

1 Annex to:

2 EFSA NDA Panel (EFSA Panel on Dietetic Products, Nutrition and Allergies), Turck D, Bresson J-L,
3 Burlingame B, Dean T, Fairweather-Tait S, Heinonen M, Hirsch-Ernst KI, Mangelsdorf I, McArdle HJ,
4 Naska A, Nowicka G, Pentieva K, Sanz Y, Siani A, Sjödin A, Stern M, Tomé D, Van Loveren H, Vinceti
5 M, Willatts P, Fewtrell M, Lamberg-Allardt C, Przyrembel H, Arcella D, Dumas C, Fabiani L, Martino L,
6 Tomcikova D, and Neuhäuser-Berthold M, 2017. 2018. Scientific opinion on the update of the tolerable
7 upper intake level for vitamin D for infants. EFSA Journal 2018; **volume(issue):NNNN**, 124 pp.
8 doi:10.2903/j.efsa.2018.NNNN

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10 behalf of European Food Safety Authority.

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12 **Annex A – Statistical methods used to estimate the intake-response of** 13 **serum 25(OH)D concentration on daily supplemental intake of** 14 **vitamin D and to derive the percentage of infants exceeding a serum** 15 **25(OH)D concentration**

16 The objective of the statistical analysis was to characterise with the dose-response relationship
17 between the exposure to 'high' intake levels of vitamin D in the healthy population of infants (aged 0
18 to 12 months) and achieved serum concentrations of 25(OH)D. The Panel considers 200 nmol/L to be
19 a serum concentration of 25(OH)D below which it is unlikely that adverse effects (hypercalciuria,
20 hypercalcaemia, nephrocalcinosis, abnormal growth patterns) would occur in infants (Section 3.3.6.5.
21 of the scientific opinion). The analysis was based on the data collected during a systematic literature
22 review (Section 3.1. of the scientific opinion). This analysis is described in brief in Section 3.5. of the
23 scientific opinion and in more details in the present Annex. The below steps were followed in the
24 statistical analysis, and are described in details in the following sections:

- 25 ✓ A **meta-analytical mixed-effect model** was set up to explain the relationship between
26 **supplemented vitamin D intake and study-arm mean serum 25(OH)D**
27 **concentration**. Background intake from food was not considered since seldom measured in
28 the retrieved studies. The Panel considered that this leads to an underestimation of the true
29 intake corresponding to potential adverse effects and it was concluded that this was
30 acceptable since leading to a conservative UL estimate;
- 31 ✓ The model was adjusted for a set of explanatory factors (fixed effects) and a set of factors
32 explaining the hierarchical structure in the data (random effects);
- 33 ✓ The **distribution of the study-arm mean achieved serum 25(OH)D concentration**
34 **under realistic combinations of vitamin D intake and other explanatory factors** was
35 simulated based on the predictive meta-analytical mixed-effect model previously set;
- 36 ✓ **Individual responses were simulated** for each mean response value predicted by the
37 model under the assumption that a truncated normal distribution describes the variability of
38 an individual response around the study population mean. Since inter-individual variability was
39 unknown, it was estimated using within study variability extracted from each study-arm-
40 measurement occasion;
- 41 ✓ The simulated individual distribution of serum 25(OH)D was **stratified by classes of**
42 **vitamin D intake** (between 5 and 50 µg/day with step of size 5 µg), **baseline**
43 **concentration of the biomarker** (below 30 nmol/L; 30–60 nmol/L; 60–90 nmol/L) **and**
44 **age class** (below and above 6 months of age). For each group defined by age-dose-baseline,
45 the percentages of infants expected to exceed a pre-defined concentration of the biomarker
46 serum 25(OH)D concentration were computed. To address the uncertainty surrounding the
47 choice of such concentration (Section 3.3.6.1. of the scientific opinion) and in order to
48 investigate sensitivity of the results to it, two concentrations (150 and 200 nmol/L) were used.

49 1.1. Mixed effect meta-regression model: dose-response relationship 50 of study-arm mean serum 25(OH)D on vitamin D intake

51 Among the possible meta-analytical approaches, the meta-regression has the advantage of permitting
52 the assessment of the **influence of a set of explanatory variables** when exploring the relationship
53 between the exposure to a potential hazard and an effect (van Houwelingen et al., 2002). This allows
54 explaining at least part of the total heterogeneity among studies.

55 1.1.1. Dose-response approach

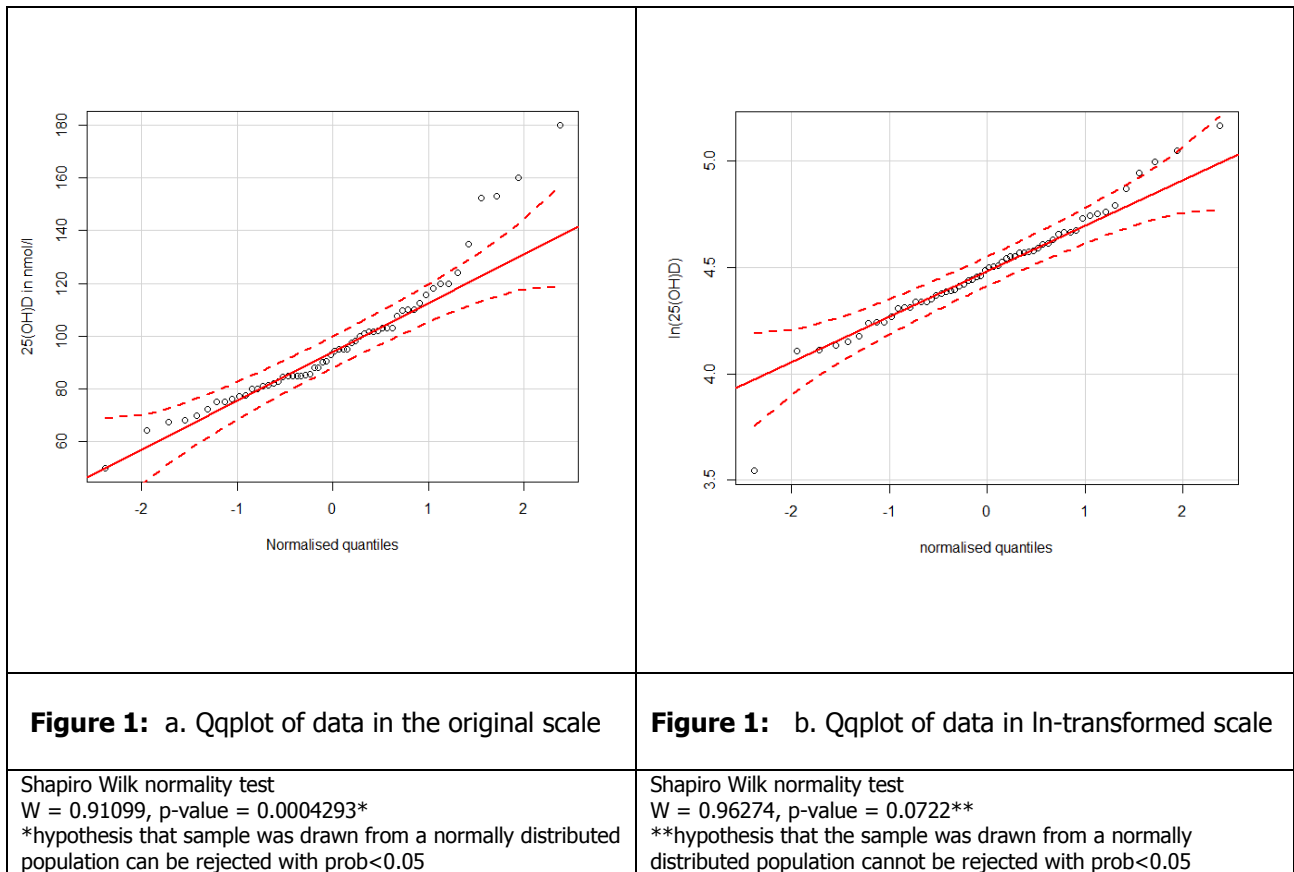
56 First, this analysis refers to a nutrient, considerations about balancing risk of inadequacy and risk of
57 adverse effects are needed. Secondly, the usual toxicological approach of setting the effect of concern
58 (the so-called critical effect or Benchmark Response (EFSA Scientific Committee et al., 2017)) based
59 on the definition of a threshold for the Relative Risk (e.g. risk ratio, odds ratio) is not necessarily
60 applicable for a nutrient and related biomarker(s), for which e.g. absolute 'thresholds' might also be
61 biologically relevant.

