CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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CODEX ALIMENTARIUS COMMISSION

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COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION AT STEP 5 [1]

Committee on Fresh Fruits and Vegetables
Comité sur les fruits et légumes frais
Comité sobre Frutas y Hortalizas Frescas

Proposed draft standard for ware potatoes

(in reply to CL 2017/91/OCS-FFV)

Comments of Algeria, Colombia, Costa Rica, Egypt, Ghana, Guatemala, United Kingdom, United Republic of Tanzania

Algeria

paragraphe 2. Définition du produit :

la liste des variétés de pommes de terre de conservation doit être fixée en annexe de cette norme

paragraphe 4.Dispositions concernant le calibrage : alinéa 3 :

il est recommandé que le texte soit écrit comme suit :

cependant l'homogénéité de calibre dans les emballages de vente jusqu' á 5kg de poids net peut être limitée a un écart maximum de 30 mm entre le plus petit et le plus grand tubercule

- Il y a lieu d'ajouter un autre point relative au condition d'entreposage de ce genre de produit

Colombia

Colombia considera que si bien el Anteproyecto de norma para la patata (papa) de consumo de manera general está bien estructurado de acuerdo con los lineamientos Codex, se requiere el consenso en algunos aspectos técnicos que aún se mantienen entre corchetes para el avance de trámite de la norma.

Colombia amablemente, propone las siguientes recomendaciones:

Numeral 3.1 REQUISITOS MÍNIMOS

Colombia propone eliminar [es decir, brotes no mayores a 1 mm de largo;].

Texto propuesto: estar prácticamente sin brotes;

Justificación: las papas con brotes no son adecuadas para su consumo porque presentan cambios sensoriales significativos, por lo tanto, no se deberían comercializar. Tampoco se establece el número de brotes que pueden estar presentes, pero no es igual que se presente un brote o muchos brotes.

Colombia propone eliminar [externos e internos]

[1] This document compiles comments submitted through OCS by 31 May 2018 in reply to CL 2017/88/OCS-NFSDU and CL 2017/91/OCS-FFV as well as comments submitted through OCS by 10 June 2018 in reply to CL 2017/38/OCS-RVDF, CL 2017/46/OCS-CF and CL 2017/47/OCS-CF.

Texto propuesto: [estar exentas de defectos que afecten al aspecto general del producto, su calidad y presentación en el envase tales como:

Justifación: Los defectos internos puede que no afecten el aspecto general del producto, por lo tanto, sugerimos modificar el texto.

Colombia propone eliminar coloración verde pálida no superior a un octavo de la superficie y que puede ser eliminado mediante un pelado normal no constituye un defecto;

Texto propuesto: coloración verde;

Justificación El área del defecto es más un tema del capítulo de clasificación por categorías, por lo tanto, se debería llevar allí. Es muy subjetiva la descripción del color (verde pálido) igualmente no es práctica la evaluación de este defecto. Además, el color verde es un indicio de presencia de solanina que tiene efectos tóxicos, por lo tanto, por inocuidad, no se debe permitir el color verde independientemente de su intensidad.

Colombia propone eliminar debido al calor;

Texto propuesto: manchas obscuras;

Justificación: El color oscuro no solo lo causa el calor.

Colombia porpone eliminar (incluyendo el crecimiento de grietas), (solo para las variedades en que la piel no es usualmente áspera) superior a 4 mm de profundidad;

Texto propuesto: grietas, cortes, picaduras, magulladuras o rugosidades, que no sean propias de la variedad.

Justificación: Cada defecto no es aceptable, sin importar el detalle de la descripción.

Colombia propone eliminar manchas sub-epidérmicas de color gris, azul o negro que no superen los 5 mm de profundidad;

Justificación: No se pueden observar visualmente sino que requieren destruir el producto. No es práctico determinar la profundidad. Se sugiere retirarlo.

Colombia propone eliminar manchas pardas (rojizas), y otros defectos internos;

Texto propuesto: huecos o corazón negro;

Justificación: Es importante describir los defectos ya que si no se especifican, pueden ser muchas cosas. Por otra parte las manchas están referidas en una viñeta anterior

Colombia propone eliminar costra profunda común de la papa y costra polvorienta de la papa con una profundidad de 2 mm o más.]

Justificación: La papa no tiene costra. Por lo tanto, se sugiere retirar este defecto.

Colombia propone eliminar [costra superficial común de la papa, es decir, la mancha de la costra no deberá extenderse más de un cuarto de la superficie del tubérculo.]

Justificación: La papa no tiene costra. Por lo tanto, se sugiere retirar este defecto.

Colombia propone adicionar en una nueva viñeta que diga: estar exento de plagas y enfermedades o daños causados por estas.

Justificación: Se sugiere adicionar el requisito de estar exento de plagas y enfermedades ya que así como en otras normas de producto se ha incluido, también se presenta en la papa.

Numeral 5.1. [TOLERANCIAS DE CALIDAD]

Colombia propone eliminar Cuadro de tolerancias de calidad

Justificación: No es práctica la aplicación del cuadro que se encuentra en el proyecto, por lo tanto, se sugiere incluir en cambio los textos usuales de Codex.

Incluir los textos usuales de Codex y en este sentido sugerimos tener en cuenta los textos de la norma Codex Stan 238 numeral 4.1, para yuca dulce.

Costa Rica

Costa Rica apoya el avance del Anteproyecto de norma en el trámite 5. Tal como se acordó en la 20a sesion del CCFFV.

Egypt

Egypt agrees the "PROPOSED DRAFT STANDARD FOR WARE POTATOES" to be adopted at step 5 with no comments.

Ghana

We propose increase in the total tolerances for Class II from 10 to 15 and reduce off size for Extra Class from 10 to 5.

Rational: This is to create a distinction between classes

Guatemala

Guatemala's opinion about. Proof.

United Kingdom

The UK does not believe that Extra Class is appropriate for ware potatoes. Further we believe that classification for ware potatoes should be optional, and that ware potatoes not classified into a quality class should have to meet the requirements of Class II. Further a definition of early potatoes should be added as a footnote to the definition of produce for clarification.

United Republic of Tanzania

Tanzania supports the adoption at Step 5 of the Draft Standard for Ware Potatoes, REP18/FFV para 60(ii) and App. IV. All issues regarding Table for tolerances will be worked out by the eWG prior to CCFFV21 under the leadership of India as Chair, Cameroun and Peru as Co-Chairs.

