



JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

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PROPOSED DRAFT AMENDMENT OF THE STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN (CODEX STAN 74-1981) TO INCLUDE A NEW PART B FOR UNDERWEIGHT CHILDREN AT STEP 4

(Prepared by the EWG led by India)

Introduction

1 At the 35th session of CCFSDU the Committee agreed to establish an eWG, chaired by India and returned the proposed draft amendment to Step 2/3 for redrafting and circulation for comments at Step 3 and consideration at the next session. Further, it was also agreed that if eWG failed to establish the 'SCOPE' in line with WHO guidance documents, the Committee at its next session would recommend the discontinuation of work.

2 The Terms of reference of the work as per the REP 14/NFSDU (para 91) for the proposed work were as follows:

- Considering the scope to address categories of older infants and young children taking into account WHO guidance documents
- Considering all comments of the committee in its 35th session to resolve issues emerging in the current draft
- Considering all comments received by the members of eWG to draft a new part B of the standard or consider a different approach, if appropriate

Background

3 This new work for establishment of part B of CODEX STAN 074-1981, Rev-I 2006 is as discussed during the 32nd session of Codex Committee of Nutrition and Foods For special Dietary uses (CCNFSDU) held at Santiago, Chile in 2010 (Appendix V, REP 11/NFSDU) and focuses on the three key issues i.e. Cereal content, Minimum protein and Energy Density concerning underweight infants and young Children.

4. The committee after discussion agreed for an Electronic Working Group chaired by India, working in English, to prepare a draft New Part B of the Standard for circulation at Step 3 and consideration by the next Session of the Committee, subject to approval by the Commission at the 34th session. (para 115 to 124 , REP 11/NFSDU).

5. The 34th Session of CAC approved the work in July 2011 on Inclusion of a New Part B for Underweight Children in the Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981) (NO4-2011).

The proposed work focused on the following three key issues concerning underweight infants and young Children including those at risk:

a) Cereal content: The processed foods for underweight infants and young children are based primarily on cereals, as they are not only an important source of carbohydrates but also provide a good amount of protein and other nutrients like minerals and vitamins. The Committee would consider establishing minimum cereal content for these foods.

b) Minimum protein content: The Committee would consider establishing the minimum protein content and quality in the processed cereal based foods for underweight infants and young children.

c) Energy Density: The Committee would consider establishing the minimum energy density of processed cereal based foods for underweight infants and young children and if fats and oils may be added to increase the energy density."

6. During the 33rd session of CCNFSDU held in 2011 at Bad sodden am Tanus, Germany, the proposed draft for part 'B' could not be considered by the committee due to time constraint and was returned to eWG chaired by India & working in English, circulation for comments at Step 3, and consideration at next session in 2012.(Para 126-129, REP 12/NFSDU).

7. The deliberations held during the 34th and 35th Session of CCNFSDU, respectively at Bad Soden am Taunus, Germany in 2012 and 2013 were centered on the 'SCOPE' of the work. {Para 134 (REP 13/NFSDU) directed to refer the WHO technical note 'Food supplementation for children with moderate acute malnutrition'; and the Committee in its ToR Para 91, (REP 14/NFSDU) has indicated that the 'SCOPE' to address categories of older infants and young children is to take into account WHO guidance documents.}

8. WHO guidance document i.e. "WHO. Technical note: Supplementary Foods for the Management of Moderate Acute Malnutrition in infants and children 6–59 months of age. Geneva, World Health Organization, 2012" states that the "Currently there are no evidence-informed recommendations for the composition of supplementary foods specially designed for the management of children with moderate acute malnutrition"

Page 1. As mentioned in the document, these recommendations are extrapolated from the intakes recommended for the children with severe acute malnutrition (SAM) and those recommended for healthy children.

ELECTRONIC WORKING GROUP (2014)

9. In pursuance to the decision of 35th CCNFSDU, an eWG chaired by India was formed and 22 Codex members (Codex Member Countries, Member organization, and Codex Observers) namely Argentina, Brazil, Canada, European Union, Germany, The Institute of Food Technology, Iran, The International Lactation Consultants Association, International Alliance of Dietary Food Supplement Associations, Indonesia, IBFAN, Japan, New Zealand, Nigeria, Russia, Singapore, Thailand, Tunisia, Uruguay, United States, Korea, ISDI participated in this ewg.

