

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 4, 5, 6, 7

NFSDU/43 CRD19

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Forty-third Session

Düsseldorf, Germany

7 – 10 March with report adoption by virtual mode on 15 March 2023

*Comments by Indonesia*

#### AGENDA ITEM 4: REVIEW OF THE STANDARD FOR FOLLOW-UP FORMULA (CXS 156-1987) STRUCTURE AND PREAMBLE

Indonesia would like to thank New Zealand for preparing a discussion paper addressing some of the remaining aspects of the review of the Standard for Follow-up Formula (CXS 156-1987): Structure and Preamble. In regard to Recommendations 1 and 2 in Appendix I, Indonesia would like to provide the following comments:

Recommendation 1: Structure	Comments
That CCNFSDU agree to one standard with two parts, Part A covering Follow-up Formula for Older Infants and Part B covering Drink for Young Children with Added Nutrients, or Product for Young Children with Added Nutrients, or Drink for Young Children, or Product for Young Children.	As per our previous response to CL 2022/24/OCS-NFSDU, Indonesia continues to support 2 separate standards to accommodate differences in nutrient needs/requirements and use of food additives.
Recommendation 2: Preamble	Comments
That CCNFSDU consider and discuss the following Preamble text options:	
This Standard is divided into two sections. Section A refers to Follow-up Formula for Older Infants, and Section B deals with Drink for Young Children with Added Nutrients, or Product for Young Children with Added Nutrients, or Drink for Young Children, or Product for Young Children. [The application of this Standard should be consistent with national health and nutrition policies and relevant national/regional legislation and take into account the recommendations made in the International Code of Marketing of Breast-milk Substitutes, as per the national context]. [Relevant World Health Organization (WHO) guidelines and policies and World Health Assembly (WHA) resolutions were considered in the development of this Standard and may provide further guidance to countries].	In line with comment on supporting the establishment of two separate standards, Indonesia considers that the standards do not require Preamble.

## AGENDA ITEM 5: GENERAL PRINCIPLES FOR THE ESTABLISHMENT OF NRVS-R FOR PERSONS AGED 6 – 36 MONTHS (AT STEP 4)<sup>1</sup>

Indonesia would like to thank eWG chaired by Ireland for preparing the development of General Principles for the establishment of NRVs-R for persons aged 6 – 36 months. Indonesia would like to provide the following comments:

1. Appendix II, Part A: The proposed draft General Principles for Establishing Nutrient Reference Values (NRVs-R) for Persons Aged 6 – 36 Months
  1. Preamble : a. Indonesia agrees to add further text to clarify that these NRVs-R are used for labeling packaged foods for special dietary purposes (FSDU) intended for people aged 6-36 months.  
b. Indonesia agrees with the amendment on the last sentence for clarity and conciseness as the preamble overall states the principles apply to persons 6–36 months and encompasses options for separate and combined sets of NRVs-R for this population.
  2. Definitions : Indonesia agrees with the definition of Daily Intake Reference Values (DIRV), Individual Nutrient Level 98 (INL98), Upper Level of Intake (UL), and Adequate Intake (AI).
  3. General Principles for Establishing NRVs-R : Indonesia agrees with General Principles for Establishing NRVs-R
2. Appendix II, Part B: The revised pilot stepwise approach on the application of the proposed Draft General Principles for Establishing Nutrient Reference Values (NRVs-R) for Persons Aged 6 – 36 Months  
Indonesia agrees with the revised pilot stepwise approach on the application of the proposed Draft General Principles for Establishing Nutrient Reference Values
3. Appendix II, Part C: The Proposed draft NRVs-R for persons aged 6 – 36 months for vitamin B12, iodine, vitamin B6, riboflavin, thiamine, niacin, and vitamin C  
Indonesia supports the proposed draft NRVs-R for several nutrients, i.e., vitamin B6, thiamin, niacin, and riboflavin. However, Indonesia has different values for Vitamin B12, Iodine, Vitamin C due to specific condition in Indonesia that requires higher intake of those nutrients.

## AGENDA ITEM 6: TECHNOLOGICAL JUSTIFICATION FOR SEVERAL FOOD ADDITIVES

Firstly, Indonesia would like to express an appreciation to the EU for providing the update of work of the eWG on food additives. Indonesia would also like to ask for clarification regarding the intended meaning of “Proposed use level (per 100 mL in final product as consumed)” considering that the current term used is “Maximum Level” to reflect the safety concern for food additives.

Furthermore, in response to the request for information on the technological justification of several food additives, Indonesia would like to provide the following comments:

No.	Food Additives	Comments
1.	Ascorbyl palmitate (INS 304)	Indonesia supports the setting limit as GMP with a reference to the nutrient limits of Ascorbyl palmitate (INS 304) in the food category 13.1.3 and 13.3.3.
2.	Tocopherol concentrate, mixed (INS 307b)	Indonesia supports the use of Tocopherol concentrate, mixed (INS 307b) with the maximum 1 mg/100 mL in finished product as consumed.

**AGENDA 7: PRIORITIZATION MECHANISM / EMERGING ISSUES OR NEW WORK PROPOSALS**

Indonesia supports the development of proposed draft guideline for the preliminary assessment to identify and prioritize new work for CCFSDU.

In addition, Indonesia also supports the proposal for new work on the establishment of harmonized guidelines for probiotics for use as ingredients in food. As probiotic-containing foods are available across the globe, Indonesia is of the opinion that such harmonized guideline is essential. Specifically, the guideline is expected to provide the appropriate use of the term probiotics that would be useful in ensuring that only acceptable probiotic-containing products are on the market hence protecting the interest of consumers.