



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

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**PROPOSED DRAFT REVISED STANDARD FOR FOLLOW UP FORMULA FOR OLDER
INFANTS AND DRINK/PRODUCT FOR YOUNG CHILDREN WITH ADDED NUTRIENTS OR
DRINK FOR YOUNG CHILDREN: REMAINING SECTIONS (AT STEP 4)**

Comments of Chile, Costa Rica, Ecuador, Kenya, Mali, Senegal, HKI and WPHNA

CHILE

Chile welcomes the opportunity to participate by submitting comments in step 3 on the revision of the Standard for follow-up formulae: Draft Standard for follow-up formulae for older infants and [product] for young children

General comment:

We generally agree with the text and the progress made so far, and have specific observations regarding the text, taking into consideration the discussion and comments made at the last CCNFSDU meeting in 2018 and in the EWG regarding this document.

Specific comments:

Recommendation 1

We believe that a sentence stating that no sweetness should be added to these products should be maintained as a principle, so that if more scientific data become available in the future to assess the intensity of sweetness, this principle can be specified in more detail in the standard and more objective indicators for this characteristic can be made available.

We therefore propose the following text:

Lactose should be the carbohydrate of choice in [name of product] based on milk proteins. *[In products not made from milk proteins, glucose polymers (such as starch) should be the carbohydrate of choice so that they do not contribute to the sweet taste]*

Monosaccharides and disaccharides other than lactose should not exceed 2.5 g/100 kcal (0.60 g/100 kJ). National or regional authorities may limit this level to 1.25 g/100 kcal (0.30 g/100 kJ). Sucrose and fructose should not be added.

Recommendation 2

We believe that it should be deleted from the optional ingredients section. As these substances are additives, and they are not allowed in additives. In addition, we thought that the principle of not adding sweetness to these products would already have been included.

Recommendations 3 to 8: we agree with the suggestions of the EWG coordinators.

Recommendation 9

For points a) and b), we agree with writing out the full text, as indicated in option 2 in each letter.

Recommendations 10 to 15: we agree with the suggestions of the EWG coordinators.

¹ **Note:** for CCNFSDU42 these comments will be considered under Agenda Item 4a). See the footnote and notes to the provisional agenda ([CX/NFSDU 21/42/1](#)).

² This is a re-issue of the comments published for CCNFSDU41, for consideration by CCNFSDU42.

COSTA RICA

Costa Rica thanks New Zealand, France and Indonesia for all the work done and also for the opportunity to provide the following comments:

Recommendation 1

Costa Rica supports recommendation 1 with the following amendment:

4) Lactose should be the carbohydrate of choice in [name of product] based on milk protein. **[For low-lactose products and products that are not based on milk proteins, glucose polymers should be the preferred carbohydrates for use].**

Monosaccharides and disaccharides other than lactose should not exceed 2.5 g/100 kcal (0.60 g/100 kJ). National and/or regional authorities may limit this level to 1.25 g/100 kcal (0.30 g/100 kJ). Sucrose and/or fructose should not be added.

Recommendation 2

Costa Rica considers, as indicated by the Chair of the EWG, that paragraph 3.2.1 of the “optional ingredients” section deals with the addition of ingredients or substances to achieve a “particular nutritional purpose”. The text added in brackets is inconsistent with this, since imparting or enhancing a sweet taste does not serve a nutritional purpose.

New ingredients or optional substances must be safe and suitable for the target population in accordance with the general principles set out in the revised text. The Codex standard should reflect the latest science at the time it is set or revised.

The use of flavouring substances and food additives is managed, respectively, by the provisions on flavouring substances and food additives in the Standard. Perhaps this could be considered as the intended purpose of this sentence, specifying which substances it refers to.

Recommendation 3

Costa Rica supports points a and b of Recommendation 3.

Recommendation 4

Costa Rica supports Recommendations 4a and 4b. However, with regard to 4b we have one concern, since the CCNFSDU did not set a sodium maximum to ensure the nutritional integrity of [name of product] for young children. If a sodium limit is established, we support maintaining the sentence [the sodium amounts derived from vitamin and mineral ingredients shall comply with the limit set for sodium in Section 3.2.6].

Recommendation 5

Costa Rica supports Recommendation 5, a and b.

Recommendation 6

Costa Rica supports Recommendation 6, a and b.

Recommendation 7

Costa Rica supports Recommendation 7, a and b.

Recommendation 8

Costa Rica supports Recommendation 8a.

With regard to Recommendation 8b), we consider it preferable that “packaging gases” be included in the food additives section in the appropriate functional class. We believe it is not necessary that they also be retained in Section 7 Packaging. Now, if the packaging gases were listed in both places, as in the case of the infant formula standard, we would agree.

Recommendation 9

Costa Rica supports option 2 for Recommendation 9, a and b, as they consider that it can provide more clarity to the text.

With regard to Appendix II, we have the following observations:

INS 322 covers both INS 322 (i) and 322 (ii). However, only INS 322 (i) has a JECFA monograph and safety assessment. In addition, the GSFA specifies that Lecithin INS 322 (i) is permitted in FC 13.1.2. Therefore, this information in the product standard should be for INS 322 (i).

With regard to sodium ascorbate 301, we would like to point out that sodium ascorbate is a source of sodium. For older infants, it must have the accompanying sodium note as in the current standard. Practically, this should be shown by adding a third column indicating: within the sodium limits in Section 3.1.