10. The extract of the Discussion Document circulated among the members of the eWG in July 2014 is **Annexed**.

11. Nine Codex Members /Member organization responded to the questions raised in the first discussion document namely Brazil, Canada, Germany, Iran, ISDI, New Zealand, United States, IBFAN, European Union.

12. Most of the eWG members (Brazil, Canada, ISDI, New Zealand and United States) are of the view that the Committee need to come to an agreement on the definition of the target population for which 'Part B' is intended for before continuing with further work. Two of the eWG members (Iran and European Union) highlighted the issue of inclusion of stunting and wasting along with the underweight children under the 'SCOPE' of the 'Part B' as mentioned by the WHO Representative during the 35th Session of CCNFSDU (Rep14/NFSDU; para 82- 93). One eWG member (IBFAN) has even highlighted the challenge and risk with the proposed work.

Conclusion

13. The eWG members could reach no consensus on the 'SCOPE' of the work. The members were of the view that :

The Committee should first agree on the "SCOPE" of the work i.e. in principle agreement on the DEFINITION of the target population for which "Part B" is intended, before continuing with any further work.

14. As the eWG could not reach a consensus even on the proposed "Scope" of the work, it is requested to deliberate on the issue during the forthcoming 36th Session of CCNFSDU scheduled for 24-28th November 2014, Bali, Indonesia. Based on the discussions at the plenary, further course of action can be decided.

ANNEXURE

**EXTRACT OF DISCUSSION PAPER CIRCULATED AMONG THE ELECTRONIC WORKING
GROUP 2014**
**PROPOSED DRAFT AMENDMENT TO THE STANDARD FOR PROCESSED CEREAL-
BASED FOODS**
**FOR INFANTS AND YOUNG CHILDREN
CODEX STAN 74-1981**
NEW PART 'B' FOR UNDERWEIGHT OLDER INFANTS AND YOUNG CHILDREN
1. INTRODUCTION

In pursuance to the decision of the 35th session of CCNFSDU (Rep 14/NFSDU , Para 91) a kick off message for inviting the participation, has been issued by India, the chair of the eWG, through Codex Secretariat on 29th May 2014.

The Terms of reference of the work as per the REP 14/NFSDU (para 91) for the proposed work is as follows:

- Considering the scope to address categories of older infants and young children taking into account WHO guidance documents
- Considering all comments of the committee in its 35th session to resolve issues emerging in the current draft
- Considering all comments received by the members of eWG to draft a new part B of the standard or consider a different approach, if appropriate

The chair of the Electronic Working Group (eWG) will use the outcomes of this discussion paper, including the comments for drafting future regulations of part 'B' of Processed Cereal Based Foods.

Background

1. This new work for establishment of part B of CODEX STAN 074-1981, Rev –I 2006 is as discussed during the 32nd session of Codex Committee of Nutrition and Foods For special Dietary uses (CCNFSDU) held at Santiago, Chile in 2010 (Appendix V, REP 11/NFSDU) focuses on the three key issues i.e. Cereal content, Minimum protein and Energy Density concerning underweight infants and young Children.

2. The committee after discussion agreed for an electronic Working Group chaired by India, working in English, to prepare a draft New Part B of the Standard for circulation at Step 3 and consideration by the next Session of the Committee, subject to approval by the Commission at the 34th session. (Para 115 to 124, REP 11/NFSDU).

3. The 34th Session of CAC approved the work in July 2011 on Inclusion of a New Part B for Underweight Children in the Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981) (NO4-2011).

(Extract Appendix V, Appendix V, REP 11/NFSDU)

“The main aspects to be covered”:

The proposed work focuses on the following three key issues concerning underweight infants and young Children including those at risk:

a) Cereal content: The processed foods for underweight infants and young children are based primarily on cereals, as they are not only an important source of carbohydrates but also provide a good amount of protein and other nutrients like minerals and vitamins. The Committee would consider establishing minimum cereal content for these foods.

b) Minimum protein content: The Committee would consider establishing the minimum protein content and quality in the processed cereal based foods for underweight infants and young children.

c) Energy Density: The Committee would consider establishing the minimum energy density of processed cereal based foods for underweight infants and young children and if fats and oils may be added to increase the energy density.”

