codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 5 **CX/NFSDU 07/29/05**
October 2007

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

29th Session

Bad Neuenahr-Ahrweiler, 12 - 16 November 2007

PROPOSED DRAFT REVISION OF THE ADVISORY LIST OF NUTRIENT COMPOUNDS FOR USE IN FOODS FOR SPECIAL DIETARY USES INTENDED FOR INFANTS AND YOUNG CHILDREN

- Comments at Step 6 of the Procedure -

Comments from:

BRAZIL
COSTA RICA
CUBA
DOMINICAN REPUBLIC
GHANA
GUATEMALA
UNITED STATES OF AMERICA

BRAZIL

Brazil does not have specific criteria for the purity requirements of the nutrients compounds. It agrees with the withdrawn of the substances for which do not exist purity requirements specifications internationally. Regarding the list of food additives (List D), it is suggested that the CCNFSDU directs it to the CCFA in order to analyze the food additives used nutrient carriers.

COSTA RICA

Costa Rica is grateful for the opportunity to ask that point 5.4 be corrected in the Spanish version of ALINORM 07/30/26, Appendix V as this version mentions the compound calcium L-ascorbate instead of sodium L-ascorbate as appears in the English version of the aforementioned document.

CUBA

Cuba agrees with the correction.

DOMINICAN REPUBLIC

Suggests finding more up-to-date bibliographic sources so that the products supported by a majority of countries and the most commonly researched and accepted drugs are included.

Asks that the following corrections be considered in Appendix V:

1. Page 81, table, section 1.10 reads CALIO instead of CÁLCICO (CALCIUM).
2. Standardise the use of brackets so that they appear on every line. Use International nomenclature.
3. On page 93. clarify the term CHLORIDE THIAMINE HYDROCHLORIDE. We believe it should read THIAMINE HYDROCHLORIDE.
4. On page 94. In Point 9.1 it should read HIDROCLORURO (HYDROCHLORIDE) and not HIDORCLORURO.
5. On page 97. The expression INTENDED USE is not needed.
6. On page 98. Translate the phrase NOT FOR INFANTS into Spanish.
7. In sections 6.5, 6.6 and 6.7 on page 100 there are opening brackets. Why are there no closing brackets? And finally
8. On page 102. The following numbers are between brackets: [10] or [100]. Clarify which value should be used to avoid confusion.

GHANA

Generally, Ghana finds the document acceptable.

GUATEMALA

Document in English		Document in Spanish		Justificacion
Page	**Text**	**Página**	**Texto**	
89	5.4 Sodium-L-ascorbate	**93**	5.4 L-ascorbato ~~cálcico~~ sódico	Change to sodium L-ascorbate as this is the correct translation into Spanish
96	~~[~~6.5 Disodium Uridine 5-monophosphate salt	**100**	~~[~~6.5 Sal disódica de uridina 5-monofosfato	Delete bracktes and approve text as these nucleotides are commonly used ininfant formulas and there are international organisations that support their use at a determined purity.
96	~~[~~6.6 Disodium Guanosine 5-monophosphate salt	**100**	~~[~~6.6 Sal disódica de guanosina 5-monofosfato	
96	~~[~~6.7 Disodium Inosine 5-monophosphate salt	**100**	~~[~~6.7 Sal disódica de inosina 5-monofosfato	
	Add Lutein and Zeaxanthin		Agregar Luteìna y Zeoxantina	These are natural compounds that are found in foods and they are commonly used as food additives. It is also found in human milk. [1,2,3]

References:

1. R Capeding, N Calimon, J Lebumfacil, AM Davis, RM Kline, BJ Harris
Addition of a new ingredient lutein to infant formula fed to healthy term infants in a growth and safety trial. Presented at the 30th Congress of the Union of Mediterranean-Middle Eastern Pediatrics Societies, Sept. 4-7, 2006 Damascus, Syria

2. MJ Kullen, J Bettler, K Ramanujam, J Lebumfacil, N Calimon, M Capeding, S Troemel, J O'Connell and B Harris. The bioavailability of lutein from infant formula. The *FASEB Journal* 2007; 21: A728.

3. Jewell VC, Mayes CB, Tubman TR, Northrop-Clewes CA, Thurnham DI. A comparison of lutein and zeaxanthin concentrations in formula and human milk samples from Northern Ireland mothers. Northern Ireland Centre for Food and Health, University of Ulster, Coleraine BT52 1SA, Northern Ireland.
European Journal of Clinical Nutrition. 2004 Jan;58(1):90-7.

UNITED STATES OF AMERICA

I. GENERAL COMMENTS

The United States supports the scope, format, and organization of the draft revised Advisory Lists at Step 6, as presented in ALINORM 07/30/26, Appendix V.

Specific comments on the individual Advisory Lists are provided below.

II. SPECIFIC COMMENTS

C: ADVISORY LIST OF AMINO ACIDS AND OTHER NUTRIENTS FOR USE IN FOODS FOR SPECIAL DIETARY USES INTENDED FOR USE BY INFANTS AND YOUNG CHILDREN

Comment: We note that lecithin is included in Advisory List C. We recommend removal of lecithin from the Advisory Lists.

Rationale: Lecithin is not recognized as a nutrient and, therefore, should not be included in the Advisory Lists of Nutrient Compounds. Lecithin is listed as a food additive (emulsifier, INS no. 322) for use in the revised standard for infant formulas and formulas for special medical purposes intended for infants and in the standards for follow-up formula, processed cereal-based foods, and canned baby foods.

LIST OF NUTRIENT COMPOUNDS THAT LACK OFFICIAL PURITY REQUIREMENTS

Comment: As the Committee moves toward finalizing the Advisory Lists, compounds that do not have official purity requirements should be removed from the lists, consistent with the criteria in 2.1.c.

Comment: We note that several nutrient sources are listed under incorrect categories in this table. If purity requirements are identified for calcium-L-methylfolate, this compound should be listed under the List B heading (vitamin compounds). If purity requirements are identified for compounds currently included under the List D heading (food additives), those compounds should be listed under the List C heading (amino acids and other nutrients).

D: ADVISORY LIST OF FOOD ADDITIVES FOR SPECIAL NUTRIENT FORMS

Comment: We agree with the recommendations of the ad hoc physical Working Group on the GSFA to add "for vitamin B_{12} dry rubbing, 0.1% only" to the maximum level for mannitol (INS 421) and to clarify that the acronym PUFA corresponds to polyunsaturated fatty acids.

Comment: We note that the maximum level for gum arabic is 100 mg/kg in ready-to-use food in the existing standard (CAC/GL 10). We are not aware of new information to indicate that this level of gum arabic is no longer technologically justified. Therefore, we suggest that the maximum level of 100 mg/kg in ready-to-use food be retained. In addition, we suggest use of the name gum arabic (acacia gum) to be consistent with the INS designation.

Rationale: In response to a request from CCNFSDU, the Committee on Food Additives (CCFA) endorsed the food additive provisions of the Advisory List of Food Additives for Special Nutrient Forms with some exceptions. Specifically, CCFA did not endorse any value for gum arabic (INS 414) and requested that CCNFSDU identify the level of use that is technologically justified and to revise the name of gum arabic to be consistent with the INS (para 62-63 and Appendix V).

Comment: We note that CCFA has agreed to have the Codex Secretariat create an Annex to the GSFA that would contain all of the food additive provisions of commodity standards as an intermediate step towards their full integration into the GSFA.