62 1.1.2. Model assumptions: Normality, homoscedasticity and linearity

63 Normality, uniformity of the residual variance across doses (i.e. homoscedasticity) and linearity are
64 standard assumptions in regression and meta-regression analysis (Viechtbauer, 2010a). Visual
65 inspection of the distribution of the response and the residuals can help identifying important
66 deviations from these assumptions.

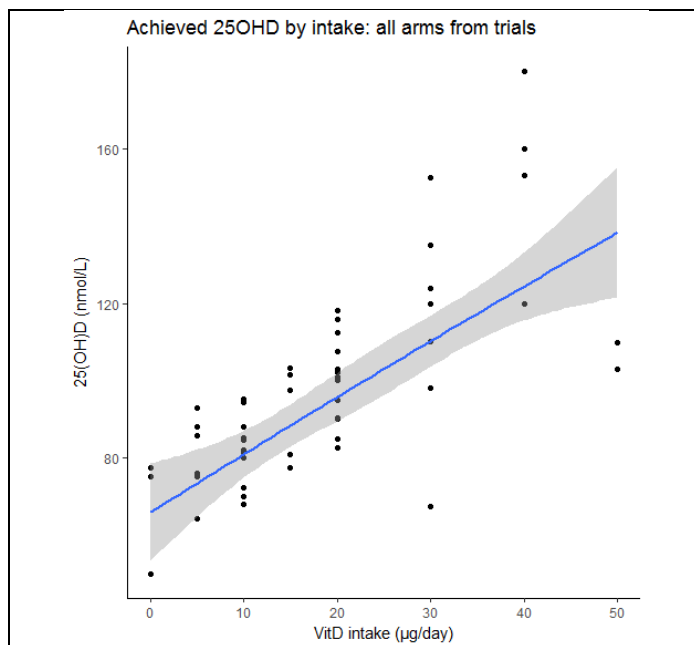
67 The response variable – the serum 25(OH)D concentration - is assumed to come from a population
68 that is **normally distributed**. This assumption was tested both graphically and using formal testing
69 (Shapiro and Wilk, 1965). The normality of the response was assessed both on the original scale and
70 on the natural log-transformed scale (ln-scale in the following).

71 QQplot on the original scale (Figure 1.a) shows **deviations from normality in the right tail** of the
72 distribution providing indication of some right skewness. Deviations from normality are mainly
73 **resolved** (i.e. dots are better contained into the dotted band after ln-transformation of the response)
74 **when moving to the ln-scale** as it is reasonable to expect in these cases (Figure 1.b).



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A visual inspection of the unadjusted relationship of serum 25(OH)D concentration on vitamin D intake showed that **linearity** might fit relatively well the data **except** at high vitamin D intake (e.g. 40 µg/day), where most of the points systematically lay above or below the regression line (Figure 2)



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Figure 2: Unadjusted intake-response relationship (no moderator variables) – original scale

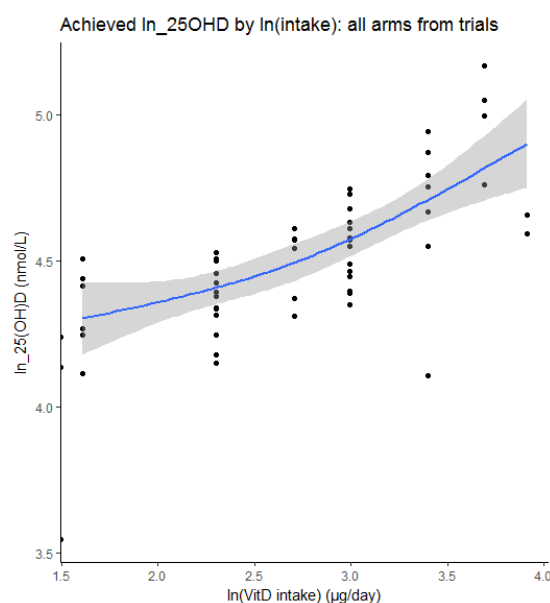
Figure 2 indicates mean 25(OH)D response (in the original scale) in each arm (black dots) of the various studies at different levels of vitamin D intake, the blue line is the fitted line of the mean response, the grey band is the confidence interval around the mean.

83 The figure also displays some deviation from the assumption of constant variance across doses,
 84 higher variability being present for doses between 30 and 40 $\mu\text{g}/\text{day}$.

85 The \ln -transformation of the serum 25(OH)D response is expected to **improve the approximation**
 86 **to a normal distribution and reduce the impact of lack of homoscedasticity.**

87 **A \ln -transformation of the explanatory variables** (specifically of the vitamin D intake and
 88 baseline concentration) can improve the **linear** fit considering that a **\ln -transformation** of the
 89 response could make relationship deviating from linearity.

90 The unadjusted intake response relationship of \ln -transformed serum concentration of 25(OH)D (\ln -
 91 25(OH)D) on \ln -transformed vitamin D intake ($\ln(\text{VitD intake})$) is shown in Figure 3. The approach
 92 proposed by Higgins et al. (2008) was used to \ln -transform study-arm mean and standard deviation
 93 values.



94

95 **Figure 3:** Unadjusted intake-response relationship (no moderator variables) – \ln -scale for
 96 response and intake

97 **In order to assess the influence of the choice of the scale (original or \ln -transformed) and**
 98 **the related uncertainty** on the simulated study-arm means of the achieved serum 25(OH)D
 99 concentration, **both scales have been considered** for response and intake in the models described
 100 below.

101 1.1.3. Selection of the explanatory variables

102 **The background intake** of vitamin D from diet (i.e. vitamin D from formulae and other foods for
 103 infants, fortified and not fortified) was rarely measured/reported in the studies. Therefore, the intake-
 104 response relationship was established only on the basis of the additional dose of vitamin D provided
 105 (trials), which was always **through a supplement** (and not a fortified food) in the dataset used
 106 (Section 3.5.1. of the scientific opinion). This was done under the assumption that difference of bio-
 107 availability of vitamin D when supplemented, naturally present or added to food could be considered
 108 limited, as only scarce data on this aspect is available (EFSA NDA Panel, 2016) (Section 7. of the
 109 scientific opinion).

110 A series of factors were identified as **potential confounders/moderators** that could be able to
111 modify either the response (serum 25(OH)D concentration) or both the response and the exposure
112 (vitamin D intake) (Sections 3.2.3. and 3.5.2.1. of the scientific opinion). They included:

- 113 • Serum 25(OH)D baseline concentration;
- 114 • Latitude;
- 115 • Feeding type at start;
- 116 • Body weight/age
- 117 • Categories of length of gestational period;
- 118 • Supplementation duration;
- 119 • Vitamin D form (D₂ versus D₃);
- 120 • Analytical method used to measure serum 25(OH)D concentration.

121 Transformation and re-categorisation of some of these variables are described in Table 5 of the
122 scientific opinion.

123 A **visual investigation** (Figure 4) was performed in order to identify factors that, based on data,
124 might have a stronger impact on the intake-response relationship of serum 25(OH)D concentration on
125 vitamin D intake. Some variables showed a potential for interaction with vitamin D intake level (e.g.
126 supplementation duration). Because of the limited size of the sample and the need to balance
127 complexity and interpretability of the results (i.e. parsimony principle), it was decided to include only
128 the main effects in the model and not the interactive ones.

129 A graphical investigation of the dose-response by concentration of the biomarker serum **25(OH)D at**
130 **baseline** (Figure 4.c) highlighted that higher values are achieved when the concentration at baseline
131 is higher. The effect of the initial concentration is more evident at more extreme vitamin D intake
132 levels (below 10 and above 30 µg/day). The variable was included by default in the model for
133 biological reasons (Section 1.8.1. of the scientific opinion). It logically replaced the intercept from the
134 model that therefore was eliminated.

