

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 4b and 6**

**NFSDU/42 CRD 13**

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

### Forty-second Session

Virtual

19 - 25 November and 1 December 2021

*Comments by Uganda*

### Agenda Item 4b: Draft scope, description and labelling for drink/product for young children with added nutrients or drink for young children (at Step 7) (replies to CL 2021/03/OCS-NFSDU)

#### Title

Following the discussion and recommendations from the EWG. Uganda appreciates the work done by the EWG. Uganda therefore, would like to withdraw the earlier submitted comments on changing the title of the draft standard. However, we still propose to consider and strongly include a disclaimer in the body of the standard that, "this product is not a replacement or substitute to Breast milk"

#### Justification:

- To prevent misleading the general population that, these products are nutritious and can serve or replace the purpose of breast-feeding.

#### 2. Description

##### 2.1 Product definition

Uganda proposes to delete the words "Drink for young children" and include "fortified" in the brackets and addition of a new product description 2.1.3;

The clause and underlying statements rephrased to read;

##### 2.1 Product Definition

##### 2.1.1 Drink/product for young children with added nutrients (fortified).

product manufactured for use as a liquid part of the diversified diet of young children [which may contribute to the nutritional needs of young children].

##### 2.1.2 Drink/product for young children with added nutrients (fortified)

processed by physical means only and so packaged as to prevent spoilage and contamination under all normal conditions of handling, storage and distribution in the country where the product is sold.

##### 2.1.3 Drink/product for young children with added nutrients (fortified).

excludes highly sweetened drinks/ products/ processed beverages with artificial flavours and colours or any artificial additives consumed by young children.

#### Justification for 2.1.2 and 2.2.2:

- For clarity to standard users

#### Justification for 2.1.3:

- To prevent consumption of high sugar products and artificially processed products that could lead to malnutrition cases like obesity in children.

#### Final observation and conclusion on the definition

Following the discussion and recommendations in the EWG report, Uganda wishes to withdraw the above-submitted comments on the definition and finally agrees to support **Option 2** of the two recommendations. Uganda supports option 2 below;

“OPTION 2: (delete text in the square brackets):

Drink/product for young children with added nutrients or Drink for young children means a product manufactured for use as a liquid part of the diversified diet of young children [which may contribute to the nutritional needs of young children]

In some countries, these products are regulated as breast-milk substitutes”

**Justification:**

- Addition text in the square brackets is already implied in the definition, to prevent confusion to the standard users therefore, Option 2 is suitable.

**9.1 Name of product**

**9.1.3**

Uganda proposes deletion of the word ‘protein’ and replace with ‘key nutrients’ and editing of the underlying texts. The new change to read;

9.1.3 The sources of key nutrients in the product shall be clearly shown on the label.

a) If [name of animal] milk is the only source of protein\*, the product may be labelled “Drink/Product for Young Children with Added Nutrients Based on [name of animal] milk protein”.

b) If [name of plant] is the only source of protein\*, the product may be labelled “Drink/Product for Young Children with Added Nutrients Based on [name of plant] protein”.

c) If [name of animal] milk and [name of plant] are the sources of proteins\*, the product may be labelled “Drink/Product for Young Children with Added Nutrients Based on [name of animal] milk protein and [name of plant] protein”.

**Justification:**

- To add all the sources of key nutrients in the product not protein only
- For clarity to the standard users

**9.3 Declaration of Nutritive Value**

Uganda agrees with the section but with a technical reservation

**Justification:**

- Need to comment on the section 3 of the draft standard.

**9.6 Additional labelling requirements**

Uganda agrees with the section

**Justification:**

- The section is in agreement with the existing national regulation on breast feeding substitutes (National regulations on Marketing of infants and young children foods).

**Agenda Item 6: General Principles for the establishment of NRVs-R for persons aged 6 – 36 months  
(Replies to CL 2021/56/OCS-NFSDU)**

Uganda proposes considerations on the questions in the circular letter as below;

**Part a:** To incorporate the principles as an annex in the Guideline on Nutrition Labelling (CXG 2- 1985).

**Justification:**

- This will ease reference to the principles by the standards users through increased use-ability and accessibility of the principles to the standard users.

**Part b:** Need to include Nutrient Reference Values as for non-communicable diseases (NRV-NCD) for sodium and potassium as reflected in the CXG 2, consideration for general population. However, Uganda calls for provision of more scientific and relevant data from the Codex expert committee for nutrition for further support and guidance on our proposal in relation to the targeted population (6-36 months of age), this being a vulnerable group. Extrapolations of data or obtaining the Dietary Intake Reference Values (DIRs) should consider the sensitivity of the targeted age group.

**Justification:**

- Protection of the vulnerable target population in terms of safety and health.