Committee on Nutrition and Foods for Special Dietary Uses
Comité sur la nutrition et les aliments diététiques ou de régime
Comité del Codex sobre Nutrición y Alimentos para Regímenes Especiales

Review of the Standard for Follow-up Formula (CXS 156-1987): proposed draft essential composition requirements

(in reply to CL 2017/88/OCS-NFSDU)

Comments of Algeria, Argentina, Brazil, Canada, Colombia, Costa Rica, Egypt, Kazakhstan, New Zealand, Norway, Philippines, South Africa, United Republic of Tanzania, United States of America, EU Specialty Food Ingredients, Helen Keller International, International Dairy Federation, International Special Dietary Food Industries

Algeria

Paragraphe 3.1.1: il y a lieu de définir l 'expression "deuxième age"

Argentina

About SECTION A - FOLLOW-UP FORMULA FOR OLDER INFANTS

Argentina agrees with the proposal

About SECTION B - [NAME OF PRODUCT] FOR YOUNG CHILDREN

c) Carbohydrates

Available carbohydrates 4)

Argentina reaffirms the comment made in the previous round. Supports the eWG recommendation to restrict mono-and disaccharides other than lactose at 10% of total energy (this equates to 20% of available carbohydrates). This is a significant step in reducing the level of added sugars in follow up formula, as the current Codex Standard (Codex Stan 156-1987) does not set specifications. The level of 20% available CHO also aligns with the WHO recommendation that, for both adults and children, the intable of free sugars should be restricted to less than 10% of total energy intake.

Suggested footnote 4 would then read:

4) Lactose should be the preferred carbohydrate in (name of product) based on milk protein. Mono-and disaccharides, other than lactose, should not exceed 20% of available carbohydrate.

[Vitamin D 9)]

Argentina supports the level of Vitamin D proposed to increase of the upper value for Vitamin D from current 3,0µg/100 kcal to 4,5µg/100 kcal will allow an intake of Vitamin D through food which covers better the need of children. It will not lead to excessive intake.

Recommended daily intake:

In 2016 EFSA set on adequate intake when endogenous synthesis is minimal for children 1-17 years of 15µg/day. Other organizations than EFSA have lower (WHO 2004: 5µg/dia or higher (DACH 20µg/day) recommended intake levels for children 1-18 years. The Nordic recommendation for Vitamin D is set at 10µg/day assuming some endogenous Vitamin D synthesis.

As upper level (UL) for Vitamin D intake EFSA proposed in 2012 50µg/day for children 1-10 years.

Reference:

EFSA Panel (NDA)Dietary reference values for vitamin D, EFSA Journal 2016;14(10):4547

WHO/FAO (World Health Organization/Food and Agriculture Organization of the United Nations), 2004. Vitamin and mineral requirements in human nutrition: report of a joint FAO/WHO expert consultation, Bangkok, Thailand, 21–30 September 1998, 341 pp.

Nordic Council of Ministers, 2014. Nordic Nutrition Recommendations 2012. Integrating nutrition and physical activity. Nordic Council of Ministers, Copenhagen, Denmark. 627 pp.

D-A-CH (Deutsche Gesellschaft für Ernährung, Österreichische Gesellschaft für Ernährung, Schweizerische Gesellschaft für Ernährung), 2015. Referenzwerte für die Nährstoffzufuhr. 2. Auflage/1. Ausgabe, DGE, Bonn, Germany.

Alles M., Eussen S., van der Beek E.:Nutritional Challenges and Opportunities during the Weaning Period and in Young Childhood, Ann Nutr Metab 2014;64:284–293

EFSA Panel (NDA): Scientific Opinion on the Tolerable Upper Intake Level of vitamin D1, EFSA Journal 2012;10(7):2813

Eussen S. , Pean J., Olivier L., Delaere F., Lluch A.: Theoretical Impact of Replacing Whole Cow's Milk by Young-Child Formula on Nutrient Intakes of UK Young Children: Results of a Simulation Study, Ann Nutr Metab 2015;67:247–256

Brazil

Brazil would also like to provide specific comments on Section B: [NAME OF PRODUCT] FOR YOUNG CHILDREN.

Brazil agrees with the proposed draft essential composition requirements.

With regard to the texts in square brackets, Brazil would like to provide the following comments:

On item "c) Carbohydrates" Brazil agrees that lactose should be the preferred carbohydrate in [name of product] based on milk protein. Therefore, mono- and disaccharides, other than lactose, should not be added unless needed for technological reasons.

Considering that it is fundamental to take into account the WHO (2015) recommendations to reduce the intake of free sugars to less than 10% of energy and conditionally recommended a further reduction to less than 5% of energy for both adults and children, Brazil considers that it is necessary to reduce the amount of mono- and disaccharides, other than lactose, at the minimum level possible. So, we propose that the amount of these carbohydrates in [name of product] based on milk protein should not exceed 1.25 g/100kcal (0.30 g/100kJ) of available carbohydrate. However, considering technological reasons that could exist in some specific cases, we agree to include a provision allowing national and/or regional authorities to extend this level to 2.5 g/100 kcal (0.60 g/100 kJ).

Brazil is also of the opinion that the requirements for the addition of any ingredient with the purpose of imparting sweet taste should be addressed by this standard given that there has been general agreement that [name of product] for young children should not be overly sweet tasting. Thus, it is important to limit the addition of not only mono- and disaccharides but also other carbohydrates which contribute to the sweet taste of the product as well as other non-carbohydrate ingredients with the purpose of imparting a sweet taste as they can have similar sweetening effects. However, we consider that it is difficult to determine in practice when other carbohydrates than lactose will contribute or not to the sweet taste, specifically when used in accordance with the maximum levels allowed for these substances (mono- and disaccharides).

However, Brazil considers that it is important to further discuss the sentences “that have no contribution to the sweet taste should be preferred” and “sucrose and/or fructose or other carbohydrates contributing to the sweet taste of [name of product] should not be added, unless needed as a carbohydrate source” in order to make clear the objective of do not confer a sweeter taste but without causing a misinterpretation.

Brazil consolidated proposal:

Lactose should be the preferred carbohydrates in [name of product] based on milk protein. For products not based on milk protein, carbohydrate sources (like starch) [that have no contribution to the sweet taste should be preferred].

