

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 4, 8, 9, 10**

**NFSDU/39 CRD/17**

**Original language only**

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

**Thirty-ninth Session**

**Berlin, Germany  
4 - 8 December 2017**

*Comments of Indonesia*

### **Agenda Item 4**

#### **Recommendation 1**

- Indonesia considers that the minimum protein requirement should be 1.8 g/100 kcal or 0.43 g/100 kJ. But if the Committee decide to set the minimum protein requirement at 1.6 g/100 kcal or 0.38 g/100 kJ, Indonesia proposes to add the following note "Competent national and/or regional authorities may deviate from the above conditions, as appropriate for the nutritional needs".
- Indonesia agrees to open the square bracket for "or non-goats" in food note 5 for consistency.
- Indonesia agrees to open the square brackets for foot note 6.

#### **Recommendation 3**

Indonesia supports the recommendation of the eWG to set the minimum total fat requirement of 3.5 g/100 kcal or 0.84 g/100 kJ.

#### **Recommendation 4**

Indonesia supports the recommendation of the eWG to set the maximum available carbohydrate of 12.5 g/100 kcal or 3.0 g/ 100 kJ.

#### **Recommendation 5**

- Indonesia supports to limit mono- and disaccharides, other than lactose, of 20% of available carbohydrates.
- Indonesia agrees that sweet tasting carbohydrates are restricted in accordance with the amended footnote 4.
- Indonesia also supports the additional statement to limit the addition of non-carbohydrate ingredients with the purpose of imparting a sweet taste.

#### **Recommendation 6**

Indonesia supports recommendation that the percentage limit for sugars [and other carbohydrates contributing to the sweet taste] is converted to an absolute amount based on the energy density (g/ 100 kcal and g/ 100 kJ) of product for young children once a decision is made on the maximum level of available carbohydrates.

#### **Recommendation 7**

Indonesia proposes that calcium-to-phosphorus ratio should be included. Based on Report of the Scientific Committee on Food on the Revision of Essential Requirements of Infant Formulae and Follow-on Formulae (adopted on 4 April 2003), which mentioned that effective calcium retention requires adequate phosphorus to be available. For this reason the ratio of calcium to phosphorus within formula should be specified.

#### **Recommendation 8**

Indonesia supports the mandatory addition of vitamin D with the proposed minimum and maximum levels (minimum level 1.5 µg/100 kcal or 0.36 µg/100 kJ and maximum level of 4.5 µg/100 kcal or 1.08 µg/100 kJ)

**Recommendation 9**

Indonesia supports the following statement for the preamble:

The Codex Alimentarius Commission acknowledges the need to ~~[protect and support / recognize]~~ breast-feeding as an unequalled way of providing ideal food for the healthy growth and development of infants. At the same time Codex acknowledges that numerous formulae have been produced, intended for use, where ~~[necessary / appropriate]~~, as a substitute for human milk in meeting the normal nutritional requirements of infants provided they are prepared under hygienic conditions and given in adequate amounts. In addition, various products have also been produced intended specifically for young children as they progress to a more diversified diet of family foods and these products should not discourage breastfeeding.

The production, distribution, sale and use of follow-up formula for older infants and [name of product] for young children should be consistent with national health and nutrition policies and relevant national/regional legislation, and take into account, ~~[as appropriate]~~, the recommendations made in the International Code of Marketing of Breast-milk Substitute (1981) and the Global Strategy for Infant and Young Child Feeding. Relevant WHO guidelines and policies as well as relevant World Health Assembly (WHA) resolutions that have been ~~[endorsed / supported]~~ by member states ~~[may also]~~ provide guidance to countries in this context.

**Recommendation 11**

Indonesia supports the following statement for section 1.2:

This section of the Standard contains compositional, quality, safety, ~~[labelling and analytical]~~ requirements for Follow-up Formula for Older Infants.

**Recommendation 12**

Indonesia supports the following statement for section 1.3:

Only products that comply with the criteria laid down in the provisions of this section of this Standard ~~[should / shall]~~ be presented as Follow-up Formula for Older Infants

**Recommendation 13**

Indonesia supports the recommendation to include reference to WHO documents and WHA resolution within the Preamble

**Recommendation 14**

Indonesia supports the proposed introductory paragraph to the Labelling Section for follow-up formula for older infants (Section A)

**Recommendation 15**

Indonesia agrees that the progress of reviewing this Standard should not be delayed and that any consideration of NRVs (if established for this age group) and the purpose of such NRVs in the *Guidelines for Nutrition Labelling* (CAC/GL 2-1985), including the need to consider whether any labelling provisions within Codex standards for foods for infants and young children need to be revisited if NRVs are adopted by Codex, should form part of the ToR for a NRV working group.

