promulgated thousands of regulations and standards. There is no possible way for eleven persons to develop that many regulations, no matter how diligent they might be. In fact, the drug cartel is probably involved up to its eye balls, but substantiation of this statements would be very welcome.

• **Many herbs will also be banned.** **Codex does not deal with herbs in any way.**

***Plans to extend Codex to U.S. and worldwide*—The United Nations' *Codex Alimentarius Commission*, assisted by the U.S. *Food and Drug Administration* (FDA), views the EU *Food Supplements Directive* as a basic pattern which should be followed in developing a global trade standard for dietary supplements!** **While I am sure this is true, this definitive statement should be documented if such documentation exists. I would be very glad to have that document. My email is rima.laibow@healthfreedomusa.org.**

***FDA "harmonization" standards* — The FDA is currently at work, preparing "directives" for "harmonization" of its dietary supplement laws, so they will fully agree with the excessively restrictive "international standard" set by the EU *Codex Alimentarius Commission*. The Codex Alimentarius Commission is not an EU organ. The FDA does not regulate through directives. It has, however, stated that its policy is to give preference to international standards over domestic ones and has repeatedly stated its intent to harmonize with Codex.**

***Protests are being ignored*—On January 29, urgent messages were sent to Kofi Anan, head of the UN, to extend the deadline for its acceptance of *Codex* standards. But the pleas were disregarded.** **The UN does not accept or reject Codex standards. It created the Codex process and nations either accept or reject Codex standards. I imagine that might account for the fact that the "pleas were disregarded".**

Emergency meetings, by groups opposed to enactment of the *Codex* in Europe, have been held by concerned groups for several months. **Codex is not being enacted in Europe. The EU had adopted standards (the EFSD and other EU directives) which are Codex compliant but are NOT the same as "enactment of the Codex in Europe". The distinction is not merely legalistic: Codex impacts at different levels than national legislation but then drives national legislation. Also, Codex is much, much more than restrictions on food supplements and there are many other areas of Codex which the EU has not [yet?] adopted, making the above statement in this document wholly inaccurate and misleading.**

In August 2005, proposed EU legislation is set to ban many of the leading-edge nutritional supplements people currently take for granted. U.S. compliance is likely to follow shortly. **This is not accurate. The EU legislation was passed on November 4, 2002 and is currently being implemented. The US compliance mentioned here is prevented by US law. The Natural Solutions Foundation has entered a Citizens Peititon, a legal challenge to the US Codex policy which violates US law. We urge people to sign it at http://www.healthfreedomusa.org/action/step3/petition-letter.shtml .**

Gigantic cartels are gradually gaining control of every key industry. It is all a sign that we are nearing the end. **I do not understand this sentence. The end of what? Is this Biblical apocalyptic end or the end of our constitutional democracy or the end of clean food?**

***What Codex will accomplish* — This new regulation will accomplish several objectives:** **Codex is not "a new regulation", it is a compilation of thousands of regulations, some of which may be viewed at http://www.codexalimentarius.net/web/index_en.jsp , "Official Standards" drop down window.**
(1) It will pour millions of *euros* (European equivalent of dollars) into the large pockets of the drug companies. **I fail to understand this comment. It will pour Ethiopian berr, US**

dollars, Ghanian cedi, South African rand, Indian rupee, Japanese yen, etc., into the hands of Big Pharma, Big Chema, Big Argibiz, Big Medica and Big Biotechna.
(2) Lacking the vitamins, the maladies of the people will increase and they will need more drugs.
(3) Physicians and hospitals will have more patients to treat and profit from.

The international drug cartel **— A number of years ago, agreements were quietly entered into by the large drug companies in Germany, America, and Britain. German drug companies would have their government lead out in introducing standards heavily restricting the sale of nutritional supplements, in all nations which enter into trade agreements with the European Union. I would be very grateful for documentation of these agreements. We believe that they exist, but, to my knowledge, there is no documentation that they do. We infer, therefore, that this must have happened. Proof would be greatly welcomed. Germany was selected as the nation to initially push it; since Germans do not tend to use supplements. At the time that these agreements would have been made, neither did most people in the US. I find this very perplexing and look forward to documentation so we can all share in this knowledge.**

Supplemental Guidelines**—Work on these *Supplement Guidelines* was first proposed by the German delegation to the *Codex Nutrition Committee* in 1990. For several years, work progressed slowly; but the agenda was kept alive by the Germans. And the US.**

At the same time, Germany also introduced the idea of a *European Food Supplements Directive* (EFSD). That effort was shelved for some years, after a first round of consultations showed that the field was much too difficult and contentious to regulate by directive. A few years later however — after Codex's work on supplements had progressed — work restarted on the supplements directive. By that time, both the governments of Britain and Germany were promoting it. (It is believed that their government officials had been paid off.) Please supply the documentation for this belief. It would benefit all of us to have it. As it happened, the *European Directive* was accepted in 2003, two years before the *Codex Guidelines*. Actually, it was adopted on November 4, 2002.

In shaping the Codex "consensus" on supplements, its German chairman (Rolf Grossklaus) and the representative of the European Union (Basil Mathioudakis) have been more or less openly accused of bending the rules. What does this mean? What rules have they not been willing to bend? Although I know a fair amount about Codex I have no idea what this means. Clarification would be most welcome. Objections by some member nations were ignored or overruled. Most of those nations were poor and not in a position to complain very much, lest they be barred from trade relations with Europe. One of the nations objecting was China, which does not meet the descriptors above. South Africa also objected.

The result was a text for the *Codex Supplements Guidelines* that reads remarkably similar to the *European Food Directive*. Unfortunately no transcripts of those meetings exist. The report prepared by the *Codex Secretariat* does not include details of proposals and comments. Stenographic records of meetings were never released. Actually, an edited version of the CAC meeting at which the Vitamin and Mineral Guideline was ratified is available on the Codex website mentioned above. In addition, a report of the proceedings of that body is also available on the website. This report does contain details of most proposals and comments although some are not included.

Effects of the 1994 U.S. dietary law **— In the United States, after the *Dietary Supplement Health and Education Act of 1994* (DSHEA) was enacted by Congress, Americans were able to learn the health benefits of vitamins, minerals, and herbs. Prior to that time, no advertising, by supplement manufacturers or sellers, was permitted. As a result, prior to 1994, it was much more difficult for Americans to learn how nutrients could resist and**

overcome disease. In addition, under this law, Americans were able to purchase them in larger dosages. Dosages are NOT a part of the DSHEA act. Rather, they are classed as foods which have no safe upper limits and can therefore be dosed at any level the consumer or manufacturer thinks appropriate.

As more and more Americans learned how beneficial these nutrients were, by 2002 more nutritional supplements were being sold in the U.S. than drug medications!

***Why that law was enacted*—That 1994 law (DSHEA) was passed because large numbers of Americans demanded it. Over 2.5 million ordinary citizens wanted to make sure dietary supplements (such as herbs, vitamins, minerals and other food-based supplements) would remain on the over-the-counter market. The movement, to create DSHEA, started when a 1992 FDA task force published a report announcing the FDA's desire to remove these products from the shelves; since they represent a "*disincentive for patented drug research.*"**

Immediately following this announcement, millions of Americans learned about how famed vitamin doctor, Jonathan Wright's patient-filled medical office in the Northwest was raided that same month by nearly two dozen gun-carrying FDA agents in the name of "regulating supplements." Battering down an unlocked office door, and backed by burly sheriff's department deputies, the agents lined up staff and patients against the wall. They pulled IVs from patients' arms in the middle of treatments, confiscated patients' records, and took the hard drive from the office computer. They did all this because Dr. Jonathan Wright was using nutritional supplements to heal very sick people who could not get help from standard AMA medical care. It is not clear why they did this. Dr. Wright was never charged with any offense and he was never told why the raid had occurred. He was told that a bottle of moldy Vitamin B was removed from his garbage bin. We can surmise that "They did all this because Dr. Jonathan Wright was using nutritional supplements to heal very sick people who could not get help from standard AMA medical care." We do not know that for a fact, however. What we do know for a fact is that doctors like Dr. Wright are under continual attack from the FDA and from State licensure boards.

As the general public became aware of just how many doctors' offices, manufacturing companies, distributors, and health-food stores had been assaulted by similar raids, the horror of all this forged a mighty health freedom army that resulted in the unanimous passage of DSHEA. Well, having been part of this "Mighty health freedom army" I would say that the threat of loosing access to nutrients and herbs, not the assault on doctors, etc., was the significant factor. The attacks added fuel to the fire. However, there certainly was a mighty force on the side of natural health and health freedom. It was fed and moved and motivated by the NNFA and its member health food stores. Today, the NNFA is on the other side. We can presume that it is because of its pharmaceutical membership. See http://www.healthfreedomusa.org/aboutcodex/propaganda.shtml for more information on this aspect of the Codex problem.

***Provisions of DSHEA* —**
(1) DSHEA made a clear distinction between "*food*" (which is considered generally safe and did not need to have permission from the FDA to be allowed on the market) and "*drugs*" (which are invariably toxic, potentially deadly, and in need of lengthy and expensive evaluation before they were available to the public under prescription from a doctor).

(2) DSHEA provided the FDA with plenty of legal authority to remove herbs or dietary supplements from the market, providing the agency has plenty of *real* evidence of *real* harm to the public. The FDA also has the authority to limit the amount of a supplement to low levels *if* the agency has plenty more than a scintilla, in fact, of *real* evidence to prove higher levels *are actually* dangerous. But, of course, the FDA has been unable to produce such

evidence.

Drug cartel determined to get rid of DSHEA **— A primary objective of Codex is get rid of that law! I would be greatful for documentation that the primary objective of Codex is to get rid of that 1994 law when Codex was conceived in 1952, created in 1962 and, according to this report, the Vitamin and Mineral Guideline was suggested by Germany in 1990 when DSHEA did not yet exist and the FDA action which led to its passage, the 1992 FDA announcement. Its existence reduces drug sales, keeps people well, and helps restore them to health without expensive medical intervention.**

The power behind the throne **—Actions by the European Union and the United Nations affect millions of lives. What makes it possible for drug companies to have so much influence at the EU and UN? The answer is rather simple: It is well-known that drug companies make excessive profits by overcharging on medicinal drugs. They claim that the profits are needed for research into new drugs. Yet that research only requires paying the salaries of a number of technicians working in laboratories.**

It is well-known that most of the profits are used for advertising and similar projects which will increase sales.

It is the opinion of the present writer (Vance Ferrell) that one of those projects is large political contributions to the White House, Congress, as well as immense bribes to EU and UN officials. We know about the large political contributions but if the present writer has documentation about the bribes paid to EU and UN officials, that should immediately be made public.

Another project is paying immense amounts in advertising dollars to the various news media in drug ads — and then threatening to stop the lucrative advertising if they tell the public what Codex is about to do. We infer that this is the case. If the writer has evidence that this is so, it is critically important that the evidence be made public. Now you can understand why the newspapers, newsmagazines, and news broadcasts do not say a word about the nutritional crisis about to break over our heads. Codex is much, much, much more than a nutritional crisis and has already begun breaking over our heads. Fructose is part of the beverage supply because, although the FDA banned it, beverage manufacturers pointed out that Codex permits it and so banning it in the US would constitute a barrier to trade. The FDA changed its ruling. The obesity epidemic is, in large part, a result of this change in rules. Other examples abound.

In 2004, pharmaceutical companies spent over 4 billion dollars on direct consumer advertising. This includes media advertising. In addition, that same year, $785 million was spent on Congressional lobbying.

A joint venture**—Codex is a joint venture between the United Nation's *World Health Organization*, *Food and Agriculture Organization* (WHO/FAO), the *European Union* (EU), and the *World Trade Organization* (WTO). This is inaccurate. The UN created Codex and arranged to have the WHO and the FAO administer, fund and run it. There is no formal relationship between Codex and the EU or the WTO. The WTO has accepted Codex as a standard to use in deciding the outcome of dispute resolutions processes involving food.**

The *World Trade Organization* (WTO) has already stated that, as soon as it is approved (which will occur this summer), it will enforce Codex "guidelines" *as the world standard for trade in dietary supplements*. This will mean that gradually, pill-by-pill, our access to the dietary supplements we depend on will disappear. The Vitamin and Mineral Guideline was ratified by Codex on July 4, 2005. The WTO accepted Codex standards, regulations and

guidelines, all of them, for use in food-related trade disputes. While the VMG is a real problem and the WTO will use it to determine trade sanctions against nations, there is nothing different about this guideline and its relationship to the WTO form all the other Codex standards which have been ratified by the Codex Commission.

Both the UN and the WHO are mandated to protect the health and welfare of the world's population; but they obviously shirked on this responsibility, when the Codex decisions were made.

***U.S. Codex Office*—The U.S. Codex Office is a department in the U.S. Department of Agriculture (USDA), which works closely with Codex in Europe. If you go to its website, you will be told this:**

"The Codex Alimentarius Commission was created in 1963 by FAO and WHO to develop food standards, guidelines and related texts such as codes of practice under the Joint FAO/WHO Food Standards Programme. The main purposes of this Programme are protecting health of the consumers and ensuring fair trade practices in the food trade, and promoting coordination of all food standards work undertaken by international governmental and non-governmental organizations."

***Earlier Congressional bills*—In addition to its cooperation with the German and British drug industry in Codex, the drug industry in America has been hard at work on introducing legislation to greatly restrict vitamins, minerals, and herbs.**

In 2003, bills were introduced in Congress which, if enacted, would regulate certain supplements in the U.S. Though the bills died when the 108th Congress ended in December, new versions are thought to be ready for introduction in March or April of this year (2005).

One of those bills would have granted the Food and Drug Administration authority to regulate supplements in the same way that it regulates over-the-counter drugs.

The bills would have weakened DSHEA, which gave consumers who use supplements definite protections against government regulations.

(But, if you want to contact your congressman or senator about the bills, you must give the number of the new 2005 bills. Apparently, they have not been introduced yet. With Codex looming on the horizon, perhaps the drug companies will not bother to introduce them.) Many of them have been introduced already. Please go to http://www.healthfreedomusa.org/action/step2.shtml to take action by emailing Congress on the bills through the Natural Solutions Foundation email engine.

The power in Codex—Here is why Codex can overrule our U.S. dietary laws:

The United States Federal Register, Oct. 11, 1995, FDA Policy on Standards stated that "where a relevant international standard exists, or completion is imminent, it will generally be used in preference to a domestic standard."

If this is still the FDA policy, as soon as the Codex Guidelines take effect in Europe in August, the FDA will immediately try to enforce Codex here in America. This has nothing whatsoever to do with whether the EFSD takes effect in Europe or not. This is inaccurate and misleading. The Codex standards which are ratified are driven by the US anyway. It is the FDA and USDA intent to implement them regardless of what the EU does.

The problem is that we entered, by treaty, into the World Trade Organization (WTO). The U.S. Constitution states that U.S. treaties take precedence over U.S. laws. It is not clear that we are actually in a treaty relationship with the WTO since our entry was passed by ordinary congressional action, NOT by the required 2/3 majority necessary to ratify a treaty.

There is already activity on Capital Hill to prepare "harmonization" rules, which will lock America into obedience to Codex dietary regulations. Harmonization has been underway by the FDA and the USDA for some time as mentioned in the case of fructose. The fire is already out of the basement and burning down the food-supply house, so to speak.

***An interconnected, international web of control* — Codex Alimentarius is the result of a complex relationship between the *United Nations,* the *World Trade Organization* (which has been authorized to enforce Codex Alimentarius through trade sanctions), the *World Health Organization* (which is actively creating *Codex Alimentarius* regulations), and our *American Food and Drug Administration*. These are working closely with industry representatives of the pesticide, chemical, pharmaceutical, dairy, and biotechnology industries.**

***The origin of Codex*—The United Nations established the *Codex Alimentarius Commission* in 1963, to ensure clean, abundant food for the planet and remove all barriers to international trade of that food. At that time, the *World Health Assembly* approved the establishment of the *Joint FAO/WHO Program on Food Standards,* to promulgate standards for ratification by the *Codex Alimentarius Commission*.**

***First discussed in 1988* — The idea of controlling dietary supplements was first openly discussed at the 1988 session of an EU-based Codex committee, the *Codex Committee on Nutrition and Foods for Special Dietary Uses* (CCNFSDU). The author stated that the idea was first introduced in 1990. This appears contradictory so clarification would be welcome.**

Through the following years, the EU representative to that committee kept presenting the developing *Food Supplements Directive* ideas as core elements of the Codex *Guidlines*. It is my understanding that the issue was pressed by the US and the EU representative. In fact, during this period, the WTO sanctioned Germany because it banned the sale of supplements outright. They had to back down on that position and move toward the EFSD concept instead. They certainly are hostile to nutrients. The EU representative emphasized the fact that he was speaking on behalf of 15 nations. This large EU block of "votes" in the CCNFSDU and other Codex sessions helped him get what he wanted.

