

August 2002

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 2

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

FAO/WHO COORDINATING COMMITTEE FOR ASIA

Thirteenth Session, Kuala Lumpur, Malaysia 17-20 September 2002

MATTERS ARISING FROM THE 24TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION AND 49TH AND 50TH SESSION OF THE EXECUTIVE COMMITTEE

RECOMMENDATIONS FOR :

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

PROPOSED DRAFT REVISED STANDARD FOR INFANT FORMULA,

GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS: CLASS NAME

-PROPOSAL BY INDONESIA-

The following 3 recommendations are proposed by Indonesia with regard to the standards under discussions by Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) and Codex Committee on Food Labelling (CCFL).

RECOMMENDATIONS FOR THE PROPOSED DRAFT REVISED STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN

IN RESPONSE TO ALINORM 03/26

**(CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES -
CCNFSDU)**

BACKGROUND

The next session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), will be held in Berlin from 4-8 November 2002. One of the most important items on the agenda is the Draft Revised Standard for Processed Cereal-based Foods for Infants and Young Children.

ISSUES

- In line with Indonesian findings from the exclusive breast feeding studies, in fact that beside in adequate intake of breast feeding also, growth faltering is influenced by lower energy density of traditional complementary food as well as insufficiency of micro nutrient quantity.

- Based on National Socio Economics Survey in the year 2000, shows that the prevalence of PEM on children under five years approximately 72 percents, while prevalence of infants four to six months is around 12 percents. In order to prevent the growth faltering among babies below six months, beside continue breast feeding, complementary food shall be given four to six months onwards or when upon the advice of health workers.
- Some cereal products have other ingredients, such as milk, or protein-rich pulses, at greater level and thus these products are not 'primarily' cereals. These cereals conform to the current Codex Standard (CODEX STAN 74-1991), but will not conform to the revision.
- The amount of trans-fatty acid should be limited, therefore the usage of Hydrogenated fats should be prohibited. **RECOMMENDATION**

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1. SCOPE

We support the recommendation of the WHO Expert Consultation; to protect the health of the infant, but also leaving room for some flexibility for introducing a cereal at an earlier age, if and when necessary.

We propose the following wording:

{This standard covers processed cereal-based foods intended for feeding infants as a complementary food from **the age of 4 to 6 months** onward, or when upon the advice of an independent health worker it is required to satisfy their nutritional requirements and for feeding young children as part of their progressively diversified diet, in accordance with World Health Assembly Resolution WHA54.2(2001) **and the respective country policy**}

2. DESCRIPTION

The description presently reads:

"Processed cereal-based foods are prepared primarily from one or more milled cereals which constitute at least 25% of the final mixture on a dry weight basis."

We agree to the requirement for 25% content of one or more milled cereals. However, some cereal products have other ingredients, such as milk, or protein-rich pulses, at greater levels than 25% and thus these products are not '*primarily*' cereals. These cereals conform to the current Codex Standard (CODEX STAN 74-1991), but will not conform to the revision. We strongly recommend the removal of the word '*primarily*' from the description, so the sentence reads:

"Processed cereal-based foods are prepared ~~primarily~~ from one or more milled cereals which constitute at least 25% of the final mixture on a dry weight basis."

2.1 PRODUCT DEFINITIONS

2.1.1 "Products consisting only of cereals which are or have to be reconstituted with milk or other nutritious liquids."

This category also covers cereal products where fruits, oils, sugars, vitamins, minerals or other ingredients might be added. Thus we suggest the following wording:

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

3.1 ESSENTIAL COMPOSITION

3.1.1 "Dry cereal, rusks, 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."

Here there is the same problem as is encountered in section 2. DESCRIPTION, concerning the word 'primarily'. Some products, specifically those containing milk or protein rich pulses and beans, may not conform to this composition. These products take advantage of locally produced crops, their nutritional quality is excellent and there is no reason to exclude them from this standard.

The following wording is suggested:

"Dry cereal, rusks, 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 *may also be used* or oil seeds in smaller proportions."

3.2 ENERGY DENSITY

The energy density should not be less than 0.8 kcal/g instead of 0.8 kcal/100g (editorial error).

3.3 PROTEIN

3.3.1 This section refers to a reference protein, but the reference is not defined. We support the use of casein as a reference.

3.5 LIPIDS

We suggest introducing a sentence "No hydrogenated fats should be used". This is in accordance to lower the trans-fatty acid.

