



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

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**PROPOSED DRAFT REVISED STANDARD FOR FOLLOW UP FORMULA FOR OLDER
INFANTS AND DRINK/PRODUCT FOR YOUNG CHILDREN WITH ADDED NUTRIENTS OR
DRINK FOR YOUNG CHILDREN: REMAINING SECTIONS (at Step 4)**

*Comments of the European Union, India, Laos, Mexico, Nigeria, Panama, Russian Federation and Thailand
(Note: This document is a compilation of the comments published as CRDs¹ for CCNFSDU41 and is for
consideration by CCNFSDU42)*

EUROPEAN UNION

European Union competence

European Union vote

This document provides specific comments on each recommendation made by the eWG Chairs in document CX/NFSDU 19/41/5.

Recommendation 1 (Dextrose equivalent)

The EU supports the inclusion of a maximum limit of the DE for glucose polymers for products not based on milk protein with an additional clarifying text:

*4) Lactose should be the preferred carbohydrates in [name of product] based on milk protein. [For products not based on milk protein glucose polymers **that consist of D-glucose units linked primarily by α-1-4 bonds and that have a dextrose equivalent (D.E.) of less than 15** should be the preferred carbohydrates used.] [For products not based on milk protein, carbohydrate sources (like starch) with an average DE of 15 should be used. OR For products not based on milk protein, a combination of carbohydrate sources giving an average dextrose equivalent not higher than DE15 (corresponding to the relative sweetness of lactose), should be preferred.] (for consideration by the EWG on follow up formula)*

Mono- and disaccharides, other than lactose, should not exceed 2.5 g/100kcal (0.60 g/100kJ). National and/or regional authorities may limit this level to 1.25 g/100 kcal (0.30 g/100 kJ). Sucrose and/or fructose should not be added.

The EU notes that [name of product] for young children is not necessary to satisfy the nutritional requirements of young children when compared with other foods that may be included in their normal diet. Therefore, it is important to ensure that the sweet taste of [name of product] for young children not based on milk protein is limited to avoid the development of taste preferences that are unfavourable and that could lead to the development of overweight and obesity later in life and associated increased risk for developing non-communicable diseases.

Relative 'sweetness' is a characteristic of a food as well as a characteristic of an ingredient that can be objectively measured. The sweetness level of [name of product] for young children is influenced by the sweetness level of its ingredients and their concentration. As ingredients play a role in influencing the final sweetness level of a product, the EU considers that the sweetness level of ingredients should be limited. In general, the relative sweetness of glucose syrups or maltodextrins as ingredients increases with increasing DE.

The EU is of the view that introducing a maximum limit of the DE for glucose polymers that are used as source of available carbohydrates in products not based on milk protein can contribute to ensure that products not based on milk protein are not sweeter than products based on milk protein, for which lactose is the preferred

¹ CRD25, CRD28, CRD32, CRD35, CRD36, CRD42, CRD45, CRD47

carbohydrate. The table below (H. Douglas Goff, Richard W Hartel, Ice Cream, 7th Edition, 2013 Edition, Springer, ISBN-13: 978-1461460954) illustrates this approximation.

Ingredient	Average molecular weight	Relative sweetness ^a	Total solids (%)	Relative freezing point depression ^b	Maximum total sugar supplied ^c (%)
Dextrose	180	74	92	1.90	40
Fructose	180	173	100	1.90	40
Sucrose	342	100	100	1.00	100
Lactose	342	16	100	1.00	d
Maltose	342	32	100	1.00	40
Honey	~270	75	74	1.46	45
Invert sugar	~270	95	77	1.12	30
<i>High fructose corn syrup</i>					
90%	180	125	77	1.88	50
55%	185	98	77	1.85	50
42%	190	86	71	1.80	50
<i>High maltose corn syrup</i>					
55 DE	411	55	81	0.83	40
<i>Corn syrups</i>					
64 DE	298	68	82	1.15	25-50
42 DE	428	48	80	0.80	25-50
36 DE	472	42	80	0.72	25-50
32 DE	565	40	80	0.61	25-50
20 DE	900	23	80	0.38	e
<i>Maltodextrins</i>					
15 DE	1,200	17	95	0.29	e
10 DE	1,800	11	95	0.19	e
5 DE	3,600	6	95	0.10	e