135 Figure 4.a depicts the intake-response relationship stratified by **classes of latitude**: class 3
136 corresponding to countries located above 50° parallel (North or South), class 1 for countries closer to
137 the equator line (between 40°South and 40° North), class 2 for the countries in between (Table 5 of
138 the scientific opinion). The results indicate higher concentrations of serum 25(OH)D for infants living
139 in northern countries. This would conflict with the expectation of a lower endemic vitamin D
140 production at higher latitudes. A possible justification for this result was that the latitude was masking
141 other factors favouring higher concentrations of serum 25(OH)D in northern countries (e.g. country
142 specific practices as for maternal and infantile vitamin D supplementation) and/or infant sun exposure
143 was too limited to expect an effect on the biomarker (Section 1.7.1.1. of the scientific opinion). **The**
144 **Panel then decided to discard this factor from the model since it was lacking biological**
145 **relevance.**

146 The intake-response relationship stratified by **type of feeding at the start of the study**
147 (Figure 4.b) shows that achieved serum 25(OH)D concentration is higher for infants receiving a mixed
148 feed at the start of the study as compared to exclusively breastfed infants. This hierarchy is inverted
149 for low levels of vitamin D intake (up to 10 µg/day). The Panel considered that feeding status can
150 change quickly at this stage of the life and probably observations taken only at baseline are not much
151 indicative of the feeding type in the following weeks. Therefore, the **Panel decided to discard this**
152 **variable from further analysis.**

153 The Panel discussed whether mean body weight or mean age was more relevant to explain the
154 achieved mean concentration of serum 25(OH)D. The two variables were highly correlated ($r = 0.99$)

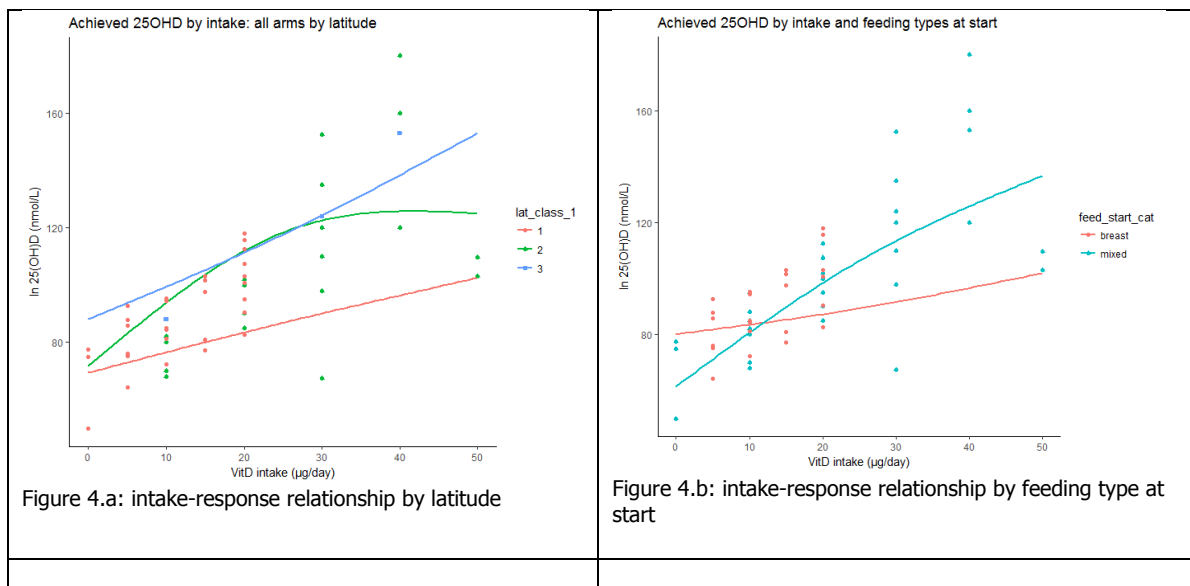
155 in the available body of evidence. Therefore, from a statistical perspective, the inclusion of both of
 156 them in the model would have not been advisable. Indeed high correlation among fixed effects in a
 157 model (known as multicollinearity issue) can increase the variance of the coefficient estimates and
 158 make the estimates very sensitive to minor changes in the model. Eventually, **age** was selected
 159 because always reported for the study participants, whereas body weight was sometimes missing. The
 160 possibility to obtain model predictions stratified by age classes was also considered a plus.

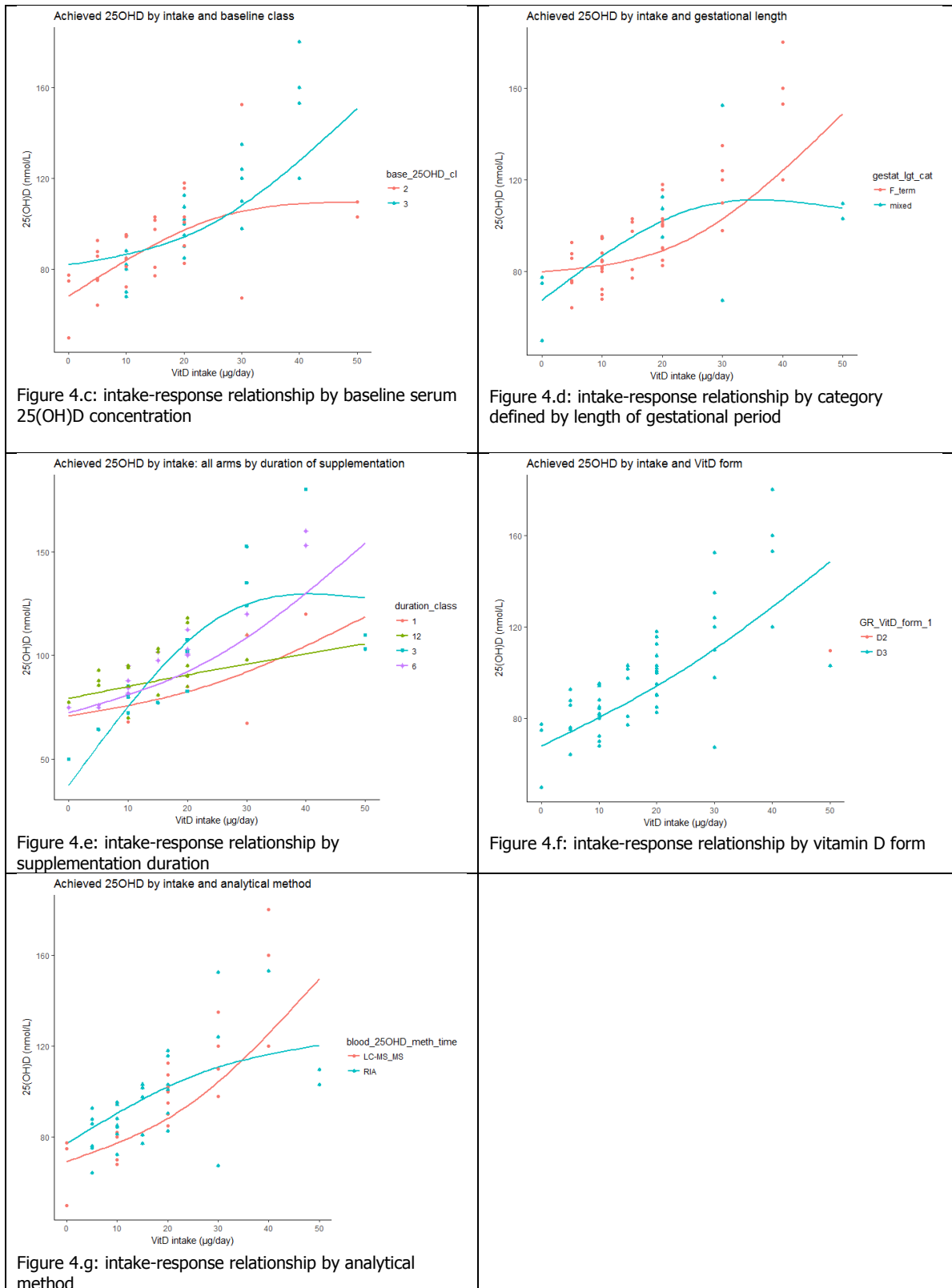
161 The intake-response relationship does not highlight a clear pattern for different **lengths of**
 162 **gestational period** (i.e. groups of only full-term infants vs groups of mixed/unclear/unspecified
 163 length of gestational period, Figure 4.d). At extreme doses full terms infants are over-performing, the
 164 opposite is observed at intermediate doses.

165 Some differences in the shape of the dose-response relationship and in the achieved concentration of
 166 serum 25(OH)D are identified at different **supplementation durations** (Figure 4.e), '6-months'
 167 being the duration leading to the highest study-arm mean concentrations at the highest doses (above
 168 40 µg/day).

169 Comparison of the intake-response relationship for **vitamin form** D₂ and D₃ (Figure 4.f) could not be
 170 performed since study-arms eventually included in the body of evidence after exclusion of infants with
 171 rickets and high risk of bias studies enclosed only one study administering vitamin D₂.

172 Only two **analytical methods** (Figure 4.g) were used in the studies finally included in the body of
 173 evidence (LC-MS/MS and RIA). The measurements provided by the RIA method were higher for doses
 174 up to around 35 µg/day. The reverse occurred for higher doses.





175 **Figure 4:** Achieved serum 25(OH)D concentration on vitamin D intake by some potential
 176 moderators

177 *Categories for baseline serum 25(OH)D, latitude and duration class are reported in table 5 of the scientific opinion

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179

180 1.1.4. Identification of the best predictive model

181 In order to explain the effect of moderator variables on the intake-response relationship to better
 182 explain heterogeneity and to account for the hierarchical structure in the data, a **mixed effect meta-**
 183 **regressive model** was used as suggested by van Houwelingen et al. (2002).

