



CLASSIFICATION OF VITAMIN AND MINERAL COMPLEXES ACCORDING TO THE COMMODITY NOMENCLATURE OF FOREIGN ECONOMIC ACTIVITIES OF THE REPUBLIC OF UZBEKISTAN

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ABSTRACT

*This article examines the issues of classification of
vitamin and mineral complexes according to the
commodity nomenclature of foreign economic activity of
the Republic of Uzbekistan. Statistical analysis was
carried out during the customs clearance of vitamin and
mineral complexes, scientific articles and world
experience in declaring vitamin preparations were
considered, as well as vitamins and minerals in the
composition of vitamin and mineral complexes were
studied, the daily intake of vitamins and minerals in the
composition of vitamin and mineral complexes was
compared and it is recommended to classify vitamin and
mineral complexes according to commodity item 2106 of
the FEACN of the Republic of Uzbekistan.*

From the scientific literature we know that vitamins come from the Latin word meaning "life." Vitamins are important microelements. They do not provide energy, but are very important for the normal functioning of the body and maintaining health. The body obtains vitamins naturally from food and requires a constant daily supply to maintain the required level. However, today it is difficult to get the required amount of vitamins from food. The main reason for the inadequate supply of vitamins and minerals is both unbalanced diets and the quality of the products themselves, the nutritional value of which is significantly reduced when using modern production technologies. World practice shows that it is possible to enrich the diet with vitamins and compensate for the deficiency of these important nutrients through the consumption of vitamin-mineral complexes (VMC) [1].

Vitamin-mineral complexes contain a set of minerals, vitamins, amino acids and other substances and are a homogeneous mixture of vitamins or minerals based on a carrier substance. Vitamins are food components and are not considered drugs [2].



Vitamins are used as a special means for the prevention and treatment of hypo- and avitaminosis caused by their lack of nutrition. Doses of microelements contained in some vitamin-mineral complexes are registered as medicinal products, although they do not meet the requirements for use as medicinal products. They can usually be used as a dietary supplement (dietary supplement) or to supplement vitamins in a regular diet [1]. Ready-to-use vitamin and mineral complexes, depending on the form of release, are divided into tablets (uncoated or coated), incl. chewable, effervescent, lozenges, capsules; dragees, lozenges; liquid, including drinks, syrups, gels, powdered, including concentrates for preparing drinks [2]. Vitamins can be produced in the form of a single-component vitamin (for example, vitamins A, E, C) or in the form of multivitamins (multivitamins), that is, a vitamin-mineral complex (VMC).

In the State Register "Center for the Safety of Pharmaceutical Products" under the Ministry of Health of the Republic of Uzbekistan in 2023, 172 different types of VMC, produced in 33 domestic, 37 CIS countries and 102 foreign countries as medicines, were registered and approved for use in medical practice [3]. These VMC are assigned to commodity item 3004 according to the Commodity Code for Foreign Economic Activity of the Republic of Uzbekistan.

Pharmaceutical preparations containing vitamins can be classified as headings 2106, 2936 and 3004 according to the Commodity Nomenclature of Foreign Economic Activity of the Republic of Uzbekistan [4].

-2106 – Food preparations not elsewhere specified or included:

2106 90 980 3 – – – Blends of vitamins and minerals designed to provide a balanced nutritional supplement

-2936 – Provitamins and vitamins, natural or reproduced by synthesis (including natural concentrates), derivatives thereof used primarily as vitamins, and intermixtures of the foregoing, whether or not in any solvent:

2936 90 000 2 – – – mixtures of vitamins, including in any solvent

-3004 – Medicaments (excluding goods of heading 3002, 3005 or 3006) consisting of mixed or unmixed products for therapeutic or prophylactic uses, put up in measured doses (including those in the form of transdermal administration systems) or in forms or packing's for retail sale:

3004 50 000 – Other, containing vitamins or other products of heading 2936

From the names of the HS item for foreign economic activity given to pharmaceutical preparations containing vitamins, it is clear that vitamin-mineral complexes have a high probability of being classified in commodity item 2106.

And also according to the explanations, heading 2106 is defined as follows:

.....“Products, often classified as dietary supplements or dietary supplements, consisting of or based on one, one or more vitamins, minerals, amino acids, concentrates, extracts, isolates or similar substances contained in food products, or synthetic versions of such substances prepared as a supplement to the normal diet. They include such products whether or not they also contain sweeteners, colors, flavorings, fragrances, carriers, fillers, stabilizers or other special auxiliary substances. Such products are often packaged with claims that they support overall health or wellness, improve athletic performance, prevent potential



nutritional deficiencies, or correct suboptimal nutrient levels. These products do not contain sufficient active ingredients to provide therapeutic or prophylactic effects against diseases or conditions other than those associated with nutritional deficiencies. Other products containing sufficient quantities of the active ingredient to provide a therapeutic or prophylactic effect against a specified disease or disease are excluded (heading 3003 or 3004)" [5]

In a number of countries around the world, members of the Eurasian Economic Union, the European Union, the USA, Moldova and other VMC countries, it is classified in commodity item 2106 according to the Commodity Nomenclature of Foreign Economic Activity. However, in Uzbekistan, VMC are registered as medicines by the "Center for the Safety of Pharmaceutical Products" under the Ministry of Health of the Republic of Uzbekistan and are included in the State Register as medicines and are classified according to the Commodity Nomenclature of Foreign Economic Activity of commodity item - 3004.

