

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 7

**CX/NFSDU 03/7-Add. 1
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Twenty-fifth Session

Bonn, Germany, 3- 7 November 2003

**PROPOSED DRAFT REVISED STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR
INFANT AND YOUNG CHILDREN**

- Comments at Step 3 of the Procedure -

Comments from:

NEW ZEALAND

AOECS – ASSOCIATION OF EUROPEAN COELIAC SOCIETIES

EUROPEAN COMMUNITY

JAPAN

New Zealand

2. DESCRIPTION

The word 'primarily' needs to be deleted. There is a minimum cereal content set at 25% for one or more milled cereals and this is sufficient to define the content of the products. Some cereal products have other ingredients such as milk or protein-rich pulses at levels greater than 25% and thus, although highly nutritious, these products are not primarily cereal.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

In regards to sections 3.6 (Minerals) and 3.7 (Vitamins), New Zealand recommend a taking a risk-based approach to establishing any minimum and maximum levels for these nutrients.

3.5 Lipids

New Zealand recommends deleting the sentence in the third set of square brackets. There is no need to set a minimum lipid level. Infants will ingest sufficient fat by consuming a mixed diet consisting of a milk source and complementary foods.

3.6 Minerals

3.6.1 Delete the square brackets and express the sodium content per 100kJ as well as per kcal in the same way as the other nutrient levels within the draft standard.

New Zealand also supports the position made by Australia regarding the removal of 'ready to eat product' and propose that their recommended amendment be adopted:

3.6.1 The sodium content of the products described in Sections 2.1.1 to 1.2.4 shall not exceed 100mg/100kcal (24mg/100kJ), except in the case of products intended for children over one year of age, where the sodium content shall not exceed 200mg/100kcal (48mg/100kJ).

3.8 Optional Ingredients

3.8.1 Replace the wording in the square bracket with the following so that the text reads:

In addition to the ingredients listed under 3.1, other ingredients suitable for infants and for young children can be used.

No reference to age is needed as this is covered in the scope of the standard.

3.8.3 The Australia New Zealand Food Standards Code does not regulate the addition of cocoa in foods for infants. New Zealand is not aware of any justification for the restriction of cocoa. In the absence of any justification we recommend the removal of the restriction.

3.9 Quality Factors

3.9.1 Delete 'including optional ingredients', as this will be covered under 'all ingredients'.

3.10 Consistency and Particle Size

3.10.1 New Zealand recommends removing the words 'spoon feeding', as it is not relevant to all foods regulated by the standard e.g. rusks.

4. FOOD ADDITIVES

There is an incorrect number for xanthan gum – it should be 415 rather than 425.

New Zealand supports the addition of any flavouring, excluding caffeine or quinine, not just vanillin or ethyl vanillin as these are permitted in the Australia New Zealand Food Standards Code.

The Australia New Zealand Food Standards Code separates out Food Additives and Processing Aids. We recommend Codex consider separating out these two topics in this standard also.

8. LABELLING

Standard 2.9.2 – Food for Infants from the *Australia New Zealand Food Standards Code* contains a number of labelling requirements, which we believe could be included in the Codex Standard. These are:

- the labelling of honey as ‘sterilised’ to reflect section 3.8.2, which allows use of honey following processing to destroy *Clostridium botulinum*. For example, *where honey is used as an ingredient, the word ‘sterilised’ must be used in association with the word ‘honey’*;
- the labelling of a food as ‘sweetened’ if the food has more than a certain level of added sugar. In Australia and New Zealand this level is 4g/100g. For example, *where the added sugars content of a food exceeds 4g/100g, the word ‘sweetened’ be included on the label*; and
- prohibiting labels from recommending that a food can be added to bottle feeds of infant or follow-up formula.

8.1.1 The first option is New Zealand’s preferred option. We also support leaving the restriction of pictorials to national legislation.

New Zealand disagrees with the statement made about nutrition and health claims. We support the provision of health and nutrition claims in accordance with national legislation and would like to make reference to Australia’s comments. Australia noted ‘that there was agreement at the 31st session of the Codex Committee on Food Labelling (ALINORM 03/22A, para 66) to advance the proposed Draft Guidelines of Use of Nutrition and Health Claims to Step 8. Section 1.4 of the Guidelines prohibits the use of nutrition and health claims on foods for infants and young children except where provided for in relevant Codex standards or national legislation’.

8.6 Information for utilisation

8.6.2 The word ‘alone’ should be included after ‘water’. Water is used to reconstitute infant formula product that may be used in the dilution of cereals.

8.6.3 New Zealand recommend deletion of this clause as the declaration of the presence or absence of gluten is too problematic and the appropriate cereals will be listed in the ingredient list. We also acknowledge that further discussions regarding the Draft Standard for Gluten Free Foods (at Step 7) are scheduled for the 25th session of CCFNSDU.

New Zealand does not support any labelling which makes reference to a set age. We support labelling that acknowledges the natural variation in the physiological development of infants.

