

# codex alimentarius commission



FOOD AND AGRICULTURE  
ORGANIZATION  
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WORLD  
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ORGANIZATION



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**Agenda Item 5**

**CX/NFSDU 02/5-Add. 3  
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## **JOINT FAO/WHO FOOD STANDARDS PROGRAMME**

**CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES  
Twenty-fourth Session  
Berlin, Germany, 4 - 8 November 2002**

### **PROPOSED DRAFT REVISED STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN**

*- Comments at Step 3 of the Procedure*

#### **Comments from:**

COSTA RICA

#### **1. Scope:**

As regards Section 1, we suggest to delete the first paragraph and to support the second version as it is clearer.

*~~This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of 6 months onwards, or when upon the advice of an independent health worker it is required to satisfy their individual nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).~~*

*or:*

*[This standard covers processed cereal-based foods intended for complementary feeding of infants from the age of 6 months onwards, or for feeding young children as part of their progressively diversified diet in accordance with the World Health Assembly resolution WHA54.2 (2001).]*

#### **2. Description:**

In Section 2.1 we suggest to replace the term "Product Definitions" by "Definitions of Product Categories".

Following the terminology used in Sections 3.1.1, 3.10.2 and 8.2 of this proposed draft standard, we suggest to add the term "dry cereals" at the beginning of the sentence in Sections 2.1.1 and 2.1.2. Further, we propose to delete the words "are or" so that the statement now reads "have to be reconstituted", as, according to our proposal, this would be based on dry cereals. Furthermore, we suggest preceding the sentence in 2.1.2 by "products consisting of...".

2.1.1 Products consisting only of **dry** cereals which ~~are or~~ have to be reconstituted with milk or other appropriate nutritious liquids.

2.1.2 **Products consisting of dry** cereals with an added high protein food which are or have to be reconstituted with water or other protein-free liquid.

2.1.5 should be 2.1.4

We propose to define the term “infant” in Section 2.2.1 by using the definition from the proposed draft revised standard for infant formula (“The term “infant” means a person not more than 12 months of age.”).

2.2.1 ~~Por lactante se entiende una persona de menos de 12 meses de edad.~~ **entienden los niños(as) mayores de 12 meses de edad.** (= “The term **infant** means a person more than (? translator’s note) 12 months of age.” - It seems that the word “no” was omitted from the definition, i. e. instead of “mayores de” - “more than” the sentence should read “no mayores de” - “not more than”, translator’s note.)

2.2.2 The term **young children** means persons from the age of more than 12 months up to the age of three years (36 months).

### 3. Essential composition and quality factors:

We suggest to change the last sentence in Section 3.1.1 as follows: “It may also contain legumes (pulses), starchy roots or stems (such as arrow root, yam or cassava) or oil seeds in smaller proportions.”

3.1.1 Dry cereal, rusk, biscuits and pasta are prepared primarily from one or more milled cereal products, such as wheat, rice, barley, oats, rye, maize, millet, sorghum and buckwheat. It may also contain legumes (pulses), starchy roots (such as arrow root, yam or cassava) ~~or starchy stems~~ or oil seeds in smaller proportions. (Instead of “maranta” or “arruruz” - the Spanish term for “arrow root” - “arroz” - the Spanish term for “rice” - was accidentally used, translator’s note)

In Section 3.6.2 the phrase “in points 2.1.2” should read “in point 2.1.2”.

3.6.2 The calcium content shall not be less than 20 mg/100 kJ (80 mg/100 kcal) for products mentioned ~~in points~~ **in point** 2.1.2.

In Section 3.8.1 we suggest deleting the words “four to” to make it clear that this refers to infants of more than six months of age and young children. We further think that, similar to the current standard, a list of ingredients should be added.

3.8.1 In addition to the ingredients listed under 3.1, other ingredients suitable for infants who are more than ~~four to~~ six months of age and for young children can be used.

### 5. Contaminants:

In Section 5.1 we suggest to refer to the maximum limits for pesticide residues indicated in the report of the Panel of Experts on Pesticide Residues (JMPR) and correct the last sentence so that it reads as follows: “...población a la que están destinados”. (Correction applies to Spanish version only, translator’s note.)

#### 5.1 PESTICIDE RESIDUES

The product shall be prepared with special care under good manufacturing practices, so that residues of those pesticides which ~~may be~~ are **used** ~~required~~ in the production **and** storage ~~or processing of the raw materials or the finished food ingredient~~ do not remain, or, if technically unavoidable, are reduced to the lowest level ~~maximum extent~~ possible.