^aSweetness relative to sucrose on an as is or product basis
^bFactor to estimate freezing point depression relative to solids equal in weight to sucrose
^cPercent of sugar on a sweetness basis generally acceptable from a quality viewpoint
^dLactose provides low sweetness, but amount is limited by tendency to crystallize
^eLower DE corn starch products build body and provide bulk rather than sweetness

The DE can be assessed on an ingredient check base and therefore enforced. The EU has included in its regional legislation a limit on DE for glucose syrups used in the manufacturing of infant and follow-on formula. Assessment of compliance can be achieved by assessing compliance of the ingredients used for manufacture.

Recommendation 2 (3.2.1.-Optional ingredients)

The EU supports the retention of the sentence 'substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]' under 3.2.1 Optional ingredients. However, the EU suggests adding the word "ingredients" as the latter term is broader covering all ingredients with sweetening properties whilst the term "substance" is usually associated with chemically defined substances as additives (i.e. sweeteners and flavour enhancers). Thus the sentence would read '*ingredients or substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]*'.

The EU notes that due to sugar reduction policies, there is currently considerable momentum to develop non-sugar ingredients that impart or enhance sweet taste that may not necessarily and in all cases be classified as additives. It is expected that the number of such ingredients will increase in the future. While such substances may be used to reduce sugar intakes in adults, for the age group of infants and young children, their use may negatively influence the development of healthy taste preferences and should therefore be addressed in the standard.

Recommendation 3 (Purity requirements)

The EU agrees with the proposal to retain the provisions relating to purity requirements of the current Follow-up Formula Standard for both follow-up formula for older infants and for [name of product] for young children.

Recommendation 4 (Vitamin Compounds and Mineral Salts)

The EU in general agrees with the proposed approach to retain provisions 3.4.2.1 and 3.4.2.2 of the current Follow-up Formula Standard for follow-up formula for older infants.

However, when it comes to the exact wording, the EU kindly notes that Sections 3.3.1 and 3.3.2 would need to be renumbered in the provision in accordance with the final structure of the revised Standard and that the provision could reference the title of CXG 10-1979 (i.e. *Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses Intended for Infants and Young Children*) as is the case in the Standard for Canned Baby Foods and in the Standard for Processed Cereal based Foods for Infants and Young children.

In terms of [name of product] for young children, in addition to the comments made above, the EU supports the proposal to retain only provision 3.4.2.1 of the current Follow-up Formula Standard considering that a maximum level for sodium has not been set for such products and therefore provision 3.4.2.2 is not relevant.

Recommendation 5 (Consistency and Particle Size)

The EU in general agrees with the recommendation to retain provision 3.5 in the current Follow-up Formula Standard relating to consistency and particle size for both follow-up formula for older infants and for [name of product] for young children.

However, in order to be in line with the wording used in the more recently revised Infant Formula Standard the EU would suggest a small change to the proposed texts as follows:

When prepared according to the directions of use, the product shall be free of lumps and of large, coarse particles and suitable for adequate feeding of older infants.

When prepared according to the directions of use, the product shall be free of lumps and of large, coarse particles and suitable for adequate feeding of young children.

Recommendation 6 (Specific prohibitions)

The EU agrees with the Chair's recommendation.

Recommendation 7 (Food additives – permissions for food additives)

The EU agrees with the recommendation to retain the current permissions for food additives (excluding flavourings) in the current Follow-up Formula Standard for both follow-up formula for older infants and [name of product] for young children.

Recommendation 8 (Food additives-administrative changes)

The EU supports Recommendation 8a, i.e. the administrative changes i – iii, and the alignment of the names of food additives in the current Follow-up Formula Standard with those in the GSFA.

As regards Recommendation 8b, the EU notes that "Packaging gases" is a functional class recognized both at the EU and Codex level. Therefore, and also in line with the IF Standard, the functional class "Packaging gases", together with the provisions for INS 290 carbon dioxide and INS 941 nitrogen, should be included in the Food Additive section as per the approach taken in the Infant Formula Standard.. The EU is of the view that "Packaging gases" shall not be retained in Section 7 (Packaging).

