CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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

Forty-first Session

Dusseldorf, Germany
24 – 29 November 2019

Comments by Nigeria

AGENDA ITEM 3

Comment: **Nigeria is of the view that Biofortification is useful in the context of Codex work and it will improve trade of biofortifed crops. The country is developing regional standards on Biofortified Foods.**

Justification: Currently biofortification of staple crops is on the increase across regions in the developing countries for sustainable and improved nutrition.

AGENDA ITEM 4a

Comment: **Nigeria supports retaining the last sentence of clause 9.6.4, with the removal of square bracket and the deletion of the word ''label'' such that the sentence reads "cross promotion between product categories is not permitted on the labeling of the product"**

Justification: **Cross promotion discourages breastfeeding and creates confusion about the use of infant formula.**

AGENDA ITEM 4b

Comment: **Nigeria supports the recommendation of the eWG for the deletion of Dextrose Equivalent (DE) from the Standard Follow-Up Formula.**

Justification: **DE is not a quality parameter in infant formula and does not measure the degree of sweetness.**

AGENDA ITEM 4C

Labelling Clause 9

Comment: **Nigeria proposes adoption of labeling provisions in section A of the Follow Up Formula upon incorporation of the amendment introduced by CCFL45 during endorsement of labeling provisions for section A.**

Justification: **Products are related to those covered by section A.**

AGENDA ITEM 4D

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**

AGENDA ITEM 5A

Comment: **Nigeria has supported the preamble and still supports the preamble as proposed.**

Justification**:**   **It gives important reference materials that must be used together with the guidelines in formulating RUTF products.**

(b) Good Manufacturing:

Comment: **Nigeria supports the proposed draft test for "good manufacturing" and good hygiene practices".**

Justification**:**   **The text makes reference to Codex Standards related to hygiene which is consistent with the Codex procedural manual.**

(c) Method of Analysis

Comment: Nigeria proposes amendment of the proposed text to read as follows:

                     It is recommended that methods of analysis and sampling of RUTF be in accordance with the Recommended Methods of Analysis and Sampling (CXS 234-1999), General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995), The Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997), Code of Hygienic Practice for Low Moisture Foods (CXC 75-2015), and other relevant Codex Alimentarius texts. When needed, specific methods of analysis should be developed in accordance with appropriate Guidelines on Measurement Uncertainty (CXG 54-2004), Protocol for the Design, Conduct and Interpretation of Method Performance Studies (CXG 64-1995), and Harmonized IUPAC.

                     In addition, new clauses on contaminants and pesticide residue limits should be introduced to make reference to Codex Standard CXS 193-1995 and levels established by Codex Alimentarius Commission for pesticide residue.

Justification**:**   **Reference should be made to the codex methods of analysis and sampling (CXS 234-1999.)**

(d) Packaging

Comment**:**   **Nigeria supports to the proposed text for "packaging" section of the guidelines.**

Justification: **The proposed text is consistent with similar clauses in existing texts.**

(e) Labeling:

Comment: **Nigeria agrees to amend the first bullet of additional mandatory labeling by replacing "medical" with 'health worker".**

Justification: **The text addresses the labeling aspects and makes reference to existing Codex labeling Standards.**

AGENDA ITEM 5B

Recommendation 1: (FOOD ADDITIVES)

Comment: **Nigeria appreciates the work of EWG of RUTF and proposes that this table should be sent to CCFA for their rectification.**

Justification**: CCFA is best suitable to assign the food category.**

Recommendation 4.2: (Identification of Food category for RUTF).

Comment: **Nigeria supports the adoption of clause 4.2.**

Justification: **10-12% total energy contribution from protein will ensure that patient receives enough protein content that they are able to metabolize.**

Recommendation 5 (Processing Technology**):**

Comment: **Nigeria supports adoption of proposed texts.**

Justification**: The text provides specific guidance on how to choose the processing methods while allowing choice of methods by the producer.**

Recommendation 6 (Carbohydrates**):**

Comment: **Nigeria agrees to the proposed test on carbohydrate in RUTF Guidelines.**

Justification: **The proposed text provides a quantitative limit for free sugars in the final products. This is an objective measure for limiting the use of free sugars in the products.**

AGENDA ITEM 6

Comment: **Nigeria supports the development of code of practice for the reduction of the levels of TFAs.**

AGENDA ITEM 10

Comment: **Nigeria commends the effort of Germany in preparing this discussion paper and supports the development of the proposed guidelines to better prioritize the work of the Committee.**

Justification: **The draft guideline has elaborated on a clear guideline on the step that will be considered before a new work item is initiated including where an existing Codex text has to be revised.**

AGENDA ITEM 11

Comment: **Nigeria appreciates the work of Argentina in drafting this paper and supports the development of draft Guidelines for Probiotics.**

Justification: **It is important to provide guidance on probiotics because there are still existing scientific gaps on the benefits associated with probiotics.**

AGENDA ITEM 12

Comment: **Nigeria thanked Costa Rica, United States of America and Paraguay in drafting this discussion paper and supports the commencement of work on the development of guidelines to establish nutritional profile for food labeling.**

Justification: **It makes work easy and a better way to inform consumer on true nutrition content of products.**