The limit shall take into account the specific nature of the products concerned and the specific population group for which they are intended.

### 6. Hygiene:

Regarding Section 6, we suggest to include subsections a, b and c from the current standard which are much more detailed and much clearer.

**6.3 When tested by appropriate methods of sampling and examination, the product:**

- a) *shall be free from pathogenic microorganisms;*
- b) *shall not contain any substances originating from microorganisms in amounts which may represent a hazard to health; and*
- c) *shall not contain any other poisonous or deleterious substances in amounts which may represent a hazard to health.*

## 8. Labelling:

In Section 8.3 we propose to replace the statement “or young children” by “children under six months of age”, as the products covered by this standard are intended for this population group. In addition, it is made clear that according to Section 8.7 they neither constitute breast milk substitutes nor should they be presented as such.

8.3 *[The label shall have no pictures of infants ~~or young~~ under six months of age or text, which idealizes the use or suggests an inappropriate age of introduction of these products.]*

With regard to Section 8.4 a), we suggest to stipulate that the energy value must be given in both kilocalories and kilojoules, and to replace the word “or” by “and”. In addition, the phrase “where appropriate” should be deleted so that the energy value, in line with the nutrients in letter b), has to be given per 100 g and as per specified quantity of the food as suggested for consumption

In Section 8.4 b) 3.2.2 should be replaced by 3.7.

We suggest deleting Section 8.4. c), as in our opinion it is covered by the previous section and it is unclear.

### 8.4 DECLARATION OF NUTRITIVE VALUE

*The declaration of nutrition information shall contain the following information in the following order:*

*(a) The energy value, expressed in calories (kcal) ~~or~~ and kilojoules (kJ), and the amount of protein, carbohydrate and fat expressed in grammes (g) per 100 g of the food as sold, and ~~where appropriate~~, as per specified quantity of the food as suggested for consumption;*

*(b) in addition to any other nutritional information required by national legislation, the total quantity in the final product of each vitamin and mineral added according to Section ~~3.2.2~~ 3.7 shall be declared per 100 g as well as according to the serving size of the food suggested for consumption;*

*~~(c) the average quantity of the vitamins and minerals when their declaration is not covered by the provisions of section 8.3.1 (b) expressed in numerical form per 100 g or 100 ml of the product as sold and where appropriate per specified quantity of the foods as suggested for consumption.~~*

In Section 8.6.2 we suggest to replace the word “formula” by “nutritious liquids” to match Section 2.1.1.

8.6.2 *For products covered by 2.1.1, directions on the label shall state “Milk or ~~formula~~ nutritious liquids but no water shall be used for dilution or mixing” or an equivalent statement.*

Section 8.6.3 should be deleted, as the standard, in accordance with its scope, does not cover products intended for children under six months of age.

~~8.6.3 *The presence or absence of gluten should be indicated on the label, if the intended age of use is below [six months].*~~

With regard to Section 8.6.4, we suggest (the words “to delete” seem to be missing, translator’s note) “four to” so that it is not recommended to feed the product to children below six months of age. Further, the words “trabajador sanitario” should be replaced by “profesional de la salud”. (Change applies to the Spanish version only, translator’s note.)

*[8.6.4 The label shall indicate clearly from which age the product is intended for use. The label shall clearly state that the product is not recommended for use below ~~4 to~~ 6 months. (in accordance with the above explanation it can be assumed that “4 to” should be deleted, translator’s note) In addition, the label shall include a statement indicating that the decision when precisely to begin complementary feeding should be made in consultation with a health worker, based on the infant specific growth and*

*development needs. Additional requirements in this respect may be made in accordance with the legislation of the country in which the product is sold.]*

Regarding Section 8.7, we recommend to delete the square brackets, as we agree with the statement that the products in question are not breast milk substitutes and must not be presented as such.

*The products covered by this standard are not breast-milk substitutes and shall not be presented as such.*

#### **9. Methods of analysis and sampling:**

Finally, we recommend to replace the word “preparados” in Section 9 by “fórmula”. (Change applies to Spanish version only, translator’s note.)

*Véase la Sección relativa a los métodos en el Anteproyecto de Norma Revisada para ~~los Preparados~~ **Fórmula** para Lactantes.*