Recommendation 9 (Carry-over of food additives)

In line with the endorsed principle that foods intended for infants and/or young children shall be prepared without food additives whenever possible, the EU supports option 2, i.e. the adoption of the text from the Infant Formula Standard and Standard for Processed Cereal- based Foods for Infants and Young Children for both follow-up formula for older infants and [name of product] for young children. This would reflect Section 4.3 of the GSFA wherein follow-up formulae is listed among the foods for which the carry-over of food additives is not acceptable.

Option 1 is not preferred as the reference to the whole Section 4 of the Preamble to the GSFA includes Section 4.1 and Section 4.3 that are mutually exclusive. A reference to Section 4.3 could be considered after the alignment has been finalized (as it refers to additive provisions listed in Tables 1 and 2 of the GSFA).

Recommendation 10 (Flavourings)

The EU welcomes the Chair's recommendation to include the JECFA numbers in addition to the name of the flavouring substance in the standard. This inclusion should help in better identifying and characterising the flavouring substances in the standard. The JECFA numbers for flavouring substances are essentially equivalent to the INS numbers for food additives and indicate that there are JECFA evaluations and specifications for them. The EU can also accept the inclusion of a reference to the Guidelines for the Use of Flavourings (CXG 66-2008) in accordance with the Codex Procedural Manual.

However, the EU notes that infants and young children is a particularly vulnerable population group with regard to taste, as during the early life period taste preferences are formed, that can determine dietary preferences

throughout life. Such taste preferences can lead to preferences for certain foods that are not in line with dietary recommendations, which in turn increases the risk for (early) development of (childhood) overweight and obesity and related non-communicable diseases. Globally, the EU is among the regions with the highest rates of childhood obesity. Taste preferences can be set by recurring exposure to certain foods and flavours. The EU is therefore concerned that allowing flavourings to be added to follow-up formula for older infants and to [name of the product] for young children could negatively influence the normal development of taste preferences that are established when infants and young children are provided with an appropriate, recommended diet. Follow-up formula for older infants and [name of the product] for young children are products that are typically consumed very frequently, normally on a daily bases. Given this very frequent exposure, it is very likely that those food categories strongly influence the development of taste preferences later in life. The EU currently does not have specific provisions for flavourings intended for infants and young children. Taking into account the rational above, the EU could support the Chair's proposal provided a footnote that would allow national and regional authorities to restrict or prohibit the use of the flavourings listed under sections 4.5 is added to those provisions.

The proposed texts read as follows:

a) Follow-up formula for older infants:

That CCNFSDU agree to the following text for follow-up formula for older infants:

4.5 Flavourings [¹⁾]

Natural Fruit Extracts: GMP

Vanilla extract: GMP

Ethyl vanillin [(JECFA no. 893)]: 5 mg/100 ml

Vanillin [(JECFA no. 889)]: 5 mg/ 100 ml

[The flavourings used in products covered by this standard should comply with the Guidelines for the Use of Flavourings (CXG 66-2008)]

[¹⁾ National and/or regional authorities may restrict or prohibit the use of the listed flavourings]

b) [name of product] for young children

That CCNFSDU agree to the following text for follow-up formula for older infants:

4.5 Flavourings [¹⁾]

Natural Fruit Extracts: GMP

Vanilla extract: GMP

Ethyl vanillin [(JECFA no. 893)]: 5 mg/100 ml

Vanillin [(JECFA no. 889)]: 5 mg/ 100 ml

[The flavourings used in products covered by this standard should comply with the Guidelines for the Use of Flavourings (CXG 66-2008)]

[¹⁾ National and/or regional authorities may restrict or prohibit the use of the listed flavourings]

Recommendation 11 (Contaminants)

The EU agrees with the Chairs' recommendation to adopt the "Contaminant" provision of the more recently revised Infant Formula Standard for both follow-up formula for older infants and [name of product] for young children.

Recommendation 12 (Hygiene)

The EU agrees with the Chairs' recommendation to adopt the "Hygiene" provisions within the Infant Formula Standard for both follow-up formula for older infants and [name of product] for young children.