Recommendation 10

Costa Rica supports Recommendation 10, a and b.

Recommendation 11

Costa Rica supports Recommendation 11, a and b.

Recommendation 12

Costa Rica supports Recommendation 12, a and b, although it considers the following amendment to be necessary:

HYGIENE

It is recommended that the product covered by this standard be prepared and handled in accordance with the appropriate sections of the [General Principles of Food Hygiene \(CXC 1-1969\)](#) and other relevant Codex texts such as the [Code of Hygienic Practice for Powdered Formulae for Infants and Young Children \(CXC 66-2008\)](#) **and, in the case of liquid formula that has been commercially sterilised, the appropriate sections of [the Code of Hygienic Practice for Aseptically Processed and Packaged Low-Acid Foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low Acid Canned Foods (CXC 23-1979)].**

Products must comply with the microbiological criteria established in accordance with the [Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods \(CXG 21-1997\)](#).

Recommendation 13

Costa Rica considers it preferable that “packaging gases” be included in the food additives section in the appropriate functional class. We believe it is not necessary that they also be retained in this section on Packaging. Now, if the packaging gases were listed in both places, as in the case of the infant formula standard, we would agree.

Recommendation 14

Costa Rica supports Recommendation 14, a and b.

Recommendation 15

Costa Rica supports Recommendation 15, a and b.

ECUADOR

(i) General comments

Ecuador appreciates the work done by the electronic working group led by New Zealand, France and Indonesia.

It also stresses that this regulation should be aligned with World Health Assembly resolution 69.9 and resolutions WHA33.32 (1980), WHA34.22 (1981), WHA35.26 (1982), WHA37.30 (1984), WHA39.28 (1986), WHA41.11 (1988), WHA43.3 (1990), WHA45.34 (1992), WHA46.7 (1993), WHA47.5 (1994), WHA49.15 (1996), WHA54.2 (2001), WHA55.25 (2002), WHA58.32 (2005), WHA59.21 (2006), WHA61.20 (2008) and WHA63.23 (2010) on infant and young child nutrition, appropriate feeding practices and other related issues.

(ii) Specific comments

Ecuador agrees with the recommendations made by the Chair in the document generated as a result of the work of the electronic working group. However, it does not agree with Recommendation 10 because, according to the WHO clarification issued in 2016³ and 2019⁴, follow-up formulae for infants and young children aged 6-36 months are considered to be breast-milk substitutes. Therefore, flavourings should be restricted to the use of vanilla extract and vanillin, excluding natural fruit extracts.

A clarification of this argument in Recommendation 10 is thus requested.

³ Guidance on ending the inappropriate promotion of foods for infants and young children.

http://apps.who.int/gb/ebwha/pdf_files/WHA69/A69_7Add1-en.pdf?ua=1

⁴ Clarification on the classification of follow-up formulas for children 6-36 months as breast-milk substitutes.

<https://apps.who.int/iris/bitstream/handle/10665/275875/WHO-NMH-NHD-18.11-eng.pdf?ua=1>

KENYA

Kenya supports the recommendations as proposed by the eWG. In regard to recommendation 9 where two options are provided in relation to carry-over principle of food additives, Kenya supports option 2 which borrows similar words as those in CXS 72 on infant formula standard. Option 2 provides more clarity on the matter in addition to making reference to the preamble of GSFA in part b of the text. This option will make the standard user friendly.

MALI

The presentation of this working document has given rise to the following questions, comments, observations and contributions:

RECOMMENDATION 1: EQUIVALENT IN DEXTROSE

Mali supports the proposed text with the deletion of the brackets. The text will therefore read: "Lactose should be the preferred source of carbohydrate in milk protein-based [product name]. In products that are not milk protein-based, glucose polymers will be the preferred source of carbohydrate."

RECOMMENDATION 2: SENTENCE IN SECTION 3.2.1 ON [PRODUCT NAME] FOR YOUNG CHILDREN

Mali is in favour of retaining the proposed text, including the words in brackets, to ensure its longevity. This issue is a critical one, given the amount of global interest in this subject and the need to tackle the issue of overweight children and childhood obesity. It is estimated that by 2030, 250 million children worldwide will be obese, and the period from 12 to 36 months of age is crucial for ensuring that children do not become predisposed to prefer sweet-tasting foods.

The text to be retained is as follows: "Substances must not be added with the aim of imparting or enhancing the sweet taste of [product name]."

RECOMMENDATION 3a: PURITY REQUIREMENTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text, and emphasises the need to change and distinguish the relevant age groups based on the definitively worded standard.

The text should read: "All ingredients must be clean, of good quality, safe and suitable for ingestion by older infants. They must satisfy their normal quality requirements, for example in terms of colour, flavour and smell."

RECOMMENDATION 4a: COMPOUND VITAMINS AND MINERAL SALTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text

This should read: "The compound vitamins and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 must be selected from the Advisory List of Mineral Salts and Compound Vitamins for Use in Foods for Infants and Young Children approved by the Codex Alimentarius Commission (CXG 10-1979)."

The amounts of sodium originating from vitamins and minerals must not exceed the sodium limit specified in Section 3.1."

RECOMMENDATION 4b: COMPOUND VITAMINS AND MINERAL SALTS FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text, including the deletion of the second sentence.

The text should read: "The compound vitamins and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 must be selected from the Advisory List of Mineral Salts and Compound Vitamins for Use in Foods for Infants and Young Children approved by the Codex Alimentarius Commission (CXG 10-1979)."