Mono- and disaccharides, other than lactose, either added as ingredients, or constituents of ingredients and/or increased above the amount contributed by the ingredients by some other means, should not exceed 1.25 g/100kcal (0.30 g/100kJ) of available carbohydrate. National and/or regional authorities may extend this level to 2.5 g/100 kcal (0.60 g/100 kJ). [Sucrose and/or fructose or other carbohydrates contributing to the sweet taste of [name of product] should not be added, unless needed as a carbohydrate source]. Other non-carbohydrate ingredients should not be added with the purpose of imparting or enhancing a sweet taste.

On Section B: [NAME OF PRODUCT] FOR YOUNG CHILDREN, Brazil agrees with recommendation for Vitamin D3.

Canada

GENERAL COMMENTS:

In response to the 2017 decision of the Committee to postpone a recommendation for vitamin D levels in products for young children (12-36 months) until the 40th session (2018) due to a lack consensus regarding this topic, Canada appreciates the opportunity to provide the following input.

SPECIFIC COMMENTS:

Canada re-iterates its position in supporting Recommendation 8 from the eWG report on Review of the Standard for Follow-Up Formula (Codex Stan 156-1987) that was presented in Agenda Item 4 of the CCNFSDU39 meeting held in December 2017 (CX/NFSDU/39/17/4).

Canada supports the mandatory addition of vitamin D at a minimum level of 1.5 µg/ 100 kcal and a maximum of 4.5 µg/ 100 kcal.

Rationale:

Vitamin D insufficiency is prevalent among young children globally. The IEG 2015 report (Suthutvoravut et al 2015) found that young children had inadequate vitamin D intakes in many parts of the world. Using serum 25-hydroxyvitamin D concentration to define vitamin D status, vitamin D deficiency (serum 25-hydroxyvitamin D <27.5 nmol/L or <50 nmol/L) was found in 10% of children aged 6-23 months in New Zealand, and in 34.9 and 42.8% of children aged 2-4.9 years in urban and rural areas of Indonesia, respectively. The same study also summarized surveys in young children from 4 countries in Southeast Asia which showed that vitamin D insufficiency may be a problem in many tropical countries, in addition to countries at higher latitudes such as those in North America and Europe. Similar reports have now emerged from sub-Saharan Africa with a study by Ludmir et al (2016) detecting low serum 25-hydroxyvitamin D (< 20 ng/mL, i.e., <50 nmol/L) in 19% of a sample of under-2 year olds in Botswana and another by Wakayo et al (2015) demonstrating similar low levels in 42% of school-aged children in central Ethiopia. A review by Palacios et al (2014) has summarized the global burden of vitamin D deficiency affecting infants and children (among others) across tropical and non-tropical countries.

Minimum Level

Przyrembel and Agostoni (2013) noted that complementary feeding regimens differ between countries and are determined by tradition, empirical behaviours and availability of foods. Although they stated that FUF is not needed in the diets of young children based on available evidence, they propose that if such a product were available, the vitamin D content should have a minimum of between 1 and 1.3 µg/ 100 kcal, which are similar to the proposed minimum level.

The minimum level is also similar to the amount of vitamin D in whole cow's milk in Canada, i.e., 1.6 µg/ 100 kcal.

The recently revised EU regulations (2016) and the EFSA (European Food Safety Authority, 2014) recommend a minimum vitamin D amount of 2 µg/ 100 kcal in follow-on formula and infant formula, which is higher than the proposed minimum of 1.5 µg/ 100 kcal.

Maximum Level

In Canada and the United States of America, the Dietary Reference Intakes (DRIs) for vitamin D were updated by the National Academy of Medicine (NAM) in 2011, and the Tolerable Upper Intake Level (UL) was set at 62.5 µg/ day for children 1-3 years. Assuming a daily intake of 500 ml of this product and an energy density of about 60 kcal/ 100 ml, exposure data indicates that the proposed maximum of 4.5 µg/ 100 kcal would result in average intakes well below the NAM UL (i.e., calculated vitamin D intake of 13.5 µg/ day) demonstrating that there is no risk of vitamin D toxicity associated with the proposed level. The maximum level is also in line with the recommended maximum levels for vitamin D made in the report by the International Expert Group (IEG 2015).

Reference:

1. Suthutvoravut U et al. Composition of Follow-Up Formula for Young Children Aged 12-36 Months: Recommendations of an International Expert Group Coordinated by the Nutrition Association of Thailand and the Early Nutrition Academy. Ann Nutr Metab. 2015; 67(2): 119-32.

2. Ludmir J et al. Vitamin D Status in Botswana Children Under 2 Years Old With and Without Active Tuberculosis. Am J Trop Med Hyg. 2016; 94(5):971-4.

3. Wakayo T et al. Vitamin D deficiency and its predictors in a country with thirteen months of sunshine: the case of school children in central Ethiopia. PLoS One. 2015; 10(3):e0120963.

4. Palacios C et al. Is vitamin D deficiency a major global public health problem? J Steroid Biochem Mol Biol. 2014; 144 Pt A:138-45

5. Przyrembel H and Agostoni C. Growing-up milk: a necessity or marketing? World Rev Nutr Diet. 2013;108: 49-55.

6. EFSA (2014). Scientific Opinion on the essential composition of infant and follow-on formulae. EFSA Panel on Dietetic Products, Nutrition and Allergies (NDA). EFSA Journal, 2014; 12 (7): 3760, pp 106

7. IOM (2011). Dietary Reference Intakes for Calcium and Vitamin D.

Colombia

Colombia considera que el texto debe avanzar en el trámite 5. No obstante, se solicita tener en cuenta los siguientes comentarios:

Colombia propone considerar que la traducción correcta al español corresponde a Cisteína en SECCIÓN A: PREPARADOS COMPLEMENTARIOS PARA LACTANTES DE MÁS EDAD 3 COMPOSICIÓN ESENCIAL Y FACTORES DE CALIDAD 3.1 Composición esencial a) Proteínas.

Colombia propone que se especifique que la forma aceptada de la vitamina D es la D3, tal como se especifica para la Sección B del anteproyecto, numeral d) de la sección 3.1 Composición esencial.

Colombia sugiere modificar la redacción en español para el texto propuesto para el Total de nucleótidos, para mayor claridad de la recomendación de la norma frente a las determinaciones de las autoridades nacionales, en el literal 3.2.3 del numeral 3.2 ingredientes facultativos. Para tal fin, se propone la siguiente redacción: Los niveles podrían ser determinados por las autoridades nacionales.