While this was unfolding, the U.S. initially protested the regulation of dietary supplements, but gradually its opposition faded away. The FDA-led U.S. delegation kept compromising — until finally it totally yielded to the plan to essentially eliminate vitamins and herbs. I would appreciate the documentation for the statement that there was US opposition to the regulation of dietary supplements. If my understanding is incorrect on this matter I would be happy to revise it, but all of the information that I have is that the US was front and center in the fight to restrict dietary supplements in Codex.

Throughout all those years, continuing up to the present time, the chairman of that *Codex Commission* (currently Rolf Grossklaus, M.D.) has always been a German.

***Inside official Codex meetings* — Health focused consumers, health scientists, physicians,**

others practicing natural medicine, and other health-focused voices have been absent either physically or functionally from official *Codex Alimentarius* deliberations. Unofficial observers may not speak during the sessions.

Members of delegations may not discuss standards and Codex-related business with members of other delegations! A small Actually, it is a considerable number of trade organizations number of trade organizations have participated in Codex Alimentarius committees and the *Codex Alimentarius Commission*; but their views have often differed sharply from those of health-focused professionals and consumers. A small number of pro health and consumer groups have observer status and so may make comments during the deliberations but may not vote in Codex. Since Codex avoids voting assiduously and "decides" issues by "consensus (a concept whose definition is a moving target since Codex refuses to define it and the Chair of a meeting declares that consensus has been reached at any time he/she chooses), their ability to vote is less relevant than it would appear to those of us used to deciding issues by a democratic process.

Of course, the real work of such a complex regulatory structure takes place outside of official sessions. And no health advocates have had access to those secret meetings, agreements, and sessions.

***How Codex committees operate* — The Codex Alimentarius standards are being promulgated by the *Codex Alimentarius Commission*, which was established as a Trade Commission in 1963 by the United Nations (UN). They concern every area having to do with the production, processing, packaging and use of food, herbs, supplements, and food components.**

There are about 20 *Codex Alimentarius Committees*. They prepare and develop guidelines on every aspect of food and present those guidelines to the *Codex Alimentarius Commission* for ratification, as soon as those guidelines have reached "*Step 8*" of the guideline development process.

Committees and the Commission operate through poorly defined "consensus"; so actions of those bodies may not represent the will of the delegates or even of the countries they represent. The decision process is not a democratic one.

There have been instances in which delegates have been bodily removed by security guards at the request of the chairman, if they persisted in seeking discussion after the chairman has declared a matter closed! Actually, Dr. Carolyn Dean reported this in her book "Death By Modern Medicine" but the delegates who were in the room, including those friendly to nutrition, dispute the report and state that no one was removed from the room as described in this book. I spoke to the delegate described in her account of the incident and he denied that he had been removed. What apparently happened was a shouting match between the delegate and the chairman.

When I attended the same committee meeting in the same chamber one year later, believing this event to have occurred before I spoke with the delegate, I looked for the armed guards. There were none. The various governments tolerate this, in the hope that the resulting standards will increase profitable trade between the nations.

Trade organizations with strong publicly documented ties to the pharmaceutical, chemical, and agricultural industries have a very influential voice at these meetings.

There has been no effective representation from health advocates,

nutritional supplement manufacturers, natural health-care professionals, or other non-pharmaceutically oriented group at the *Codex Alimentarius Commission* meetings.

The *Commission* meets every two years, always offshore (Rome, Bonn, Paris, etc.), and never in the United States. Actually, it now meets every year alternating between Rome (FAO headquarters) and Geneva (WHO headquarters)

The U.S. representatives to the *Commission* have well-documented, unwholesome connections to the very industries that stand to profit and benefit from the wholesale implementation of the Codex standards.

Consumers have virtually no say at all; and consumers are the ones who are going to be affected by all the decisions that the *Codex Alimentarius Commission* makes.

The governments of both India and South Africa have repeatedly expressed their dissatisfaction with the foolish nutritional theories of Codex and the restriction of nutrients and herbs. But they have been regularly overrun, during meetings, by "consensus" tactics which do not allow full discussion or debate on these crucial issues.

***Standards on everything* — Codex sets international standards for everything from parmesan cheese to sweet cassava, canned sardines to chicken meat, echinacea to rice. Each standard is ratified after reaching "*Step 8*" in Committee.**

***The U.S. signed the GATT, SPS, and TBT* — The United States is now locked in, because of certain treaties it earlier signed to join GATT *(General Agreement on Trade and Teriffs)*. As I mentioned earlier, it is not clear whether we actually are in those treaties or not. More recently, the Agreement on the Application of *Sanitary and Phytosanitary Measures* (SPS) and the *Agreement on Technical Barriers to Trade* (TBT) were approved in Europe. This is inaccurate. The SPS and TBT are agreements which form part of the WTO agreements. Whether the EU approved them or not has nothing to do with their WTO status. They are subsections of GATT. These are all international treaty agreements. They are international agreements. They are not US treaties as far as our Constitutional consultants can tell.**

As of July 1, 2005, the Central American Free Trade Agreement (CAFTA) is working its way through Congress; it has just been approved by a House panel and the Senate Finance Committee (June 29). There are nations in Central or South America which could use the SPS and TBT provisions in CAFTA to pressure the U.S. to harmonize with the Codex *Guidelines*. CAFTA passed in July, 2005

***When Codex became mandatory* — Codex standards and guidelines were voluntary; that is, each nation could obey or disobey them. But that changed when the various nations signed new treaties at the *Uruguay Round* of GATT; at which time the WTO [World Trade Organization] came into existence. Because of what we signed at Uruguay, we are required to obey the WTO. We have the option of defying the WTO and paying trade sanctions. The UK did so for many years to keep toxic meat laced with hormones from the US out of the UK food supply.**

The WTO has enforcement power through a new international court, the *Dispute Settlement Body,* which does not follow our rules of evidence. The Dispute Settlement Body is not a court. It is not new. It was created in 1997. See http://www.wto.org/English/tratop_e/dispu_e/dispu_e.htm for further

information on this body.

***WTO placed corporations over nations* — The WTO has put the mechanisms in place to override any national law that interferes with multinational corporate profits. This is not accurate. The WTO cannot over ride US law. See http://trade.businessroundtable.org/trade_2006/wto/decision.html for more information. Although I do not agree with the rosy picture of the WTO painted by this site, the information on the WTO powers is accurate. That is why Congressman Ron Paul tried to remove us from the WTO in 2000 via *House Joint Resolution 90.* But Congress failed to enact it.**

***The NGOs* — Many people, from all over the world, protested at the non-governmental organization (NGO) meetings in Seattle, in 1999, and Quebec City in 2001. They were already suffering from the dietary, ecological, trade, fisheries, and other problems imposed through UN trade agreements, which left them the poorer. The "NGOs" are the big business cartels. Some are and some are not. There are social activist NGOs and industrial NGOs and every possible shade of opinion and motivation in between.**

Codex is based neither on science nor democracy. Unelected government officials, working in cooperation with industry and trade interests, make decisions which become domestic and international standards, when enacted as law by the member states of the WTO.

When the WTO was created, the original purpose of Codex (to provide clean food for the planet with no international barriers to the movement of that food) was replaced by the interests of major corporations — who had the money to pay off certain officials.

***The U.S. has already had to yield to WTO* — Several WTO rulings have gone against U.S. law, forcing Congress to change our law under threat of cross-sector trade sanctions against broad sectors of our economy. The most recent and publicized of these was the situation regarding our steel industry and tariffs. If they can force the U.S. to change policy over such a vital national interest as our steel industry, the dietary and herbal supplement industry will be easy to eliminate.**

***Every UN member nation involved* — When the Codex rules for dietary supplements become binding, the *escape clause* within GATT that permits a nation to set its own standards—will be overruled. This is inaccurate. Please see the Natural Solutions Foundation eBook at http://www.healthfreedomusa.org/resources/books.shtml for detailed information on why this important statement is absolutely false. This will apply to all member countries of the UN. Any nation that does not accept and apply these new standards will be heavily fined by the World Trade Organization, creating the potential for crippling entire sectors of that nation's economy. The solution proposed to nations by the Natural Solutions Foundation and the Citizens Working Group on Codex makes it possible for nations to avoid the damage of the Codex regulations and the WTO trade sanctions. Every health freedom supporter should make themselves familiar with this important advance in health freedom and support it.**

The primary targets were Europe, the United States, Canada, Australia, and New Zealand — which are the largest purchasers of drugs. (As of this writing, July 2005, all of the above-named nations have submitted to Codex, except the U.S.) This is inaccurate. All of the above named countries are part of the support system for Codex. The US is, in fact, its driving force.

The Codex ban on nutrients will ultimately include every UN member nation. But, instead of

calling it a "ban," the Codex Commission calls it a "*positive list*" of nutritional directives. ("Positive" means a few very low-dosage vitamins and herbs are included, and everything else is banned.) Codex does not enforce or ban anything. It is up to member states to do so or not. That is the power of the Natural Solutions Foundation Codex solution mentioned above and available at http://www.healthfreedomusa.org/resources/books.shtml .

***The July 4-9, 2005, meeting* — The new *Codex Alimentarius*, adopted in a secret meeting in Europe in November 2004, is scheduled to be voted on at a meeting to be held July 4-9, 2005, in Rome. If approved, the ban on nutrients will begin in Europe on August 1, 2005. This is a mishmash of inaccurate information. Please see detailed comments above.**

At that time, there will be final approval of new worldwide vitamin guidelines that are expected to restrict availability of nutrient-containing supplements to consumers the world over. The text of the guidelines was finalized last November in Germany, by the *Codex Committee on Nutrition and Foods for Special Dietary Uses*. The Vitamin and Mineral Guideline was ratified in Rome on July 4, 2005 to the jubilation of the US Codex Manager who through souvenir balls marked with the date into the air for delegates to catch and keep!

These types of international regulations are elaborated *without public input and even without the consent of national parliaments* of the participating countries. This is untrue. It is the national parliaments which enact the legislation which enacts, or does not enact, the regulations of Codex.

Each country entrusts its vote to one person which will eventually determine national laws as well, the head of the national *Codex* delegation. And *Codex* delegations are typically headed by relatively low-level administrative employees of national health ministries. There are no votes in Codex. Voting is avoided by the Chairs who make decisions based on shifting definitions of "consensus".

So we are having what amounts to international laws they are not international laws. Countries are now being educated by the Natural Solutions Foundation to the options that they do, in fact, have to NOT enact Codex standards and NOT be subject to WTO sanctions being developed over the heads of and without input from national legislative authorities, let alone the public that will face the consequences. Democratic procedure has been officially abolished in the name of globalizing the economy and "removing barriers to trade. The abolishment of democratic procedure is de facto, not official. We still have the democratic options open to us if we take them and persuade other countries to do the same. That is why the Natural Solutions Foundation is asking for the support of every health freedom activist. We spent a month in Africa meeting with high level government officials and will do the same in Asia shortly bringing them this very important message about their options which they did not realize they had because of Codex propaganda.

Theoretically, because the United States belongs to the *World Trade Organization* (WTO), any changes approved in Europe automatically become law in the United States, superseding our own laws; There is no such theory. because, as mentioned earlier, treaties entered into by the U.S. take precedence over applicable U.S. laws. EU law is not treaty law in the US any more than Bolivian law is. As you can see, we are no longer a sovereign nation. But there can be delays, as will be discussed later.

"*Harmonization*" — *or else.* Before final ratification of the Vitamin and Mineral Guidelines occurs in Rome on July 4-9, 2005, "harmonization" by the U.S. is "voluntary"; but it can be

enforced by WTO trade sanctions. Before ratification there was no possibility that the Vitamin and Mineral Guideline could have been enforced by WTO trade sanctions. None. After ratification, which occurred on July 4, 2005 in Rome, Italy compliance with Codex will be mandatory No, compliance with Codex is enacted by nations or WTO trade disputes can result with trade sanctions imposed on the loosing nation; and enforcement by WTO trade sanctions is a powerful threat on its own to make sure that it is complied with properly. If that were not bad enough, the SPSA *requires* domestic compliance with ratified standards. The SPS does not require any such thing if a country chooses not to enact legislation which is science based and uses a higher, more restrictive standard. That means that the U.S. will have to bring its laws and standards down to those of Codex and keep them there!

***Said to be impossible to fight the ban* — If the U.S. fails to comply with these changes, the WTO will initiate lawsuits the WTO does not initiate law suits against our government. Our attorneys will not be able to win those cases in court—because they are settled in an international court in Europe which cares nothing about U.S. laws. The WTO is not a court and cases are not settled there. The WTO can impose trade sanctions unless the US chooses to use a standard different from Codex based on better science. The US has DSHEA and it needs to be protected because, at least in the area of nutrients, we have the law based on better science to protect our nutrients. Unfortunately, our manufacturers are dumbing down their nutrient formulas to be able to sell to Codex compliant countries and the FDA is determined to over ride DSHEA to reduce nutrient access, too. There are bills in Congress to do this as well. But Codex is much more than nutrient restircition. We need to protect our food supply on the irradiation side, the pesticide side, the hormones in food side, the GMO side, the antibiotics side. It is all the same battle and it needs to be fought cleverly since there are so many battles and we do not have the resources of industry. That means we must fight it at the causal level. We believe that our template for national action, embodied first in the Vitamin and Mineral Guideline,**
http://www.healthfreedomusa.org/resources/books.shtml , makes this possible.

The only other alternative is for the U.S. to withdraw from the *World Trade Organization* — and it fears to do that. Well, I think that would be great but it is not the only alternative. See above.

***Coalition against Codex* — A meeting of a group opposed to Codex (the *American Association for Health Freedom*) met in Washington on April 22-23, 2005, in order to lay plans for keeping America from submitting to the ban. But whether this coalition of several dozen organizations will accomplish anything is not known at this time. It is not a colalition of several dozen organizations. It lists 15 organizations on its website. So far I am not aware of any accomplishments but any would be welcome.**

***Official AMA position*—The *American Medical Association* (AMA) and *World Medical Association* (WMA) have gone on record as not favoring the Codex ban. But whether or not that is a sincere position is not clear. There is no doubt that neither organization has done much, if anything, to openly oppose Codex in the halls of Congress or in Europe. I do not know what ban is being discussed since Codex does not ban nutrients in its Vitamin and Mineral Guideline. Nor am I able to locate the official position of the AMA or the WMA on Codex or "the Codex ban". I would appreciate greatly having these references or documents since, if they exist, they are very important.**

***Why the July meeting is necessary* — Paul Lasok, QC, an attorney that is one of the world's leading experts on European Union law, presented the case for preserving consumers' freedom of access to dietary supplements. On January 25, 2005, in the European *Court of Justice* in Luxembourg, Lasok argued on behalf of the UK-based Alliance for Natural Health.**

At issue was the so-called "positive list" of nutrient ingredients, in the *Food Supplements Directive,* which would be permitted to be included in the manufacture of dietary supplements. That "list" had excluded nearly all vitamins and herbs!

In June, the court issued a verdict favorable to Codex, permitting the "*Positive List*" to eliminate 75 percent of the forms of vitamins and minerals currently used in the EU market. This was NOT a verdict: the European system is different than our. This was a non-binding preliminary opinion which is followed about 80% of the time in the final, binding verdict. In this case, it was, unfortunately, not followed.

The Codex Commission had to await the outcome of that lawsuit in the Court of Justice, before it could grant final approval to the *Food Supplements Directive* at the July 4-9 meeting in Rome. Incorrect. The Codex Commission ratified the Vitamin and Mineral Guideline on July 4, 2005. The European Court of Justice delivered its verdict on the case on July 12, 2005.

***U.S. leaning toward approval* —On June 9, 2005, the U.S. Codex Office held a public meeting to discuss agenda items coming before the July *Codex Alimentarius Commission* in Rome. Informal inquiries indicated that the preliminary U.S. position on the Guidelines was to support finalization. It was not preliminary or informal. US policy was strongly in favor of supporting the ratification of the Guidelines. The Natural Solutions Foundation attended that meeting on June 9, 2005 and spoke at it, challenging that position.**

***Just issued* — At the end of June, the *U.S. Delegation to Codex* issued a formally written statement to the *Codex Alimentarius Commission,* that the United States, during the July 4-9, 2005, meeting in Rome, will support compulsory Codex rules created by this international organization which directly overrule U.S. law regarding access to vitamins. That does not mean automatic acceptance by the U.S. Senate or Congress, but it is not far from it. They do not directly overrule US law. They contradict US law and if the US chooses to apply them by regulation or legislation, they will be in violation of US law.**

***We have a controlled (or paid off) press* — This Codex crisis is the clearest proof the present writer has ever seen that it is true that we have a "controlled press" in America! There is absolutely no mention of the fact that America is hurtling toward the total loss of vitamin and herbal supplementation in ABC, NBC, CBS, Fox, BBC, or the newspapers and newsmagazines! They are silenced by their desire to not offend the drug companies which provide them with millions of dollars in drug ads. Nor is there a mention of all the other things that Codex is doing to the food supply and to our health thereby.**

***Harm in harmonization* — Through the process, called "*harmonization,*" our nation, our legislators in Washington will be required to bring America into submission to Codex requirements — regulating international trade, distribution, and processing of food, herbs, and nutrients. Those proposed standards will be extremely detrimental to the environment, your health freedom, your health and your access to clean and unadulterated food. They are not required to do so unless they choose to. There is a process by which we will be safe from WTO trade sanctions if we choose to follow it.**
http://www.healthfreedomusa.org/resources/books.shtml details this process.