184 It includes both **fixed effects** and **random effects**:

185 - the fixed effects being variables that have an influence on the achieved concentration of the
 186 biomarker (serum 25(OH)D concentration) and have an impact on the value of the predictions,

187 - the random effects reflecting the correlation structure in the data.

188 As in any mixed effect model, the random components are assumed to have zero mean and therefore
 189 to contribute only to explain variability and heterogeneity in the data. They are intended to account
 190 for lack of independence in the data attributable to the fact that several arms (dose groups) are
 191 analysed for each individual trial and repeated measurements might be taken on the same arm. A
 192 compound symmetry structure is considered to formalise the hierarchy in the data. It assumes that
 193 the level of correlation is the same for all possible couple of observations (multiple arms in a study,
 194 multiple observations on the same arm). This approach conveniently allows reducing the number of
 195 parameters to be estimated as for the random components.

196 **Four nested models** were set up with **increasing number of fixed effects** (except the fourth).

- 197 - **Model 1** is the so-called '**null-model**' that is based on the assumption of no intake-response
 198 relationship (constant mean achieved serum concentration of 25(OH)D across levels of
 199 vitamin D intake).
- 200 - **Model 2** includes only vitamin D intake and consider the baseline serum concentration of
 201 25(OH)D instead of the intercept.
- 202 - **Model 3** adjusts the response of serum 25(OH)D concentration on the vitamin D intake for
 203 the baseline value and a series of **moderators that include: duration, analytical**
 204 **method, length of gestational period, latitude, age.**
- 205 - **Model 4** retains only **a subset** of the fixed factors in model 3.

206 A series of goodness of fit indicators were produced to identify the model better fitting the data.

207 **Table 1:** Goodness of fit indicators

Model	Model fixed effects	logLik	-2logLik	AIC	AICc	BIC
1	Intercept	-259.25	518.49	528.49	529.67	538.71
2	vitD intake, baseline serum 25(OH)D, no intercept	-250.45	500.90	512.90	514.61	525.05
3	vitD intake, baseline serum 25(OH)D, duration, analytical method, length of gestational period, age, no intercept	-214.51	429.02	455.02	465.42	479.62
4	vitD intake, baseline serum 25(OH)D, duration, age, no intercept	-223.49	446.97	468.97	475.74	490.22

208 LogLik: log-likelihood (the higher the better); -2LogLik: deviance; AIC: Akaike information criterion; AICc: Akaike information
 209 criterion corrected; BIC: Bayesian information criterion. For -2logLik, AIC, AICc and BIC the lower the better

210 The choice of the model was **based on the goodness of fit** (as indicated in Table 1) and the
 211 interpretability of the results, in addition to the biological relevance and statistical significance of the
 212 fixed factors. The overall considerations and model results are provided in more detail only for
 213 models 3 and 4 since their goodness of fit largely exceeds that of models 1 and 2 based on all the

214 indicators above. Statistical heterogeneity was tested using a χ^2 test (Cochrane's Q test – (Veroniki et
215 al., 2016)).

216 1.1.4.1. Model 3

217 Results of the estimates of the residual heterogeneity and overall significance of the fixed effects, the
218 parameters for fixed effects, structure and estimates of the random effects are reported in Tables 2–5
219 respectively. They are based on the six studies selected after the screening (Section 3 of the scientific
220 opinion), corresponding to 17 arms and 58 time-points of measurements.

221 **Table 2:** Test for residual heterogeneity and overall significance of fixed effects

Test for	Value	p
Residual heterogeneity	QE(df = 49) = 7.6	1.0*
Fixed effects (overall)	QM(df = 9) = 681.2	< .0001**

222 QE: Q test for residual heterogeneity; QM: Q test for moderators; df: degrees of freedom

223 *hypothesis that residual heterogeneity is equal to 0 cannot be rejected with prob<0.05

224 **hypothesis that overall variability explained by fixed effects (moderators) is equal to 0 can be rejected with prob<0.05

225 **Table 3:** Fixed effects estimate

Factor	Effect estimate	Standard Error	p-value	Prediction Interval lower bound*	Prediction interval upper bound*
VitD intake	1.7348	0.4688	0.0002	0.8160	2.6537
Baseline serum 25(OH)D	0.4838	0.6642	0.4664	-0.8181	1.7856
Duration: 1	25.4606	37.4128	0.4962	-47.8672	98.7884
Duration: 3	43.4741	37.7349	0.2493	-30.4849	117.4331
Duration: 6	57.2148	39.0943	0.1433	-19.4087	133.8382
Duration: 12	65.4620	38.0235	0.0851	-9.0627	139.9867
Analytical method: RIA	2.3300	13.5712	0.8637	-24.2691	28.9291
Gestational length: mixed	-5.4677	12.0982	0.6513	-29.1797	18.2443
Age	-0.5935	0.3097	0.0553	-1.2006	0.0136

226 *the Prediction Interval of the estimated effects expresses both the sampling uncertainty and the uncertainty due to
227 variability across studies. It provides the interval (lower and upper bound) that would contain a future true estimated
228 effect (if extracting a new sample of studies) with a certain probability (usually 95%), given what has already been
229 observed.

230 For categories of duration and analytical method; see Table 5 of the scientific opinion. RIA: radioimmunoassay.

231

232 The fixed effect vitamin D intake, baseline concentration of the biomarker and age are expressed as
233 continuous variables, whereas supplementation duration, analytical methods and length of gestational
234 period are treated as categorical data. For the categorical fixed effects, one category is used as a
235 reference and the parameters for the remaining classes indicate their additional effect with respect to
236 the reference one (0 for the duration, LC-MS/MS for the analytical method, full-term for the category
237 of length of gestational period).

238 Overall the model was able to **explain most of the heterogeneity in the data**, being the residual
239 component not statistically significant (Table 2). The fixed effects were **overall statistically**
240 **significant** (Table 2), though most of the **individual main effects were not** (Table 3).

241

242 **Table 4:** Random effects - hierarchical structure in the data

Variance components	n. levels
1 st hierarchical level: study	6
2 nd hierarchical level: arm	17
1 st hierarchical level: arm	17
2 nd hierarchical level: repeated measurement	58

243 **Table 5:** Random effect estimate – arms and repeated measurements

Parameters	Estimate
$Var = \tau^2$	0.001
$Corr = \rho$	0.50
$Var = \gamma^2$	0.001
$Corr = \phi$	0.50

244 **1.1.4.2. Model 4 – original scale**

245 Results of the estimates of the residual heterogeneity and overall significance of the fixed effects, the
 246 parameters for fixed effects, structure and estimates of the random effects are reported in Tables 6–9
 247 respectively. Fixed effects were taken forward from the previous model when they were statistically
 248 significant or marginally so ($p < 0.10$) (i.e. vitamin D intake, duration and age). Duration was still
 249 considered although only one category (12 months) was statistically significant. The baseline
 250 concentration of serum 25(OH)D was included based on biological considerations.

251 **Table 6:** Test for residual heterogeneity and overall significance of fixed effects

Test for	Value	p
Residual heterogeneity	QE(df = 51) = 7.9	1.0*
Fixed effects (overall)	QM(df = 7) = 680.8	< .0001**

252 QE: Q test for residual heterogeneity; QM: Q test for moderators; df: degrees of freedom

253 *hypothesis that residual heterogeneity is equal to 0 cannot be rejected with prob<0.05

254 **hypothesis that overall variability explained by fixed effects (moderators) is equal to 0 can be rejected with prob<0.05

255 **Table 7:** Fixed effects estimate

Factor	Effect estimate	Standard Error	p-value	Prediction interval lower bound*	Prediction interval upper bound*
VitD intake	1.73	0.45	0.0001	0.85	2.61
Baseline serum 25(OH)D	0.39	0.41	0.3462	-0.42	1.20
Duration: 1	30.22	24.89	0.2247	-18.57	79.00
Duration: 3	48.21	19.42	0.0131	10.14	86.28
Duration: 6	62.85	20.01	0.0017	23.62	102.08
Duration: 12	71.11	19.78	0.0003	32.34	109.88
Age	-0.59	0.31	0.0551	-1.20	0.01

256 * the Prediction Interval of the estimated effects expresses both the sampling uncertainty and the uncertainty due to
 257 variability across studies. It provides the interval (lower and upper bound) that would contain a future true estimated
 258 effect (if extracting a new sample of studies) with a certain probability (usually 95%), given what has already been
 259 observed.

260 For categories of duration; see Table 5 of the scientific opinion.

261 As for model 3, the fixed effect vitamin D intake, baseline concentration of the biomarker and age are
 262 expressed as continuous variables, whereas supplementation duration, analytical methods and length
 263 of gestational period are treated as categorical data.