Colombia sugiere modificar la redacción en español para el texto propuesto para el L-Carnitina, para mayor claridad de la recomendación de la norma frente a las determinaciones de las autoridades nacionales. Para tal fin, se propone dejar: Los niveles podrían ser determinados por las autoridades nacionales.

Colombia apoya tomar un valor mínimo de 1,5 y que el valor máximo sea 4,5, teniendo en cuenta que la forma más usada de es la D3, con una tasa de absorción del 50%, en los datos encorchetados relacionados con la SECCIÓN B: [NOMBRE DEL PRODUCTO] PARA NIÑOS PEQUEÑOS, 3 COMPOSICIÓN ESENCIAL Y FACTORES DE CALIDAD 3.1 Composición esencial.

Costa Rica

Costa Rica, apoya la adopción en el trámite propuesto.

Egypt

Egypt agrees the proposed draft with no comments.

Kazakhstan

SECTION A: FOLLOW-UP FORMULA FOR OLDER INFANTS

3 ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Essential composition

3.1.2 The proposed caloric content of Follow-up formula for older infants is optimal.

3.1.3 a) Protein. Kazakhstan maintains a minimum protein content of 1.6 g / 100 kcal. Excess intake of protein with follow-up formula provokes increase in body mass of a child and the development of obesity in the future. This is especially active in the so-called insulinogenic amino acids, which are present in any milk (except the mother's), which have the function of stimulating the production of insulin with a small intake of lactose. This leads to formation of insulin resistance and the development of type 2 diabetes in the future. This effect of excess protein in the formula has a very large evidence base and is not questioned.

It is also necessary to regulate the ratio of whey protein to casein in follow-up formula. This is an indicator of the adaptability of the formula to the functional capabilities of an infant's digestive system. The optimum for the follow-up formula is 60/40.

d) Vitamins

Recommended intake for vitamin A is placed into intervals of 85-150 μg RE in Kazakhstan. The state of actual nutrition of the population of Kazakhstan is not characterized by a deficiency of this vitamin, because traditionally in our country the consumption of butter (the carrier of this vitamin) is characterized by consumption above the recommended norms.

Recommended intake for vitamin D is within the range of 0.8-1.2 μg. For the specificity of our region, where almost all children are prescribed additional intake of vitamin D in the form of an aqueous solution, excessive intake of food is not rational.

Recommended intake for vitamin E is as minimum consumption of 0.7 TE. The state of actual nutrition of our population is characterized as deficiency of the vitamin E intake. Therefore, there is no reason to reduce the daily dose of tocopherol in the formula for children. Given the environmental burden on the body, vitamin E is extremely important as an active antioxidant too.

SECTION B: [NAME OF PRODUCT] FOR YOUNG CHILDREN

3 ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Basic composition

3.1.2. The proposed caloric content of the product is optimal and does not require correction.

3.1.3 a) Protein.

The minimum value of protein presented in the table is 1.8 / 100 kcal. corresponds to the recommended content of 1.3 g / 100 ml of the finished product. The maximum value is not specified.

c) Carbohydrates.

The declared figures correspond to the recommended standards. It is doubted that the use of ingredients that give sweet taste should be prevented. Until now, it was allowed to use maltodextrin (dextrinmaltose) in lactose-free products to give them sweet taste. In case of the prohibiting the use of this sweetener, low-lactose and especially lactose-free products will become unsuitable for food, since they will have a pronounced bitter taste. Dextrinmaltose enhances the bifidogenic properties of the infant formula, reduces its osmolality and, in addition, is more slowly absorbed than lactose, which makes it possible to increase the intervals between feedings.

d) Content of vitamins

Kazakhstan supports all the proposed norms of vitamins and minerals.

New Zealand

New Zealand has been leading the work on the review of the Standard for Follow-up Formula and has been chairing the electronic working group since the beginning of the work in 2013. Significant efforts have been made to achieve the draft essential composition and the work has progressed because of a willingness of members to compromise. New Zealand recognises this Circular Letter as an important step in that process.

New Zealand strongly supports the adoption of the proposed draft essential compositional requirements for revised Standard for Follow-up formula (CXS 156-1987) at Step 5.

Norway

Norway is a member of the European Free Trade Organisation (EFTA). The Agreement on the European Economic Area brings together the EU and the EFTA States in a single market. Therefore, Norway has the same legislation on infant formula and follow-on formula as the EU.

Several of the proposed minimum and maximum requirements for nutrients deviate from the Regulation (EU) 2016/127 on Infant Formula and Follow-On Formula, which is implemented into Norwegian law. This regulation is based on the recent scientific opinion of EFSA. In general, we consider that such justified national/regional regulations take precedence over Codex standards.

SECTION B: [NAME OF PRODUCT] FOR YOUNG CHILDREN

Specific comment - section 3.1.3 d –Vitamin A

We are of the opinion that a maximum of 180 ug RE is too high, and can lead to intakes of vitamin A exceeding the UL. EFSA has stated that children are particularly sensitive to excessive vitamin A intakes. Children from 12 to 36 months receive vitamin A from a progressively diversified diet, which will add to vitamin A received from [name of product] of young children.

We propose a maximum of 120 ug RE vitamin A/100 kcal. This value is the average between the content of full fat milk and the maximum of 180 ug RE vitamin A/100 kcal in the infant formula standard. This level of 120 ug RE would also be in line with the EFSA advise for vitamin A content in follow-up formula for older infants (114 µg RE vitamin A/100 kcal). Furthermore, a maximum of 120 ug RE vitamin A/100 kcal would be significant higher than the content in the breast milk of 85 ug RE vitamin A per 100 kcal.

SECTION B: [NAME OF PRODUCT] FOR YOUNG CHILDREN

Specific comment - section 3.1.3 d – Zinc

We are concerned of a GUL value of 1.5 mg zinc/100 kcal, since it can lead to overexposure of zinc.

We propose a GUL of 1.0 mg. This value would avoid exceeding the UL of 7 mg/day for children 1-3 years old (Institute of Medicine 2001, EU Scientific Committee of Food 2003), taking into account that children from 12 to 36 months also receive zinc from a progressively diversified diet.