**Recommendation 16**

Indonesia supports option 1 which split provision 9.1.4. into two provisions.

**Recommendation 17**

Indonesia supports the proposed text for section 9.2 – List of Ingredients.

**Recommendation 18**

Indonesia supports the proposed text for section 9.3 – Declaration of Nutritive Value and proposes to add the following for point c:

c. In addition, the declaration of nutrients in a) and b) per 100 kilocalories (or per 100 kilojoules) **or per serving** is permitted.

**Recommendation 19**

Indonesia supports the proposal of the eWG to refer to the outcome of CCFL

**Recommendation 20**

Indonesia supports the proposed rewording of section 9.5 Information for Use.

**Recommendation 21**

Indonesia would like to clarify regarding the term “Independent health worker” and who are persons included as independent health worker.

**Recommendation 23**

Indonesia supports the following statement for section 1.2:

This section of the Standard contains compositional, quality, safety, [labelling and analytical] requirements for [name of product] for young children.

**Recommendation 24**

Indonesia supports the following statement for section 1.3:

Only products that comply with the criteria laid down in the provisions of this section of this Standard ~~[should /-shall]~~ be presented as] be presented as] [name of product] for young children.

**Recommendation 25**

Indonesia supports the inclusion of reference to WHO documents and WHA resolutions within the Preamble.

**Recommendation 26**

Indonesia supports the introductory paragraph to the Labelling Section for [name of product] for young children (Section B).

**Recommendation 27**

Indonesia agrees that the progress of reviewing this Standard should not be delayed and that any consideration of NRVs (if established for this age group) and the purpose of such NRVs in the *Guidelines for Nutrition Labelling* (CAC/GL 2-1985), including the need to consider whether any labelling provisions within Codex standards for foods for infants and young children need to be revisited if NRVs are adopted by Codex, should form part of the ToR for a NRV working group.

**Recommendation 28**

Indonesia supports option 1 which split provision 9.1.5 into two provisions.

**Recommendation 29**

Indonesia supports the proposed text for section 9.2 – List of Ingredients.

**Recommendation 30**

Indonesia supports the text for Section 9.3 – Declaration of Nutritive Value for [name of products] for young children.

**Recommendation 31**

Indonesia supports the proposal of the eWG to refer to the outcome of CCFL

**Recommendation 32**

Indonesia supports the proposed text in section 9.5 Information for use.

**Recommendation 34**

Indonesia proposes the following definition for follow-up formula intended for older infants:

**Follow-up formula for older infants** means a product, specially manufactured for use as a **total or partial substitute for breast-milk given as a** liquid part of ~~[a progressively / diversified]~~ diet for older infants when complementary feeding is introduced.

**Recommendation 36**

Indonesia proposes the following name for follow-up formula intended for older infant :

Follow-up formula

**Recommendation 37**

Indonesia supports the following name for product for young children:

Formulated drink for young children

#### **Agenda Item 8**

Indonesia would like to appreciate Australia for preparing the discussion paper on NRVS-R for Older Infants and Young Children and would like to support the developing of NRVs-R for older infants and young children.

#### **Agenda Item 9**

Indonesia would like to provide the following comment on the eWG recommendation:

##### **Recommendation 1**

Indonesia supports to set framework for more specific products (foods intended for infants and young children)

##### **Recommendation 2**

**Q3: *Is there other food additive performing the same/similar technological effect which [is more suitable/ has already been approved] for use in foods for infants and young children?***

Comment: Indonesia proposes to open the square brackets

**Q4: *What are the lowest possible amounts necessary to accomplish the desired technological effect?***

Comment: Indonesia proposes to modify the question in Q4 with the following:

Q4: ~~What a~~Are there the lowest possible amounts necessary to accomplish the desired technological effect?

If the answer is No the proposal should be discarded

If the answer is Yes, it should be accompanied with information on the use level and continue to Q5.

##### **Recommendation 3**

Indonesia supports the recommendation to continue the work on framework including its testing with the food additives referred to in parts b and c of the eWG mandate.

#### **Agenda Item 10**

Indonesia would like to appreciate Canada for preparing Discussion Paper on Claim for "free" of Trans Fatty Acids. Indonesia would like to propose to add condition for claim of free trans fatty acids in 100 g/100 ml and per serving.