264 **Table 8:** Random effects – hierarchical structure in the data

Variance components	n. levels
Outer factor: study	6
Inner factor: arm	17
Outer factor: arm	17
Inner factor: repeated measurement	58

265 **Table 9:** Random effect estimate – arms and repeated measurements

Parameters	Estimate
$Var = \tau^2$	0.0010
$Corr = \rho$	0.50
$Var = \gamma^2$	0.0010
$Corr = \phi$	0.50

266 Also in this case, the model **explained most of the heterogeneity** in the data (Table 6). Overall
 267 the fixed effects were statistical significant (Table 6), with **all individual effects statistically**
 268 **significant** ($p < 0.05$) or marginally significant ($p < 0.10$) **except** for the baseline serum 25(OH)D
 269 concentration and one duration category (Table 7).
 270

271 Based on these arguments, **model 4 was considered the most suitable** to predict mean study-
 272 arm value of serum 25(OH)D.

273 1.1.4.3. Model 4 – In-scale

274 An additional model was fitted keeping the same fixed and random effects as in model 4 but using a
 275 In-scale for the achieved serum concentration of 25(OH)D (response), its baseline value and the
 276 vitamin D intake. Fixed effects estimates for In-transformed model are reported in Table 10.

277 **Table 10:** Fixed effect estimates under In-scale model

Factor	Effect estimate	Standard Error	p-value	Prediction Interval lower bound*	Prediction interval upper bound*
Ln(VitD intake)	0.08	0.04	0.03	0.01	0.15
Ln(Baseline serum 25(OH)D)	0.36	0.16	0.02	0.05	0.67
Duration: 1	2.84	0.64	<.0001	1.59	4.09
Duration: 3	3.03	0.58	<.0001	1.89	4.16
Duration: 6	3.04	0.58	<.0001	1.92	4.17
Duration: 12	3.06	0.54	<.0001	2.0	4.13
Age	-0.002	0.003	0.41	-0.01	0.004

278 * the Prediction Interval of the estimated effects expresses both the sampling uncertainty and the uncertainty due to variability
 279 across studies. It provides the interval (lower and upper bound) that would contain a future true estimated effect (if
 280 extracting a new sample of studies) with a certain probability (usually 95%), given what has already been observed.
 281 For categories of duration; see Table 5 of the scientific opinion.

282 Also in this case the model **explained most of the heterogeneity** in the data. Overall the fixed
 283 effects were statistical significant, with **all individual effects statistically significant** ($p < 0.05$)
 284 **except** for the age that was anyhow kept in the model in order to being able to produce separated
 285 estimates by age categories (Table 10).

286 Compared to the model based on variables expressed in the original scale, the model with In-
 287 transformed scale for response and some fixed effects is considered to better meet assumptions of

288 normality and homoscedasticity. Adherence to linearity is better achieved in the model expressed in
 289 the original scale.

290 1.1.5. Model formal description

291 Based on the discussion above, model 4 with variables expressed in the original and ln-transformed
 292 scale was retained for further analysis. The formal structure of model 4 (original scale and ln-
 293 transformed scale) is described below:

$$294 Y_{ijk} = \beta_0 X_{0ij} + \beta_1 X_{1ij} + \beta_2 X_{2ijk} + \beta_3 X_{3ijk} + s_{ij} + r_{jk} \quad \text{Model in the original scale}$$

$$295 \ln(Y_{ijk}) = \beta_0 \ln(X_{0ij}) + \beta_1 \ln(X_{1ij}) + \beta_2 X_{2ijk} + \beta_3 X_{3ijk} + s_{ij} + r_{jk} \quad \text{Model in the ln-scale}$$

296 Where $X_{0ij}, X_{1ij}, X_{2ijk}, X_{3ijk}$ are the **fixed effects**:

- 297 ✓ Baseline value of the serum 25(OH)D prior to start vitamin D supplementation
- 298 ✓ Vitamin D supplemental intake (in µg/day)
- 299 ✓ Age of the infants (in weeks)
- 300 ✓ Supplementation duration in categories (in weeks)

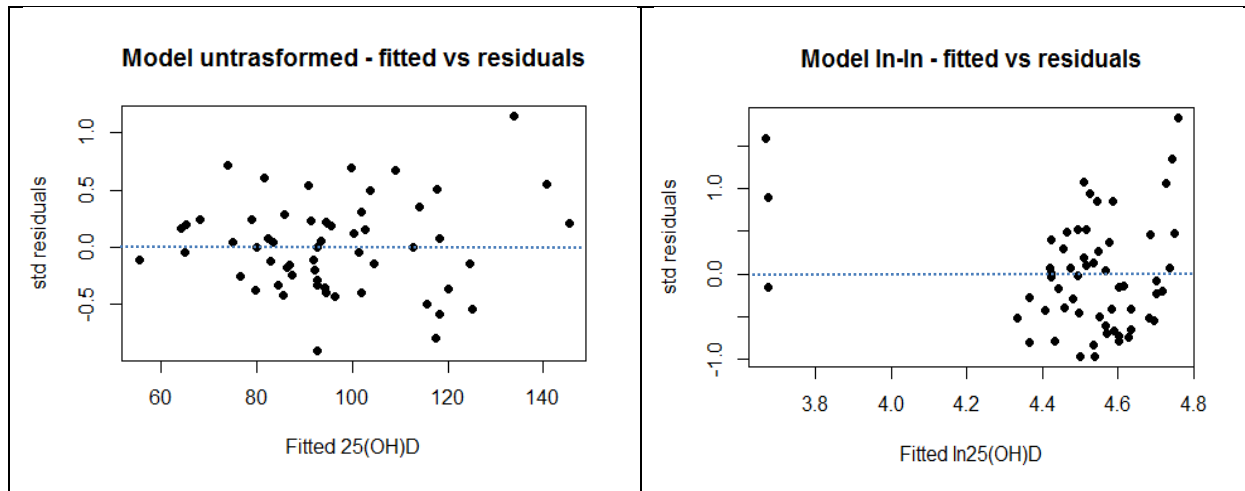
301 And s_{ij}, r_{jk} are the **random factors** with variability denoting the amount of heterogeneity explained
 302 by the correlation structure among arms (j) within a study (i) and repeated measures (k) within each
 303 study-arm (j). The random factors were assumed to be normally distributed with a compound
 304 symmetry structure for the variance/covariance matrix with component τ^2 (across study variability)
 305 and ρ (between arms correlation) and γ^2 (within arm variability) and ϕ (between repeated
 306 observations correlation) respectively. The compound symmetry is a correlation structure that
 307 assumes a constant correlation between each couple of arms from the same studies and each couple
 308 of repeated observations on the same arm. A Restricted Maximum Likelihood method was used to
 309 estimate heterogeneity components (Viechtbauer, 2005; Raudenbush, 2009)

310 1.1.6. Model diagnostics

311 **Diagnostics** were performed for each of the two models (original and ln-scale) in order to identify
 312 possible deviations from main assumptions, outliers (if any) and more influential observations (if any).

313 1.1.6.1. Diagnostic for deviation from linearity and outliers detection

314 From a biological viewpoint, it would have been more realistic to expect that the achieved serum
 315 25(OH)D concentrations levels off at high doses of vitamin D. In addition there could be some
 316 uncertainty in the shape of the association for doses larger than 40 µg/day due to scarcity of evidence
 317 at higher intake. However **inspection of the standardised residuals versus the fitted study-
 318 arm mean serum 25(OH)D values** (Figure 5) has not highlighted major patterns that might raise
 319 concerns **for any of the two models** on the linearity of the relationship since overall study arms
 320 (dots) are evenly spread around the zero line.