SECTION B: [NAME OF PRODUCT] FOR YOUNG CHILDREN

Specific comment - section 3.1.3 d –Vitamin D

We propose a maximum vitamin D level of 3.0 µg/100 kcal, which would align the maximum level with the value agreed for follow-up formula for older infants.

A caloric intake of 500 kcal with a minimum level of 3 µg/100 kcal would result in an intake of 15 µg/100 kcal, accounting for 100% of DIRV of 15 µg (EFSA 2016), thus meeting vitamin D requirements alone. A value of 3 µg/100 kcal would not lead to excessive intakes.

SECTION B: [NAME OF PRODUCT] FOR YOUNG CHILDREN

Specific comment - section 3.1.4

We strongly support this principle. We deem it imperative that national and/or regional authorities may amend nutrient levels if the nutritional needs of the local population and scientific justification warrants such deviation.

SECTION A: FOLLOW-UP FORMULA FOR OLDER INFANTS

Specific comment - section 3.2.3 – L(+) lactic producing cultures

We agree that the standard allows for the use of lactic acid-producing cultures during the production process for the purpose of producing lactic acid in the product. We consider it essential that the acidified final formula should not contain significant amounts of viable lactic acid-producing bacteria, and any residual amounts in the final product of residues should not present any health risk. These are essential elements of the purpose of acidifying formula, and we strongly support this text.

Furthermore, we agree with the proposed principles that safety and suitability should be scientifically demonstrated if lactic acid producing cultures are added with an aim of a beneficial physiological effect. We recognise that this should be done for the specific strains and at the level of use. However, we want to underline that we are of the opinion that safety and suitability is not to date fully demonstrated for the use of probiotics in follow-up formula. Due to the fact that infants are especially vulnerable, and that there still is scientific uncertainty whether there are long-term negative effects, we consider a cautious approach appropriate. Furthermore, there is insufficient evidence to draw conclusions on beneficial effects on infant health of the probiotics strains added to follow-up formula. Probiotic bacteria should not be added to follow-up-formula until safety and suitability can be scientifically demonstrated.

SECTION A: FOLLOW-UP FORMULA FOR OLDER INFANTS

Specific comment - section 3.1.3 d – Zinc

We are concerned of a GUL value of 1,5 mg zinc/100 kcal, since it can lead to overexposure of zinc.

The maximum value for zinc in the Regulation (EU) 2016/127 on Infant Formula and Follow-On Formula, which is implemented into Norwegian law, is 1.0 mg zinc/100 kcal. A GUL 1.0 mg would avoid exceeding the UL of 5 mg/day for infants 7-12 months1.

Due to the considerable support in the committee of the value of 1,5 mg zinc/100 kcal, and a justified lower value in our national legislation, we can accept a Codex value of 1,5 mg zinc/100 kcal even though we would have preferred a Codex value of 1,5 mg zinc/100 kcal.

1 Institute of Medicine 2001. Dietary Reference Intakes for Vitamin A, Vitamin K, Arsenic, Boron, etc.

SECTION A: FOLLOW-UP FORMULA FOR OLDER INFANTS

Specific comment - section 3.1.3 d – Iodine

We are concerned of a GUL value of 60 µg iodine/100 kcal, since it can lead to overexposure of iodine.

The maximum value for iodine in the Regulation (EU) 2016/127 on Infant Formula and Follow-On Formula, which is implemented into Norwegian law, is 29 µg iodine/100 kcal.

Due to the considerable support in the committee of the value of 60 µg iodine/100 kcal, and a justified lower value in our national legislation, we can accept a Codex value of 60 µg iodine/100 kcal even though we would have preferred a Codex value of 29 µg iodine/100 kcal.

SECTION A: FOLLOW-UP FORMULA FOR OLDER INFANTS

Specific comment - section 3.1.3 d –Vitamin A

We are concerned of a maximum value of 180 µg RE vitamin A/100 kcal, since it can lead to overexposure of vitamin A. EFSA has stated that children are particularly sensitive to excessive vitamin A intakes.

The maximum value for vitamin A in the Regulation (EU) 2016/127 on Infant Formula and Follow-On Formula, which is implemented into Norwegian law, is 114 µg RE vitamin A/100 kcal.

Due to the considerable support in the committee of a value of 180 µg RE vitamin A/100 kcal, and a justified lower value in our national legislation, we can accept a Codex value of 180 µg RE vitamin A/100 kcal even though we would have preferred a Codex value of 114 µg RE vitamin A/100 kcal.

Philippines

The Philippines supports the current draft of the essential compositional requirements for older infants and children at Step 5 for adoption by the Codex Alimentarius Commission in the Revision of the Codex Standard for Follow Up Formula since these are consistent with previous Philippine Positions as justified by current generally accepted scientific evidence. The minimum and maximum values presented in the draft were aligned with the proposal in the Philippine Positions. We also support retention of the bracketed texts.

South Africa

South Africa supports the advancement of the proposed Support adoption of the composition requirements for older infants and young children at Step 5, as agreed by the committee. We are of the opinion that the proposed draft Essential composition requirements for older infants and young children are based and the advice of competent RASBs and sound science.

United Republic of Tanzania

Tanzania supports adoption of 1.8 g/Kcal as minimum protein level in follow-up formula based non-hydrolysed milk protein. This is the most appropriate level in order to help developing countries, especially in Africa, where alternative sources of proteins are considered poor sources of protein e.g. grains and legumes. The minimum level of 1.6 g/Kcal best suits countries with good alternative sources of protein.

United States of America

The U.S. supports adoption of proposed draft essential composition requirements with the following suggested revisions:

The product for young children contains calcium but does not contain phosphorus; we suggest a footnote be added to calcium as follows:

Calcium***

***If phosphorus is added, it should be added in the following ratio

Ratio calcium/ phosphorus

Min Max

1:1 2:1

EU Specialty Food Ingredients

EU Specialty Food Ingredients supports the revision of essential criteria for Follow-Up Formula for older infants (6-12 months) and [name of the product] for young children (12-36 months) which reflects the different roles of these products as part of a diversified diet, and which are a good source of nutrition for both macro and micronutrients.

Therefore, EU Specialty Food Ingredients strongly supports the adoption of the proposed draft revised Standard for Follow-up formula (CXS 156-1987) at step 5 on the essential composition (REP18/NFSDU Appendix II) by the Codex Alimentarius Commission.