In order to classify VMC as medicines or biologically active additives, it is necessary to consider the classifications given to these two groups.

Medicine, medicinal product, medication, medicine, pharmaceutical (novolat. praeparatum medicinale, praeparatum pharmaceuticum, medicamentum; slang. medicinal product) - a substance or mixture of substances of synthetic or natural origin in the form of a dosage form (tablets, capsules, solution, ointment, etc. p.), used for the prevention, diagnosis and treatment of diseases [6].

Biologically active food additives (BAA) are biologically active substances and their compositions intended for direct intake with food or inclusion in food products. Dietary supplements are used as an additional source of biologically active substances (dietary fiber, vitamins, minerals, amino acids) to eliminate their deficiency and optimize the diet [7].

So, the difference between drugs and biologically active substances is that these drugs are used for the prevention, detection or treatment of specific diseases. The dose of active substances in a drug determines whether the drug can be used to prevent, diagnose, or treat diseases. The information above explains the importance of dosage when separating a drug from a dietary supplement.

As part of the analysis of the VMC, the definition of the difference between medicines and dietary supplements, and the classification of VMC according to the Commodity Nomenclature of Foreign Economic Activity, as well as the recommendations of the Harmonized System Committee of the World Customs Organization, and the experience of foreign countries were studied.

Based on the given definitions and recommendations, the vitamins and minerals contained in 6 types of VMCs were analyzed in comparison with the daily norm for adults (Table).

Table

ANALYSIS OF VITAMINS AND MINERALS CONTAINED IN VITAMIN AND MINERAL COMPLEXES WITH DAILY REQUIREMENTS FOR ADULTS

No	Vitamins and minerals	daily norm	Name of product
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		Dose (for 1 day)	Elevit p.	Multi- Tabs	Comp livit	Vitrum	Duovit	Olig ovit
			1 tab.	1 tab.	1 tab.	1 tab.	1 tab.	1 tab.
1	Vitamin A (retinol and beta-carotene), ME*	3 300-5000	3600	1300	3300	17200	5000	5000
2	Vitamin B1, (thiamine), mg	1,1-2,4	1,6	0,87	1,0	1,5	1,0	0,5
3	Vitamin B2 (riboflavin), mg	1,2-3,0	1,8	1,4	1,27	1,7	1,2	0,5
4	Vitamin B3, (vitamin PP, niacin), mg	13-25	19	16	7,5	20	13	5
5	Vitamin B6 (pyridoxine), mg	1,5-2,8	2,6	1,15	2,5	2	2	2,5
6	Vitamin B12, (cyanocobalamin), mcg	2,0- 6,0	4,0	2,5	4,0	6	3	-
7	Vitamin C, mg	50-100	100	80	50	60	60	100
8	Vitamin D (ergocalciferol and cholecalciferol), ME	100-500	500	20	-	30	200	500
9	Vitamin E (tocopherol), ME	30-40	15	12	10	13,5	10	12,5
10	Vitamin K, mcg	45-200	-	75	-	25	-	-
11	Biotin (vitamin H), mcg	30-200	200	50	-	30	-	-
12	Pantothenic acid (vitamin B5), mg	4-12	10	6	5	10	-	10
13	Folic acid, mcg	400-600	800	200	100	400	-	-
14	Ferrum (Fe), mg	10-18	60	10	5	16	10	10
15	Zinc (Zn), mg	10-12	7,5	10	2,5	15	3	0,75
16	Copper (Cu), mg	1	1	1	0,75	2	1	0,5
17	Manganese (Mn), mg	2	1	2	2	2,5	1	0,5
18	Selenium (Se), µg	55-70	-	55	50	25	-	-



19	Chromium (Cr), µg	40	-	40	-	25	-	-
20	Iodine (I), µg	130-150	-	150	-	150	-	-
21	Magnesium (Mg), mg	260-400	100	75	60	100	-	3
22	Phosphorus (P), mg	600-900	125	-	-	-	27	250

As can be seen from the table, the content of the main vitamins in the multivitamin complexes Elevit Pronotal, Complivit, Duovit, Vitrum Plus, Multi-Tabs and Oligovit does not exceed the daily norm for humans [8]. Therefore, these vitamin complexes should be classified under 2106, and not 3004, under the HS. Today, in the Republic of Uzbekistan, vitamin and mineral complexes are classified under heading 3004 of the Commodity Nomenclature of Foreign Economic Activity.

Conclusions:

Based on the above analytical data, in accordance with the classification rules, the basic rules for the interpretation of multivitamins, multivitamin-mineral complexes imported into the Republic of Uzbekistan in accordance with the Commodity Nomenclature of Foreign Economic Activity and in accordance with the recommendations of the WCO multivitamins, vitamin-mineral complexes containing flavorings, food and other substances (except for those intended for intravenous administration), we recommend classification under heading 2106 of the Commodity Nomenclature of Foreign Economic Activity as a balanced additive to the diet of adults with an increased body need for vitamins;

it is necessary to submit a proposal to the Interdepartmental Customs Tariff Council on the classification of multivitamins, multivitamin-mineral complexes and multi-vitamin complexes, not as a medicinal product according to HS 3004, but as heading 2106 - food products not otherwise specified or not included.

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