***Congress or Senate* — It is not clear whether the entire Congress has to approve this "harmonization" or if only the Senate will do that. Neither. Regulations by either the FDA, USDA or similar organizations (e.g., EPA) will do the trick. However, the full Congressional process is needed to pass legislation to comply with any aspect of Codex. The information provided in this sections is simply wrong. Because Codex is under the World Trade Organization (WTO) Codex is not under the WTO. The WTO has accepted the Codex**

standards as a standard for dispute resolution. Not the standard. A standard. and the GATT agreement, Codex is actually part of our WTO and GATT agreements. Inaccurate. The U.S. Constitution requires that only the Senate enter into treaties with foreign powers. But the WTO is a trade agreement, not a treaty. At the present time, CAFTA, a trade agreement with Central America, is working its way through both houses of Congress. CAFTA has already passed. It binds us to use Codex. But we were already bound to accept Codex by every other trade agreement we have entered into (NAFTA, for example.) The issue is not whether we need to follow Codex. The issue is whether we choose to adopt a health promoting standard in place of a Codex one and then enact protective legislation based on better science than Codex. That is our option just as it is the option of every nation in Codex and the WTO. That protective strategy overcomes the dangers of both Codex and the WTO. Health freedom advocates need to get behind that strategy and make it a national priority.

***Phase-in period* — Once Codex is adopted by a nation via "harmonization" (forced acceptance) or through the effects of the SPSA, there is a "phase-in period" during which the administrative structure of implementation is established according to a strict timetable.**

***Can this Codex attack be stopped?* — There is no certainty about this. An English lawyer, named Anderson, considered to be a very capable attorney in that nation, has agreed to fight the Codex in court because he thinks he can win. Codex is not determined by, imposed by, or settled in "court" although the implementation in each country may be.**

You should contact your Congressmen and Senators, and tell them how you think they should vote. There is currently no Codex legislation before Congress. Tell them to protect health, health freedom and DSHEA by going to http://www.healthfreedomusa.org/action/step2.shtml and taking the steps necessary to direct Congress. It is imperative that concerned natural health consumers (and their patients, friends, relatives, suppliers, people who shop in health-food stores and use clean food and therapeutic doses of nutritional supplements, etc.) become fully activated to stop Codex from being enacted in the United States.

Codex based on Napoleonic Code* — It is important to note that *Codex Alimentarius* operates under the Napoleonic legal code, *under which anything not explicitly permitted is forbidden!

In contrast to the Napoleonic legal code, the U.S. operates under the *Common Law* code, under which anything not specifically forbidden is permitted.

***How standards are enforced*—Once ratified, a standard can be enforced in one of two ways: (1) Domestic compliance is required by the *Sanitary and Phytosanitary Agreement* (signed by the United States), in which *Article 3* makes domestic (internal) compliance *mandatory* with WTO accepted standards (*e.g. Codex Alimentarius*). Unless the country adopts a standard based on better science. We need to protect DSHEA and get the US to adopt legislation based on better science in all the areas in which Codex threatens our health, food supply and environment.**

Countries whose domestic law complies with Codex regulations are held to be in *automatic compliance* with Codex Alimentarius for WTO *Dispute Resolution* purposes.

(2) International trade sanctions may be applied to countries which, by means of the *World Trade Organization (WTO) Dispute Resolution* process, are found to be in violation of the *Codex Alimentarius Standards.*

In the absence of any trade dispute, the WTO can charge a nation with providing a *hidden or*

overt barrier **to trade (*i.e.* not meeting Codex regulations) of foodstuffs; thus this would subject them to WTO trade sanctions anyway.**

Also an EU country can file a trade dispute with the WTO against the U.S. The WTO *Dispute Settlement Panel* would compare the less restrictive Codex Guidelines against the ~~lenient~~ more restrictive, at least where we have decent laws such as DSHEA. There is poor and lenient regulation of GMO foods, for example, and not very good pesticide regulation here in the US. Codex is even less restrictive: anything toxic but profitable goes U.S. pattern. Any country, including the US, can file a trade dispute with the US against any other country.

All this may seem very technical; and it is. Yet its complicated machinery is being used to bring millions of people under the control of a few men.

Codex uses WTO *Trade Sanctions* to override national laws. No, the WTO uses Codex to impose trade sanctions unless the national law of the country is based on better science. As mentioned earlier, on October 11, 1997, the FDA issued a policy statement in the *United States Federal Register,* which stated that our nation would accept international standards, whether completed or nearing completion, in preference to domestic standards. This statement was issued on that date in 1995.

This laid the ground work for the replacement of our domestic laws and standards, by those of Codex; This is inaccurate as detailed above yet our domestic laws and standards are far higher than those of Codex! In some areas. In GMO, they are less restrictive. In pesticides, they are not nearly restrictive enough. Actually, the standards set by Codex are dangerously low. This is because Codex standards are set by the various corporations and industries, so they can make more money.

This replacement would take place despite the will of the American people, as expressed through the laws passed by their elected representatives to keep their food safe and their supplements available. We have precious few of those laws and need many more to keep Codex from damaging us all.

Codex Alimentarius, although lacking the force of law, is a set of regulations which can be enforced by trade sanctions of the WTO; and the *Sanitary and Phytosanitary Agreement* (SPSA) can compel compliance with its rules in virtually every country of the world—through nation membership in the WTO. The SPSA is an agreement which is part of the WTO agreements which actually allows countries to set higher standards than Codex if they can back them up with science. We should be doing so in every area threatened by Codex.

Part 2

Codex Attack on Vitamins 2

AND MINERALS, HERBS, AND ORGANIC FOODS

2 - LOOKING DEEPER INTO CODEX

***Normal diet said to be all you need* — The *Preamble* of the *Codex Draft Guidelines for Vitamin and Mineral Food Supplements* states that a normal diet provides all the nutrients you need. There is no mention that supplemental nutrition can enhance health and prevent disease; even though a *World Health Organization* publication documents those facts — and WHO is the parent organization of Codex.**

To be banned **— Should the *Codex Commission* approve the *Draft Guidelines for Vitamin and Mineral Supplements* on its agenda, 300 of the 420 basic vitamin and mineral products, commonly used by European consumers, will be banned from manufacture and trade inside the European Community. This confuses the EFSD and Codex Vitamin and Mineral Guideline. The EFSD was approved long before the VMG was ratified. They are conceptually related by have no formal relationship whatsoever to each other. Implementation of one has no bearing on implementation of the other. They are completely separate processes./**

Five aspects of Codex Alimentarius **— Consider the following:**

• Dosages will be at RDA levels (which are always pathetically low) and will be considered a drug *that requires a prescription. All such drugs must be produced only by drug companies.* This is incorrect. Dosages are not set in the Vitamin and Mineral Guideline on RDA basis. In fact, it is specified that dosages shall not be multiples of the RDA.

• No supplements to be sold or used for preventive or therapeutic use. If this plan is successful, people will not be able to purchase them to prevent or treat disease. Since nutrients will be banned that have any impact on the human body (considered to be an Averse Event under the rules set for nutrients by the WHO Workshop on the topic) there will be no nutrients available under any circumstances which can be used for these purposes.

• Codex regulations will be binding internationally. Any nation which has entered into trade agreements with the EU will be forced to adopt the Codex or receive heavy trade sanctions until it does. This is inaccurate. See discussion of this point above.

• All other types of supplements will be banned, unless Codex gives testing and approval. As mentioned above, Codex does not "give testing and approval" for anything. This will be certain to be expensive. Such tests will also be inadequate. A favorite trick of drug and governmental authorities is to test such small doses of the supplement, so that it does not prove of any noticeable value. More later on why testing cannot be done.

• Codex regulations are not based on previous scientific or research findings. Those regulations were developed by eleven persons, appointed by the EU with drug cartel approval. See the information on this misconception above.

Limited access to supplements **— Codex Alimentarius sets maximum allowable dosages of permitted substances and forbids all others. In Europe, described as "the Future Face of Codex," restrictive standards for nutrients are being set by the *European Supplements Directive* which specifies that only a total of 28 supplements will be allowed at ultra low, subclinical doses. See the information on these staements above. This is a mix of nearly correct and incorrect information which, unfortunately, muddies the waters considerably. The EU and Codex are not related in any formal way.**

In the European Union, all other nutritional materials, apart from these 28 therapeutically useless supplements, will become illegal substances on August 1, 2005. This was delayed by the July 12, 2005 ECJ decision which is now being worked out in its final details of application. While the *European Food Supplements Directive* is responsible for these standards, they are closely allied with the intent and spirit of Codex itself.

This will disappear **— Here is what we are told will disappear if the European form of Codex is enacted, as a treaty "harmonization" by the U.S. Senate: Here is what will disappear based on the ratified VMG if it is allowed to become US policy in place of DSHEA:**

- **High potency nutrients? *Gone!***
- **All nutrients not on the Codex list? *Gone!***
- **New nutrients or herbs? *Gone!***
- **Higher doses of permitted nutrients? *Gone!***
- **Traditional medicines with nutritional value? *Gone!***
- **For those who eat such things: Hormone-free milk, poultry, and meat? *Gone!***
- **Safe levels of pesticides, hormones, animal drugs, and other toxins? *Gone!***
- **Non irradiated food? *Gone!***

More on this later.

***Eliminating supplements considered important* — The objective of Codex is to eliminate the ability of nutrients to prevent, treat, or cure any disease or condition. No, the objective of Codex is, unfortunately, much, much wider than that. It involves the adulteration of the entire food supply. Because they are natural substances, *nutrients are not patentable*. Therefore there is little money to be made in their sale. In addition, they help people physically; and this interferes with the income which drug companies, physicians, and hospitals can earn.**

***Impossible to obtain new supplement approval* — Manufacturers and sellers of supplements will not be able to stay in business; because many would not be able to meet the requirements for nutrients not already approved. Even if they could try to obtain approval, such approval is due to expire December 31, 2010. This pertains only to the EU and has nothing whatsoever to do with Codex. This is fiscal insanity, to spend half a billion dollars on a temporary permit for a non-patentable substance. The cost of obtaining a derogation, or exception to the EFSD ban on a supplement is nowhere near half a billion dollars and the UK is providing financial support to companies wishing to apply for such derogations which do, in fact, expire on that date. Half a billion dollars or more is the cost of a drug being tested and approved here in the US according to drug manufacturers. Many industry observers say the costs are, in fact, far less.**

While there are some impractical options for a few nutrients to become permissible as prescription drugs, the cost and stipulations are so difficult that it is unlikely any nutrients can pass this set of hurdles.

***Sample dosage changes* — Virtually every nutrient at any effective dose will be banned in Europe under the *European Food Supplements Directive.* We can expect exactly the same results here in the U.S., unless we do what the Europeans did not do in time and take massive action. But it has nothing to do with the EFSD here in the US. Rather, we must not allow the VMG to direct our nutrition policy. DSHEA needs to be protected from Congressional assault and FDA regulations which undermine it.**

Codex Would Make Vitamin C *above 200 mg. per day* as illegal as heroin! And as punishable a crime. Heroin is an illegal substance; and it is the model. Your doctor cannot write you a prescription for heroin. You cannot buy, sell, make, distribute, or use heroin. If Codex in

America follows what is coming to Europe, Vitamin C, for example (at any dosage higher than 200 mg. per day), would be illegal. A gram of Vitamin C would be an illegal substance! You would not be permitted to take over 32 mg. daily. We expect that the actual dosage will be more like 65 mg per day. That is still terrifically unacceptable and a violation of our health rights. DSHEA says that nutrients have no upper limits on their dosage.; It needs to be protected.

More dosage examples: Vitamin B6, not over 10 mg. Folic acid, not over 5 mg. Pantothenic acid (B5), not over 200 mg. B12, not over 9 mcg. Anyone who understands effective vitamin doses will recognize that these are essentially useless.

For example, a dose of CoQ10 which has been shown to resolve breast cancer in some patients (400 mg. per day), would be illegal; because CoQ10 would be totally illegal at any dose following the *European Supplements Directive* model.

***Only 28 nutrients would be allowed. We anticipate. This is not certain. But the maximum upper limits have been set so low* that they have little or no clinical impact in keeping us healthy and none at all in returning us to a state of health if we are ill. This is certain. And those which are available would be exorbitantly priced.This is already happening. (In addition to those nutrients, a few low-dosage German herbal formulas will also be available.) They will not likely be available in the US: herbs in the EU are covered by a separate directive which restricts their use harshly.**

***Sample price increases* — Norway and Germany are already operating under the new Codex regulations. The price of zinc tablets has gone from $4 to $52. Echinacea has risen from $14 to $153. Both require a physician's prescription.**

***Soon to be eliminated* — Around 5,000 safe supplement and herbal formulas and nutrients that have been on the market for decades will soon be banned**

***Other nations already "harmonizing"* — Through "harmonization" with Codex via the *Trans-Tasman Agreement,* Australia and New Zealand have been "harmonized" with Codex.**

Canada has achieved the same status indirectly by "harmonizing" with the *Trans-Tasman Agreement* rather than with Codex itself. The net result, however, is the same harm which will come to the United States through Senate and/or Congressional "harmonization" with the Codex.

***It can happen here* — There is a worldwide push for "harmonization" to eliminate clean food, nutritional supplements, therapeutic vitamins, and other natural health choices. It can and it will, unless Americans take appropriate action, tell others, and write officials in Washington.**

Obviously, we do not need to be protected from safe and effective natural healing tools. In their place, Codex offers us pharmaceuticals (medicinal drugs), the third largest killer in America. Actually, the 4th largest killer in America according to the Journal of the American Medical Association (JAMA) when only drugs in hospital which have been used properly are considered. Take into account all drugs, in and out of hospital, and those which are not used according to directions (by either patient or doctor) and the number is truly mind boggling.

Codex Alimentarius is the triumph of the Drug Industry over mankind! Natural medicine remains the best prevention, treatment, and cure for chronic disease. Codex eliminates that option.

Major changeover **— In the United States at the present time, nutrients are currently classified as "foods," and so have no upper limits. This is because of the *1994 Dietary Supplements Health and Education Act* (DSHEA). At the present time, any substance not explicitly forbidden is permitted as a nutrient in the United States.**

Under Codex, any substance and any dosage not explicitly permitted by Codex policy would banned as a nutrient. The difference is of major importance to health freedom.

But the situation gets still worse. The people behind Codex are determined that neither food nor nutrients will ever again be used to treat diseases and infirmities!

The wording of Codex specifically eliminates the possibility that supplements and nutrients could be used to prevent, treat, or cure any disorder.

Yet, more than 80 percent of Americans now use supplements specifically to prevent, treat, and cure diseases and other conditions. Nutritional and environmental physicians, naturopaths, nutritionists, chiropractors, and other licensed health professionals employ hundreds of natural minerals, supplements, and herbs precisely because they are effective in preventing, treating, and curing many diseases and chronic/degenerative conditions. Consumers spend $20 billion per year in the United States for supplements alone.

Dr. Wong Ang Peng, who was present at the November 2003 *Codex Committee on Nutrition and Food for Special Dietary Uses* (CCNFSDU), wrote:

> **"We, the people of the world have entrusted WHO, FAO, and Codex Alimentarius to regulate on health measures, to protect our health. If only the people knew . . Codex is not about health, it is about wealth. Codex is not for public interest, it is for industrial interest. It was a super sellout. It was super hypocrisy."**

What will happen when it takes effect? **— When that time comes, Rolf Grossklaus, M.D., who is both the EU delegate and chairman of the *Codex Committee on Nutrients and Food for Special Dietary Uses* (CCNFSDU), has declared that nutrients will quickly be eliminated. He has also said that the *European Food Supplements Directive* (EFSD) will be "the future face of Codex."**

This is the result of applying so-called "*risk assessment*" science, designed for toxic substances, to determine nutrient levels. Yet, in reality, nutrients are nontoxic foods; thus they have no dangerous upper limits. They are not like dangerous industrial and natural chemicals and substances or medicinal drugs.