Helen Keller International (HKI)

Section 3.1.3 b (Lipids)

We strongly disagree with the proposed minimum level of total fat (3.5 g/100 kcal) allowable in the product for young children.

The Nutrition Association of Thailand, in collaboration with the Early Nutrition Academy and the Federation of International Societies on Pediatric Gastroenterology, Hepatology and Nutrition (FISPGHAN) proposed a minimal fat content 4.4g/100 kcal, which is equivalent to about 40–55% of energy, similar to that in breast milk. National guidelines in the Australia, Canada, China, New Zealand, UK, US and others recommend use of whole milk for children 12-24 mo of age. The compositional requirements of follow-on Formula in England, Scotland, Wales and Northern Ireland all have a minimum of 4.0 g/100 kcal (Crawley and Westfield. Infant Milks in the UK: A Practical Guide for Health Professionals – February 2016).

While some clinicians suggest that young children 24+ mo of age can transition from whole milk to reduced fat milk in order to reduce risk of overweight, evidence is lacking to support this practice. (Huh et al. J Am Diet Assoc. 2010 110(4): 563–570; Lagström et al, 1999 Am J Clin Nutr 69:516–23; O'Conner et al, Pediatrics 2006 118(4):e1010-8; Rautiainen el al, Am J Clin Nutr 2016;103:979–88.)

Decreasing the minimum level of fat in the standard for young children will require a higher level of either carbohydrates or protein to meet the required minimum energy density of 60kcal/100mL. Since the standard has a maximum for carbohydrates, a product with the proposed lower level of fat will contain a higher level of protein than full-fat cow's milk and much higher than breastmilk. This is detrimental since "Excess protein intakes during infancy and early childhood may enhance weight gain and later risk of obesity" (Koletzko et al 2009; Weber et al 2014, Hörnell et al 2013). This approach of lowering fat to reduce obesity is counter to the evidence.

Section 3.1.c Carbohydrates

We support the proposed limit on carbohydrates of 12.5 g/100 kcal and the inclusion of footnote 4:

[Lactose should be the preferred carbohydrates in [name of product] based on milk protein. For products not based on milk protein, carbohydrate sources (like starch) that have no contribution to the sweet taste should be preferred.

Mono- and disaccharides, other than lactose, either added as ingredients, or constituents of ingredients and/or increased above the amount contributed by the ingredients by some other means, should not exceed 2.5 g/100kcal (0.60 g/100kJ) of available carbohydrate. National and/or regional authorities may limit this level to 1.25 g/100 kcal (0.30 g/100 kJ). Sucrose and/or fructose or other carbohydrates contributing to the sweet taste of [name of product] should not be added, unless needed as a carbohydrate source. Other non-carbohydrate ingredients should not be added with the purpose of imparting or enhancing a sweet taste.]

Vitamin D

Even in countries with high sunlight, vitamin D deficiency remains a problem. We support a minimum level as proposed: at a minimum level of 1.5 µg /100 kcal (0.36 µg /100 kJ) and a maximum level of 4.5 µg /100 kcal (1.08 µg /100 kJ)."

International Dairy Federation (IDF/FIL)

The IDF supports the adoption of the draft standard Follow-up Formula (CXS 156-1987): proposed draft essential composition requirements as appended to CL 2017/88/OCS-NFSDU, at step 5.

International Special Dietary Food Industries (ISDI)

ISDI welcomes the revision of the compositional requirements within the Codex standard for Follow-Up Formula at step 5.

ISDI acknowledges all the progress made over the last 5 years to frame the future standard and wants to thank the CCNFSDU Chair and the chair and co-chairs of the eWGs established to focus on specific aspects of the review of this standard.

ISDI supports the revision of essential criteria for Follow-up formula with clear differentiation in requirements between formula for older infants (6-12 months) and [name of the product] for young children (12-36 months) reflecting the different roles of these products. These products are available worldwide and contribute to a balanced diet of older infants and young children and are a good source of nutrition for both macro and micronutrients.

As a consequence, ISDI strongly supports the adoption of the proposed draft revised Standard for Follow-up formula (CXS 156-1987) at Step 5 on the essential composition (REP18/NFSDU Appendix II) by the Codex Alimentarius Commission. We look forward to continue to work on the proposed draft of the Standard at Step 6.

Committee on Contaminants in Foods
Comité sur les contaminants dans les aliments
Comité sobre Contaminantes de los Alimentos

Proposed draft Code of practice for the reduction of 3-monochloropropane-1,2-diol esters (3-MCPD) and glycidyl esters (GEs) in refined oils and food products made with refined oils

(in reply to CL 2018/46/OCS-CF)

Comments of Burkina Faso, Canada, Gambia, Iraq, Kenya, Senegal, Thailand, Trinidad and Tobago, United Republic of Tanzania, Collagen Casings Trade Association, Global Organization for EPA and DHA Omega-3s

Burkina Faso

les huiles végétales comestibles sont produites à partir de fruits, les graines, les noix et le raffinage des huiles végétales comestibles (à des températures d'environ 200 ° C ou plus) peut produire des 3-MCPD, 3-MCPDE et de l'ester glycidylique. Une évaluation du JECFA (JECFA 83 en 2016) a indiqué que le 3-MCPDE est cancérogène et cible généralement les reins et les organes reproducteurs mâles. Le JECFA a en outre établi une DJMTP de groupe de 4 ug / kg pour le 3-MCPD et le 3-MCPDE. Le JECFA a donc conclu que le glycidol est génotoxique et pose donc un problème de santé. CCCF11 (2017) à COP pour la réduction du 3-MCPDE et du GE dans les huiles raffinées et les produits fabriqués avec des huiles raffinées jusqu'à la CEE sous la direction des Etats-Unis. Ce travail a été approuvé par CAC40 (2017).

Nous appuyons la décision d'adopter COP à l'étape 5 pour plus de détails et de commentaires car Le 3-MCPD et le GE sont tous deux formés au cours du processus de chauffage mais par des mécanismes différents et sont connus pour poser des problèmes de santé. GE se forme à des températures supérieures à 200 ° C et sa formation augmente avec l'augmentation de la température. Le 3-MCPDE est présent à des températures plus basses (160-200 ° C) en présence de composés chlorés mais n'augmente pas à des températures plus élevées. Le JECFA a noté que l'exposition alimentaire au 3-MCPD pour les nourrissons nourris au lait maternisé pourrait dépasser de 2,5 fois la DJMTP, selon les pays.