RECOMMENDATION 5a: CONSISTENCY AND SIZE OF PARTICLES FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text.

The text should read: "When prepared as directed, the product must be free from lumps and coarse particles."

RECOMMENDATION 5b: CONSISTENCY AND SIZE OF PARTICLES FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text.

The text should read: "When prepared as directed, the product must be free from lumps and coarse particles."

RECOMMENDATION 6a: SPECIFIC PROHIBITIONS IN RESPECT OF FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text.

The text should read: "The product and its constituents must not have been treated with ionising radiation."

RECOMMENDATION 6b: SPECIFIC PROHIBITIONS IN RESPECT OF [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text.

The text should read: "The product and its constituents must not have been treated with ionising radiation."

RECOMMENDATION 7a: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposal that for follow-up formula for older infants, the authorisations for food additives (excluding flavourings) should be retained in the current Standard for Follow-up Formula (CXS 156-1987), and notes that these will be replaced with a reference to the corresponding sections of the GSFA when harmonisation is complete.

RECOMMENDATION 7b: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposal that for [product name] for older infants, the authorisations for food additives (excluding flavourings) should be retained in the current Standard for Follow-up Formula (CXS 156-1987), and notes that these will be replaced with a reference to the corresponding sections of the GSFA when harmonisation is complete.

RECOMMENDATION 8a: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali is in favour of retaining the text about packaging gas in the "Food additives" section, of appropriate classification, and its retention in Section 7 on packaging.

RECOMMENDATION 8b: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali is in favour of retaining the text about packaging gas in the "Food additives" section, of appropriate classification, and its retention in Section 7 on packaging.

RECOMMENDATION 9a: CARRIERS OF ADDITIVES AND NUTRIENTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali is in favour of Option 1, which consists in a reference to Section 4 of the Preamble of the GSFA (CXS 192-1995). As noted by the Chair, this would ensure that Section 4.3 is read within the context of Section 4 in its entirety and that it conforms to the principle of referring to existing terms rather than repeating requirements that are already in product standards.

RECOMMENDATION 9b: CARRIERS OF ADDITIVES AND NUTRIENTS FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali is in favour of Option 1, which consists in a reference to Section 4 of the Preamble of the GSFA (CXS 192-1995). As noted by the Chair, this would ensure that Section 4.3 is read within the context of Section 4 in its entirety and that it conforms to the principle of referring to existing terms rather than repeating requirements that are already in product standards.

RECOMMENDATION 10a: FLAVOURINGS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali is strongly opposed to the proposed text regarding authorised flavourings in [product name] for young children.

No flavourings should be authorised for these products, because they replace the liquid part of the diet and are regarded as substitutes for breast milk, not as complementary foods. As such, the standards for [product name] must conform to the provisions imposed for infant formulas, which do not permit flavourings. It is equally important to note that the fundamental rationale where health and nutrition are concerned is to disallow flavourings. These flavourings can cause infants to develop a preference for sweet-tasting foods. All sweet flavourings that encourage a preference for sweet-tasting foods, at this vital stage of life, are not recommended and can have a negative effect on food choices and health throughout childhood and on into adulthood.

If these flavourings are authorised, they can predispose children to a preference for flavourings encountered in sweetened and flavoured milk, juice and fizzy drinks in the beverages/liquid foods category. These are not healthy choices for children compared with ordinary milk and water, which are not flavoured.

RECOMMENDATION 10b: FLAVOURINGS FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali is strongly opposed to the proposed text regarding authorised flavourings in [product name] for young children.

No flavourings should be authorised for these products, because they replace the liquid part of the diet and are regarded as substitutes for breast milk, not as complementary foods. As such, the standards for [product name] must conform to the provisions imposed for infant formulas, which do not permit flavourings. It is equally important to note that the fundamental rationale where health and nutrition are concerned is to disallow flavourings. These flavourings can cause infants to develop a preference for sweet-tasting foods. All sweet flavourings that encourage a preference for sweet-tasting foods, at this vital stage of life, are not recommended and can have a negative effect on food choices and health throughout childhood and on into adulthood.

If these flavourings are authorised, they can predispose children to a preference for flavourings encountered in sweetened and flavoured milk, juice and fizzy drinks in the beverages/liquid foods category. These are not healthy choices for children compared with ordinary milk and water, which are not flavoured.

RECOMMENDATION 11a: CONTAMINANTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text.

The text should read: “The products covered by this standard must comply with the maximum limits of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products addressed by this standard must comply with the Maximum Residue Limits for Pesticides adopted by the Codex Alimentarius Commission.”

RECOMMENDATION 11a: CONTAMINANTS FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text.

The text should read: “The products covered by this standard must comply with the maximum limits of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products addressed by this standard must comply with the Maximum Residue Limits for Pesticides adopted by the Codex Alimentarius Commission.”

RECOMMENDATION 12a: HYGIENE FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text and the retention of the wording in brackets, so that it can be examined at a future date.

The text reads as follows: “It is recommended that the product covered by the present standard is prepared and handled in conformity with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969) and other relevant parts of the Codex, for example: Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008), Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993), and Code of Hygienic Practice for Low and Acidified Low Acid Canned Foods (CXC 23-1979).

The products must satisfy all microbiological criteria established in the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).”

RECOMMENDATION 12b: HYGIENE FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text and the retention of the wording in brackets, so that it can be examined at a future date.