As regards the proposal to reference two additional Codex documents (Codex Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993) and the Codex Code of Hygienic Practice for Low and Acidified Low-acid Canned Foods (CXC 23-1979)), the EU notes that follow-up formulae are mainly marketed in powder form on the EU market, but there are products available in ready-to-drink form too. Such products can be considered as canned ready-to-feed follow-up formula based on the CODEX definition of canned foods i.e. "commercially sterile food in hermetically sealed containers". Therefore, in case the Committee prefers to reference the two additional texts, the EU can accept it.

Recommendation 13 (Packaging)

The EU agrees with the recommendation to adopt the packaging provisions in the current Follow-up Formula Standard for both follow-up formula for older infants and [name of product] for young children.

As noted under Recommendation 8b the EU considers that “Packaging gases” should be included in the Food Additive section and listed under the appropriate functional class. Thus, the EU does not support retaining Packaging gases in Section 7 (Packaging).

However, if, in addition to their inclusion in the Food Additive section, there is a strong preference to retain Packaging gases (i.e. nitrogen and carbon dioxide) in Section 7, the EU could accept it, provided a reference to the Food Additives section is made in the last sentence of Section 7.1 as follows:

“...; nitrogen and carbon dioxide may be used as a packing media, i.e. as food additives (packaging gases), in line with Section 4 of this standard.”

Recommendation 14 (Fill of containers)

The EU agrees with the recommendation to adopt the “fill of containers” provisions in the current Follow-up Formula Standard for both follow-up formula for older infants and [name of product] for young children. The also agrees with the revised level of 5 oz.

Recommendation 15 (Method of analysis and sampling)

The EU agrees with the recommendation to adopt the “Method of analysis and sampling” provisions in the current Follow-up Formula Standard for both follow-up formula for older infants and [name of product] for young children.

INDIA

Comment: Recommendation 10:- India does not support the addition of flavorings in follow-up formulas for older infants and young children.

Rationale: These flavorings can cause infants to develop a preference for these foods and can have a negative effect on food choices. Also, Flavors are not permitted in infant formula as per the Codex Infant Formula Standard (0 -12 moth) (Codex Stan 72).

LAO PEOPLE’S DEMOCRATIC REPUBLIC**RECOMMENDATION 1: DEXTROSE EQUIVALENT**

Lao PDR supports the proposed text with the deletion of the square brackets.

The text to read: ⁴⁾ *Lactose should be the preferred carbohydrates in [name of product] based on milk protein. For products not based on milk protein glucose polymers should be the preferred carbohydrates used.*

RECOMMENDATION 2: SENTENCE IN SECTION 3.2.1 FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the retention of the proposed text included in the square brackets in order to ensure future proofing of the text. This is a critical issue as the world increasingly faces and is required to address the issue of overweight and obesity in children – it is estimated that by 2030, 250 million children worldwide will be obese – and that the period 12-36 months is critical in ensuring children do not become conditioned to sweet tastes.

The text to be retained is: *Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product].*

RECOMMENDATION 3a: PURITY REQUIREMENTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Lao PDR supports the proposed text, noting the need for modification and separation of the relevant age groups depending on the final structure of the standard.

The text to read: All ingredients shall be clean, of good quality, safe and suitable for ingestion by older infants. They shall conform with their normal quality requirements, such as colour, flavour and odour.

RECOMMENDATION 3b: PURITY REQUIREMENTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the proposed text, noting the need for modification and separation of the relevant age groups depending on the final structure of the standard.

The text to read: All ingredients shall be clean, of good quality, safe and suitable for ingestion by young children. They shall conform with their normal quality requirements, such as colour, flavour and odour.

RECOMMENDATION 4a: VITAMIN COMPOUNDS AND MINERAL SALTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Lao PDR supports the proposed text.

The text to read: *Vitamin compounds and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 should be selected from the Advisory List for Mineral Salts and Vitamin Compounds for Use in Foods for Infants and Children approved by the Codex Alimentarius Commission (CXG 10-1979).*

The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.1.

RECOMMENDATION 4a: VITAMIN COMPOUNDS AND MINERAL SALTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the proposed text including the deletion of the second sentence.