Under the new rules, health-food stores would no longer be able to market and distribute nutritional supplements at therapeutic doses. Most health-food stores and privately owned nutrient manufacturers would probably go out of business.

Once Codex is implemented (either through "harmonization" or mandatory compliance), we will be forced to follow something very close to the European model of Codex. Under this, it would be illegal to manufacture, buy, sell, recommend, or use any nutrients or herbs except the EFSD's 28 ultra-low dose nutrients (one of which is fluoride, a systemic poison!), whether or not you are a licensed health professional.

Natural supplements at therapeutic doses, herbs, enzymes, and other non-pharmaceutical treatments would be banned.

Of course, drugs, hospitals, surgery, and radiation would still be available.

***U.S.* "*harmonization*" *next* — Codex regulations are already in full force in Germany, Britain, and a few other European nations. They have already been "harmonized" (*i.e.*, approved) and/or are scheduled for implementation in the EU, Canada, New Zealand, and Australia, as well as the entire Asian Pacific Region (by means of the *Trans-Tasman Agreement*, mentioned earlier).**

The United States is next unless we act decisively! Remember, although Codex regulations are passed quietly and without effective public notice through infrequent meetings abroad that are invisible to most Americans, they would have grave and devastating impact on America's health freedom.

***What you can do* — Phone, write, and e-mail your congressmen and senators. If you favor Codex, tell them so. If you oppose it, tell them so! Do not wait! Start now!**

***When will Codex take effect in America?* — A week ago, I phoned one of the largest supplement manufacturers in America. And I was told that the ban may not go into effect in the U.S. this summer. But the threat is very real; the FDA is working to get it here. If the EU Advocate General's recommendations are followed, it will, following the final approval in July at Rome, take effect throughout EU countries on August 1. The ban is already in place in Britain and Germany.**

Here in the United States, the "harmonization" laws which would enact Codex policy have been defeated by Congress several times, each time by a smaller margin. Given the composition of the current Congress (which is *extremely pro-business!*), it is virtually certain that "harmonization" legislation would be passed when introduced unless we take swift and immediate steps to assure that this does not happen.

This is being called a "stealth attack" on your freedom to eat what you want and care for your health, without the interference of government.

From the best we can estimate, Congress (or the Senate alone) will quietly pass this "harmonization" this late summer, this fall, or just after the fall elections. Perhaps it may not come until next year. But do you dare wait?

Codex is not a democratic process; and we, the people, have neither voice nor vote in the matter *— once our legislators have agreed to obey it.*

Americans could stop it — If enough Americans rose up as one wo/man and demanded action, anything could be done; any change could be made.

***How will it happen?* —One possibility is the U.S. Congress (or Senate alone) will "harmonize" with Codex, thus locking our nation into its provisions. Codex is a huge group of regulations. They don't get implemented as a single block.**

Another possibility is that the WTO will use a lawsuit, see earlier comments on this inaccurate notion or threat of economic boycott WTO does not create economic boycotts: it imposes trade samctions which are not boycotts, to force our legislators to approve Codex. As mentioned earlier, several earlier WTO rulings have gone against U.S. law, forcing Congress to change our law under threat of cross-sector trade sanctions against broad sections of our economy. The most recent and publicized of these was the situation regarding our steel industry and tariffs. If they can force the U.S. to change policy over such a vital

national interest as our steel industry, the dietary and herbal supplement industry will be easy to eliminate.

A third, and less likely possibility is that, when compliance with the Vitamin and Mineral Standard is ratified as expected at the next *Codex Alimentarius Commission* meeting, in Rome, July 4-9, 2005, the WTO will attempt to require immediate submission to it by nations throughout the world, including the U.S. This is not how the process works. The WTO does not require submission to anything. A trade dispute is entered and won. The WTO determines the amount of the sanction and the winning nation gets to decide how it is used. This takes years. But such a rapid demand is not likely.

***Sequence of events* — Here are the events between November 2004 and August 2005:**

(1) In November 2004, vitamin and mineral guidelines were finalized in Bonn, Germany. It was passed in November 2002 and went into effect in 2004.

(2) January 5, 2005, the German *Federal Institute for Risk Assessment* (BfR), directed by Rolf Grossklaus, released a 341-page report on risk assessment of nutrients used in food supplements. The report made extremely low recommendations for maximum levels of vitamin and mineral supplements. I cannot find any record of this report but would be very glad to have it. Is it possible that the document referred to is the WHO Workshop on the Application of Risk Assessment to Nutrients? If so, this has nothing to do with bFR.

(3) On January 29, 2005, urgent messages were sent to Kofi Anan, head of the UN, to extend the deadline for its acceptance of *Codex* standards. But the pleas were disregarded. By whom? As explained above, the UN has set no deadline for acceptance of Codex standards so it is easy to see why the please would be ignored. It is the hope of the Codex Commission to have its standards implemented by a particular date.

(4) On April 5, 2005, a nonbinding opinion of the Judge Advocate General of the *European Court of Justice* (ECJ) required the EFSD to use more science to create its standards (instead of merely a collection of assumptions). This non binding decision has no weight whatsoever although it did give us hope at the time that the ECJ case would go our way.

The rest of Codex implementation, however, was not challenged in that ruling. This opinion had no legal weight and the court was expected to render its final ruling in June 2005. If the EFSD was upheld, the August 1 ban would go forward. If it was not, it would be revised and then go forward.

But even if the EFSD guidelines are overturned, member nations of the WTO (which includes the U.S.) would still be bound by the SPSA *(Sanitary and Phytosanitary Agreement)* to bring their standards into conformity with Codex guidelines and standards. No, they have the option to implement or not implement the Codex guidelines, standards and regulations, one at a time.

(5) In June 2005, that legal question against part of Codex was settled favorably to Codex. This does not have any meaning as far as I can tell. The ECJ ruled only on the EFSD on July 12, 2005. This is totally unrelated legally to Codex.

(6) On June 9, 2005, the U.S. Codex Office, in Washington, held a public meeting to discuss agenda items coming before the July *Codex Alimentarius Commission* in Rome.

(7) At the end of June 2005, the *U.S. Delegation to Codex* wrote a letter to the *Codex*

Alimentarius Commission, **saying that the United States will support compulsory Codex rules at the Rome meeting. At the June 9 meeting referred to above, the US confirmed its policy to support the VMG.**

(8) In July 4-9, 2005, at Rome, the *United Nations, Food and Agriculture Organization* (FAO), *World Health Organization* (WHO), and the *Codex Alimentarius Commission* is set to ratify those guidelines. This is inaccurate. Those dates were the dates of the Codex Alimentarius Commission meeting, not the UN, FAO or WHO meetings. It was Codex that ratified the VMG.

(9) On August 1, 2005, the *European Food Supplements Directive* (EFSD)—which is a "Directive" by the *European Community* (EC) — not a directive by Codex — will restrict the sale into and within Europe of dietary supplements that contain any of hundreds of ingredients or forms of ingredients not on the EFSD "*approved lists*" *(Annex I or II),* except for ingredients that have received "*derogation*" (approval for continued sale) until 2009 in one of 25 European countries (member states of the EU) and which are being considered for addition to one of the approved lists by the *European Food Safety Authority* (EFSA).

Aside from a potential one-year "sell/buy through grace period," taken together with upcoming dosage limit guidelines to be set by the FAO/WHO *Nutrient Risk Assessment Project*, European retailers and consumers will most assuredly have their choice of innovative, high-potency dietary supplements greatly curtailed, officially, as of August 1, 2005. This was suspended pending working out of the final details.

Do the above two paragraphs seem complicated? It is only because of such a confusing web of committees and rules, secretly carried out they have been carried out in public to the apathetic indifference of the European public until after the EFSD was approved. At that point, millions of letters were received in Brussels and London. It was, however, too late. The EFSD was underway to this point, that the international drug cartel of Germany, U.S., and Britain have been able to bring the world to the edge of this horrible cliff!

Australia, New Zealand, and Canada **— As mentioned earlier, the *Trans-Tasman Agreement* has been used by Australia and New Zealand to "harmonize" with Codex. Canada also achieved the same status indirectly by "harmonizing" with the *Trans-Tasman Agreement* rather than with Codex itself.**

Global implementation **— We are told that "global implementation" of Codex will occur on January 1, 2010. The date I have seen is, in fact, December 31, 2009, but the difference is trivial. The concept is a bad, bad, bad one. Although, on August 1, 2005, the Codex ban will go into effect in EU nations (and it is being adopted by several other nations: Canada, Australia, New Zealand, etc.), — To my knowledge the EFSD has not been adopted by Canada, Australia or New Zealand. The Codex issue is quite bad enough without confrusing it with the EFSD the final, total imprisonment of every member nation of the UN in the nutritional prison house of Codex will not occur until January 2010.**

3 - SPECIFICS OF THE BAN

Areas of control**—Codex would provide stringent controls over seven different areas:**

1 - Vitamins, minerals, nutrients, and physiologically active substances

2 - Herbal supplements and treatments

3 - Genetically modified organisms

4 - Toxic residues

5 - Antibiotics, drugs, growth stimulants, and other hormones in food animals

6 - Organic Foods

7 - Irradiation of food

We will now examine each of these seven:

4 - FOOD SUPPLEMENTS

Utterly shocking **—Codex would**
(1) limit the number of different vitamins, minerals, nutrients, and physiologically active substances which could be purchased anywhere.
(2) It would limit dosage of the few which would be permitted.
(3) They could only be sold on a physician's prescription. They would not be available with or without a physicians' prescription since they would be untested drugs if they were under a doctor's Rx.
(4) You could only buy them in a drugstore This is not supported by anything I know. .
(5) They would have to be synthetic. We anticipate this but it is not certain.
(6) You would have to pay very high prices for every tablet.
(7) When fully implemented, only approved drug companies could make them. There is no substantiation for this claim.
(8) It would be a crime to use any nutrients — even the permitted ones — in the home treatment of an infirmity or disease. They could not be used to "prevent, treat, or cure any condition or disease," is Codex's words for it. There is no indication that home treatment is specified in any way. No clinically effective nutrients would be available, effectively eliminating home or office treatment with them.

Seems unbelievable? Read on.

Only 15-100 percent of what is in food **— Codex defines minimum allowable dosages of permitted nutrients as 15 percent of the amount naturally occurring in foods while maximum allowable doses of any permitted nutrients may not exceed the dose of that nutrient as normally found in food!**

A complicated formula **— Permitted nutritional supplement values are determined by subtracting the amount assumed to be in the average expectable daily diet, from the maximum allowable dose and the result is the permitted upper limit of a nutrient. No dosage of this nutrient may be used which is any higher than the permitted upper limit, with or without a prescription. This system is based neither on science nor sense. The objective is to make the typical "junk food" diet of Western civilization the standard!**

Illegal nutrients **— The following two categories would be classified as illegal:**
(1) Higher doses of permitted nutrients
(2) Any amount of nutrients not explicitly permitted. No, any nutrient not explicitly permitted.
You have confused the EFSD and Codex here. They are not the same and what you have

written is very, very confusing.

Both would be classified as illegal substances (like heroin) and, as such, would be legally unavailable under any circumstances.

***Testing of nutrients not feasible* — Although the system for testing *additional nutrients* or *higher nutrient doses* (than those specified by Codex) Codex does not test or approve nutrients can theoretically be done, in reality, no company will dare to request testing for new nutrient formulas or higher dosages. *Here are seven reasons why*:**

(1) The natural substances must be submitted and accepted for testing — at a cost of approximately $250,000 per submission. You are talking about he EFSD here, not Codex

(2) If accepted, a substance may undergo *Phase 1, 2, and 3 testing* — but only as a *drug*.

(3) The testing will be done by Codex, not true using extremely low dosages which cannot be shown to have useful therapeutic effects. Not true.

(4) If, after testing, the substance is found to be efficacious and safe, it will only be marketed as a *prescription* drug. There is nothing at all in Codex which says or implies this.

(5) Permission to market a new nutrient as a drug expires on December 31, 2005, and cannot be renewed or extended. You have mixed up Codex and EFSD here again

(6) A substance successfully tested in this way may then be prescribed *at only the tested dosage* and *only for the tested conditions*. This is not Codex

(7) The cost of this procedure is staggering, — *and most applications for such testing have been turned down.* Because natural molecules cannot be patented, potential manufacturers are unable to recoup the outrageous costs of testing through later sales.

***Only 28 low-dosage nutrients* — As mentioned earlier, when it goes into effect on August 1, 2005, the European Union (EU), whose Directives (EFSD and the THMPD) are the model administrative agencies for Codex implementation, will only permit a total of 28 ultra-low dosage nutrients.**

(The EFSD is the *European Food Supplements Directive.* The THMPD is the *Traditional Herbal Medicinal Products Directive,* which will be discussed in the next section on herbs.)

***Examples of banned nutrients* — Nutrients like Boron, Vanadium, and Natural (Mixed Tocopherols) Vitamin E will be banned under the EFSD ruling. Vitamin E will likely be permitted, but only at ultra low dosages under the EFSD (10 IU). The ECJ ruling apparently made natural vitamins and mineral sources legal in the EU. This says nothing at all about Codex.**

All other nutrients (such as alpha lipoic acid, glutathione, picnoginol, 7-Keto DHEA, 1 gram doses of vitamin C, CoQ10, curcumin, and even fish oil), while not explicitly covered by the July guideline, are anticipated to become banned substances (brazenly called "*anti-therapeutic nutrients*"), when Codex is finalized during the five years before it is fully implemented on January 1, 2010.

***Positive/negative list* — The CCNFSDU *(Codex Committee on Nutrients and Food for Special Dietary Uses)* has made it clear that other nutrients would be excluded under the**

"positive list/negative list" concept. Under this, "everything not permitted on the positive list is forbidden and everything forbidden on the negative list is forbidden by virtue of being absent from the positive list."

***Eliminate nutrition* — Codex's *Nutritional Supplements Committee* Chairman Dr. Rolf Grossklaus has stated that "nutrition has no place in medicine." According to Codex, nutrients have no role in keeping us healthy and none at all in returning us to a state of health if we are ill.**

"*Risk Assessment*" — This strange way of making decisions is called "*Risk Assessment Science*" to nutritional medicine. By the way, the only company permitted to submit risk assessment data to Codex — is owned by Dr. Grossklaus, the chairman of CCNFSDU! Actually, I misstated that in the information that you took this from: he is the Chairman of the Board of bFR. I do not know what, if any, ownership position he holds in the company.

"*Risk Assessment*" is said to be the way that decisions are made as to which nutrients and herbs should be included in the "*Positive List.*" Grossklaus' company privately and secretly decides which nutrients *would be a risk* to the health of people taking them. Obviously, this is all a total fraud. While this is a private process, it is not a secret one.

Grossklaus is going to answer in the Judgment for attempting to damage the health of millions of people, so the pharmaceutical companies can finish the job by drugging them to death.

***Low dosage* — The allowable maximum upper limits for permitted nutrients have intentionally been set so low that they have little or no clinical impact on any human being, no matter how sensitive to the nutrient!**

***Only synthetic* — Even more sinister is the fact that only synthetic nutrients will be sold.**

Although Codex's current *Vitamin and Mineral Standard* (not yet ratified) Ratified July 4, 2005 states that natural and synthetic forms may be used, under the EFSD, only synthetic forms (produced from chemicals) of permitted nutrients would be available and natural forms (extracted from foods) would become illegal substances. But the EFSD is NOT Codex and this limitation was reversed by the Jul;y 12, 2005 ECJ ruling.

***Only manufactured by drug companies* — Under the EFSD, those synthetic nutrients (at ultra-low dosages) would have to be *manufactured by pharmaceutical companies*, in order to meet the Codex-determined molecular standards for use in humans or animals. There is nothing in Codex which makes this determination or sets this limitation. This is absolutely wrong.**

"*Molecular standards*" — Codex says that only synthetic nutrients, at ultra-low dosages and manufactured by pharmaceutical companies, will meet its "molecular standards" for use by humans or animals. Where does Codex say this? Codex is bad enough without confusing the issues.

***High priced* — Whatever *ultra-low dosage nutrients* are available *will be exorbitantly priced*, as current experience in Norway and Germany reveals, where profit margins of synthetic, permitted nutrients are being "harmonized" to match drug profit margins of profit.**

***Why such requirements?* — If you think carefully about it, the only reason for these rules is to increase sickness. That would be the only logical reason why only a few nutrients would be**

available. They would be low dosage and only in synthetic form. Literally thousands of scientific research experiments on people and lab animals have conclusively proven that nutrients maintain health and cure diseases, including many (many!) which drugs cannot cure.