The text reads as follows: “It is recommended that the product covered by the present standard is prepared and handled in conformity with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969) and other relevant parts of the Codex, for example: Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008), Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993), and Code of Hygienic Practice for Low and Acidified Low Acid Canned Foods (CXC 23-1979).

The products must satisfy all microbiological criteria established in the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).”

RECOMMENDATION 13a: PACKAGING FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text.

The text should read: “The product must be packaged in containers that preserve the food’s hygienic and other qualities. In liquid form, the product must be packaged in hermetically sealed containers; nitrogen and carbon dioxide may be used for packaging.

Containers and packaging may only be made of materials that are safe and suitable for their intended use. If the Codex Alimentarius Commission has defined a standard for all materials of this kind used for packaging, this standard shall apply.”

RECOMMENDATION 13b: PACKAGING FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text.

The text should read: “The product must be packaged in containers that preserve the food’s hygienic and other qualities. In liquid form, the product must be packaged in hermetically sealed containers; nitrogen and carbon dioxide may be used for packaging.

Containers and packaging may only be made of materials that are safe and suitable for their intended use. If the Codex Alimentarius Commission has defined a standard for all materials of this kind used for packaging, this standard shall apply.”

RECOMMENDATION 14a: FILLING OF CONTAINERS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text.

The text should read: “Where ready-to-eat products are concerned, the container filling must be:

- (i) at least 80% v/v for products weighing less than 150 g (5 oz);
- (ii) no less than 85% v/v for products weighing between 150 and 250 g (5 - 9 oz); and
- (iii) at least 90% v/v for products weighing more than 250 g (9 oz) of the water capacity of the container. The water capacity of the container is the volume of distilled water at 20 °C that the sealed container will hold when it is completely full.”

RECOMMENDATION 14b: FILLING OF CONTAINERS FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text.

The text should read: “Where ready-to-eat products are concerned, the container filling must be:

- (iv) at least 80% v/v for products weighing less than 150 g (5 oz);
- (v) no less than 85% v/v for products weighing between 150 and 250 g (5 - 9 oz); and
- (vi) at least 90% v/v for products weighing more than 250 g (9 oz) of the water capacity of the container. The water capacity of the container is the volume of distilled water at 20 °C that the sealed container will hold when it is completely full.”

RECOMMENDATION 15a: ANALYTICAL AND SAMPLING PROCEDURE FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Mali supports the proposed text.

The text should read: “To verify compliance with the current standard, the analytical methods set out in the Recommended Methods of Analysis and Sampling (CXS 234-1999) shall be used, in accordance with the requirements of the current standard.”

RECOMMENDATION 15b: ANALYTICAL AND SAMPLING PROCEDURE FOR [PRODUCT NAME] FOR YOUNG CHILDREN

Mali supports the proposed text.

The text should read: “To verify compliance with the current standard, the analytical methods set out in the Recommended Methods of Analysis and Sampling (CXS 234-1999) shall be used, in accordance with the requirements of the current standard.”

SENEGAL

Recommendation 1: The CCNFSDU is invited to approve the following text: “4) In milk protein-based [product name], lactose must be the preferred source of carbohydrate. [In products that are free from milk protein, glucose polymers shall be the preferred source of carbohydrate.]”

Monosaccharides and disaccharides, other than lactose, must not exceed 2.5 g/100 kcal (0.60 g/100 kJ). National and/or regional authorities may limit these figures to 1.25 g/100 kcal (0.30 g/100 kJ). Sucrose and/or fructose must not be added.”

Senegal’s position: Senegal approves the text as proposed.

Comment: The use of these products at these doses does not change the flavour of follow-up formula for older infants and [products] for young children

Recommendation 2: The CCNFSDU is invited to consider whether it agrees to retain the sentence [No substance intended to impart or enhance sweetness in [product name] may be added] in Section 3.2.1 “Optional ingredients”, in order to emphasise that these substances or ingredients must not be used in products, or whether it should be deleted.

Senegal’s position: Senegal approves this proposal regarding Recommendation 2.

Comment: In accordance with the objective of Recommendation 1, it is important that these guidelines are retained in the standard to emphasise the need to avoid the addition of sweeteners.

Recommendation 3: a) Follow-up formula for older infants: The CCNFSDU is invited to approve the following text regarding the “Purity specifications” section for follow-up formula for older infants: “All ingredients must be clean, of good quality, safe and suitable for ingestion by [older] infants aged 6 months and over and by young children. They must comply with the normal quality requirements, for example in terms of colour, flavour and smell.”

b) [Product name] for young children: The CCNFSDU is invited to adopt the following text regarding the “Purity specifications” section for [product name] for young children: “All ingredients must be clean, of good quality, safe and suitable for ingestion by infants aged 6 months and over and by young children. They must comply with the normal quality requirements, for example in terms of colour, flavour and smell.”

Senegal’s position: Senegal supports the two proposed passages.

Comment: These passages guarantee the quality of the product and the health of consumers.

Recommendations 4, 5, 6, 7 & 8: Senegal backs the recommendations of the electronic working group.

Comment: All these recommendations guarantee product quality and safety.

Recommendation 9:

Senegal’s position: Senegal supports Option 2 in Section A and Section B.

Comment: The passages about follow-up formula are a lot more precise and are already included in Section 4 of the Codex General Standard for Food Additives (GSFA).

Recommendation 10:

Senegal’s position: Senegal is not in favour of adding flavourings to follow-up formula for the two categories in Section A.