The text to read: *Vitamin compounds and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 should be selected from the Advisory List for Mineral Salts and Vitamin Compounds for Use in Foods for Infants and Children approved by the Codex Alimentarius Commission (CXG 10-1979).*

RECOMMENDATION 5a: CONSISTENCY AND PARTICLE SIZE FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

RECOMMENDATION 5b: CONSISTENCY AND PARTICLE SIZE FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the proposed text.

The text to read: *When prepared according to the directions of use, the product shall be free of lumps and of large, coarse particles.*

RECOMMENDATION 6a: SPECIFIC PROHIBITIONS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

RECOMMENDATION 6b: SPECIFIC PROHIBITIONS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the proposed text.

The text to read: *The product and its components shall not have been treated by ionizing radiation.*

RECOMMENDATION 7a: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

RECOMMENDATION 7b: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the proposal to retain the permissions for food additives (excluding flavourings) in the current Follow-up Formula Standard (CXS 156-1987), for [name of product] for young children, noting these will be replaced by a reference to the corresponding sections of the GSFA following the completion of the alignment work.

RECOMMENDATION 9a: CARRY-OVER FOOD ADDITIVES AND NUTRIENT CARRIERS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

RECOMMENDATION 9b: CARRY-OVER FOOD ADDITIVES AND NUTRIENT CARRIERS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports Option 1 of referencing Section 4 of the Preamble of the GSFA (CXS 192-1995) as this would as per the note of the Chair ensure that Section 4.3 is read in the context provided by the entire Section 4 and would follow the principle to reference existing texts rather than to repeat requirements included in commodity standards.

RECOMMENDATION 10a: FLAVOURINGS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS Lao PDR strongly objects to the text proposed regarding flavourings permitted.

No flavourings should be permitted in these products as they replace the liquid part of the diet and are considered breast-milk substitutes and not complementary foods. As any sweet flavouring can result in developing a preference for sweet tastes, at this vital stage of life, is not recommended.

RECOMMENDATION 10b: FLAVOURINGS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR strongly objects to the text proposed regarding flavourings permitted in [name of product] formula for young children.

No flavourings should be permitted in these products as they replace the liquid part of the diet and are considered breast-milk substitutes and not complementary foods. As any sweet flavouring can result in developing a preference for sweet tastes, at this vital stage of life, is not recommended.

RECOMMENDATION 11a: CONTAMINANTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

RECOMMENDATION 11a: CONTAMINANTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the proposed text.

The text to read: *The products covered by this Standard shall comply with the Maximum levels of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products covered by this Standard shall comply with the maximum residues limits for pesticides established by the Codex Alimentarius Commission.*

RECOMMENDATION 12a: HYGIENE FOR FOLLOW UP FORMULA FOR OLDER INFANTS

RECOMMENDATION 12b: HYGIENE FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Lao PDR supports the proposed text and to retain the text in square brackets for future proofing.

The text to read: *It is recommended that the product covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), and other relevant Codex texts such as the Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008) the Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low-acid Canned Foods (CXC23-1979).*

The products should comply with any microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).

MEXICO

ORIGINAL DOCUMENT	NATIONAL STANCE
GENERAL COMMENT	We suggest deleting the adjective “follow-up” in the product name and throughout the text of Section A (Appendix II and III) as it denotes stages and suggests to the consumer that this product is the one that immediately follows breastfeeding. We see this product as an option in addition to breastfeeding, which is recommended up to 2 years and beyond.
GENERAL COMMENT	<i>Mexico suggests that this product (name of the product) for young children should be considered as an additional option in the young child’s diet.</i> JUSTIFICATION: <i>At this age children are already integrated into the family diet.</i>
Recommendation 1	Mexico suggests the following wording for Recommendation 1, in line with what is suggested in 4 b, footnote 4. Lactose should be the carbohydrate of choice in [name of product] based on milk proteins; for low-lactose products and products that are not formulated using milk protein, glucose polymers should be the preferred carbohydrates for use. JUSTIFICATION: Since low-lactose products for young children are available on the market, we suggest that they be considered within this Recommendation, alongside non-dairy products.