85 percent illegal **— On August 1, 2005, 85 percent of the natural substances currently available in health-food stores and pharmacies in Europe are set to become illegal as a direct result of Codex adoption of the EFSD standards. That which remains will be rendered almost useless by the dosage/cost/synthetic requirements. Codex is NOT the EFSD. The EFSD is not Codex. They are related in the minds of people who want to restrict nutrition but they are NOT the same thing.**

UNESCO report affirms value of nutrients **— As Dr. Grossklaus has repeatedly stated, EFDS is the "future face" of *Codex Alimentarius*. While the problem here in the United States will be acute, it will be a problem of immense proportions in the underdeveloped world.**

That fact is verified by an official UNESCO report. Here is a statement in this report:

> **"Few outside specialist circles are aware of the scale and severity of vitamin and mineral deficiency, or of what it means for individuals and for nations. It means the impairment of hundreds of millions of growing minds and the lowering of national IQs.**
>
> **"It means wholesale damage to immune systems and the deaths of more than a million children a year. It means 250,000 serious birth defects annually and the deaths of approximately 50,000 young women a year during pregnancy and childbirth.**
>
> **"It means the large-scale loss of national energies, intellects, productivity, and growth.**
>
> **"This problem was largely controlled decades ago in the industrialized nations. It could now be controlled worldwide by means that are tried and tested, available, and affordable.**
>
> **"That is why the World Bank says that 'The control of vitamin and mineral deficiencies is one of the most extraordinary development-related scientific advances of recent years. Probably no other technology available today offers as large an opportunity to improve lives and accelerate development at such low cost and in such a short time.' " — *UNESCO,* "*Vitamin and Mineral Deficiencies: A Global Progress Report.*"**

Unfortunately, bribe money is shutting mouths in high places — at the very time when they should speak up and put a stop to this sneak attack. Do you have documentation for this or is this your speculation? Whichever it is (and it is my speculation, too) you need to identify it as one or the other.

5 - HERBAL SUPPLEMENTS

AND TREATMENTS

The *Traditional Herbal Medicinal Products Directive* (THMPD) is an EU directive, it has nothing to do with Codex is part of the overall Codex set of permissions and bans. Absolutely untrue. Herbs are NOT part of the Codex purview any longer. They were handed off to the WHO when nations argued with the US and tried to protect them. It includes a very short list of herbs which may be used and the conditions for which they may be used, — which is

another short and very trivial list.

But any condition which might require "medical [drug] care" may not be treated with herbs. Under the THMPD.

All other applications of herbs and any other herbs besides those permitted are strictly forbidden; since they and their indications are not on the "positive list."

There is the possibility that a few formulas of well-known Chinese or other traditional herbal medicines may ultimately be exempt. If so, it will only be done to please the Chinese government, so it will ratify Codex. It has nothing to do with Codex. Codex does not get ratified. Standards, guidelines and regulations get ratified. China objected briefly and then did nothing to prevent the ratification of the VMG at the July 4, 2005 session of Codex Commission.

Clever ways to exclude nutrients **— It was reported in Britain that, according to THMPD, once Codex goes into effect in a nation, an herbal product could only continue to be sold if it had already been on the market for 30 years, including 15 years in Europe. You have confused the THMPD and Codex. Thus, this is not correct.**

The report went on to state that about 300 nutrients and nutrient sources, already sold in Britain, are not on the permitted list; and, unless comprehensive safety dossiers are approved or the remedies are licensed in the same way as pharmaceutical drugs, they would be banned. Products affected by that ruling include both vitamins, minerals, and herbs. Examples would be Vitamin B6, Vitamin C, echinacea, black cohosh, St. John's wort, multi-vitamin supplements, and minerals.

Secret meetings**—Although herbs were part of the original Codex deliberations, they were suddenly (and some say illegally) removed and placed under a closed committee of the WHO. Thus your statements about Codex and herbs do not make any sense at all.**

According to the legal analysis of experts in this matter, it is anticipated that shortly before the global implementation of *Codex Alimentarius* on January 1, 2010, all herbs will be returned to Codex Alimentarius and declared to be "untested drugs." Thus, it is anticipated that all herbs will become illegal.

Native medicinal herbs banned **— The *Traditional Herbal Medicinal Products Directive* (THMPD) also includes native medicinal use throughout the world. THMPD only applies in the EU so it cannot ban anything other than in the EU so it does NOT ban anything throughout the world. THMPD specifies which conditions may be treated using herbs. Only minor, self-limited conditions (not requiring drugs) may be treated by herbal means. Treating any other conditions with herbal remedies would be a criminal act. In the EU.**

Some complex oriental herbal formulas may be permitted, but most would be lost. Ayurveda, Tibetan, tribal, and other traditional medicines which use herbs and natural substances would be forbidden worldwide, because scientific documentation on their value is difficult to secure. Again, THMPD does not ban anything world wide any more than DSHEA makes nutrients foods worldwide. (Although we are working toward that goal)

Native peoples in many lands would be forbidden access to native herbs Only if those lands are in the EU; yet they would not have access to pharmaceutical drugs. (Those living in remote areas would probably ignore the WTO ban.) It is not a WTO ban. It is not a ban for anyone outside of the EU. Codex has no impact on herbs. Your argument does not make sense.

Chinese Traditional Medicine and Ayurvedic medicinal herbs are banned because Codex requires lengthy use in Europe as a pre-condition to registration. This is totally without factual basis. Codex requires no such testing in Europe. The EU requires it. But a number of natural herbal medicines, already on the German market, were given approval by the 15/30-year formula, mentioned earlier. Keep in mind that the Codex plot was first hatched in Germany.

***Codex vs. WHO* — It is of interest that the European herbal medicines directive runs counter to an initiative of the World Health Organization which has recently issued guidelines for the safe use of traditional, complementary, and alternative medicines which include herbals. WHO wishes to make these widely available in all countries as an alternative to pharmaceutical medicines. In contrast, Codex, a subsidiary of WHO, is seeking to ban herbs which the parent body recognizes as useful in keeping people well throughout the world.**

6 - GENETICALLY MODIFIED ORGANISMS

***Codex fully legalizes GMOs* — Codex legalizes the unlabeled (unlabeled!) use of genetically modified organisms (GMOs). Monsanto Corporation, among others, will make billions from that proviso. NO, this has not happened yet. Fourty three countries fought off the latest US bid to do so at the Codex Committee on Biotechnology meeting in Spetember, 2005 (Japan).**

Codex Alimentarius makes the unlabeled use of GMOs legal in all foods, under all circumstances, — even though there is significant opposition in many parts of the world to the widespread use of GMOs. Not true. This is the law in the US. The nations of the world have been successful so far in beating that regulation back.

***Codex is already in Iraq!* — Farmers in Iraq provide us with a glimpse of what a Codex future would look like in America. Under the new Iraqi constitution, farmers must purchase their seeds from Monsanto; and they are forbidden to gather any of the seeds and use them to plant new harvests the following year. The following year, they must buy fresh seed from Monsanto. This has nothing to do with Codex. It was implemented through the Iraqi Patent Office and the new Iraqi Constitution. It pertains only to certain seed families so far.**

"*Helping*" *nature* — Many GMOs have been genetically engineered, so that seeds *will not germinate* without the use of specific pesticides (such as *Roundup*,® a Monsanto product).

There is increasing scientific data that birth defects, chemical sensitivity, chronic fatigue syndrome, asthma, severe allergies and a host of other conditions can be enhanced or caused by increased pesticide exposure. Yet many crops will not grow without the pesticides! In order to enrich themselves, there are men willing to destroy the world.

***Genetic drift* — Another problem is "genetic drift." The altered DNA in the GMO seed is gradually scattered by pollen and the wind, from one field to another as GMO crops interbreed with non-GMO crops. Each year, more and more farms will be contaminated by GMO crops. GMO genetic material is recognized as a major threat to the biological integrity of the entire planet. Codex regulations will accelerate the spread of GMOs throughout the world.**

***Not labeled* — Genetically modified organisms which are not GMO-labeled will become legal globally if the US gets its way in Codex. This will be done in spite of significant science-based opposition to the use of GMOs.**

It is true that there are "standards for testing of GMOs" in the Codex papers; but you can

expect that they will never be applied if the seed manufacturers do not want them.

Into baby foods **— Incredibly, the Codex *Committee on Nutrients and Foods for Special Dietary Uses* has ruled that GMOs can be used in baby foods and formulas!**

Commenting on this, Dr. Wong Ang Peng, wrote of the 2004 Bonn CCNFSDU meeting, which he attended:

> **"Sadly too, the proposal of EU to allow GMO ingredients in infant formulas did not get much opposition, except from a public interest NGO [non-government organization].**
>
> **"GMO ingredients, the domains of multinational corporations from the developed countries, would, henceforth, be openly allowed into baby food. Let it be on record that the delegates of this 25th Session of Codex Committee proposed and approved these patented DNA mutating junk ingredients."**

Into animal feed **— Codex will also permit GMOs to be freely used in animal feed without being labeled as GMOs.**

7 - TOXIC ENVIRONMENTAL RESIDUES

Codex promotes toxic contamination **— Extremely high maximum limits for pesticide and veterinary drug residues, toxic chemicals, hormones in food, and other environmental contaminants are permitted by Codex.**

Codex may be turning the world into a businessman's paradise; but it is turning the world into a living horror for the rest of us.

These upper limits are many times higher than levels advocated, even by chemical and pesticide industry lobbying groups!

Strange diseases from pesticides **— Scientists recognize that their impact on human health is not yet known. But many research studies into the negative effects of the pesticides, required by some GMO plants foods, have already been carried out.**

For example, there is increasing scientific evidence that the incidence of cancer, Alzheimer's, Parkinson's Disease, birth defects, chemical sensitivity, chronic fatigue syndrome, asthma, severe allergies, and several other serious conditions (which were previously rare) are becoming increasingly common and more deadly where there is increasing levels of the pesticide exposure that GMO crops require.

Toxic poisons maim and kill **— Toxic levels, currently existing, are already known to cause cancer, heart disease, autism, chronic degenerative conditions, and organ failures. Making permissible toxic levels higher would only accelerate this destructive worldwide trend.**

Dangerous labels **— Farmers and ranchers use the toxic chemicals in the amounts which they read on the labels. But following Codex label directions will poison our farms, ranches, streams, and rivers.**

Consider aflatoxin **— The second most potent non-ionizing carcinogen known is *aflatoxin* — which will be permitted by Codex at frighteningly high levels in milk — which is consumed in large quantities by children. This was one time that even WHO spoke up. It conceded in a press release that these levels were extremely high:**

> **"The Codex Commission also set maximum levels of *aflatoxin* in milk and milk products. *Aflatoxin* is a carcinogenic substance that can be transmitted from animal feed. The new maximum limit for *aflatoxin* in milk is 0.5 micrograms per kilogram.**
>
> **"Some countries argued for a stricter *aflatoxin* limit of 0.05 micrograms per kilogram. However the majority of countries agreed that the higher limit was more feasible, particularly in developing countries."**

Cancer-causing **— Cancer, once a rare occurrence, is anticipated to strike 50% of the earth's inhabitants by 2010 under current permissible levels of pesticides and other toxins! — But, when Codex institutes its much higher "*Safe Upper Limits*" for these poisonous substances, the impact on the collective immune system and fertility rates of the planet are beyond imagination. It will greatly accelerate health problems.**

Part 3

Codex Attack on Vitamins 3

AND MINERALS, HERBS, AND ORGANIC FOODS

8 - ANTIBIOTICS, DRUGS,

GROWTH STIMULANTS,

AND OTHER HORMONES

IN FOOD ANIMALS

Poisoning required **— Codex requires that all conventionally farmed livestock *must be treated* with antibiotics, veterinary drugs, hormones, and growth stimulants. No exceptions.**

Useless guidelines **— Codex has prepared "guidelines" to "prevent irresponsible use of veterinary drugs." But they are a sham. Poorly worded and with so many generalities and exceptions as to be unenforceable, the "guidelines" are worthless.**

In striking contrast are the very strict Codex regulations concerning nutritional supplements and herbs:
(1) Minutely controlled and detailed prohibition of nutritional standards.
(2) Sharply defined positive list and a broad explicit and implicit negative list which effectively prohibits all therapeutic dosages of all nutrients.

Veterinary drugs are permitted without limit **— or penalty, even if overused — regardless of how harmful they may be to livestock and humans. But invaluable nutritious and essential substances are forbidden or reduced to meaningless small amounts.**

9 - ORGANIC FOODS

Eliminate organic foods **— Codex even wants to get rid of "organic" foods! Why? How would big business make extra money by doing that? In two ways:**
(1) The primary advantage is that, without quality food, people will become sicker and need more drugs.
(2) A lesser advantage is that farmers will decide to buy more insecticides and chemical fertilizers; since, under Codex, "organic foods" no longer mean anything.

Accomplished by re-labeling **— The standards and definitions of "organic food" will be changed. Under Codex, a farmer or rancher will be able to call his products "organic" — when they are full of toxic poisons. The Codex definition of "organic food" includes *as little as 70% organic contents* — but without saying that on the label. (The other 30% can consist of poisons or contaminants.)**

Organic, free range and biodynamic farming (both crops and livestock), while technically permitted, are defined so loosely that antibiotics, toxins like *Rotenone*, fish and dairy products for livestock feed, and veterinary drugs (including antimicrobials) may be used *at the discretion of* the certifying agent or farmer.

Drought, hardship, severe conditions, or "other" situations can all cause the definition of "organic" to be stretched beyond reason and safety. There are no penalties for violation of "organic" farming principles for either crops or animals.

Organic livestock **— Codex approved new guidelines for organic livestock production, which greatly reduce the reality of "organic." The chemical standards for animal feed and treatment are changed.**

Short conversion times **— Both plants and animals can be given poisons of various kinds only a little time before harvesting, milking, or butchering. Farmers need only switch to "organic," no-chemical methods just before harvesting. Ranchers can move livestock to "organic" fields just prior to going to market.**

10 - IRRADIATION OF FOOD

Irradiation mandatory **— Codex Alimentarius fully legalizes — and *requires* irradiation — of food at the time of harvesting or butchering. Yet irradiation is widely opposed by food safety advocates.**

Although allegedly designed to "protect us from food-borne illness," there is considerable scientific evidence that irradiation of food generates extremely high amounts of free radicals in the food. Protein structures are modified in unhealthy ways by introducing ionizing radiation into food before it is eaten.

Flooded with radiation **— Codex has weakened the international food irradiation rule, by allowing any food to be irradiated at any dose, regardless of how high it may be. The new standard lists no maximum radiation dose to which foods can be treated!**

The previous limit was 10 kilo Gray, a dose of radiation equivalent to 330 million chest X-rays. At such doses, the chemical composition of foods can be altered. Vitamins, proteins, and other nutrients can be destroyed. And flavor, odor, and texture can be corrupted.

The decision to do this was made by the chairman of Codex, over the objections of more than 10 countries (including Austria, Denmark, Germany, Italy, Mexico, and Spain).

***Obeying its masters* — The International Atomic Energy Agency (IAEA), a UN subsidiary, owes its loyalty to the nuclear industry; therefore it works with governments to devise new ways to sell them nuclear technologies. It is impossible for the main advocate of nuclear technology to advise Codex in a disinterested, scientific manner because of its vested interests in the speedy and complete adoption of food irradiation.**

***Faulty studies*—A report by *Public Citizen* says this:**

> **"WHO [World Health Organization] has relied on a very small number of faulty studies in declaring food irradiation safe. This unscientific and shoddy work is the foundation of acceptance of food irradiation across the world. Codex has not relied on disciplined, dispassionate or scientific advice in setting standards for food irradiation. Instead, the decisions and regulations recommended by Codex are used as a starting point for the facilitation of international trade. Both the *Agreement on the Application of Sanitary and Phytosanitary Measures* (SPS) of the *World Trade Organization* (WTO) and the *Agreement on Technical Barriers to Trade* (TBT) follow Codex's lead and encourage the international harmonization of food standards from a trade perspective." — *Public Citizen, report dated October 2002.***

***Repeatedly irradiated* — The irradiation of food produces immense, free-radical populations in that food. The higher the ionizing dose, the higher the free-radical production. Under Codex, food components may be irradiated and then, as they are combined with other components, they may be irradiated again. And again, and again! Each time, the free-radical population is increased.**

The only protection against their pervasive damage is high doses of anti-oxidants like Vitamin C, beta carotene, glutathione, etc. — which would be illegal under Codex.