Comment: These flavourings can alter the taste of the product and lead to addiction in children.

Recommendations 11 (Contaminants), 12 (Hygiene), 13 (Packaging), 14 (Filling of containers) and 15 (Analytical and sampling methods):

Senegal supports the recommendations of the electronic working group.

Comment: These recommendations refer to the texts of the Codex Alimentarius Commission.

HKI – HELEN KELLER INTERNATIONAL

RECOMMENDATION 1: DEXTROSE EQUIVALENT

Helen Keller International supports the proposed text with the deletion of the square brackets.

The text to read: ⁴⁾ *Lactose should be the preferred carbohydrates in [name of product] based on milk protein. For products not based on milk protein glucose polymers should be the preferred carbohydrates used.*

RECOMMENDATION 2: SENTENCE IN SECTION 3.2.1 FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the retention of the proposed text included in the square brackets in order to ensure future proofing of the text. This is a critical issue as the world increasingly faces and is required to address the issue of overweight and obesity in children – it is estimated that by 2030, 250 million children worldwide will be obese – and that the period 12-36 months is critical in ensuring children do not become conditioned to sweet tastes.

The text to be retained is: *Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product].*

RECOMMENDATION 3a: PURITY REQUIREMENTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text, noting the need for modification and separation of the relevant age groups depending on the final structure of the standard.

The text to read: All ingredients shall be clean, of good quality, safe and suitable for ingestion by older infants. They shall conform with their normal quality requirements, such as colour, flavour and odour.

RECOMMENDATION 3b: PURITY REQUIREMENTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text, noting the need for modification and separation of the relevant age groups depending on the final structure of the standard.

The text to read: All ingredients shall be clean, of good quality, safe and suitable for ingestion by young children. They shall conform with their normal quality requirements, such as colour, flavour and odour.

RECOMMENDATION 4a: VITAMIN COMPOUNDS AND MINERAL SALTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *Vitamin compounds and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 should be selected from the Advisory List for Mineral Salts and Vitamin Compounds for Use in Foods for Infants and Children approved by the Codex Alimentarius Commission (CXG 10-1979).*

The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.1.

RECOMMENDATION 4a: VITAMIN COMPOUNDS AND MINERAL SALTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text including the deletion of the second sentence.

The text to read: *Vitamin compounds and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 should be selected from the Advisory List for Mineral Salts and Vitamin Compounds for Use in Foods for Infants and Children approved by the Codex Alimentarius Commission (CXG 10-1979).*

RECOMMENDATION 5a: CONSISTENCY AND PARTICLE SIZE FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *When prepared according to the directions of use, the product shall be free of lumps and of large, coarse particles.*

RECOMMENDATION 5b: CONSISTENCY AND PARTICLE SIZE FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *When prepared according to the directions of use, the product shall be free of lumps and of large, coarse particles.*

RECOMMENDATION 6a: SPECIFIC PROHIBITIONS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *The product and its components shall not have been treated by ionizing radiation.*

RECOMMENDATION 6b: SPECIFIC PROHIBITIONS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *The product and its components shall not have been treated by ionizing radiation.*

RECOMMENDATION 7a: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposal to retain the permissions for food additives (excluding flavourings) in the current Follow-up Formula Standard (CXS 156-1987), for follow-up formula for older infants, noting these will be replaced by a reference to the corresponding sections of the GSFA following the completion of the alignment work.

RECOMMENDATION 7b: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposal to retain the permissions for food additives (excluding flavourings) in the current Follow-up Formula Standard (CXS 156-1987), for [name of product] for young

children, noting these will be replaced by a reference to the corresponding sections of the GSFA following the completion of the alignment work.

RECOMMENDATION 8a: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International agrees to administrative changes i – iii, and to aligning the names of food additives in the current Follow-up Formula Standard with those in the GSFA and the changes in Appendix II.

RECOMMENDATION 8b: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports retaining the text on packaging gases in the Food Additive section and it being listed under the appropriate functional class and supports retaining them in Section 7 on Packaging.

RECOMMENDATION 9a: CARRY-OVER FOOD ADDITIVES AND NUTRIENT CARRIERS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports Option 1 of referencing Section 4 of the Preamble of the GSFA (CXS 192-1995) as this would as per the note of the Chair ensure that Section 4.3 is read in the context provided by the entire Section 4 and would follow the principle to reference existing texts rather than to repeat requirements included in commodity standards.

RECOMMENDATION 9b: CARRY-OVER FOOD ADDITIVES AND NUTRIENT CARRIERS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports Option 1 of referencing Section 4 of the Preamble of the GSFA (CXS 192-1995) as this would as per the note of the Chair ensure that Section 4.3 is read in the context provided by the entire Section 4 and would follow the principle to reference existing texts rather than to repeat requirements included in commodity standards.

RECOMMENDATION 10a: FLAVOURINGS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International strongly objects to the text proposed regarding flavourings permitted in [name of product] formula for young children.

No flavourings should be permitted in these products as they replace the liquid part of the diet and are considered breast-milk substitutes and not complementary foods. As such, the standards for [name of products] should be in line with the provisions for infant formula which do not permit flavourings. It is also important to note that a critical health and nutrition rationale for not permitting flavourings. These flavourings can contribute to developing sweet taste preferences. Any sweet flavouring that results in developing a preference for sweet tastes, at this vital stage of life, is not recommended and can have a negative impact on food choices and health outcomes throughout the child's life and into adulthood.