Recommendation 2	<p>Mexico supports placing section 3.2.1 in English between brackets in Recommendation 2 for the following reason:</p> <p>[Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product], as we consider the Spanish version to be incorrectly translated, and it should be:</p> <p>“No deben adicionarse sustancias con el propósito de impartir o potenciar un sabor dulce del (nombre del producto)”</p>
Recommendation 3	<p>Mexico agrees with Recommendation 3 taking into account the general comments mentioned above.</p>
Recommendation 4	<p>Mexico agrees with Recommendation 4(a), and the following wording is suggested for Recommendation 4(b):</p> <p>Vitamin compounds and mineral salts</p> <p>The vitamin compounds and mineral salts used in accordance with sections 3.3.1 and 3.3.2 should be selected from the <u>Advisory lists of mineral salts and vitamin compounds for use in foods for infants and children</u> (CXG 10-1979), adopted by the Codex Alimentarius Commission.</p> <p><u>Sodium concentrations derived from vitamin and mineral ingredients shall comply with the limits set for sodium in section 3.1.3.</u></p> <p>JUSTIFICATION</p> <p>With regard to Recommendation 4b, we wish to express concern that no sodium maximum was established to ensure the nutritional integrity of [name of product] for young children. In this regard we suggest retaining the sentence “<i>Sodium concentrations derived from vitamin and mineral ingredients shall comply with the limits set for sodium in section 3.2.6.</i>”, which provides specific guidance.</p>
Recommendation 5	<p>Mexico agrees with Recommendation 5 taking into account the general comments mentioned above.</p>
Recommendation 6	<p>Mexico agrees with Recommendation 6 taking into account the general comments mentioned above.</p>
Recommendation 7	<p>Mexico agrees with Recommendation 7 taking into account the general comments mentioned above.</p>
Recommendation 8	<p>Mexico agrees with Recommendation 8 a)</p> <p><i>For Recommendation 8 b) Mexico agrees to the inclusion of (packaging gases) in the food additives section within the corresponding functional class, in addition to maintaining them in section 7 as currently contemplated in CODEX-STAN 72-1981.</i></p>
Recommendation 9	<p>Mexico agrees with Recommendation 9 taking into account the general comments mentioned above.</p> <p>Mexico suggests opting for option no. 2</p>
Recommendation 10	<p>Mexico agrees with Recommendation 10 taking into account the general comments mentioned above.</p>
Recommendation 11	<p>Mexico agrees with Recommendation 11 taking into account the general comments mentioned above.</p>
Recommendation 12	<p>Mexico agrees with Recommendation 12 for both products in the section and suggests inserting the following text in the paragraph after the sub-paragraphs:</p> <p>HYGIENE</p> <p>It is recommended that the product covered by this <i>Standard</i> be prepared and handled in accordance with the <i>General Principles of Food Hygiene</i> (CXC 1-1969) and other relevant Codex texts, such as the <i>Code of Hygienic Practice for Powdered Formulae for Infants and Young Children</i> (CXC 66-</p>

	<i>2008) and, in the case of liquid products that have been commercially sterilised, the appropriate sections of the [the Code of Hygienic Practice for Aseptically Processed and Packaged Low-Acid foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low Acid Canned Foods (CXC 23-1979)].</i>
Recommendation 13	<i>Mexico agrees with Recommendation 13 taking into account the general comments mentioned above.</i>
Recommendation 14	<i>Mexico agrees with Recommendation 14 taking into account the general comments mentioned above.</i>
Recommendation 15	<i>Mexico agrees with Recommendation 15 taking into account the general comments mentioned above.</i>
Appendix II Appendix II	<p><i>Mexico suggests:</i></p> <p>In the case of Lecithin, according to the JECFA Monographs and the updated GSFA, the INS number is 322(i)</p> <p>In the case of Sodium Ascorbate INS 301, since it is a source of sodium, in addition to complying with the maximum dose, the provisions of section 3.1 must be considered, so this additive must be associated with the note,</p> <p>“* Only applicable to follow-up formulae for older infants. “</p>

NIGERIA

Comment: Nigeria supports the proposed text in Recommendation 1.

Rationale: **DE (DE is a term used to determine the degree of hydrolysis of starch) is not a critical parameter in the standard and may not be important for infant formula.**

Glucose polymers do not impact sweet taste to final product when used.