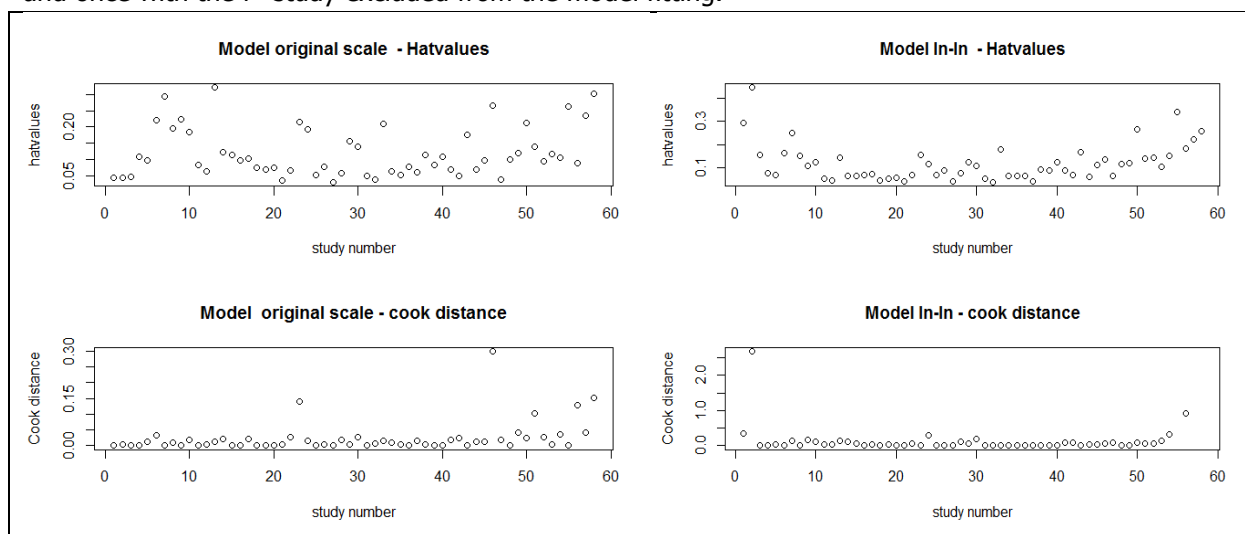
321 **Figure 5:** Standardised residuals – original scale and ln-transformed scale model

322 One dot represents a repeated study arm or a repeated observation on a study arm. Residuals obtained from adjusted models
 323 (i.e. including moderators).

324 It was considered that a non-linear model reaching a plateau at high doses would be expected to lead
 325 to lower predictions of the study-arm mean values in the upper tail of the distribution (lower
 326 responses at higher doses) as compared to the ones estimated with the linear model. Therefore, the
 327 Panel concluded that the estimates obtained with a linear model are conservative.

328 **1.1.6.2. Outliers and influential case diagnostic**

329 Conventionally, any observation with standardised residual greater than 3 (positive or negative) is
 330 considered as an outlier. The inspection of the standardised residuals plot (Figure 5) has not
 331 highlighted any evident outliers since no standardised residuals exceed 2 (positive or negative). A
 332 variety of **influential case diagnostics** can be computed when conducting a meta-analysis
 333 (Viechtbauer and Cheung, 2010). Figure 6 shows a plot of the Hat values the Cook's distances
 334 computed **on the 58 mean observations that form the body of evidence**. The Hat value is an
 335 indicator of the **distance between predicted and observed value**. Cook's distance can be
 336 interpreted as the distance between the entire set of predicted values once with the i^{th} study included
 337 and once with the i^{th} study excluded from the model fitting.



338 **Figure 6:** Original scale (left) and ln-transformed scale (right) model - Hat values and Cook's
 339 distance for the 58 arms-measurement occasions.

340 X-axis: the progressive number identifies arms-measurement occasions; Y-axis: Hat values (above) and the Cook's distance
 341 (below) calculated for each arms-measurement occasions.

342
 343 The analysis of the Hat values shows there is **no study-arm that largely overcomes the others**
 344 for both models (original scale and ln-transformed scale). In fact, all Hat values fall within a range of
 345 3 times the overall Hat values mean (0.12 for both models) except one for the ln-transformed scale
 346 (observation number 2). As for the Cook's distance, when using the original scale model, **5 arms-**
 347 **repeated measurement occasions** appear to be **more influential**, since their value exceeded
 348 3 times the overall average (0.024), whereas 3 study-arms-measurement occasions are identified as
 349 more influential in the ln-transformed model (values above 3 times the mean of 0.18). Highly
 350 influential observations for the original scale and the ln-transformed scale model are listed in Tables
 351 11 and 12 respectively.

352 **Table 11:** Original scale model: study arm and measurement occasions with Cook's distance
 353 exceeding three times the mean

Study ID	Paper	arm	time of observation (in weeks)	Cook
3897	(Ziegler et al., 2014)	2	48	0.1392671
2921	(Holst-Gemeiner et al., 1978)	1	2	0.2999646
3687	(Gallo et al., 2013)	3	48	0.1018319
3687	(Gallo et al., 2013)	4	8	0.1294815
3779	(Gordon et al., 2008)	2	6	0.1527853

354 ID: automatic identification number.

355 **Table 12:** Ln-transformed scale model: study arm and measurement occasions with Cook's
 356 distance exceeding three times the mean

Study ID	Paper	arm	time of observation (in weeks)	Cook
3792	(Grant et al., 2014)	1	17	0.34
3792	(Grant et al., 2014)	1	26	2.69
3687	(Gallo et al., 2013)	4	8	0.92

357 ID: automatic identification number.

358 After further investigation of the most influential data, it was concluded that there are no major
 359 concerns, since no unusual patterns or possible anomalies have been identified for these
 360 observations. Boths models in the original and ln-transformed scales are used in the following analysis
 361 to give a sense of the uncertainty associated to the several choices made at the methodological level
 362 and their influence on the results.

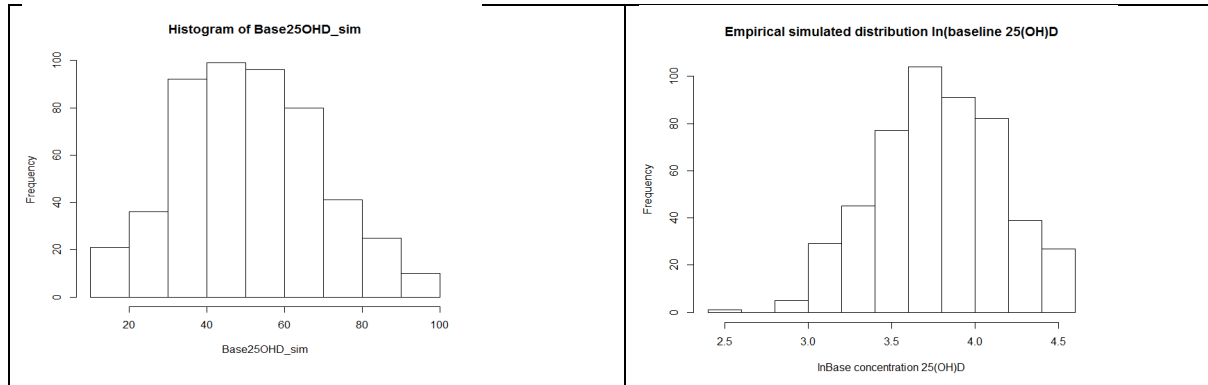
363 1.2. Predicted study mean achieved serum 25(OH)D concentration

364 The distribution of the **mean** achieved serum concentration of 25(OH)D was **simulated using the**
 365 **two predictive models** (original and ln-transformed scale) described above.

366 The hypothesis here is that study-arm means in the body of evidence represent a **random sample**
 367 from a theoretical population of study-arm mean values whose distribution can be described
 368 conditionally to the value of the explanatory variables 'vitamin D intake', 'baseline concentration',
 369 'duration' and 'age'. Since few observations are available in the body of evidence, an empirical
 370 distribution was generated with a large number of simulations (random draws) to approximate better
 371 the true distribution.

372 To make the model predictions **more realistic, a probability distribution was used for the**
 373 **baseline value of serum 25(OH)D to reflect the variability that is expected for this factor**
 374 **in a theoretical population of studies.** The distribution was elicited based on expert's knowledge.
 375 A truncated normal distribution with a mean of 50 nmol/L, standard deviation of 20 nmol/L and range

376 between 10 and 100 nmol/L was considered realistic. A truncated normal was preferred to avoid
 377 values biologically unrealistic (i.e. baseline study mean concentrations below 10 and above
 378 100 nmol/L). The simulated empirical distribution of the study mean baseline serum 25(OH)D
 379 concentration, obtained generating 500 random draws, is showed in Figure 7 in the original (left side)
 380 and ln-transformed scale (right side) respectively.



381 **Figure 7:** Empirical distribution of Baseline serum 25(OH)D (nmol/L). Absolute frequency out of
 382 500 random drawings – original scale (left) and ln-transformed scale (right)

383 As for **vitamin D intake** and **age** of the infants, a range of 5–50 µg/day and 1–52 weeks was
 384 considered appropriate. For the latter factor, the assumption was that the mean age of the infants in
 385 a random sample of studies has approximately a **uniform distribution** over the range 1 to
 386 52 weeks. For simplicity, the range 1 to 52 was used. For the vitamin D intake, the range **observed**
 387 **in the body of evidence** was considered (5 to 50 µg/day). Table 13 summarises the
 388 distributions/values considered realistic for the fixed factors.