RECOMMENDATIONS FOR THE PROPOSED DRAFT REVISED STANDARD FOR INFANT FORMULA

IN RESPONSE TO ALINORM 03/26

(CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES - CCNFSDU)

BACKGROUND

The next session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU), will be held in Berlin from 4-8 November 2002. One of the most important items on the agenda is the Draft Revised Standard for Infant Formula.

ISSUES

- In 2001 the WHO Expert Consulting Committee recommended "exclusive breastfeeding for 6 months, with introduction of complementary foods and continued breastfeeding thereafter." The Expert Consulting Committee also recognized that some children might suffer from growth faltering or iron deficiency before 6 months and these children would need other foods.
- However, Indonesia has concern with the appropriate usage of infant formula in order to enhance the breast feeding program. Since the severe and moderate protein energy malnutrition that caused growth faltering starting below six month still higher in Indonesia therefore, Indonesian government has decided has decided to implement the

exclusive breast feeding until four months after birth.

- On the Second Meeting of the Asean Task Force on Codex from 20-21 May 2002, Indonesia introduced a discussion paper. However, after further study it is realized that the other alternative is more general.

RECOMMENDATION

3. SCOPE

1.1 Indonesia would like to withdraw the discussion paper submitted on the second meeting of the Asean Task Force on Codex from 20-21 May 2002, which appears in the report as Annex 9. Further Indonesia will support the original phrase *where necessary*. The first sentence should therefore be exactly the same with proposed draft.

As it is presently written, the standard would be applicable to products intended both for normal healthy infants and for infants with special nutritional requirements. However it is our position that formula for unhealthy infants should not be included in this standard for infant formula, but should be included in an equivalent Codex standard on foods for Special Medical Purposes (FSMP). The second sentence should therefore read:

"The provisions in this standard are not intended for infants with special nutritional requirements."

If both type of these products were to be included here, then the compositional requirements of the standard could be inappropriate for infants with special needs. If a specialized product is adapted to particular nutritional situations, it might pose a health hazard to normal healthy infants. In addition, statements such as 'use under medical supervision' would not necessarily appear.

2.1.2 We suggest deleting the second sentence which is redundant

After that, all the other [] should be deleted. 2.1. will read "*Infant formula shall be nutritionally adequate to ensure normal growth and development when used in accordance with its directions for use to meet the nutritional requirements of infants by itself during the first months of life up to the introduction of appropriate complementary feeding*".

3.1.2 (d) Protein:

(i) The possibility to use source of protein other than milk and soy should be maintained as in the current Codex STAN 72-1981. Thus the second sentence should read "*.....nitrogen content x 6.25 for soya and other protein isolates and their partial hydrolysates*".

3.1.2 (e) Fat and Fatty Acid

Trans Fatty Acids

Our position is that the trans fatty acid content of infant formula shall not exceed 5% of the total fat content. The reason is that milk fat can contain up to 6% trans fatty acid and it can be desirable to make infant formula with a fat mix containing 90% milk fat.

9.1. THE NAME OF THE FOOD

9.1.4 This sentence should be changed to the original language in the Codex Standard 72-1981 to read: "*A product which contains neither milk nor any milk derivative ~~shall~~ may be labelled contains no milk or milk products or an equivalent phrase*".

The list of ingredients would show the composition of the product and whether it contains milk or not. It is extremely difficult to guarantee the complete absence of milk or of any milk derivative from a product. If this is to be required, it would be necessary to establish threshold levels of permissible milk content.

"[9.1.5...[No health claims shall be made regarding the dietary properties of the product.]]

Regarding the whole paragraph 9.1.5 which is in [], much will depend on whether foods for infants with special nutritional requirements are included in the Scope of the Standard. As mentioned above in Section 1.1, we strongly recommend not to include such foods in the Standard. If this is achieved, the whole paragraph 9.1.5 must be deleted.

However, if foods for infants with special nutritional requirements are included in the Scope of the Standard, then Paragraph 9.1.5 must be retained and the [] must be deleted. The last sentence "*No health claims shall be made regarding the dietary properties of the product*" must be deleted because a health claim will be an essential piece of information about the product. If it is justified, it should be allowed. Some legislations permit such claims.

In all cases, i.e. whether foods for infants with special nutritional requirements are included or excluded from the Scope of the Standard we recommend to add a new paragraph 9.1.5 (or other, depending on the numbering system,) with the following wording:

"In order to provide information concerning the composition and the specific properties of foods intended to meet the nutritional requirements of infants, nutrition and health claims are permitted insofar as they are supported by relevant scientific data".