Canada

Canada would like to thank the chair of the electronic working group, the United States, and co chairs the European Union and Malaysia, for their efforts in drafting the Code of practice for the reduction of 3-monochloropropane-1,2-diol esters (3-MCPDE) and glycidyl esters (GE) in refined oils and food products made with refined oils.

Canada supports adoption of this code of practice at Step 5, as well as the continued development of certain parts of the document, particularly the text retained in square brackets.

Gambia

Edible vegetable oils are produced from fruits, seeds, and nuts and refining of edible vegetable oils (at temperatures of about 200C or higher) can produce 3-MCPD, 3-MCPDE and glycidyl esters. A JECFA evaluation (JECFA 83 in 2016) reported that 3-MCPDE are carcinogenic and usually target the kidney and male reproductive organs. JECFA further established a group PMTDI of 4ug/kg for 3-MCPD and 3- MCPDE. JECFA also concluded that glycidol is genotoxic and also poses a health concern. CCCF11 (2017) decided to prepare a COP for the reduction of 3-MCPDE and GE in refined oils and products made with refined oils through an EWG led by the USA. This work was approved by CAC40 (2017).

3-MCPD and GE are both formed during the heating process but by different mechanisms and are known to pose health concerns. GE forms at temperatures above 200C and its formation increases with increasing temperature. 3-MCPDE is formed at lower temperatures (160- 200C) in the presence of chlorinated compounds but formation does not increase at higher temperatures. JECFA has noted that dietary exposure to 3-MCPD for formula-fed infants could exceed the PMTDI by up to 2.5 fold depending on the country.

The Gambia therefore supports the decision to adopt the COP at Step 5 for further drafting and comments.

Iraq

no comments

Kenya

clause 15: we support the inclusion of the clause since the COP covers fish oils adequately. similar breakdown products of can be realized from non vegetable oils such as fish.

clause 19:we support the clause as it is since low lipase activity varieties will minimise the formation of Free Fatty Acids and glycerol.

clause 24: we support the clause as it is.

clause 36: we note that its an introductory paragraph for clause 36 to clause 40.

clause 41: we note that clause 41 is introductory to clause 42.

Kenya supports the decision to adopt the COP at step 5 for further drafting and comments. 3-MCPD and GE are both formed during the heating process but by different mechanisms and are known to pose health concerns. JECFA has noted that dietary exposure to 3-MCPD for formula-fed infants could exceed the PMTDI by up to 2.5 fold depending on the country.

Senegal

Contexte : Les huiles végétales comestibles sont produites à partir de fruits, de graines et de noix et le raffinage des huiles végétales comestibles (à des températures d'environ 200□ C ou plus) peut produire des esters 3-MCPD, 3-MCPDE et glycidyles. Une évaluation du JECFA (JECFA 83 en 2016) a révélé que le 3-MCPDE est cancérigène et qu'il cible habituellement les organes reproducteurs et les organes reproducteurs mâles. Le JECFA a également établi un groupe PMTDI de 4 ug/kg pour 3-MCPD et 3- MCPDE. Le JECFA a également conclu que le glycidol est génotoxique et pose également un problème de santé. CCCF 11 (2017) a décidé de préparer une COP pour la réduction de 3-MCPDE et de GE dans des huiles raffinées et des produits fabriqués avec des huiles raffinées par l'intermédiaire d'un GTE dirigé par les États-Unis. Ce travail a été approuvé par CAC 40 (2017)

Position :Le Sénégal soutientl'adoption de ce projet de Code à l'étape 5 pour continuer les discussions sur les questions en suspens

Justification : 3-MCPD et GE sont tous deux formés pendant le processus de chauffage, mais par différents mécanismes et sont connus pour poser des problèmes de santé. Les formes GE à des températures supérieures à 200□ C et sa formation augmentent avec la hausse de température. 3-MCPDE est formé à des températures plus basses (160- 200□ C) en présence de composés chlorés, mais la formation n'augmente pas à des températures plus élevées. Le JECFA a noté que l'exposition alimentaire au 3-MCPD pour les nourrissons nourris à la formule pourrait dépasser le PMTDI de 2,5 fois selon le pays

Thailand

The proposed draft COP is developed on the basis of the information on 3-MCPDE and GE mitigation methods currently used by industry and in experimental stage. The recommendation for practices in the proposed draft COP have to be based on scientifically proven studies to reduce formation of 3-MCPDE and GE significantly. However, some suggested practices in draft COP are under experiment which are not appropriate. Moreover, some recommended practices are not practical, increase cost of production and also cause excessive waste water that affected environment. So, we suggest reviewing and selecting only recommended practices which are practically and significantly reduce formation of 3-MCPDE and GE.

Trinidad and Tobago

Concern with the application and relevance to fish oil.

United Republic of Tanzania

Tanzania support that the CoP be adopted at Step 5 for further drafting and comments. 3-MCPD and GE are known to pose health concerns. They are the products of heating process with the latter being formed at temperature more than 200 degrees Centigrade and the former between 160 and 200 degrees Centigrade.

Collagen Casings Trade Association (CCTA)

CCTA organisation generally agrees with the provisions of the draft.

Global Organization for EPA and DHA Omega-3s (GOED)

GOED (Global Organization for EPA and DHA Omega-3s) supports the current draft as it is.

Proposed draft Guidelines for risk analysis of instances of contaminants in food where there is no regulatory level or risk management framework established

(in reply to CL 2018/47/OCS-CF)

Comments of Canada, Chile, Gambia, Kenya, Senegal, United Republic of Tanzania

Canada

Canada would like to thank the chair of the electronic working group, New Zealand, and the co chair, the Netherlands, for their continued efforts in preparing the draft Guidelines for risk analysis of instances of contaminants in food where there is no regulatory level or risk management framework established.

Canada supports adoption of this document at Step 5, as well as the further development of these guidelines, particularly the text retained in square brackets.