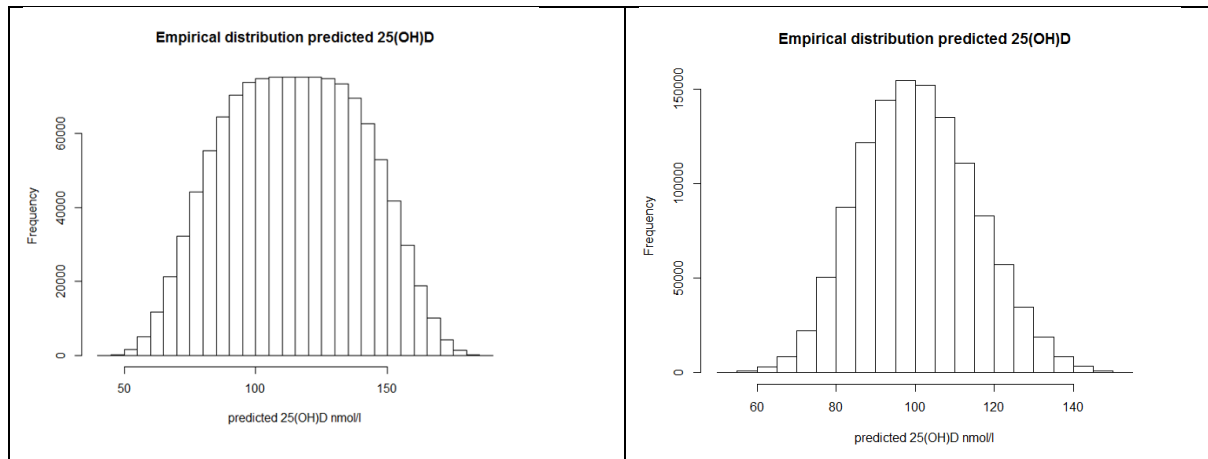
389 **Table 13:** Distributions/values of the fixed factors in the predictive model (2 lines correspond to
 390 model in the original and ln-transformed scale)

Fixed factor	Distribution or range of values	Scale
Baseline serum 25(OH)D (in nmol/L)	~TruncNorm(min = 10, max = 100, m = 50, sd = 20)	Original
	~TruncNorm(min = 2.302, max = 4.605, m = 3.837, sd = 0.385)	Natural log
Vitamin D intake (in µg/day)	Range 5-50 all integer values in the range	Original
	Range 1.609–3.912 all integer values in the range	Natural log
Age (in weeks)	Range 1–52 all integer values in the range	Original
	Range 1–52 all integer values in the range	Natural log

391 Max: maximum; min: minimum; natural log: natural logarithm i.e. ln; sd: standard deviation, TruncNorm: truncated normal

392 The supplementation duration was **always set at 6 months**, since this was the second highest
 393 mean achieved concentration of serum 25(OH)D, the first at highest vitamin D intake doses.

394 Monte Carlo simulations (Burmester and Anderson, 1994; Robert and Casella, 2004) were used to
 395 **generate the empirical distribution** of the baseline serum 25(OH)D concentration and the
 396 **predicted study-arm mean** of the achieved serum 25(OH)D concentration. A total of
 397 1,196,000 predictions were generated as the result of all possible combinations of the fixed effects.
 398 The empirical distributions and the related quartiles of the predicted mean achieved serum 25(OH)D
 399 concentration obtained using the model in the original and ln-transformed scales are provided in
 400 Figure 8 and Table 14.



401 **Figure 8:** Model in the original (left side) and ln-transformed (right side) scale - Empirical
 402 distribution of the predicted study-arm mean serum 25(OH)D concentration (nmol/L)

403 Note: y-axis: Absolute frequency out of 1,196,000 simulations.
 404

405 **Table 14:** Model in the original and ln-transformed scales: quartiles of the empirical distribution
 406 of the predicted study-arm mean achieved serum 25(OH)D concentration

Distribution value	Predicted study-arm mean achieved serum 25(OH)D	
	Original scale model	Ln-transformed model*
Minimum	44.87	54.08
1 st quartile	94.48	90.22
Median	114.50	100.20
Mean	114.50	100.80
3 rd quartile	134.50	110.70
Maximum	187.50	150.10

407 * Values are back-transformed to the original scale

408 1.3. Distribution of simulated individual responses

409 The Tolerable Upper Intake Level (UL) is defined as the 'maximum level of total chronic intake of a
 410 nutrient from all sources judged to be unlikely to pose a risk of adverse health effects in humans'
 411 (EFSA NDA Panel, 2010).

412 In order to identify such an intake of vitamin D for infants, **individual responses were simulated**
 413 from each study-arm mean response, similarly to what was done for establishing individual population
 414 coverage of the adequate intake recently established for vitamin D (EFSA NDA Panel, 2016).

415 For each of the two models (original and ln-transformed scale) the following steps were followed:

- 416 - **A truncated normal distribution** was assumed to describe the variability of the
 417 individually achieved serum 25(OH)D concentration around the study population mean.
- 418 - In the absence of reliable information on the possible variability at the individual level, an
 419 **average coefficient of variation (CV) was derived** from the study-arm-measurement
 420 occasions available in the body of evidence, averaging across all the within-study
 421 sampling variability with weights given by sample size. Implicit assumption was that
 422 within study variability provides an unbiased estimate of the inter-individual variability in
 423 the population from which individuals have been selected.
- 424 - **The mean CV has been used to compute the standard deviation** of each individual
 425 distribution by multiplying for the study-arm predicted mean value.

426 - The **distribution of individually achieved serum 25(OH)D concentration** was
 427 obtained for each of the two models, in the original and In-transformed scale, with
 428 100 random draws simulating the hypothetical population of individual around the study-
 429 arm mean.

430 **1.4. Percentage of infants exceeding defined serum 25(OH)D**
 431 **concentrations**

432 For each class of vitamin D intake, categories of the biomarker at baseline (below 30 nmol/L; 30–
 433 60 nmol/L; 60–100 nmol/L) and age classes (below and above 6 months of age), the percentages of
 434 infants expected to exceed a specific concentration of the biomarker were computed on the basis of
 435 the original and In-transformed scale models. Due to the uncertainty surrounding the choice of a
 436 concentration of serum 25(OH)D associated with an increased risk of adverse outcomes
 437 (Section 3.3.6. of the scientific opinion), two concentrations (150 and 200 nmol/L) were considered in
 438 order to investigate sensitivity of the results to it.

439 **1.4.1. Results**

440 Results are reported in Table 15 and 16 for infants up to the age of 6 months and between 6 months
 441 and 12 months respectively for model in the original scale, for concentration equal to 150 and
 442 200 nmol/L. Results are given in Tables 17–18 for the model in the In-transformed scale.

443 **Table 15:** Model in the original scale - Percentage of infants exceeding the serum 25(OH)D
 444 concentrations of 150 and 200 nmol/L – infants up to 6 months of age (26 weeks included)

VitD intake	% infants with achieved serum 25(OH)D concentration exceeding 150 nmol/L				% infants with achieved serum 25(OH)D concentration exceeding 200 nmol/L			
	Baseline serum 25(OH)D				Baseline serum 25(OH)D			
	[10, 30)	[30,60)	[60,100]	Any	[10, 30)	[30,60)	[60,100]	Any
[5-10)	1	2	6	3	0	0	0	0
[10-15)	2	5	11	7	0	0	1	0
[15-20)	5	10	18	12	0	1	2	1
[20-25)	10	17	25	19	0	2	4	2
[25-30)	16	24	33	25	1	3	7	4
[30-35)	23	32	40	34	3	6	11	7
[35-40)	32	39	48	41	6	10	16	11
[40-45)	38	47	54	48	10	15	21	17
[45-50)	46	53	60	54	15	20	27	22

445 **Table 16:** Model in the original scale - Percentage of infants exceeding the serum 25(OH)D
 446 concentrations of 150 and 200 nmol/L – infants between 6 and 12 months of age (26 weeks
 447 excluded)

VitD intake	% infants with achieved serum 25(OH)D concentration exceeding 150 nmol/L				% infants with achieved serum 25(OH)D concentration exceeding 200 nmol/L			
	Baseline serum 25(OH)D				Baseline serum 25(OH)D			
	[10, 30)	[30,60)	[60,100]	Any	[10, 30)	[30,60)	[60,100]	Any
[5-10)	0	0	1	0	0	0	0	0
[10-15)	0	1	3	1	0	0	0	0
[15-20)	1	2	7	4	0	0	0	0
[20-25)	2	6	12	8	0	0	1	0
[25-30)	6	11	19	13	0	1	2	1
[30-35)	11	18	27	20	1	2	4	2
[35-40)	18	25	35	27	2	4	8	5
[40-45)	25	34	42	36	4	7	12	8
[45-50)	33	41	49	42	7	11	17	12

448 **Table 17:** Model in the In-transformed scale - Percentage of infants exceeding the serum
 449 25(OH)D concentrations of 150 and 200 nmol/L – infants up to 6 months of age (26 weeks
 450 included)