Recommendation 2

Comment: Nigeria supports the retention of the statement under 3.2.1.

Justification: It is consistent with the objective of recommendation 1. The statement will emphasize the need of avoiding sweetening agent in Follow up Formula.

Recommendation 3

Comment: Nigeria supports the adoption of the texts as proposed for the two sections of the standard.

Justification: This text makes provision that ingoing ingredients must comply with the requirement to ensure safe and quality products.

Recommendation 4, 5, 6, 7 & 8:

Comment: Nigeria supports adoption of the recommendations as presented by eWG.

Justification: The recommendations make references to existing Codex text and other texts for similar products.

Recommendation 9

Comment: Nigeria support adoption of option 2 for both Section A and Section B of the draft standard

Justification: The text provides a better direction to the users of the standard and includes reference to section 4 of GSFA preamble (Carry-over of food additives) as intended by option 1.

Recommendation 10

Comment: Nigeria proposes that flavoring agent should not be used in section A of standard.

Nigeria supports that artificial flavoring agent should not be used in section B of the standard.

Justification: Natural fruit extracts will provide good source of nutrient to Follow Up Formula and promote healthy diet.

Recommendation 11-15 (Paragraph on Contaminants, Hygiene, Food Additives, Fill of Container, And Method of Analysis):

Comment: **Nigeria supports adoption of the recommendation by EWG.**

Justification: **As a norm the recommendation makes reference to relevant existing Codex text under the respective clauses.**

PANAMA

Recommendation 1

Panama agrees with the proposed wording.

Getting used to the sweet taste from the point of view of children's intake.

Recommendation 2

Panama agrees to keep the phrase in the standard, taking into account the need to curb the addition of additives intended to impart sweetness.

Recommendation 3

Panama agrees that the two proposals should be maintained. In accordance with points a and b.

Defining young children, what ranges are considered. (Codex 156)

0 to 12 months are infants

6 to 12 months are older infants

From 1 year to 3 years and beyond, they are young children

We propose at this point that the following product name could be considered: milk-based food for young children, fortified substitute.

Recommendation 4

Panama agrees with the proposal of points a and b.

- A) We agree
- B) We agree

Panama adds the following note: The nutrition committee has not established a sodium limit for category 4b, therefore we recommend that a limit for sodium be established.

Recommendation 5

Panama agrees with Recommendation 5, points a and b.

Recommendation 6

Panama agrees with Recommendation 6, points a and b.

Recommendation 7

Panama agrees with Recommendation 7, points a and b.

We agree that the additives used should be approved by the Codex for that category.

Recommendation 8

Panama agrees with Recommendation 8, points a and b.

- A) We agree
- B) We agree that it should be grouped together, but it does not need to appear in section 7.

Recommendation 9

Panama agrees with Recommendation 9, as detailed below:

- A) Option 2 gives greater clarity to the reader of the standard as to what is permitted.
- B) Option 2 gives greater clarity to the reader of the standard as to what is permitted.

Recommendation 10

Panama agrees with Recommendation 10, points a and b.

Recommendation 11

Panama agrees with Recommendation 11, points a and b.

Recommendation 12

Panama agrees with Recommendation 12, points a and b.

Recommendation 13

Panama agrees with Recommendation 13, points a and b.

Recommendation 14

Panama agrees with Recommendation 14, points a and b.

Recommendation 15

Panama agrees with Recommendation 15, points a and b.

Panama would also like to add that based on text 9.6.4 regarding cross-promotion we indicate the following:

- It would not be necessary to include this sentence, because as it stands it already includes the necessary recommendations for the product in these categories.
- Cross-promotion goes beyond the Codex mandate, and could lead to trade distortions.

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9.6.4 Products shall be distinctly labelled in such a way as to avoid any risk of confusion between infant formula, follow-up formula for older infants, [name of product] for young children and formula for special medical purposes, in particular as to the text, images and colours used, to enable consumers to make a clear distinction between them. Cross-promotion between product categories is not permitted on the [label/labelling] of the product.