If such flavourings are permitted, they may predispose children to a preference for flavours that, in the beverage/liquid food category, are found in sweetened and flavoured milks, fruit juices and sodas. These are not healthy choices for children, relative to regular milk and water, neither of which are flavoured.

[Note: Two references to support this are Ventura AK, Worobey J. Early influences on the development of food preferences. *Curr Bio.* 2013;23(9):R401-8. and Beauchamp GK, Mennella JA. Early flavor learning and its impact on later feeding behavior. *J Pediatr Gastroenterol Nutr.* 2009;48 Suppl 1:S25-30.]

We draw attention to the recently (September 2019) released 'Technical Scientific Report: Healthy Beverage Consumption in Early Childhood – Recommendations from Key National Health and Nutrition Organisations'. The consensus statement, developed by an expert panel of representatives from (in alphabetical order) the Academy of Nutrition and Dietetics (AND), the American Academy of Pediatric Dentistry (AAPD), the American Academy of Pediatrics (AAP), and the American Heart Association (AHA), provides authoritative guidance on optimal beverage consumption during early childhood and supports a life course approach to the development of healthy dietary patterns and prevention of chronic disease.

(Full report available at <https://healthydrinkshealthykids.org/app/uploads/2019/09/HER-HealthyBeverageTechnicalReport.pdf>)

This expert recommendation clearly states that for children 0-12 months "*Do not consume milk (flavoured or plain)*" and for 12-60 months "*Consume only plain, pasteurized milk; flavoured milk is not recommended.*" The rationale provided includes "*the expert panel considered it appropriate to recommend avoiding flavoured milk in order to minimize intake of added sugars and to avoid contributing to early establishment of a preference for sweet taste as well as potential negative impacts on nutrient intake and diet quality.*"

The expert panel recommends that "*after cow's milk is introduced at 1 year of age, only plain, pasteurized milk be consumed by young children.*" With regards to what the report refers to as toddler milk, the

recommendations are equally clear: “0-12 months: Avoid supplementation with ‘transition’ or ‘weaning’ formulas; nutrient needs should be met primarily through human milk and/or infant formula.” and for 12–60 months: “Toddler milk is not recommended; nutrient needs should be met primarily through nutritionally adequate dietary patterns.”

So, while it may be argued that standards for follow-up formula for older infants should permit flavouring, similar to processed cereal based foods for infants and young children which permits flavouring from a safety perspective, Helen Keller International believes that this argument is flawed. Codex should consider liquid foods and what effect flavoured follow-up formula for older infants (even if low in sugar) might have on the beverage preferences of children as they grow up.

We also note that the WHO is working on finalising a revised set of IYCF indicators for children under 24 months (we believe due to be published towards the end of the year). Among these, ‘sweet beverage consumption’ is an indicator of an unhealthy young child diet ‘Sweetened milks’ are also included in the category of unhealthy foods.

RECOMMENDATION 10b: FLAVOURINGS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International strongly objects to the text proposed regarding flavourings permitted in [name of product] formula for young children.

No flavourings should be permitted in these products as they replace the liquid part of the diet and are considered breast-milk substitutes and not complementary foods. As such, the standards for [name of products] should be in line with the provisions for infant formula which does not permit flavourings. It is also important to note that a critical health and nutrition rationale for not permitting flavourings. These flavourings can contribute to developing sweet taste preferences. Any sweet flavouring that results in developing a preference for sweet tastes, at this vital stage of life, is not recommended and can have a negative impact on food choices and health outcomes throughout the child’s life and into adulthood.

If such flavourings are permitted, they may predispose children to a preference for flavours that, in the beverage/liquid food category, are found in sweetened and flavoured milks, fruit juices and sodas. These are not healthy choices for children, relative to regular milk and water, neither of which are flavoured.

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With regards to what the report refers to as toddler milk, the recommendations are equally clear: “0-12 months: Avoid supplementation with ‘transition’ or ‘weaning’ formulas; nutrient needs should be met primarily through human milk and/or infant formula.” and for 12–60 months: “Toddler milk is not recommended; nutrient needs should be met primarily through nutritionally adequate dietary patterns.”

So, while it may be argued that standards for follow-up formula for older infants should permit flavouring, similar to processed cereal based foods for infants and young children which permits flavouring from a safety perspective Helen Keller International believes that this argument is flawed. Codex should consider liquid foods and what effect flavoured follow-up formula for older infants (even if low in sugar) might have on the beverage preferences of children as they grow up.

We also note that the WHO is working on finalising a revised set of IYCF indicators for children under 24 months (we believe due to be published towards the end of the year). Among these, ‘sweet beverage

consumption' is an indicator of an unhealthy young child diet 'Sweetened milks' are also included in the category of unhealthy foods.

RECOMMENDATION 11a: CONTAMINANTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *The products covered by this Standard shall comply with the Maximum levels of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products covered by this Standard shall comply with the maximum residues limits for pesticides established by the Codex Alimentarius Commission.*

RECOMMENDATION 11a: CONTAMINANTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *The products covered by this Standard shall comply with the Maximum levels of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products covered by this Standard shall comply with the maximum residues limits for pesticides established by the Codex Alimentarius Commission.*

RECOMMENDATION 12a: HYGIENE FOR FOLLOW UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text and to retain the text in square brackets for future proofing.

The text to read: *It is recommended that the product covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), and other relevant Codex texts such as the Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008) the Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low-acid Canned Foods (CXC 23-1979).*

The products should comply with any microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).