VitD intake	% infants with achieved serum 25(OH)D concentration exceeding 150 nmol/L				% infants with achieved serum 25(OH)D concentration exceeding 200 nmol/L			
	Baseline serum 25(OH)D				Baseline serum 25(OH)D			
	[10, 30)	[30,60)	[60,100]	Any	[10, 30)	[30,60)	[60,100]	Any
[5-10)	0.3	4.2	15.6	7.1	0	0.1	1.4	0.5
[10-15)	0.6	6.0	19.5	9.4	0	0.2	2.2	0.8
[15-20)	0.9	7.4	22.4	11.0	0	0.3	2.9	1.0
[20-25)	1.2	8.6	24.5	12.4	0	0.4	3.5	1.3
[25-30)	1.5	9.6	26.1	13.5	0	0.5	4.1	1.5
[30-35)	1.7	10.5	27.6	14.6	0	0.6	4.6	1.7
[35-40)	1.9	11.3	28.9	15.4	0	0.7	5.2	1.9
[40-45)	2.2	12.1	29.9	16.2	0	0.8	5.6	2.1
[45-50)	2.4	12.7	31.0	16.9	0	0.9	6.0	2.3

451 **Table 18:** Model in In-transformed scale - Percentage of infants exceeding the serum 25(OH)D
 452 concentrations of 150 and 200 nmol/L – infants between 6 and 12 months of age (26 weeks
 453 excluded)

VitD intake	% infants with achieved serum 25(OH)D concentration exceeding 150 nmol/L				% infants with achieved serum 25(OH)D concentration exceeding 200 nmol/L			
	Baseline serum 25(OH)D				Baseline serum 25(OH)D			
	[10, 30)	[30,60)	[60,100]	Any	[10, 30)	[30,60)	[60,100]	Any
[5-10)	0.1	2.1	10.2	4.2	0	0	0.6	0.2
[10-15)	0.2	3.2	13.3	5.9	0	0.1	1	0.3
[15-20)	0.4	4.2	15.7	7.1	0	0.1	1.4	0.5
[20-25)	0.5	5.0	17.5	8.2	0	0.1	1.7	0.6
[25-30)	0.6	5.7	19.2	9.1	0	0.2	2.1	0.7
[30-35)	0.7	6.9	20.3	9.8	0	0.2	2.4	0.8
[35-40)	0.8	7.0	21.5	10.5	0	0.3	2.7	1.0
[40-45)	0.9	7.5	22.5	11.2	0	0.3	3.0	1.1
[45-50)	1.1	8.0	23.5	11.8	0	0.3	3.3	1.2

454 NB: ranges expressed as [a-b) mean including a but excluding b.

455 1.4.2. Results interpretation

456 These results have to be read with caution. They represent predictions obtained from modelling,
 457 simulations and related assumptions (previously specified). The exceedance percentages should **not**
 458 **be interpreted as precise estimates, rather as informed quantitative judgements** about the
 459 expected prevalence of infants that might exceed the serum 25(OH)D concentration at the various
 460 vitamin D intake, given baseline values of the biomarker and age groups.

461 For infants **younger than 6 months**, based on the results of the prediction model in the original
 462 scale, at a vitamin D intake of up to **25 µg/day**, which is the UL previously set by EFSA NDA Panel
 463 (2012), depending on the baseline serum 25(OH)D concentration, 10 to 25% of individuals **younger**
 464 **than 6 months** would achieve serum 25(OH)D concentrations above 150 nmol/L, and **0 to 4%** of
 465 infants would achieve serum 25(OH)D concentrations above 200 nmol/L (Table 14). The results of the
 466 In-transformed scale up to a dose of 25 µg/day are consistent with the results in the original scale
 467 (Table 16).

468 For infants **between 6 and 12 months of age**, the predicted percentage of individuals exceeding
 469 serum 25(OH)D concentrations of 150 nmol/L or 200 nmol/L would be 2 to 12% or **0 to 1%** at a
 470 supplemental vitamin D intake of up to 25 µg/day, 0-2% at intakes of up to 30 µg/day and 1-4% at
 471 intakes at of up to **35 µg/day** (Table 15, original scale). For the In-transformed scale, these
 472 percentages range from 1% to 18% for the concentration of 150 nmol/L, and from **0 to around 2%**
 473 for the concentration of 200 nmol/L, for doses up to **35 µg/day** (Table 17).

474 1.5. Unaddressed sources of uncertainty

475 This section intends to provide a list of the uncertainties that have not been addressed in the
476 statistical analysis, neither quantitatively nor qualitatively.

477 1.5.1. Uncertainties related to modelling

478 Some limitations have to be acknowledged in the set-up of the models.

479 The intake-response relationship is estimated using aggregated data (study-arm mean value). The
480 relationship observed averaging across trials might not be the same as the one observed within a trial.
481 This issue is known as **ecological fallacy or aggregation bias** (difficult to investigate if no
482 individual data are available).

483 **Some potential confoundings or moderators** have not been measured in the studies and **could**
484 **not be included in the model.**

485 **Sampling uncertainty** was not accounted for in the predicted study-arm mean values. The mean
486 prediction has been considered instead of the upper bound of the credible interval of the prediction.

487 **A compound-symmetry structure was used** to describe the correlation structure in the data.
488 Other structures could have been considered.

489 **Non-linearity** could have better met the expected dose-response relationship from a biological
490 viewpoint. Although no significant deviations from linearity were identified, the lack of a large body of
491 evidence covering high doses makes the true shape of the relationship at doses higher than 40 µg/day
492 somehow uncertain. Of note, a non-linear model showing mean serum 25(OH)D concentration
493 reaching a plateau at high doses would have probably led to study-arm mean values lower in the
494 upper tail of the distribution as compared to the ones estimated with the linear model. Consequently,
495 a non-linear model would have probably led to a lower percentages of individuals exceeding a certain
496 serum 25(OH)D concentration. Therefore, the current estimates obtained on the basis of the linearity
497 assumption are considered conservative.

498 The **inter-individual variability** necessary to estimate distribution of individually achieved serum
499 25(OH)D concentration was unknown. It was estimated on the basis of the mean coefficient of
500 variation (CV) of the within study variability. The same CV has been applied to all study means to
501 derive an inter-individual variance. Therefore, implicitly, studies with larger mean were assumed to
502 have a larger dispersion of the individual values around it and vice-versa. This assumption, based on
503 observation of the real world and therefore realistic, has contributed to amplify the difference in the
504 predicted percentage of infants exceeding a serum 25(OH)D concentration between original and In-
505 transformed scale models.

506 1.5.2. Additional sources of uncertainty

507 Additional sources of uncertainties have not been addressed.

508 The dose-response has been computed considering **only vitamin D intake from**
509 **supplementation**. Background intake from food has not been considered. Assumption was that **bio-**
510 **availability** is the same for vitamin D naturally contained in food or added in fortified food and
511 provided as supplements to the infants (Section 5.6.3. of the scientific opinion). Same assumption (in
512 terms of bio-availability or compliance/risk of overdosage) applies to the **form of supplementation**
513 whether provided in drops, pills or other forms.

514 Some **analytical methods** may overestimate the 'true' value of the serum 25(OH)D concentration,
515 especially in infants. Impact of the concentration of C3-epimer of 25(OH)D, particularly in the
516 youngest infants, has also not be considered for this analysis (Section 1.8.6. of the scientific opinion).

517 **Compliance to the planned administration** is one source of uncertainty that could have equally
518 led to an overestimation or underestimation of the vitamin D doses administered to the infants.
519 Parents might equally forget to give supplements to infants or inadvertently provide a higher dose to
520 them.

521 **1.6. Software**

522 Data editing and cleaning was performed using SAS version 9.3. Statistical analyses were carried out
523 with R version 3.3.2 (R Core Team, 2013) and Rstudio version 1.0.136. The meta-regression was
524 performed using the 'metafor' package (Viechtbauer, 2010b).

525

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- 580

581 **Abbreviations**

AIC	Akaike information criterion
AICc	Akaike information criterion corrected
BIC	Bayesian information criterion
CV	coefficient variation
df	degrees of freedom
DRV	dietary reference value
ln-25(OH)D	natural logarithmic transformed concentration of serum 25(OH)D
ln-scale	natural logarithmic transformed scale
LogLik	log-likelihood
-2LogLik	deviance
LC-MS/MS	liquid chromatography-tandem mass spectrometry
NDA	Panel on Dietetic Products, Nutrition and Allergies
p-value	statistical significance level
prob	probability
Q	quantile
QE	Q test for residual heterogeneity
QM	Q test for moderators
RIA	radioimmunoassay
UL	tolerable upper intake level
serum 25(OH)D	25-hydroxy-vitamin D in serum
Vitamin D ₂	ergocalciferol
Vitamin D ₃	cholecalciferol

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