——— *MEMBER COUNTRIES OF THE UNITED NATIONS* ———

A	Cook Islands	Guatemala	Libyan Arab Jamahiriya	Peru	Syrian Arab Republic
Albania	Costa Rica	Guinea	Lithuania	Philippines	**T**
Algeria	Côte d'Ivoire	Guinea-Bissau	Luxembourg	Poland	Thailand
Angola	Croatia	Guyana	**M**	Portugal	The former Yugoslav Republic of Macedonia
Antigua and Barbuda	Cuba	**H**	Madagascar	**Q**	Togo
Argentina	Cyprus	Haiti	Malawi	Qatar	Tonga
Armenia	Czech Republic	Honduras	Malaysia	**R**	Trinidad and Tobago
Australia	**D**	Hungary	Mali	Republic of Korea	Tunisia
Austria	Democratic People's Republic of Korea	**I**	Malta	Republic of Moldova	
B		Iceland	Mauritania	Romania	
		India			

Bahamas

Bahrain

Bangladesh

Barbados

Belgium

Belize

Benin

Bhutan

Bolivia

Botswana

Brazil

Brunei Darussalam

Bulgaria

Burkina Faso

Burundi

C

Cambodia

Cameroon

Canada

Cape Verde

Central African Republic

Chad

Chile

China

Colombia

Democratic Republic of the Congo

Denmark

Dominica

Dominican Republic

E

Ecuador

Egypt

El Salvador

Equatorial Guinea

Eritrea

Estonia

Ethiopia

European Community

F

Fiji

Finland

France

G

Gabon

Gambia

Georgia

Germany

Ghana

Greece

India

Indonesia

Iran (Islamic Republic of)

Iraq

Ireland

Israel

Italy

J

Jamaica

Japan

Jordan

K

Kazakhstan

Kenya

Kiribati

Kuwait

Kyrgyzstan

L

Lao People's Democratic Republic

Latvia

Lebanon

Lesotho

Liberia

Mauritius

Mexico

Micronesia (Federated States of)

Mongolia

Morocco

Mozambique

Myanmar

N

Namibia

Nepal

Netherlands

New Zealand

Nicaragua

Niger

Nigeria

Norway

O

Oman

P

Pakistan

Panama

Papua New Guinea

Paraguay

Russian Federation

Rwanda

S

Saint Kitts and Nevis

Saint Lucia

Saint Vincent and the Grenadines

Samoa

Saudi Arabia

Senegal

Seychelles

Sierra Leone

Singapore

Slovakia

Slovenia

Solomon Islands

South Africa

Spain

Sri Lanka

Sudan

Suriname

Swaziland

Sweden

Switzerland

Turkey

U

Uganda

Ukraine

United Arab Emirates

United Kingdom

United Republic of Tanzania

United States of America

Uruguay

V

Vanuatu

Venezuela (Bolivarian Republic of)

Viet Nam

Y

Yemen

Z

Zambia

Zimbabwe

Congo	Grenada				

CODEX AND FAO HEADQUARTERED IN ROME

We knew that Codex was initially founded by FAO and WHO at a 1963 meeting in Rome. Now we learn that both Codex and FAO are headquartered there.

I found this fact buried within an obscure Codex affiliated website. "The Secretary of the *Codex Alimentarius Commission* is a senior FAO official who serves as the chief of the *Joint FAO/WHO Food Standards Programmes*, located within the *Food Quality and Standards Service of the Food and Nutrition Division* at FAO in Rome. The Commission's *Secretariat* is based at FAO's Rome Headquarters . . The *Codex Commission* meets every two years, alternately at FAO headquarters in Rome and at WHO headquarters in Geneva." — *food.gov.uk*

JULY 3, 2005 - U.S. CODEX OFFICE MEETING

> **"The delegation meeting, attended by forty delegation members and observers, took place at the Trendy Hotel at 47 Via Petroselli, Rome, just one block from the Circus Maximus.**
>
> **"Dr. Ed Scarbrough, *U.S. Codex Office* administrator and administrative leader of the *U.S. Delegation* to the 28th session of the *Codex Alimentarius Commission*, today told the delegation at its pre-meeting session that the *Codex Commission Executive Committee* had endorsed the vitamin and mineral guidelines recommended to it for adoption by its *Committee on Nutrition and Foods for Special Dietary Uses* (CCNFSDU) . . The endorsement of the guidelines by the *Executive Committee* virtually ensures their adoption by the full Commission at its July 4 meeting.**
>
> **"Dr. Scarbrough commented on Chinese and other Asian country desires to have greater flexibility, based on unique dietary habits, to add other categories than vitamins and minerals to the guidelines, and Australia's 'perennial' desire to restrict the guidelines only to countries that treat vitamins and minerals only as foods. Canada expressed lack of support for the guidelines, arguing that 'given the differences in diets, food supplies, attitudes, and consumption patterns around the world, such guidelines were best left to national governments.' In the opinion of the Canadian government, the guidelines will not apply to Canada, because it regulates vitamin and mineral supplements as 'natural health products, not as foods' . . Several countries, Mexico and Brazil among them, desire clearer rules on the consensus process used by Codex to make decisions. Some observers believe that the current consensus [instead of voting!] rules favor Europe and the U.S., and marginalize the interests of developing countries." — *James S. Turner, Board Chair, Citzens for Health, July 3, 2005.***

On the opening day of the July 4-9 Codex meetings in Rome, the decision was made to approve the *Codex Alimentarius* rules. Here is a report on this:

JULY 4, 2005 - CODEX APPROVAL AT ROME

> **"Press Release - National Health Freedom Coalition: Codex Full Commission adopts Codex Guidelines for Vitamin and Mineral Food Supplements in final form July 4, 2005, Rome Italy, by Diane Miller, JD. ["JD" means that Miller is an attorney.]**
>
> **"Minutes ago the full *Commission of Codex Alimentarius* adopted in final form, the**

***Codex Guidelines for Vitamin and Mineral Food Supplements*. This adoption is the *Step 8* adoption, the final stage of adoption for the international Codex guidelines. The *Codex Vitamin and Mineral Food Supplements Guidelines* are now official and no longer in draft form.**

"The Commission, attended by [representatives from] over 85 of the 171 Codex countries, adopted the guidelines by consensus method. There was brief discussion before adoption, taking in comments from a small number of countries and two NGOs.

"Australia requested adding the word, 'only,' in Section 1.3 between the words, 'apply' and 'in.' The sentence would then read, 'These guidelines apply *only* in those jurisdictions where products defined in 2.1 are regulated as foods.'

"Australia's comments were followed by a request from Venezuela and Spain, to clarify the Spanish translation.

"Venezuela was followed by China. China stated that every government, in making decisions about vitamins and minerals, should take into account the dietary limitations of their own countries, that governments can [should be able to] select vitamins and minerals according to the customs and habits of their [own] country. China also pointed out that there should be definitions of the sources of vitamins.

"Columbia spoke up and commented that vitamins and minerals are intended for deficiencies and are recommended for health reasons, and said that there has to be no exaggerated use of minerals.

"Egypt commented and offered a clarification, saying that vitamins and minerals can be [should be able to be] considered if daily needs are not being met.

"After the countries were heard, the Chairman recognized NGOs (non-governmental organizations) [that is, permitted them to speak next]. *National Health Federation* (NHF), a worldwide consumer organization with NGO status at Codex, was recognized to speak. Attorney Scott Tipps of NHF stood and requested that the guidelines not be adopted, but rather be sent back to committee for three important reasons.

"First, according to Codex rules a 'purpose' statement must be part of all guidelines adopted, and the vitamin and mineral guidelines did not contain a purpose. Secondly, the guidelines did not define vitamins and minerals, and therefore it is unclear as to what is being regulated. And lastly, he pointed out that the Chinese comments were substantive; and according to Codex rules on page 27 of the *Procedural Manual*, a substantive amendment request should be addressed at the committee level. His comments were heard.

"The NGO IADSA was then recognized. IADSA stressed the fact that the draft guidelines should be adopted because they had been worked on in committee for nearly 10 years, and that valuable consensus had been reached in the Bonn, Germany, committee meeting and the guidelines should now be passed.

"After all comments had been heard, the Chair, consulted with counsel to assess whether the addition of the word, 'only,' would change the meaning of the sentence. *After learning that it would not*, he consulted with Australia, and Australia repeated their request for amendment. The Chair recommended adoption of the amendment and there was no dissent.

> **"Then the Chair recommended the guidelines be adopted at Stage 8 in their final form and that China submit their substantive amendment requests to the committee at their next meeting. There was no further comment or dissent from any country and the guidelines were adopted." — *Diane Miller, National Health Freedom Coalition, July 4, 2005.***

BEWARE OF IADSA

That concludes Diane Miller's report. What is "IADSA"? It seemed to be an important health organization, yet it urged adoption of Codex. Checking on this, here is what I learned from their website:

> **"IADSA - *The International Alliance of Dietary/Food Supplement Associations:* Our task is to represent the views of the industry in the shaping of global policies and regulations that affect dietary supplements. We are the single coordinated voice speaking on behalf of over 8,500 companies and their 43 trade associations across six continents, and these numbers are growing. Since its creation in 1998, IADSA has developed into an alliance of more than 40 dietary supplement associations spread over 6 continents. There are at present more than 8,500 companies who are part of the IADSA member associations." — *iadsa.org.***

Sounds good, but where does IADSA stand in regard to Codex? Careful reading of the data on their website reveals that, while IADSA purports to be representing nutritional supplement manufacturers and sellers, it is actually a front organization for the drug manufacturers and Codex! Intermingled with talk about the value of vitamins and minerals, you will read full approval for the objectives of Codex.

After arriving at that conclusion, based on personal examination of the iadsa.org website, I found this:

> **"Members of NNFA USA have been led to believe that IADSA (International Alliance of Dietary Supplement Trade Associations) was created to 'defend the interests of the dietary supplement industry' as a UN NGO participant at Codex.**
>
> **"International Advocates for Health Freedom (IAHF) holds the opinion that IADSA is a controlled opposition group set up by Randy Dennin [president of IADSA], who was an employee of Warner Lambert at the time IADSA was first established, but who is now an employee of Pfizer, the world's largest pharmaceutical company.**
>
> **"IAHF asserts the opinion that members of NNFA USA have not been told the truth regarding the Codex vitamin issue, and that IADSA *is not* protecting their interests." — *John C. Hammell, President, IAHF (iahf.com).***

IADSA was apparently set up to fool the food supplement industry into thinking it would fight their battle for them, so they could relax and do nothing. To a great extent, over the past decade or so, IADSA succeeded. Many supplement manufacturers and health-food outlets assumed that IADSA was fighting their battles for them.

CAFTA AGREEMENT

Special clauses have been inserted into CAFTA *(Central American Free Trade Agreement),*

designed to force America to submit to Codex as soon as it is enacted by the U.S. Congress.

CAFTA has already been passed by the U.S. Senate. As soon as it passes the House of Representatives, we are told the U.S. government will be forced, by the terms of that CAFTA agreement, to restrict vitamin and supplement sales in accordance with the "*German Model*" of health care. Not accurate at all as events (or lack thereof) following the July, 2005 passage of CAFTA have proven?

When that happens, the 1994 DSHEA *(Dietary Supplement Health & Education Act)*, which protects the nutritional rights of Americans, will be nullified, the North American supplement industry (and its health-food stores) will crumble. No evidence of this happening or likely to happen unless Congress overturns or guts it.

However, enforcement is not inevitable. At the present time, over fifty percent (50%) of the total U.S. health dollar is spent annually for non-medical health and healing products. Fully 88% of U.S. adults use some kind of "*alternative*" to drugs and hospitals. If they wish, they can oppose this.

HELKE FERRIE VISITS GERMANY

> **"In the mid-1990s my mother, then in her 80s, had a stroke. She lived in Germany. When she left the hospital, I was ready with a nutritional plan that included high-dose vitamins: C, E, and B – especially Inositol, as well as co-enzyme Q10. I went to the pharmacy, whose owner had been a family friend for some 25 years, and handed him my list.**
>
> **"He handed me a small packet with a price sticker of DM 200 (then about $200), containing vitamin E capsules manufactured by one of Germany's largest pharmaceutical companies. The source was synthetic, not the "mixed" version from living plant sources I wanted, which contains the whole E spectrum. The package contained a total of 10,000 international units of E, the equivalent of a mere 25 capsules of 400 IU each that we are used to buying (I take that many in 3 days). Our bottles contain 90 capsules and cost about $20 [but these cost $200 for 25 400-IU capsules].**
>
> **"If Codex rules in Canada, we will likely pay $800 for a bottle of 90 capsules of low-quality vitamin E — *if Health Canada lets us buy that many at once, and if you can find a doctor willing to prescribe it.***
>
> **"He then handed me a tube-shaped metal container with vitamin C effervescent tablets. Each tablet, when dissolved in water, would release 10 mg of vitamin C in a refined sugar solution. Thus, this ridiculously low amount was to be taken in a toxic medium [of white sugar] that would neutralize the vitamin without it doing anything at all. The cost: about $10 for 12 tablets.**
>
> **"Then he asked me, 'What's Co-enzyme Q10? Are you allowed to buy all this in Canada in such dangerous dosages?' When I told him what I take daily, his eyes popped. Then I asked, 'Why can't I buy these supplements here?' He replied, 'Well, Germany is a Codex country.' " — *Helke Ferrie, quoted by Tim Bolen.***

GATT URUGUAY ROUND AGREEMENT

Under the terms of the *Uruguay Round* of GATT, which created the *World Trade*

***Organization*, the United States agreed to harmonize its domestic laws to the international standards. This includes standards for dietary supplements being developed by the United Nation's *Codex Alimentarius Commission's Committee on Nutrition and Foods for Special Dietary Use*.**

The *Uruguay Round Agreements* carry explicit language clearly indicating that the U.S. *must* harmonize to international standards:

> **"Members are fully responsible under this Agreement for the observance of all provisions . . members shall formulate and implement positive measures and mechanisms in support of the observance of the provisions . . by other than central government bodies [WTO TBT Agreement at Article 3.5]."**

In other words, because we agreed to the *Uruguay Rounds* changes, we are supposed to obey Codex and not let Congress oppose it.

Not only that, but Codex Alimentarius is now enforceable through the *World Trade Organization* (WTO). If a country disagrees with or refuses to follow Codex standards, the WTO applies pressure by withdrawing trade privileges and imposing crippling trade sanctions. Congress has already bowed to this pressure several times and so have the governments of many countries.

While the exemption clause USC 3512(a)(1) and (a)(2) was created to supposedly protect our laws from harmonization to international standards, it has proven to be totally ineffective. The United States has already lost seven trade disputes, despite the exemption clause. Due to the enormous pressures put on them by lobbyists from multinational corporations (who contribute millions to congressional campaigns), Congress bowed to pressure and changed U.S. laws.

It appears our government (as well as all others) is being manipulated one way or another to serve the goals of the UN, the World Health Organization, and the World Trade Organization. It has been said that "food control equals people control."

STATEMENT BY PUBLIC CITIZEN

***Public Citizen* is an outstanding organization which was founded by Ralph Nader in 1971. It serves to warn Americans of various dangers.**

Here is a remarkably good summary statement, prepared by one of their attorneys about the *Codex Alimentarius* threat! Written about 1997, it discusses the problems and carefully explains some solutions.

(Note: As throughout this report, all the bold face and brackets in the Public Citizen report are ours:)

"The *Codex Alimentarius Commission* is an international standard-setting body established jointly in 1962 by the United Nation's *World Health Organization* and the United Nation's *Food and Agriculture Organization* to facilitate international trade of food. At its inception, Codex set identity standards — that is, descriptive standards for foods — so that traders around the world would, for example, have a common understanding of what was being bought and sold as 'peanut oil.' The 158 member countries of Codex are encouraged to accept and implement Codex-approved food standards nationally, but are not obligated to do so. The United States has participated in Codex activities since 1962; but, historically, Codex

standards were not considered to be safety standards, nor were they accepted as safety standards by FDA. 21 C.F.R. § 130.6.

"Recent international trade agreements have caused a radical change in the nature of Codex standards. Both the *North American Free Trade Agreement* (NAFTA) and the *Uruguay Round* of the *General Agreement on Tariffs and Trade* (GATT) have changed the status of Codex standards by designating Codex as the international body establishing presumptively trade-legitimate food safety standards. No longer are standards set by Codex purely designed to facilitate smooth trading negotiations, nor are they voluntary.

"Codex standards — which traditionally served as a minimum floor of acceptable quality for less developed countries — have become the presumptive international standards for food safety and labeling. Under the Uruguay Round's *Agreement on the Application of Sanitary and Phytosanitary Measures* (SPS Agreement), regulatory requirements that exceed Codex standards may be challenged as trade barriers. While the SPS Agreement does not require countries to adopt Codex standards as their own national standards, a country must have a scientific justification to establish or maintain a more stringent standard to meet its chosen level of protection. The burden of proof to show a scientific justification falls on the country with a standard that is more stringent than Codex. Thus Codex standards now have new significance in the United States and for the FDA's regulatory activities because other countries may challenge an FDA safety standard as a trade barrier if the standard exceeds [is different than] the requirements set by Codex.

"Despite the heightened status and responsibility that is given to Codex and its standards under the NAFTA, GATT, and SPS Agreements, significant problems in the way Codex operates have not been addressed:

"1 - Codex Was Created to Promote International Trade and Employs Procedures that Jeopardize the Safety of the U.S. Food Supply.