9.6.4 Products shall be distinctly labelled in such a way as to avoid any risk of confusion between infant formula, follow-up formula for older infants, [name of product] for young children and formula for special medical purposes, in particular as to the text, images and colours used, to enable consumers to make a clear distinction between them. ~~Cross-promotion between product categories is not permitted on the [label/labelling] of the product.~~

RUSSIAN FEDERATION

The Russian Federation supports work and participated in the electronic working group (eWG) chaired by New Zealand. We express following opinion regarding the current recommendations of the eWG:

Recommendation 1

The Russian Federation supports proposed text of recommendation 1 and notes that low lactose formulated products for young children are in use in a significant number of countries. We propose the following text:

4) Lactose has to be a preferred carbohydrate in the milk protein-based products. For products with low lactose content or not based on milk protein, glucose polymers are allowed as carbohydrates. In this case mono- and disaccharides total, excluding lactose, should not exceed 2.5 g/100 kcal (0.60 g/100 kJ). National or regional competent authorities might decrease this level to 1.25 g/100 kcal (0.30 g/100 kJ). Addition of sucrose or fructose is not allowed.

Recommendation 2

The Russian Federation considers that proposed text “**Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]**” should be excluded from the draft.

Sub-section 3.2.1. of section 3.2. Optional Ingredients relates to ingredients or substances that are added in order to support certain effect in the finished product. Imparting or enhancing sweet taste is not one of these functions.

Moreover, “sweetness” of the product is the subjective parameter, and currently no objective method for its evaluation is available. Within the electronic working group opinion that compositional requirements have to be scientifically based and objective was expressed on numerous occasions.

Recommendation 3

The Russian Federation supports Recommendation 3.

Recommendation 4

The Russian Federation supports Recommendation 4a. With regard to the recommendation 4b, we consider it necessary to note that maximum level of sodium in the product is not yet established by the Committee.

If the limit is established, the Russian Federation is aligned with the text proposed “The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.2.6”.

Recommendation 5

The Russian Federation supports Recommendation 5.

Recommendation 6

The Russian Federation supports Recommendation 6.

Recommendation 7

The Russian Federation supports Recommendation 7.

Recommendation 8

Russian Federation supports Recommendation 8a. With regard to the Recommendation 8b we consider that Packaging gases should be included in the GSFA according to the functional class. Alternatively, they could be placed in the text of the standard under discussion either in Food Additives or Packaging sections.

Recommendation 9

The Russian Federation supports option 2 as it is already in practical use for the evaluation of the products of this category.

Recommendation 10

The Russian Federation supports Recommendation 10.

Recommendation 11

The Russian Federation supports Recommendation 11.

Recommendation 12

The Russian Federation is aligned with the text of the recommendation, but proposes correction to account for specific requirements for products in the liquid form:

It is recommended that the product, covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1- 1969), and other relevant Codex texts such as the Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008) and in the case of liquid formula that has been commercially sterilised the appropriate sections of the Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low-acid Canned Foods (CXC 23-1979) . The products should comply with any microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).

Recommendation 13

The Russian Federation supports Recommendation 13.

Recommendation 14

The Russian Federation supports Recommendation 14.

Recommendation 15

The Russian Federation supports Recommendation 15.

With regard to the minimum protein level, the Russian Federation agrees to the change in the footnote text that would allow regional competent authorities to approve products with protein level of 1.6 to 1.8 g/100 kcal and with hydrolyzed protein level below 2.25 g/100 kcal based on scientific data and clinical evaluation.

We also support the eWG proposal on micronutrients.

THAILAND

Thailand would like to express our appreciation for the electronic working group (eWG) led by New Zealand, France and Indonesia for preparing a document for Proposed draft follow up formula for older infants and [product] for young children (CX/NFSDU 19/41/5).

We would like to provide comments as follows:

Recommendation 9

For clarity and consistency with follow up formula for older infants, we prefer to use option 2.

“Option 2: Adopt the text from the Infant Formula Standards and the Standard for Processed Cereal-based foods for Infants and Young Children for the carry-over of food additives and nutrient carriers.”

Recommendation 13

To avoid repetition, we agree that the packaging gases are only listed in the Section 4 Food Additives. Therefore, the packing media in section 7.1 should be removed.

APPENDIX II: SECTION 4 FOOD ADDITIVES

We agree with the revised table in the Section 4 - Food Additives (Appendix II).