4. During the 33rd session of CCNFSDU held in 2011 at Bad sodden am Tanus, Germany, the proposed draft for part 'B' could not be considered by the committee due to time constraint and was

returned to eWG chaired by India & working in English, circulation for comments at Step 3, and consideration at next session in 2012.(Para 126-129, REP 12/NFSDU).

5. The deliberations held during the 34th and 35th Session of CCFSDU, subsequently at Bad Soden am Taunus, Germany in 2012 and 2013 were centered around the 'SCOPE' of the work. {Para 134 (REP 13/NFSDU) directed to refer the WHO technical note 'Food supplementation for children with moderate acute malnutrition'; and the Committee in its ToR Para 91, (REP 14/NFSDU) has indicated that the 'SCOPE' to address categories of older infants and young children is to take into account WHO guidance documents.}

6. WHO guidance document i.e. "WHO. Technical note: Supplementary Foods for the Management of Moderate Acute Malnutrition in infants and children 6–59 months of age. Geneva, World Health Organization, 2012" states that the "Currently there are no evidence- informed recommendations for the composition of supplementary foods specially designed for the management of children with moderate acute malnutrition"

Page 1. As mentioned in the document, these recommendations are extrapolated from the intakes recommended for the children with severe acute malnutrition (SAM) and those recommended for healthy children.

RATIONALE:

I The CODEX STAN 74–1981, is a standard for "*Processed Cereal Based complementary food for infants and young children*". The suggestion for inclusion of part 'B' for underweight children was based on the problems related to the existing Codex Standard (Part A) which prescribes low cereal content, lower energy density and no minimum protein content prescribed for the product 2.1.2 and 2.1.4.

- (i) Complementary foods have a composite density ranging from 1.07 to 1.46 kcal/g, (cooked food) (Complementary feeding: family foods for breastfed children, WHO, 2000). It translates into around 4-5 kcal per gram on dry weight basis. Energy density also depends on the of number feeds the infant is given. If the baby is taking less number of feeds or fed less quantity than mentioned per feed, the energy density has to be accordingly higher to satisfy the energy and nutrient requirements of the child.
- (ii) Considering that the normal dietary intake of all underweight children is much below the desired level, the energy density needs to be sufficiently high so as to meet the energy and protein needs of the child.
- (iii) In a paper titled "Update on Technical Issues concerning Complementary Feeding of Young Children in Developing countries and Implications for Intervention Programmes" by Kathryn G. Dewey and Kenneth H. Brown published in Food and Nutrition Bulletin Vol. 24, No.1, 2003, revised summary information for adequately nourished children receiving low (mean –2SD), average, or high (mean+2SD) amounts of breast milk energy has been provided. Extracts concerning minimum dietary **energy density** (kcal/g) required to attain the level of energy needed from complementary foods in 2 meals/day by children in developing countries with low level of Breast Milk Energy (BME)^a intake are as under:

Energy	6-8 months	9-11 months	12-23 months
	LOW BME	LOW BME	LOW BME
Total energy required + 2SD (kcal/day) ^b	769	858	1,118
BME (kcal/day)	217	157	90
Energy required from complementary foods (kcal/day)	552	701	1,028
Minimum energy density (kcal/g) 2meals/day	1.11	1.23	1.49

a. Assumed functional gastric capacity (30g/kg reference Body Weight) as 249g/meal at 6-8 months, 285 g/meal at 9-11 months, and 345 g/meal at 12-23 months.

b. Total energy requirement is based on new US longitudinal data averages plus 25% (2SD).

- (iv) The consumption of commercial infant foods constitutes <40% of the total food intake of children in this age group. (Donald Study, from Germany, J ped. Gastroenterology NS nutrition, 1998, 547-52, Food and Nutrition Bulletin, March 2003, Page 11). In most of the developing countries the commercial infant foods form only a part of their regular feeding.

- (v) Hence, the calorie density and the protein quantity and quality of cereal based foods for infants and young children are very important since the rest of the home foods in poor households from developing countries are not energy dense and also lack quality protein.
- (vi) Minimum protein content at 12% for cereal based foods for infants and young children in the context of developing countries for feeding underweight is for the following reasons:
 - Animal milk intake is low
 - Animal Protein as well as total protein intakes are low
 - Infection rate is high, and hence
 - Prevalence of under nutrition in preschool children is high
 - Protein requirements are high and nearly 60% of this has to be met from commercial/complementary infant foods.