"Codex is poorly suited to establishing global food safety standards because its mandate to protect public health takes a backseat to its competing mandate to promote international trade. Codex's focus on facilitating international trade contrasts sharply with the domestic mandate in the *Federal Food Drug and Cosmetic Act* (FFDCA) which is to protect and promote the public health, regardless of its impact on trade. Moreover, it threatens to trump United States standards that are based solely on public health, such as the *Delaney Clause*, which permits no risk of cancer from exposure to carcinogens in food. In contrast to FDA's public health mandate provided by the FFDCA, Codex has no over-arching mandate to protect public health and no codified standard that requires precautionary principles to be applied or spells out precisely how to assess whether consumer health is adequately protected.

"Instead, Codex allows health and safety standards to be set by popular votes which may be based on economic factors having nothing to do with public health protection. Codex gives each member country an opportunity to vote on each standard, even when that country has a self-interest in a less-protective standard. Thus, France and other European countries that sell non-pasteurized cheese object to any Codex dairy standards that would require pasteurization, just as pottery-producing nations like Portugal and Spain would object to stringent lead standards. It is not surprising that the United States would be outvoted by countries with less protective safety standards; because, if those countries vote to accept higher standards, their products would be banned from international trade. Thus, there is significant pressure to keep Codex standards weak.

"*2 - Lack of Public Participation in Codex Standard-Setting.*

"Codex has operated without adequate mechanisms for obtaining public input or maintaining public accountability. Meetings of the *Codex Executive Committee* are closed, even when the agenda includes decisions on risk management and other important policy issues. Observers are also excluded from the meetings of the two expert committees that perform the scientific evaluations which support Codex standards—the *Joint FAO/WHO Expert Committee on Food Additives* (JECFA) and the *Joint FAO/WHO Meetings on Pesticide Residues* (JMPR). While *Non-Governmental Organizations* [NGOs] are allowed to attend the Commission's meetings, the needed background documents are rarely provided with adequate lead times and procedural rulings by the secretariat have precluded full dissemination of consumer perspectives [have omitted giving the full facts] to Codex participants. Moreover, certain Commission decisions are taken in private sessions. For example, the decision to accept *Maximum Residue Limits* (MRLs) for growth-promoting hormones in meat production — a subject of great interest to consumer groups in many countries — was taken by secret ballot at the Commission's 21st (July 1995) meeting.

"Thus, Codex procedures are completely at odds with the transparent and participatory way in which FDA sets safety standards in the United States. Domestically, the *Administrative Procedures Act* (APA) and the *Federal Advisory Committee Act* (FACA) ensure that the public has notice and the opportunity to comment on proposed rules, and that advisory committees are balanced and open to the public. No such democratically accountable policy making process is followed by Codex.

"In recent years, some consumer and environmental organizations have attended Codex meetings and have sought to make Codex more open and participatory. Consumer and environmental representation, however, has remained sporadic and Codex has not yet significantly reformed its processes to ensure more meaningful public participation.

"The United States delegation to Codex is not headed by FDA — whose sole mandate is to protect the public health, but (is headed) by USDA — an agency with a mandate to promote the sale of U.S. agricultural products abroad. Not surprisingly, industry has been intimately involved in Codex from the outset. For example, at the most recent Codex meeting in June, representatives who attended came from Coca-Cola, Pepsi Cola, Monsanto, and Pfizer as well as such trade groups as the International Dairy Federation, the International Council of Grocery Manufacturers' Associations, the International Organization of the Flavour Industry, the International Soft Drink Council, and the International Glutamate Technical Committee. In contrast, consumers, public health advocates, and environmental organizations have been relative latecomers and still comprise a very minor voice.

"A 1993 study reported that over eighty percent of the non-governmental participants of national delegations to recent Codex committees represented industry while only one percent represented public interest organizations. Of the 37 non-governmental organizations that participated at the most recent Codex meeting this summer, only three represented the public interest community. And while many of the delegations of member countries included industry advisers, only three countries — the United States, Germany, and Norway—had consumer representatives on their delegations.

"*3 - The Rationale and Process for Codex Decisions Needs Strengthening.*

"According to a report released by the Office of the *U.S. Coordinator for Codex Alimentarius* ("U.S. Codex") in February 1995, 'aspects of the scientific and administrative procedures followed in the elaboration of [Codex health and safety standards] warrant attention to their transparency, their consistency between and within committees, and their adequacy of data requirements.' U.S. Codex identified three concerns related to the scientific basis for Codex decision:

"(1) The basic scientific approaches employed in the expert committees' evaluations need clearer articulation and public review.

"(2) The relationships among the technical experts, governments, and non-governmental organizations need to be examined and clarified.

"(3) Systematic processes need to be established for continuous reassessment and updating of the scientific approaches and the data evaluations themselves.

"U.S. Codex then established a goal that 'within five years, with the support of U.S. Codex, Codex Alimentarius decisions will be widely recognized and fully accepted as being based on strong, consistent scientific principles.' In an apparent effort to achieve this goal at the most recent Codex meeting in June 1997, the United States delegation emphasized that the risk analysis process should be transparent and that 'it was extremely important that results of risk assessment be published to be available for others to obtain information and/or to confirm their own evaluations.' While Codex is currently developing an action for development and application of risk analysis principles and guidelines in all Codex activities, Codex put off making firm recommendations for adoption of definitions for risk assessment policy and risk profile until the 23rd Session (in 1999) . .

"No comprehensive comparison of FDA and Codex standards has been conducted recently. However, a 1997 report by the Center for Science in the Public Interest pointed to five areas in which the Codex standard falls below existing FDA and USDA regulatory requirements: pasteurization of dairy products, food additives, mineral content of bottled water, meat inspection, and lead contamination. Moreover, in 1991, the *U.S. General Accounting Office* conducted a comparison of U.S. pesticide standards to Codex pesticide standards. While many pesticide tolerances or maximum residue levels (MRLs) could not be directly compared because the standards are defined differently, GAO found that for those that could be compared, among the pesticides that EPA has rated as probable carcinogens, the United States has lower MRLs (a more stringent standard) in 55 percent of the cases. GAO determined that acceptance of Codex's higher (less stringent) standards could raise health concerns because of possible increased exposure. Indeed, a 1994 analysis by *Public Citizen* and the *Environmental Working Group* found that adopting Codex tolerances for pesticides where they are higher than U.S. tolerances would increase allowable cancer risk 12 times over current U.S. levels.

"*FDA's Consideration of Codex Standards*

"Congress has made clear that FDA's obligations to protect the public from adulterated and misbranded food under the *Federal Food Drug and Cosmetic Act* (FFDCA) have not been reduced or modified by the United States' participation in international trade agreements. In approving and implementing the *Uruguay Round* trade agreements, Congress explicitly provided that 'nothing in this Act shall be construed to amend or modify any law of the United States, including any law relating to the protection of human, animal, or plant life or health.' Moreover, the *Statement of Administrative Action,* written by the Administration and approved by Congress when it implemented the *Uruguay Round* agreements, specifically lists the FFDCA as a federal environmental and health measure that is not amended or modified by the agreements. Accordingly, FDA may not adopt Codex standards that do not comply with the statutory requirements set forth in the FFDCA.

"FDA's primary goal in consideration of Codex standards, as in all of its international harmonization activities, must be to preserve and enhance its ability to accomplish its public health mission. With this goal in mind, we make the following suggestions:

"(1) FDA procedures for review of Codex standards must ensure that the agency is exercising its own independent judgment (uninfluenced by international trade pressures) when it considers whether a particular Codex standard will improve public health in the United States. The review should ensure that
- the relevant science on which the Codex standard was based is independent from industry influence and has not changed;
- that the Codex standard reflects the newest science and consumer protection concerns, including precautionary principles;
- that the factual and scientific bases for the Codex standard are part of the record made available to the public;
- and that the standard maintains the flexibility to respond to emerging health hazards and other new information.

"(2) FDA should only consider for adoption Codex standards that provide a greater level of protection than current U.S. standards or address concerns not yet regulated by FDA. For example, in 1991, GAO determined that Codex standards had lower (more stringent) MRLs for certain carcinogenic pesticides than United States MRLs in 27 percent of the comparable cases. Codex standards like these that would increase the level of consumer protection should be reviewed first and adopted. Codex standards that are adopted domestically should be reviewed at least once every three to five years to ensure that the standard still offers the highest level of health and consumer protection.

"(3) In order to identify other Codex standards for review, FDA should look to those FDA regulations that need updating and revision and consider any relevant Codex standards in conjunction with a review of FDA regulations. For example, FDA intends to review its regulations pertaining to identity, quality, and fill of container for standardized food in order to simplify the regulations where practicable and to take into account the impact of the 1990 NLEA amendments. 60 Fed. Reg. 67492 (Dec. 29, 1995). As part of this review, FDA should consider any relevant Codex standards. Whenever FDA plans to issue a new FDA regulation (or revise an existing regulation), the agency should also review any relevant Codex standards.

"(4) FDA should *not* give priority to standards adopted since 1993, because there is no basis for assuming that post-1993 standards are 'better' than those adopted previously. It is true that Codex standards adopted from 1993 forward are intended to reflect the new role of Codex standards under the SPS and TBT agreements, while those adopted previously were intended to provide product standardization and guidance to developing nations. But the significant problems are the way Codex-set standards continue; thus there is no merit to any assumption that post-1993 standards are more likely to be deserving of adoption as U.S. safety standards than those adopted previously.

"However, post-1993 Codex standards are more likely to be upheld by WTO in a trade challenge and are, therefore, much more worrisome from the public health perspective. FDA must make sufficient resources available so that it can conduct necessary scientific studies and defend its position at the WTO.

"In future Codex proceedings, FDA should strongly object to any Codex standards that are weaker than FDA standards. Indeed, the new U.S. strategic plan calls for FDA employees who participate in Codex proceedings to determine whether acceptance of a Codex standard would affect the health and safety of American consumers. FDA should not only ascertain when Codex standards fall below U.S. requirements, but also object to the approval of such standards by Codex and place on the record its reasons for contesting the soundness of Codex's proposed standard. If the United States cannot successfully block the development of weaker Codex standards, then it should record its position in the minutes and reports of

Codex proceedings, to establish a record that clearly demonstrates why the Codex standard does not sufficiently protect consumers. This record will help discourage potential trade complaints and serve as a basis for a defense before the WTO if necessary.

"(5) Public participation in the review of Codex standards is critical. FDA's proposal to publish a Federal Register notice of newly adopted Codex standards is a sensible way to get preliminary public input on the priority, to attach, to review, and evaluate particular standards. Not only should this notice also be posted on the FDA's Web page, but FDA should take affirmative steps to ensure that consumers, health organizations, and interested academics receive this information. Moreover, this notice should not be either the first or last step in providing the public with the opportunity to participate. At the front end, FDA should strive to improve public participation in the Codex standard-setting process itself, so that the public has input into the Codex standards before they are finalized. Moreover, in those situations in which FDA decides to pursue adoption of a Codex standard, a separate notice should be published in the *Federal Register* and the public should be given the opportunity to comment.

"Currently, FDA reviews Codex standards for adoption in the United States in one of the following three ways:
(1) An individual files a petition for adoption of a Codex standard; and, if reasonable grounds are provided in the petition, FDA publishes the petition in the *Federal Register* for comment.
(2) On the FDA's own initiative, a proposal for adoption of a Codex standard is published in the *Federal Register* or
(3), after publication in the *Federal Register*, the public submits comments on whether a Codex standard should be adopted. After reviewing the comments, FDA either publishes a proposal to establish a food standard or publishes a notice terminating consideration of the standard. *21 C.F.R. §§ 130.6, 564.6.*

"These regulations should be clarified in three ways:
First, the regulation should provide guidance to the petitioner by setting forth the criteria FDA will use to decide whether to publish the petition for comment. In light of FDA's public health mandate, FDA should require a petitioner to make a *prima facie* case that the adoption of a Codex standard would not lower current FDA standards or otherwise raise public health concerns. Only in such circumstances would the petition be published for comment.

"Second, the regulation should provide that FDA would, on its own initiative, consider adoption of a Codex standard when (1) the Codex standard provides a greater level of protection than a current FDA standard or addresses concerns not yet regulated by FDA,
(2) a Codex standard is relevant to new or revised FDA regulations, or
(3) a Codex standard would improve the public health or consumer protection.

"Third, the *Federal Register* notice provided for in *§ 130.6(b)(3)* should, at a minimum,
(1) describe the Codex standard and its comparability to an FDA standard;
(2) provide FDA's preliminary views on the Codex standard, including its potential for acceptance by FDA and whether rule making would be necessary;
(3) describe information the agency would need for adequate evaluation of the standard;
(4) invite information on relative importance of the standard to public health protection; and
(5) state the agency's preliminary plans to perform substantive review of the standard.
Based on the comments received, FDA would either decide to proceed with review of the Codex standard, and publish a notice to that effect in the *Federal Register* for additional comment, or decide against further review of the standard.

"*Conclusion*

"FDA's statutory mandate is to ensure public health and consumer protection. Codex standards should *only* be adopted when they will improve food safety and labeling in the United States. Given FDA's limited resources, FDA should focus on review of Codex standards (1) when the Codex standard provides a greater level of protection than a current FDA standard or addresses concerns not yet regulated by FDA and (2) when a Codex standard is relevant to new or revised FDA regulations. FDA should strive to improve public participation in the Codex standard-setting process itself and provide the public with notice-and-comment opportunities, when the agency considers adoption of a Codex standard.

"*Respectfully submitted, Lucinda Sikes, Staff Attorney, Public Citizen Litigation Group, 1600 20th Street, N.W. Washington, D.C. 20009.*"

THE BIGGEST POLITICAL SPENDER

The Drug Industry is in the news as the largest, single "purchaser of political power" (as one news source called it) in the nation. Their drug profits must be fantastic for them to be able to do this. According to a July 6, 2005, *NPR news report,* the Drug Industry spent over $128 million on lobbyists and campaigns last year. This is far more than any other trade group in America. Its drug prices have greatly increased in recent years.

Here is earlier data on this same subject:

A June 27, 2005, news announcement about Drug Industry contributions for this fall's election, in California, by PhRMA *(Pharmaceutical Research and Manufacturers of America)* totaled $27,555,607 by June 27, 2005.
Here are additional statistics:

"Drug company contributions to Republicans alone: The Republicans alone received more than $40 million in political contributions from the drug industry since 2000." — *Center for Responsive Politics, September 1, 2004.*

" 'I'd say we are actively participating in the democratic process,' says Jeff Trewhitt, a spokesman for its trade group, the *Pharmaceutical Research and Manufacturers of America* (PhRMA).

"But the sheer volume of their expenditures, Allen [a consumer advocate] worries, gives drugmakers so much weight in the political arena that they are able to thwart legislation they don't like. 'Everyone has a right to lobby their members of Congress,' Allen notes, but the drug industry 'has more money than anybody else.'

"How much the drugmakers spend in total on these efforts throughout the nation is not known. "We don't divulge operating costs," says Trewhitt.

"But the drug industry's political influence in Washington alone during the 1999-2000 election cycle has been documented in an in-depth investigation by the consumer watchdog group, *Public Citizen*. This reveals that the drug industry
(1) spent $177 million on lobbying members of Congress and $20 million on campaign contributions in 1999-2000, in sum more than any other industry;
(2) employed 625 lobbyists in 2000 — more than one for each member of Congress!

According to his team's analysis of official lobbying disclosure records, the industry recruited high-priced talent and paid individual lobbyists, on average, more than $12,000 a month. Besides the in-house lobbyists working full time for the drug companies or their trade

groups, 460 were hired from 19 of Washington's top lobbying firms.

"And in what Clemente describes as 'the revolving door' between government and industry, more than half the 625 lobbyists had previously worked on Capitol Hill or in other federal government jobs. They included 21 former members of Congress from both parties—10 Democrats and 11 Republicans.

"Incumbent candidates running for, or planning to seek, re-election received 79 percent of the contributions by pharmaceutical interests. Candidates challenging them received just 3 percent of the contributions while 17 percent went to candidates running for an open seat.

"The pharmaceutical companies backed winning candidates. Seventy-six percent of the $10 million given to candidates went to winners while losing candidates received only 13 percent of the funds.

" 'The pattern of contributions here shows that PhRMA and its member companies were looking at getting the most for their money, by giving to candidates of both parties and by giving primarily to incumbent candidates who win more often than do their challengers,' noted Ed Bender, executive director of the Institute. 'By giving to incumbents, the companies were banking on candidates more likely to be in a position to act on legislation. The fact that the top recipients of funds in selected states also held leadership positions shows that the contributions were made with an eye to which candidates would have the power to set the policy direction for the state.' " — *AARP.*

FOR ADDITIONAL INFORMATION

Federal Register where the FDA states its intention to harmonize with Codex standards: iahf.com/codx-fda.txt

We cannot tell you how you should vote or what you should tell your elected representatives about Codex. That must be your own decision.