RECOMMENDATION 12b: HYGIENE FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text and to retain the text in square brackets for future proofing.

The text to read: *It is recommended that the product covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), and other relevant Codex texts such as the Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008) the Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low-acid Canned Foods (CXC 23-1979).*

The products should comply with any microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).

RECOMMENDATION 13a: PACKAGING FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *The product shall be packed in containers which will safeguard the hygienic and other qualities of the food. When in liquid form, the product shall be packed in hermetically sealed containers; nitrogen and carbon dioxide may be used as a packing media.*

The containers, including packaging materials, shall be made only of substances which are safe and suitable for their intended uses. Where the Codex Alimentarius Commission has established a standard for any such substance used as packaging materials, that standard shall apply.

RECOMMENDATION 13b: PACKAGING FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *The product shall be packed in containers which will safeguard the hygienic and other qualities of the food. When in liquid form, the product shall be packed in hermetically sealed containers; nitrogen and carbon dioxide may be used as a packing media.*

The containers, including packaging materials, shall be made only of substances which are safe and suitable for their intended uses. Where the Codex Alimentarius Commission has established a standard for any such substance used as packaging materials, that standard shall apply.

RECOMMENDATION 14a: FILL OF CONTAINER FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *In the case of products in ready-to-eat form, the fill of container shall be:*

- (i) not less than 80% v/v for products weighing less than 150 g (5 oz.);*
- (ii) not less than 85% v/v for products in the weight range 150-250 g (5 - 9 oz.); and*
- (iii) not less than 90% v/v for products weighing more than 250 g (9 oz.) of the water capacity of the container. The water capacity of the container is the volume of distilled water at 20°C which the sealed container will hold when completely filled.*

RECOMMENDATION 14b: FILL OF CONTAINERS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *In the case of products in ready-to-eat form, the fill of container shall be:*

- (iv) not less than 80% v/v for products weighing less than 150 g (5 oz.);*
- (v) not less than 85% v/v for products in the weight range 150-250 g (5 - 9 oz.); and*
- (vi) not less than 90% v/v for products weighing more than 250 g (9 oz.) of the water capacity of the container. The water capacity of the container is the volume of distilled water at 20°C which the sealed container will hold when completely filled.*

RECOMMENDATION 15a: METHOD OF ANALYSIS AND SAMPLING FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *For checking the compliance with this Standard, the methods of analysis contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) relevant to the provisions in this standard, shall be used.*

RECOMMENDATION 15b: METHOD OF ANALYSIS AND SAMPLING FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *For checking the compliance with this Standard, the methods of analysis contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) relevant to the provisions in this standard, shall be used.*

OTHER OUTSTANDING MATTERS

STRUCTURE OF THE STANDARD

Helen Keller International strongly supports the structure of this Standard being one Standard with two parts.

Helen Keller International reiterates that because these products are conceptually similar and serve as a liquid part of the diversified diet of older infants and young children during the complementary feeding period, they should be part of the same standard. *It has nothing to do with the composition of the 2 products but with their functional role in children's diets.*

In opening our comments on this issue, Helen Keller International draws attention to the erroneous comment made during the EWG discussion on this issue, whereby it was stated that "Many of the members supporting 2 separate standards were of the view that follow-up formula for older infants is a breast-milk substitute and nutritionally complete whereas product for young children is neither". This is incorrect - the definition of BMS is not based on the composition of the product but on its function. Both categories of follow-up formula (6-12 months and 12-36 months) are generally used in LMIC to replace breastmilk and the WHO has been clear that infant formula and both categories of follow-up formula under discussion are considered as breastmilk substitutes.

The justification for one Standard with two parts is as follows:

1. The Committee has already agreed to the revision of the Follow-up Formula Standard with a point of differentiation of the products at 12 months and a Preamble to cover both categories 6-12 months and 12-36 months (see CCFNSDU meeting notes 2016, confirmed in CCFNSDU meeting notes 2017). Thus, one standard with 2 parts has already been agreed and accepted and does not require further discussion.
2. Follow-up formulas and milk products for young children are not necessary. In 1986, the World Health Assembly declared that “the practice being introduced in some countries of providing infants with specially formulated milks (so-called follow-up milks) is not necessary” (WHA 39.28). These follow-up formula products are considered by many, including Helen Keller International, as having been developed as an attempt to circumvent the marketing prohibitions of the Code by claiming that they were not breast-milk substitutes. The World Health Assembly (WHA 69.9 and related Guidance on Ending Inappropriate Promotion of Foods for Infants and Young Children), has now clarified that these products are all breast-milk substitutes.

There is, however, merit in distinguishing the sometimes-necessary products (infant formula), which have their own standard, from these unnecessary products (follow-up formula), which should have their own standard.

3. Dividing a single standard of conceptually similar products into 2 parts, based on age related compositional difference, makes logical sense and is also the approach taken in the Infant Formula Standard (CODEX STAN 72-1981). Thus, the Follow-up formula Standard would be divided into two sections with a point of differentiation at 12 months so that Part A covers the composition and labelling aspects of Follow-up Formula for Older Infants, and Part B covers the composition and labelling aspects of [Name of Product] for Young Children.
4. Precedent has been set for having a single standard with sub-divisions and having a single standard for ‘like/conceptually similar’ products makes sense.

