CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 4a, 4b, 5, 6, 7, 8, 9, 10, 11 and 12 **NFSDU/40 CRD 29**

Original language only

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

Fortieth Session

Berlin, Germany
26 – 30 November 2018

Comments of the Russian Federation

Agenda item 4a

The Russian Federation welcomes the work of eWG led by New Zealand and has the following opinion with regard to the specific points:

Upper carbohydrate limit – agree to the proposed level of 12.5 g / 100 kcal and do not object to the addition of a footnote to clarify that a maximum level of available carbohydrate up to 14 g / 100 kcal may be permitted by competent national and/or regional authorities for a product with a protein level below 3 g / 100 kcal.

Agree on proposal to consider lactose and glucose polymers as preferred source of the carbohydrates with sucrose not exceeding 20% of available carbohydrate.

Minimum protein level – agree to amend the footnote on regional authorities acceptance of formulas with protein levels between 1.6 and 1.8 g/100 kcal and on hydrolyzed proteins formulas with the level below 2.25 g/100 kcal based on scientific substantiation and clinical evaluation.

With regard to the micronutrients we remain of the same opinions as expressed in the eWG.

As with regard to the compositional requirements, we do not support introduction of Ca:P ratio and supports vitamin D range of 1.5-4 ug/100 kcal.

Agenda item 4b

With regard to the scope, product definition and labelling Russian Federation supports recommendations of the working group.

Agenda item 5

The Russian Federation welcomes the document prepared by the eWG led by South Africa, Senegal and Uganda and has no further comments on the PROPOSED DRAFT GUIDELINES FOR READY TO USE THERAPEUTIC FOODS (RUTF) as shown in Appendix 1 to the discussion document CX/NFSDU 18/40/6.

At the same time, we could not agree with recommendation 4 which suggests to adopt a list of food additives. The proposed draft is not designed to serve as a commodity standard and as such does not require inclusion of food additives section as prescribed by the Codex Procedural Manual.

We are of the opinion that food additives used in RUTF should be regulated under GSFA provisions and applicable commodity standards.

Agenda item 6

The Russian Federation thanks Zimbabwe and South Africa for drafting the discussion document and would like to note the following:

we agree with the definition of biofortification given in recommendation 1 however our main concern remains on the processes which result in biofortification. We welcome the suggestion that national and or regional authorities are free to determine the processes which are permitted for biofortification. At the same time, we believe that the nature of the process essentially defines the meaning of biofortification, and lack of a harmonised approach in this respect would undermine the whole purpose of this work.

We, therefore, suggest the Committee continues working on a harmonised list of processes covered by the definition.

Agenda item 7

As presented in CX/NFSDU 18/40/8 document, Chile and the Russian Federation have drafted four recommendations to be discussed at the plenary of the Committee

Recommendation 1

Taking into consideration that no consensus has been reached on quality of evidence collected in support of the EPA and DHA effect on CHD mortality, to postpone further discussion of the NRV-NCD for EPA and DHA until new convincing/generally accepted evidence becomes available.

The Committee might also want to seek clarification from NUGAG on their definition of CHD death and cardiac death in the systematic review of RCTs

Recommendation 2

To initiate new work on revision of the General Principles addressing the following:

Amending item 3.2.2 to account opinions of RASBs that considered not to set intake reference values for nutrients reviewed for establishing an NRV-NCD.

Recommendation 3

To continue using the terms convincing, generally acceptable, probable, possible and insufficient as defined in the Joint FAO/WHO Expert Consultation for the purpose of establishing NRV-NCD according to the General Principles.

Recommendation 4

To consider if discussion needs to be initiated on reviewing criteria of the evidence that meets definition of convincing/generally accepted.

Agenda item 8

The Russian Federation agrees with the eWG proposal and would like to support the condition - 1 g per 100 g of fat and must meet the conditions for “low” in saturated fats - for free of trans fat claim. This is in line with criterion for low in saturated fat given in Eurasian Union's regulation TR TS 022/2011.

Agenda item 9

The Russian Federation thanks Ireland, and Co-Chaired by the United States of America and Mexico for leading eWG on NRV-R for older infants and younger children. We agree with recommendations 1-7 and have no further comments.

Agenda item 10

The Russian Federation would like to thank the European Union for drafting the discussion paper. As co-chairs of the eWG, we fully support the proposed process to appraise and justify the technological need for the use of additives in foods subject to CCNFSDU standards.

At the same time, we repeatedly expressed our view that discussion of the technological need of the three additives - xanthan gum (INS 415), pectin (INS 440) and gellan gum (INS 418) - is premature considering that the appraisal mechanism has not yet been adopted.

Moreover, for INS 418, the JECFA assessment has not been fully done and the Committee is in no position to discuss the appraisal and technological justification of this additive to be used in foods for infants.

It is our position that the Committee needs to finalise discussion of the process first and review the technological justification of INS415 and INS 440 at a later stage using new process.

Agenda item 11

The Russian Federation welcomes the effort by Argentina to draft a discussion paper and project document on harmonised probiotic guidelines.

At the same time, we would like to see clarification what the purpose of the work is. In particular, there is a deviation from the original scope of defining probiotic as a food ingredient to defining requirements to foods containing probiotics. These are two separate matters which need to be discussed separately.

We also believe that definitions of probiotics vary considerably in different regions and countries, and this alone represents a considerable barrier for discussing the matter in Codex.

At this stage we do not support the proposal to establish Codex specifications for probiotics in foods. We are of the position that many aspects of the use of probiotics are influenced by national/regional regulations and nutrition habits which should be reviewed before any harmonization effort is discussed in Codex.

For example, the use of probiotics is broadly regulated in the Eurasian Economic Union, and in 2014 three Union member states adopted the interstate standard ГОСТ 32923-2014 for the use of probiotics in dairy products.

We also have to note that the use of probiotics in foods, as it relates to live bacterial strains, is a matter of biosafety which is out of the scope of proposed work, and, at the same time, strictly regulated at national and regional levels.

We therefore recommend to postpone the adoption of the new work and, if required, to initiate collecting information on definitions of probiotics in Codex member countries and agree if a global definition of probiotics is possible at all.

Agenda item 12

The Russian Federation would like to thank Costa Rica and Paraguay for leading the work on the General Guidelines and for having this opportunity to comment on the project document presented in Appendix 1 of CX/NFSDU 18/40/13.

We understand that this proposed work originates from the ongoing discussion in the CCFL on the front-of-pack nutrition labelling. While we have previously expressed our support for the FOPNL, we are also of the opinion that proposed work on nutrient profiling in CCNFSDU remains dependant on the outcome of the CCFL discussions. In particular, the scope and purpose of the FOPNL guideline are still under review. Moreover, some critical issues e.g. the use of the national/regional dietary guidelines as the basis for the FOPNL criteria have not been agreed upon and remain at the very early stage of the discussion.

In this regard, we believe that it may be premature to initiate discussion on nutrient profiles before these important discussions in CCFL are concluded.

At the same time, we would like to support recommendation to collect information from members and observers on existing nutrient profile schemes used or developed around the world.