II. The older infants from developing countries who are at risk of under nutrition require complementary foods that have adequate energy density and optimal protein content for optimal growth and prevention of under nutrition. (Dewey KG, Brown KH. Update on technical issues concerning complementary feeding of young children in developing countries and implications for intervention programs. Food and Nutrition Bulletin, 2003;24(1):

III. It is true that “underweight” children are likely to be stunted as well as wasted. As stunting results from a complex web of household, environmental, socioeconomic and cultural influences, it is recognized that multisectoral health promoting interventions along with nutritionally adequate complementary foods are necessary. However, it would not be prudent to underestimate the importance of complementary foods that have adequate energy promoting optimal linear and ponderal growth. Recent WHO consultation on dietary management of moderate malnutrition (underweight) states that diets for children with moderate malnutrition should have high energy density and adequate protein content (Michaelsen et al, Food and Nutrition Bulletin, 2010; 30:S343-S404).

IV. The proposed part B for underweight children is an attempt to prevent aggravation of under nutrition in children from developing countries by promoting complementary foods that have adequate energy density and optimal protein content. There is increasing evidence for the positive impact of feeding counselling on energy and nutrient intakes and growth in children less than two years of age”. (Complementary feeding: report of the global consultation, and summary of guiding principles for complementary feeding of the breastfed child, WHO 2002).

V. Wasting and stunting are the indicators which measure different kind of under nutrition. The underweight children have stunting, wasting or both stunting and wasting simultaneously. Stunting and wasting require careful measurement of height and are not easily identifiable by a consumer. The underweight, on the other hand, is easily identified by a consumer. Therefore in view of this the terminology was proposed under the SCOPE of the work.

VI. The SCOPE

a) If the proposed processed cereal based foods are intended to meet the requirements of OLDER MODEARATE ACUTE MALNOURISHED (MAM) infants and young children then the envisaged product would no longer be a COMPLEMENTARY FOOD and will be a therapeutic product.

‘OR’

b) If, would be proposed as Processed Cereal Based Foods Intended to meet the requirements of ‘MODERATELY WASTED’ infants and young children then also the envisaged product will not be a COMPLEMENTARY FOOD and will be a therapeutic product.

VII The children with moderate acute malnutrition or moderately wasted children need energy dense supplementary foods to facilitate catch- up growth till the wasting is corrected. These foods are typically needed for short durations. If continued beyond recovery from wasting, these foods are likely to promote obesity.

VIII These foods are similar to therapeutic foods and should be provided with careful monitoring by health functionaries. These foods cannot be considered as replacement for complementary foods that have nutrient composition that promotes optimal growth.

IX.As clarified as per para 131, REP 13 NFSDU, **the proposed amendment does not intend to focus on stunting or wasting as they have special needs.**

X. The proposed 'SCOPE' for the Part ' B' is to keep the product in line with the Part A i.e. Codex Stan-074-1981 , **A PROCESSED CEREAL BASED COMPLEMENTARY FOOD** for the children living in developing world to have an adequate energy density with optimal protein content. The SCOPE is as follows:

This standard covers processed cereal-based complementary foods intended to meet the dietary requirements of underweight¹ older infants after the age of six months and young children , as part of a progressively diversified diet, in accordance with the Global Strategy for Infant and Young Child Feeding and World Health Assembly Resolution WHA54.2 (2001).

¹ Using WHO growth standards(2006), Children having weight-for-age below -2 standard deviations (SDs) or weight-for-age z-score [WAZ] <-2, are classified as underweight
(http://www.who.int/childgrowth/standards/weight_for_age/en/index.html)

Question 1

Do you agree with the proposed SCOPE of the work, as per the Rationale given. If not, please provide a rationale.

Question 2.

Is there any alternate terminology that can be used under the 'SCOPE' so that the aspects mentioned in Appendix V, REP 11/NFSDU can be addressed. If yes, please provide the same.

Question 3

Do you agree that 'if' the 'SCOPE' of Part 'B' will address the need for Moderate Acute malnutrition then the resultant standard will be a out of the purview of CODEX STAN 74- 1981. If No, please provide a rationale.

Question 4

Do you agree that 'if' the 'SCOPE' of Part 'B' will address the need for 'Moderate wasted children' then the resultant standard will be out of the purview of CODEX STAN 74-1981. If No, please provide a rationale.