There is currently a single standard for infant formula (STANDARD FOR INFANT FORMULA AND FORMULAS FOR SPECIAL MEDICAL PURPOSES INTENDED FOR INFANTS CODEX STAN 72 – 1981) divided into 2 parts – Section A: Standard for infant formula, and Section B: Formula for special medical purposes intended for infants. Despite these products having distinctly different purposes and composition, they form one standard. Both products in the standard are necessary products for infants who, for whatever reason, are not breastfed.

Thus, it is logical to have one standard for follow-up formula (CODEX STANDARD FOR FOLLOW-UP FORMULA CODEX STAN 156-1987) divided into 2 categories; Section A: 6-12 months, and Section B: 12-36 months. These products are conceptually similar and serve as a liquid part of the diversified diet of older infants and young children during the complementary feeding period. Both have been globally accepted as being unnecessary. The fact that they have distinctly different compositions is why there would be 2 sections to the standard (as per the Standard for Infant Formula and Formulas for Special Medical Purposes).

This approach would result in 5 standards/guidelines for foods for infants, older infants and young children that each cover a distinct product category, and this approach is considered to be both logical and practical:

1. Infant formula: STANDARD FOR INFANT FORMULA AND FORMULAS FOR SPECIAL MEDICAL PURPOSES INTENDED FOR INFANTS CODEX STAN 72 – 1981.
2. Follow-up formula: CODEX STANDARD FOR FOLLOW-UP FORMULA CODEX STAN 156-1987.
3. Formulated complementary foods: GUIDELINES ON FORMULATED COMPLEMENTARY FOODS FOR OLDER INFANTS AND YOUNG CHILDREN (CAC/GL 8-1991).
4. Cereal based foods: STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN (CODEX STAN 74-1981).
5. Canned foods: STANDARD FOR CANNED BABY FOODS

WPHNA - WORLD PUBLIC HEALTH NUTRITION ASSOCIATION

Firstly, WPHNA wishes to reiterate that these products are not necessary and may contribute to negative health conditions for older infants and young children. These include obesity, diabetes, dental caries and other non-communicable diseases. Another important factor is the impact on climate change that these unnecessary products will have. They are very often marketed in single use/single portion plastic containers, and their global trade will increase greenhouse gases and other effects harmful to the environment.

Recommendation 1:

WPHNA agrees that the sentence in [] should be retained.

Recommendation 2:

WPHNA wishes to retain the sentence in [] Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of the product].

Rationale: The replacement of lactose with sucrose, glucose polymers, intense artificial sweeteners or other sweet tasting flavourings, creates a preference for sweet foods and increases the risk of obesity. It also undermines health promotion messages that encourage culturally appropriate, bio-diverse and leads to increased use of ultra-processed foods.

Recommendation 3:

Delete the brackets and retain the text within the brackets.

Add the following text marked in red to both drafts: All ingredients shall be clean, of good quality, safe from **microbiological contaminants** and **free from industrial contaminants** and suitable for...

WPHNA has concerns about the environmental and food safety aspects by the addition of Palm oil.

Recommendation 4

WPHNA agrees with text in a)

b) keep text: The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.1.

Recommendation 5 and 6

WPHNA Agrees

Recommendation 7 and 8

WPHNA considers that the product should have the smallest possible amounts of food additives and parents should be informed that in case of not breastfeeding unadulterated animal milk is to be recommended for young children.

WPHNA agrees with recommendations 7 and 8 that provide safeguards from certain additives however this needs to be carefully monitored in the light of increasing pressure from the food industry to add novel, untested ingredients ~~development of the GSFA that no new additives are added there.~~

Recommendation 9

WPHNA prefers option 2

3.6 Flavourings

Recommendation 10

WPHNA does NOT support the use of flavourings for follow-up formula and for [product] for young children. The addition of flavourings in these products which function as breastmilk substitutes should not be permitted. The sweet taste intrinsic in these products, plus the use of flavouring agents not only increases the chemical burden faced by infants and young children who are artificially formula fed, but is yet another way to promote and facilitate the dietary preferences for commercially flavoured and sweetened foods with the consequences of risking long term dietary food habits partial to ultra-processed foods.

3.6 Contaminants

Recommendation 11

Formulas for older infants and [products] for young children function as breastmilk substitutes and risk being fed not only to older infants and young children but also to babies under 6 months of age if not labelled and if cross promoted. Inappropriate and unsafe feeding can occur several times daily. The permitted levels of pesticides and other chemicals poses a far greater body burden that those risked by adults. The levels of contaminants must be kept to a far greater minimum than those toxins permitted for food and feed (CXS 193-1995).

WPHNA proposes greater rigorous criteria be required for these products than those permitted for in CXS 193-1995.

Not all contaminants listed in CXS 193-1995 specify a special reduced limit for infants or young children to protect them of a higher exposure due to higher food intake related to their bodyweight and a limited variety of food. We noted that for radionuclides a special section recommends lower content by a factor of 10 for infant

foods, this would protect older infants but not young children. This lower level must also be applied to products for young children if the standard is to be separated.

3.8 Hygiene

Recommendation 12

We agree with recommendation 12 but WPHNA is concerned that the important provision of the water temperature for the reconstitution of powdered formula products will not be discussed. This important life and health saving measure must be included on the labels of all powdered follow-up formula and [product] for young children. These products are unique in their roles as breastmilk substitutes and safeguarding the health of infants and young children must take preference over all other criteria.

Recommendation 13, 14 and 15

WPHNA agrees.