

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 7

CX/NFSDU 00/7-Add. 3

June 2000

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Twenty-second Session

Berlin, Germany, 19-23 June 2000

DRAFT REVISED STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG CHILDREN

- Comments at Step 3 of the Procedure-

Comments from:

EUROPEAN COMMUNITY

Comments on the proposed draft revised standard for processed cereal-based foods for infants and young children (Alinorm 99/26 Appendix IV).

1. Section 1. "Scope"

Scientific evidence is in favour of maintaining the reference to 4 to 6 months for the introduction of supplementary feeding in order to satisfy the nutritional requirements of all infants. Therefore the text in the square brackets should be maintained and the square brackets should be deleted.

2. Section 3.4. "Carbohydrates"

There is a mistake concerning the amount of permitted added carbohydrate (Section 3.4.2, 1st indent). The wording is in contradiction with paragraph 63 of the report of the 21st session of the Codex Committee on nutrition and foods for special dietary uses.

3. Section 3.6.1. "Sodium"

The exemption for products for children over one year of age is not acceptable. The relevant part of the section (" , except ... 200mg/100 kcal".) should be deleted. The figure of 100 mg/100kcal should be retained and the square brackets be deleted.

4. Section 3.7.1. "Vitamin B1"

The figure of 25 µg/100 kJ (100 µg/100 kcal) is preferred.

5. Section 3.8.1.

The square brackets should be deleted and the text within the square brackets retained.

6. Section 4. “Food additives”

Will collaborate with relevant Working Group.

7. Section 5.1. “Pesticide residues”

The Scientific Committee for Food (SCF), in a recent opinion on the subject (4 June 1998), expressed doubts whether all existing ADIs set within the EU or by the Joint Meeting on Pesticide Residues (JMPR) are adequate to protect the health of infants and young children. They said that there is doubt as to whether all existing ADIs have been set using databases that include all the “core” tests (multigeneration studies, developmental toxicity (teratology) studies, short-term toxicity studies, long-term chronic toxicity/carcinogenicity studies and neurotoxicity studies) now considered necessary for risk assessment for infants and young children. In addition, the SCF identified three relatively new areas of toxicity (particular endocrine and reproductive effects, developmental neurotoxicity and immunotoxicity) that deserve special consideration in relation to infants and young children. The core tests may indicate potential problems in these relatively new areas and trigger further studies. However, some substances could have effects in these areas in the absence of any warning from the results of existing core studies.

As long as uncertainty of the adequacy of ADI exists, the residues of pesticides in foods intended for infants and young children have to be as low as possible. Therefore it is proposed that a second sentence is added to the second paragraph of the section (“The products covered ... by the Codex Alimentarius Commission”) as follows:

“These limits shall take into account the specific nature of the products concerned and the specific population group for which they are intended”.

7. Section 8.3. “Declaration of nutritive value”

Paragraph 77 of the report of the 21st session states that section 8.3 was amended as proposed by the observer from the EC. This however does not appear in the proposed draft revised standard appearing in Annex IV.

The proposal, which was read and agreed by the Committee, was based on the EC comments (CX/NFSDU 98/6 – Add 2, page 6) and took into account the comments of other participants, in particular the text suggested by Canada for paragraph 8.3.1.a. It also took into account the fact that customarily for solid food 100 g is a reference amount for nutrient declaration while for liquid food 100 ml is a reference amount. The proposed text which has been accepted by the Committee should read as follows:

“8.3 DECLARATION OF NUTRITIVE VALUE

8.3.1 The declaration of nutrition information shall contain the following information in the following order:

- (a) the energy value, expressed in calories (kcal) or kilojoules (kJ), and the amount of protein, carbohydrate and fat expressed in grammes (g) per 100 g or 100 ml of the food as sold, and where appropriate, as per specified quantity of the food as suggested for consumption;
- (b) the average amount of each vitamin and mineral for which specific levels are defined in section 3.6 and 3.7 expressed in numerical form per 100 g or 100 ml of the food as sold and, where appropriate, as per specified quantity of the food as suggested for consumption;
- c) any other nutritional information required by national legislation.

8.3.2 The labelling may bear the average amount of the vitamins and minerals when their declaration is not covered by the provisions of section 8.3.1.(b) expressed in numerical form per 100 g or 100 ml of the product as sold and, where appropriate, per specified quantity of the food as suggested for consumption.

8. Section 8.5.3. “Gluten”

The square brackets should be deleted.

9. Section 8.5.4.

The square brackets should be deleted.

10. Section 8.6.

The text as it stands is acceptable. The square brackets should be deleted.

This section can hardly be justified by the content. It is suggested that this sentence is moved to the "SCOPE" section.