9.1.6 We support the first alternative, delete [].

9.6 ADDITIONAL LABELLING REQUIREMENTS

In **9.6.1 b)** there are two alternatives proposed statements.

The first alternative "[...it protects against diarrhoea an other illness]..." deviates from the WHO Code and should not be accepted.

We support the second statement:

"b)[The statement: "Breastfeeding is the best food for your baby" or a similar statement as to the superiority of breastfeeding or breastmilk.]"

9.6.5 We recommend to delete 9.6.5: indeed there cannot be any risk of confusion between two products, i.e. infant formula and follow-up formula; which have different names, different +Codex Standards, different composition, different labelling etc.

RECOMMENDATIONS FOR THE GENERAL STANDARD FOR THE LABELLING OF PREPACKAGED FOODS: CLASS NAMES.

IN RESPONSE TO ALINORM 03/22

(CODEX COMMITTEE ON FOOD LABELLING - CCFL)

BACKGROUND

At the 25th Session Code Committee on Food Labelling (CCFL) the General Standard for the Labelling of Prepackaged Foods: Class Names; it was concluded that many delegations agreed to use a single class name although there was no consensus on the level of milk

protein. One class name "milk protein" would be retained, and noted that the Committee might wish to consider the appropriate percentage (30/35/50%) further at its next session.

The Committee agreed to return the Draft Amendment to Step 6 for further comments and consideration at next session.

ISSUES

1. State of issue in the Codex

- **At the first meeting** (28 November to 2 December 1994) **the CCMP** accepted the final proposal drawn up by the IDF, which provided for two categories of products:
 - "products containing milk proteins", containing a minimum of 35% and at least 50% of milk proteins (m/m in the dry extract) which are not traditional milk product such as powder skimmed milk or whey proteins; and
 - "milk proteins" containing a minimum of 50% milk proteins (m/m in the dry extract)
- **At the second meeting (27 to 31 May 1996)**, **CCMMP** confirmed its proposal
- **At its 25th meeting (15 to 18 April 1997)**, **CCFL** reiterated its proposal
- **At its 27th meeting (27 to 30 April 1999)**, **CCFL** agreed to regroup the two categories "Milk proteins" and "Milk protein products" into a single category and to place the minimum protein content of 30/35% between brackets (m/m).
- This pilot study was **adopted in the 5th stage by the Commission at its 23rd meeting (28 June to 3 July 1999)**, Below the text adopted in stage 5:

[Milk proteins/milk proteins products]: dairy products containing a minimum of [30-35%] milk protein (m/m) calculated on the basis of dry extract.

- The CCFL transmitted this project for examination to the 4th meeting of the **CCMP (28 February to 3 March 2000)**

At this meeting, the CCMP proposed to replace the 30/35 bracket by a single value (35%) representing the minimum protein content and reserve the term "Milk Proteins" for products with minimum content of 50%

Milk protein products: dairy products containing a minimum of 35% (m/m) of any type of milk protein. If the content is greater than 50% (m/m), the word "product" can be omitted.

- **At its 28th meeting (5 to 9 May 2000)**, **the CCFL** examined this proposal, and as agreement could not be reached, send it to stage 6.

With differences of opinion on advisability of having two categories of products, some delegations wanted only one, as well as on the minimum protein content (two Asian countries wanted 30%; the others were more in favour of 50%)

- **At its 29th meeting (1 to 4 May 2001)**, **the CCFL** re-examined the same proposal; again no agreement could be reached, and the Chair pointed out as a result, the Committee could examine the need to continue the work.

The proposal is still the text adopted by the Commission in stage 5.

- **At its 30th meeting (6 to 10 May 2002)**, **the CCFL**, it was agreed to use a single class name although there was no consensus on the level of milk protein. One class name "milk protein" would be retained, and noted that the Committee might wish to consider the appropriate percentage (30/35/50%) further in its next session.

2. Analysis of the situation

- The proposals will have to be established to safeguard the positive image of Dairy Products.
- Products should be differentiated from milk powders and condensed milk
- The observation in the past that the existence of a large diversity of products on the markets with different rates of proteins made using different technologies, shows the value of clarifying the situation to develop loyal practices between manufacturers and to inform consumers.

RECOMMENDATION

Propose to retain only one category product named "Milk Protein", and considered that this name should be used only for ingredients with a high milk protein and that the minimum level of protein should be 50%.