Chile

Chile de manera general está de acuerdo con las disposiciones del borrador revisado, con la excepción de las relacionadas en el ámbito de aplicación, principios, funciones y derivación del valor límite, que requieren de mayor consideración como se destaca en los comentarios específicos. Respecto de lo indicado en el punto iii párrafo 124 del REP18/CF Chile apoya considerar la posibilidad de constituir un grupo de trabajo físico que se reuna inmediatamente antes de la próxima reunión del CCCF para revisar comentarios presentados y formular una nueva propuesta de este documento para su estudio en el CCCF13

Los contaminantes sujetos a estas Directrices son:

*Los encontrados en un lote o partida de alimentos en concreto; Se Solicita citar un ejemplo o mejorar la redacción para entender a qué se refiere

"En caso de detecciones continuadas de un contaminante alimentario, se deben efectuar actividades específicas de vigilancia para determinar el grado de la posible exposición humana y la fuente potencial de contaminación. En conjunto, podría ser necesario explorar las opciones de gestión de riesgos, tales como niveles máximos, por ejemplo encargar una evaluación de riesgos completa para caracterizar el posible riesgo o peligro"

Se apoya la inclusión de este párrafo

Se agrega información, que aclara sentido de lo indicado por el párrafo

Traducción correcta al español

Se considera que aún este paso no está claramente explicado en el documento y que por tanto su inclusión en los principios debe ser revisada

Se agrega información, que aclara sentido de lo indicado por el párrafo

Gambia

This work was approved by CAC40 (2017). CCCF12 discussed and revised the document providing more clarification on its purpose.

These guidelines are aimed at contaminants which fall outside the normal regulatory framework. It includes groups of contaminants such as chemicals used to address specific environmental and climate-change related issues, contaminants from materials used during processing of food such as non-regulated packaging materials, printing inks, oils, lubricants, resins used as manufacturing maintenance compounds, newly characterized mycotoxins or phytotoxins, and environmental contaminants such as flame retardants and fragrances.

Compounds such as food additives, pesticides, veterinary drugs etc. for which regulatory requirements exist are excluded.

The Gambia supports the decision to adopt the document at Step 5 for further drafting and comments. The guidelines are intended for chemicals not anticipated previously to be present in food but likely of very low public health concern and have potential impact on international trade. The guidelines are for application by governments.

Kenya

We propose the the numbering in clause 6 to be revised(6.1 to 6.3). also the title of the clause should be "Derivation" not as presented.

kenya proposes the deletion of the bracketed clause 3 clause below bullet 3 since its better applied to the decision tree in the annex

Senegal

Contexte : Ces lignes directrices visent des contaminants qui sortent du cadre réglementaire normal. Il comprend des groupes de contaminants tels que les produits chimiques utilisés pour traiter des questions spécifiques liées à l'environnement et au changement climatique, les contaminants provenant de matériaux utilisés pendant le traitement des aliments, tels que les matériaux d'emballage non réglementés, les encres d'impression, les huiles, les lubrifiants, les résines utilisées comme composés d'entretien de la fabrication, les mycotoxines ou les phytotoxines nouvellement caractérisées, et les contaminants environnementaux tels que les ignifuges et les parfums.

Des composés tels que les additifs alimentaires, les pesticides, les médicaments vétérinaires, etc. pour lesquels des exigences réglementaires existent sont exclus

Position : Le Sénégal soutient la proposition du comité d'adopter le document à l'étape 5 pour traiter les questions en suspens

Justification : Les lignes directrices sont destinées aux produits chimiques qui ne sont pas prévus auparavant dans les aliments, mais qui sont susceptibles d'être très préoccupants pour la santé publique et qui ont des répercussions potentielles sur le commerce international. Les lignes directrices sont destinées aux gouvernements

United Republic of Tanzania

Tanzania support the decision to adopt the document at Step 5 for further drafting and comments. The guidelines are inteded for chemicals not anticipated previously to be present in food but likely of very low public health concern and have potential impact on international trade.

Committee on Residues of Veterinary Drugs in Foods
Comité sur les résidus de médicaments vétérinaires dans les aliments
Comité sobre Residuos de Medicamentos Veterinarios en los Alimentos

Proposed draft maximum residue limit for flumethrin (honey)

(in reply to CL 2018/38/OCS-RVDF)

Comments of Bahrain, Brazil, Burkina Faso, Costa Rica, Egypt, El Salvador, Gambia, Guatemala, Kenya, Norway, Peru, Senegal, South Africa

Bahrain
no comments added

Brazil
Brazil supports the adoption at step 5 of the proposed MRL for flumethrin in honey.

Burkina Faso
Sur la base de l'évaluation du JECFA, nous soutenons l'adoption de LMR de 6ug / kg pour le miel à l'étape 5/8

Costa Rica
Costa Rica supports the proposed adoptions.

Egypt
Egypt agrees with the proposed draft maximum residue limits (MRLs) for (flumethrin) for adoption at Step 5/8.

El Salvador
el Salvador agradece el documento en tramite 5; consideramos que el texto está listo para su aprobación.

Gambia
The Gambia supports adoption of MRL at Step 5/8. JECFA (85) recommended MRLs of 6ug/kg for honey.

Guatemala
Guatemala's honey annual monitoring plan includes flumethrin. In our records over 5 years, the substance has not been detected. Sometimes, beekeepers misuse bovine drugs with flumethrin and this is not a good practice, but we have not detected the substance either.

Kenya
kenya supports the adoption of the proposed draft MRLs for veterinary drugs for flumenthrin at step 5 as unnecessary.

Norway
Norway supports the adoption of the proposed draft maximum residue limit for flumethrin (honey) as circulated for comments at step 5

Peru
Reciba un cordial saludo y a la vez en atención al documento PROPOSED DRAFT MAXIMUM RESIDUE LIMITS (MRLS) FOR VETERINARY DRUGS (for adoption at Step 5), se manifiesta conformidad al LMR planteado para la Flumetrina en miel de abeja, como innecesario, teniendo en cuenta que corresponde al acuerdo llegado por el Comité del Codex, con el respaldo del Perú, en la 24° reunión del CCRVDF, llevado a cabo del 23 al 27 de abril pasado, en la cual se manifestó que es poco probable que los residuos resultantes del uso de esta sustancia como insecticida de acuerdo con las buenas prácticas para medicamentos veterinarios planteen un riesgo para la salud humana.

Senegal
Contexte : Le JECFA (85) a recommandé des LMR de 6ug / kg pour le miel.
Position : Nous soutenons l'adoption de la LMR
Justification : la LMR a été établie sur la base de l'évaluation du JECFA

South Africa
MRL for Flumethrin
South Africa supports adoption of this MRL in Honey at Step 5, based on the JECFA assessment.