To contact your U.S. Congressional Representatives: http://www.house.gov

To contact your U.S. Congressional Senators: http://www.senate.gov

SUMMARY AND CONCLUSION

I am not a health-advocate political campaigner; I am just an American who wants to find out what is going on here. *In preparing this report, I discovered this:*

1 - The government and regular media are totally blank on this epic sellout. Only a few independents on the web discuss the crisis. The cause, I discovered, is massive political and medical advertising. Drug companies charge fabulous amounts for their products. They then funnel immense amounts of, what I consider, hush money to maintain the news blackout.

2 - Even in the "independent media," relatively little data is to be found. Mostly snippets here and there. The cause appears twofold: First, there is always so much else to write about; and, second, the various departments of the Codex cartel have consistently used extreme stealth and secrecy, to hide the various steps in their gradual takeover. This present report may be the largest you will find anywhere.
You are welcome to copy and circulate it as widely as you wish to.

3 - A significant part of the Codex plan has been to work very slowly, over a 20-year period, It is actually 43 years old while carefully crafting rules, inventing a myriad of committees, changing and updating rules, and pinning down every loose end — so that the final result would be a strait jacket around world food intake, from which it could not escape. Step by step, this work has proceeded, using slick words like "harmonize" (basic governmental changes) and "consensus" (no voting allowed).

4 - Why so much stealth and extremely slow caution? Because the Codex cartel knew that it must lead Western governments and their citizens into such a tight jail cell — that they could not afterwards arise and shake off the shackles within it.

The problem is that the peoples of those nations can demand changes and overthrow their governments at the election box, if the situation becomes too bad.

5 - So the drug/seed/insecticide/hormone (all poisonous chemicals or dangerous seeds) cartel decided to invent the *World Trade Organization* as the vehicle for takeover. The nations would fear to oppose the WTO, lest they be forbidden to sell their products on international markets. With the industrialized nations safely in their pocket, the cartel steamroller could force the entire world to buy their products — or else.

6 - Any solution? Oh, yes. Actually, there is a solutions: Codex does not implement anything. Nations implement standards. If they choose to adopt health promoting standards in place of Codex ones and their health promoting standards are based on good science, and then enact the enabling legislation, they will be safe from WTO sanctions and can protect the health fo their people. That IS the solution to Codex. For an example of how this is done in relations to the VMG, see http://www.healthfreedomusa.org/resources/books.shtml . If the citizens will be told the facts, then, when the Codex crisis hits — they will arise as one and demand withdrawal from Codex, even if it means getting rid of the WTO. Actually, all that needs to be done is to rescind the provisions approved at the 1995 *Uruguay Round* of GATT, that created the *World Trade Organization*, — which requires the nations to "harmonize" domestic laws to WTO standards. I think rescinding our membership in the WTO is a great idea. It does not solve Codex, however. Only the solution mentioned above does that.

The WTO is a chain about every nation's neck, controlled by big business, yet not answerable to any nation! Such a situation is incredible. Only decided government action can provide an escape; but political bribe money forbids that, unless citizens demand it strongly enough.

If the leading nations repudiate the WTO, it will fall dead, for it has no life nor authority apart from their permission.

"If people let government decide what foods they eat and what medicines they take, their bodies will soon be in as sorry a state as are the souls of those who live under tyranny."—***Thomas Jefferson, 3rd President of the U.S.A., writer of the Declaration of Independence, American statesman.***

"The price of liberty is eternal vigilance."—***Thomas Jefferson.***

INTERNATIONAL ORGANIZATIONS

Here is part of the web of international organizations with which Codex works, in order to accomplish its objectives:

United Nations: **Established in 1945, the UN is mandated to ensure a humane life for everyone throughout the world. The efforts address key areas of peace, human rights, environmental protection, health and poverty eradication with more than 30 affiliated organizations to achieve each element. The UN is comprised of 189 member states.**

World Health Organization (WHO): **WHO was established in 1948 by the United Nations in order to ensure high global health standards. Health is defined in WHO's Constitution as "a state of complete physical, mental and social well being, not only the absence of disease or infirmity." It is governed by 191 member nations.**

Food and Agriculture Organization (FAO): **Under the United Nations, the FAO was founded in 1945 with a mandate "to raise levels of nutrition and standards of living, to improve agricultural productivity, and to better the condition of rural populations." FAO has 183 member countries, plus one member organization: the European Community.**

World Trade Organization (WTO): **The World Trade Organization, established in 1995, is a powerful global commerce agency, which transformed the *General Agreement on Tariffs and Trade* (GATT) into an enforceable global commerce code. The WTO is one of the main mechanisms of corporate globalization. The WTO agreements are negotiated and signed by many of the world's trading nations and ratified in their parliaments. Currently, there are 144 member states.**

The European Commission on Food Safety: **The ECFS oversees food safety, including food irradiation, for the European Union.**

Joint FAO/WHO Expert Committee on Food Additives (JECFA): **While not officially part of the Codex Alimentarius Commission structure, JECFA provides independent scientific expert advice to the Commission and its specialist Committees. Both parents select membership to the Committee. FAO and WHO maintain separate websites for the Committee with respective points of view.**

International Atomic Energy Agency (IAEA): **IAEA is a UN agency that promotes nuclear technologies, including global acceptance of food irradiation. In 1959, IAEA signed a WHO agreement, granting the IAEA primary responsibility for promoting atomic energy for "peaceful" uses throughout the world. IAEA maintains 134 member states.**

International Consultative Group on Food Irradiation (ICGFI): **ICGFI evaluates and monitors global developments in food irradiation while consulting member nations and the FAO/WHO/IAEA evaluate and monitor the application of food irradiation. It also supplies information to the joint FAO/IAEA/WHO *Expert Committee on the Wholesomeness of Irradiated Food* and the *Codex Alimentarius Commission.* ICGFI is currently composed of 46 member states.**

Codex Alimentarius Commission: **Codex was created in 1963 by the FAO and WHO to develop food and irradiation standards, codes of practice under the Joint FAO/WHO *Food Standards Program*, etc. The *Uruguay Round* of GATT gave Codex power to demand obedience to standards it sets. 167 countries are members of Codex.**

URGENT UPDATE!

STOP THE PRESS - JULY 12, 2005

VICTORY FOR VITAMINS !

I am afraid that I disagree with your assessment of the case. I am not at all convinced that we achieved the success you outline. In fact, there is reason to think that we achieved very little. I was a signatory on the Scientific Brief which ANH presented to the ECJ but the decision was, in fact, not good for us at all.

The agonizing battle to enable you to continue purchasing vitamins and minerals has, for a time, been preserved. But unless vigilance is maintained, the crisis may return.

Yet this victory only covers vitamins, minerals, and related compounds (such as CQ10). It does not include the struggle to retain your right to freely purchase herbs or truly organic foods, eliminate drugs from farm animals, or stop genetically modified (GM) crops from being forced on farmers throughout the world.

That battle is ahead of us.

Here is what happened:

As mentioned in previous reports, on July 4, 2005, the Codex Alimentarius Commission met at its headquarters, in Rome, and voted to approve drastic restrictions on vitamins and minerals. Codex Commission did not meet at its headquarters: it met at the FAO headquarters

But the Alliance for Natural Health (ANH), a Europe-wide association of consumers, practitioners, distributors, retailers, and manufacturers who have an interest in food supplements and natural health, had been fighting an ongoing battle in defense of vitamins, minerals, and herbs. ANH's battle had nothing whatsoever to do with herbs. Its brief, and its suit, were focused solely on vitamins and minerals.

Although ANH presentations to Codex (including the one on July 4 at Codex headquarters in Rome) were consistently rejected, ANH had earlier mounted a legal challenge in the courts. Paul Lasok QC, was their lead attorney in all these actions. ANH made no presentations to Codex at that meeting or, to my knowledge, any other. It is not an oberserver organization and so has no standing, any more than the Natural Solutions Foundation has, to present anything to Codex. Rob Verkerk does sometimes attend as a member of the NHF delegation but, since he is not the delegate, he cannot speak at those meetings which he does attend.

In early 2002, the controversial Food Supplements Directive passed through the European Parliament with a narrow margin of support. Its purpose supposedly was to "harmonize food regulation" across Europe and thereby benefit trade. As often happens with EU legislation, most people are unaware of what is happening until it is too late.

In the spring of 2002, ANH was formed specifically to oppose punitive legislation affecting natural health worldwide. ANH spent the next three years working to have the irrational parts of the Food Supplements Directive amended.

In January 2004, ANH won the right in the UK High Court to mount a legal challenge.

(Over 40% of the UK's population take vitamins and minerals.)

This was followed by a hearing in the European Court of Justice (ECJ) in January 2005 and then by the legal, nonbinding opinion of the ECJ Advocate General on April 5, 2005, when he declared that the Directive was "invalid under EU law" and that key aspects of the legislation were "as transparent as a black box."

Then, on July 12, came the victory over Codex's Food Supplements Directive in a landmark legal case by ANH, before the European Court of Justice in Luxembourg. The decision, handed down on this date by the ECJ is a mixed decision.

First, the ECJ announced that it is upholding most aspects of the controversial EU Food Supplements Directive. That announcement appeared quite negative; and several newspapers, including the London Times, immediately printed articles, saying that vitamins and minerals would be essentially eliminated in Europe.

But the details within the verdict, which the newspapers did not take time to look at, tell a far different story.

You can see my take on the verdict at
http://www.prweb.com/releases/2005/7/prweb261235.htm . It differs sharply from yours.

1 - Natural vitamins and minerals, not on the Codex the ECJ decision does not make mention, to my knowledge, of the Codex list or anything else dealing with Codex "positive list" which are "normally found in or consumed as part of the diet," will not now be banned. They can continue to be purchased and used for any use, including as remedies. That says that natural sourcing is permitted for nutrients. But nutrients are still only available at ultra low dosages.

2 - Codex must provide a clearer understanding of what information companies need to submit in order to add an ingredient (a vitamin, mineral, etc.) to the "positive list." As aforementioned, the ECJ does not refer to Codex. It refers to the EFSD ONLY.

3 - Once an ingredient is submitted for consideration to the positive list, it cannot be refused by Codex Ingredients are not refused or accepted by Codex. You are talking about he EFSD unless a full safety assessment, based on "the most reliable scientific data available and the most recent results of international research" proves the ingredient (or dosage) is unsafe. This shifts the burden of proof to Codex there is no burden of proof on Codex. You mean the EFSD and away from the food supplement industry. In addition, any refusal can still be challenged in the courts.

At the heart of the Food Supplements Directive (FSD) is the "positive list" of vitamin and mineral ingredients allowed for use under the Directive. Codex had cleverly arranged that, in order to get an ingredient onto the "positive list," manufacturers had to go through a difficult and expensive process to prove that each natural ingredient is safe. This has NOTHING whatsoever to do with Codex. It is entirely about the EFSD. With this process originally costing up to or even more than $250,000 per ingredient (and vitamin and mineral supplement manufacturers typically being small companies), that would effectively lead to an ingredient being excluded, even if it came from natural sources that had been part of the human diet for thousands of years.

But, immediately, when the European Court issued today's ruling, the supplement

industry submitted large numbers of simplified dossiers, earlier prepared in case that ruling was made. As a result, the wide-reaching bans that were anticipated on August 1, will not occur.

This is wonderful news for tens of millions of people across Europe who take vitamin and mineral supplements —and the thousands of practitioners, retailers, and manufacturers whose small businesses rely upon them. **How is it wonderful news? The dosages of permitted nutrients are still miniscule, far too low to impact the health of those who take them although the source can be natural.**

It is also thrilling news for America, Canada, Australia, and the rest of the world! If Codex cannot get the ban into Europe, the U.S. Congress will not be required to "harmonize" with it. **Codex did not "get the ban into Europe" the processes are only conceptually related.**

God has answered the prayers of many people. **(edited) The supplements available throughout the EU will not do the job that they would be able to do at high potency doses. Why the jubilation?**

Products would have been banned with absolutely no scientific justification. Over 5,000 products would have disappeared from the shelves of UK health stores, as a result of the ban, removing access to over 300 vitamin and mineral ingredients (out of a total of about 420).

These include, among others, the main natural forms of Vitamin E, several forms of vitamin C, the key natural form of folic acid, MSM, and a range of minerals such as vanadium, silicon, and boron. These are all products which millions of citizens choose to take as part of their regular health regimen; and they have done so without any ill effects for many years.

An individual's freedom of choice, to take safe natural health products, would have been removed.

Some organizations had voiced concerns that, without the Directive, food supplements will not always be safe. This is not true; because the already existing UK and EU food law already provide perfectly effective protection from unsafe products getting onto the market through existing, comprehensive food laws. The same holds true in America and other Western nations.

But it is not scientifically rational to classify an ingredient as being unsafe without taking dosage levels into account, something that was not a condition of being admitted onto the "positive list" in the Food Supplements Directive.

Further legislative proposals by the EU are due to be considered by the European Parliament later this year and next. These include restrictions on herbal products, on maximum dosages of vitamins and minerals, and restrictions on health claims of foods.

More news later, when we learn about it. UPDATE! ***FURTHER VICTORIES!***

- JULY 15, 2005

July 15, 2005 - UN demands that Codex encourage nutrient use. **The UN made no such demand. The WHO demanded that Codex implement its Global Strategy for Diet, Physical**

Exercise and Health and that it determine if it had a relationship to nutrition. The Codex meeting ended on June 9, 2005 so your headline is not accurate.
Thinking people throughout the world have finally awakened and demanded that the UN's World Health Organization (WHO) and the Food and Agriculture Organization (FAO), the parent organizations of the Codex Alimentarius Commission (Codex), bringing it under control.

On Friday, July 15, the final day of its 2005 session at its Rome headquarters, Codex received a letter from WHO and FAO, demanding that it totally change direction — from condemning nutrition to advocating nutrition! **That was not what the WHO or FAO said. They made no such statement. I was there and you can read my blog to see what actually was said at http://blog.healthfreedomusa.org/index.php?&paged=14&&paged=14**

There are two Codex Committees on nutrition, both of which have condemned nutrients: **Neither of which have formally condemned nutrients. Both of which have made endless antinutrient decisions and reccomendations.**
(1) The Codex Committee on Nutrition and Food for Special Dietary Uses (CCNFSDU) has consistently defined nutrients as toxins (poisonous substances) and uses so-called "Risk Assessment Science" to sharply limit and control exposure to them because of presumed, but unsubstantiated, "toxic risks" from nutrients.
(2) The Codex Committee on Food Labeling (CCFL) currently has prohibited any claims of nutritional benefit for foods "to protect consumers".

The letter from WHO and FAO demanded that Codex change direction and make a contribution to world health by actively participating in, and facilitating, **It demanded that Codex implement this Global Strategy, not participate in and not facilitate** ***the WHO Global Strategy on Diet, Physical Activity and Health (Global Strategy). In other words, totally reverse direction and find ways to encourage people throughout the world to improve their nutrition, and increase the amount of nutrients in their diet!*** **No, in other words, find ways to enhance the nutritional content of foods and set standards which do that. Codex has no mandate to encourage people to do anything.**

Codex is the food standard-setting trade commission of the UN. On July 15, the WHO and FAO presented CAC with a Discussion Paper which focused on what CAC, could do to improve health world-wide, in view of the fact that it had done so little since its founding 42 years ago. **The position paper did not make that accusation: Dr. Kirsten Leitner did in her remarks to the Codex Commission. Please read my report of the event at http://blog.healthfreedomusa.org/index.php?&paged=14&&paged=14**

In the WHO/FAO document on CAC and the Global Strategy it was noted that the mandate ("Terms of Reference") of both CCFL and CCNFSDU should be amended to deal with the role of nutrition in the prevention and reduction of chronic diseases, an approach which the CCNFSDU has adamantly opposed during Dr. Rolf Grossklaus' lengthy tenure as its chairman. In fact, his repeated statement on the topic is "Nutrition has no role in medicine".

The WHO Under Secretary for Food Safety, **She was not the Under Secretary for Food Safety but the Under Secretary for Sustainable Development** ***Karen Leitner, noted that Codex had not done enough for world health.*** **That is not what she said. She said that in its 43 years of existence, Codex had made no contribution to human health.** ***The WHO further noted that, from now on, it expects a yearly report from Codex on its progress in making a contribution to human health.*** **Unfortunately, it almost said that, but not quite. It said that it expects a yearly report from Codex on its implementation of the Global Strategy referred to above. They are not quite the same although it is definitely a move in the right direction.**

Stop Codex - Protect health freedom from Codex Alimentarius.

Website contains information, resources, and calls to action.

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