AOECS – Association of European Coeliac Societies

Comment to 8.6.3.:

AOECS supports very much the decision taken by the Codex Committee on Nutrition and Foods for Special Dietary Uses at the last session in November 2002.

We would like to recall that the sentence “the presence or absence of gluten” was already requested by Spain in the year 1996 (CX/NFSDU 96/7-IV) and since that time it is included in the Draft Revised Codex Standard for Cereal-based Foods for Infants and Young Children. During the last seven years neither a governmental representative nor an international observer had expressed any reservation against “the presence or absence of gluten”.

It is well known that especially in these products the risk of contamination is very high and therefore the presence or absence of gluten is very important to know for this very sensible group of infants and young children, who are intolerant to gluten. The Codex Labelling Standard requests the labelling of ingredients, but does not focus on the risk of contamination, which is especially high in this group of products.

Also the European Commission, the European Council and the European Parliament considered this very important problem. The Commission Directive on processed cereal-based foods and baby foods for infants and young children” (96/5/EC) Article 7 (b) contains: “Information as to the presence or absence of gluten ...”

AOECS fully supports the decision taken by the Codex Committee on Nutrition and Foods for Special Dietary Uses in November 2002 and requests to keep the sentence as it is in the Codex Document ALINORM 03/26A, Appendix III:

“8.6.3. The presence or absence of gluten should be indicated on the label”**European Community****3. ESSENTIAL COMPOSITION AND QUALITY FACTORS****3.5 Lipids**

If the Committee decides to include the proposed requirements on the type or level of fats in the products that are in square brackets in section 3.5 then the following comment should be taken into account. The European Community considers that it is not necessary to stipulate a minimum level of fat in processed cereal-based foods. The draft standard already includes a minimum level of energy for the products as prepared ready for consumption so this requirement ensures that the products have a minimum energy density.

3.6.1 Minerals

The higher level of sodium in products for children over one year of age is not acceptable. The relevant part of the section (“, except ... 200 mg/100 kcal”) should be deleted. Therefore there should only be one maximum level and this should also be stated in terms of kJ, i.e. “25 mg/100 kJ (100 mg/100 kcal)”.

3.6.3 Minerals

The provision on the minimum calcium content of products is important for those products manufactured with the addition of milk and presented as such to consumers. To ensure this is clear it is proposed that “containing milk” should be changed to “manufactured with the addition of milk and presented as such”.

3.7.1 Vitamins

For vitamin B1 (thiamin) a minimum level of 25 µg/100 kJ (100 µg/100 kcal) is preferred.

3.8.1 Optional Ingredients

It is proposed that section 3.8.1 should read as follows:

“In addition to the ingredients listed under 3.1, other ingredients suitable for complementary feeding of infants and young children can be used.”

4. FOOD ADDITIVES

No comments are made at this stage as the section is under consideration by the electronic Working Group co-ordinated by Switzerland.

8. LABELLING**8.1.1**

The first proposed wording is preferred namely:

“8.1.1 The requirements of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985 (Rev. 1-1991), Codex Alimentarius Volume 1) apply to this standard. With specific reference to section 7 of that Standard national jurisdictions may further restrict the use of pictorial devices.”

With regard to the paragraph concerning health claims, in the absence of a definition of “health claims” within Codex, it is suggested that the paragraph should remain in square brackets, and discussions deferred until “health claims” have been defined.

8.4.2 DECLARATION OF NUTRITIVE VALUE

The cross reference to the provisions of the previous section is not correct and should read “section 8.4.1 (b).”

8.6 INFORMATION FOR UTILIZATION

8.6.2

Section 2.1.1 defines a category of products as "... cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids". Section 8.6.1 states that "For products covered by 2.1.1, directions on the label shall state "Milk or formula but no water shall be used for dilution or mixing" or an equivalent statement.". However "other appropriate nutritious liquids" might include liquids other than milk or formula. It is proposed that the wording of the section should be changed to:

"8.6.2 For products covered by 2.1.1, directions on the label shall state "Milk, formula or other nutritious liquids but no water should be used for dilution or mixing" or an equivalent statement."

8.6.4

The current wording of the section means that the label of the product would indicate the age range for which the product is intended. In addition it would have to bear a statement that it is not recommended for use below 6 months. The appearance on the label of the two, potentially different ages, as required by the first two sentences of 8.6.4 would introduce the risk that the labelling could be misunderstood by the consumer. The consumer may confuse products intended for young children of over 1 year of age, due to their texture, composition or other characteristics, as suitable for infants of around 6 months. Therefore the EC proposes that the 2nd sentence be amended as follows:

"The stated age shall not be less than six months for any product."

JAPAN

8. Labeling

8.1.1

Because it is groundless that pictures of young children used in a label would discourage breastfeeding, we support the following first alternative:

The requirements of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985 (Rev. 1-1991), Codex Alimentarius Volume 1) apply to this standard. With specific reference to section 7 of that Standard national jurisdictions may further restrict the use of pictorial devices.