

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
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World Health  
Organization

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Agenda Items 4, 5, 7

NFSDU/43 CRD34

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Forty-third Session

Düsseldorf, Germany

7 – 10 March with report adoption by virtual mode on 15 March 2023

*Comments by Ghana*

#### AGENDA ITEM 4: REVIEW OF THE STANDARD FOR FOLLOW-UP FORMULA (CODEX STAN 156-1987) (CL2022/24/OCS-NFSDU)

**Recommendation 1:** Structure of the standard

**Position:** Ghana supports one standard with two parts, Part A covering Follow-up Formula for Older Infants and Part B covering Drink for Young Children with Added Nutrients, or Product for Young Children with Added Nutrients, or Drink for Young Children, or Product for Young Children.

**Rationale:** The two products are related, recognized and used as breastmilk substitutes (REP22/NFSDU - Appendix III section A. 2.1.1. & Section B 2.1.1) thus it is appropriate to have two parts in one standard for ease of use and reference during implementation. It will also allow for a common preamble that will ensure the protection, promotion and supporting breastfeeding practices.

Recommendation 2: Preamble of the Standard

This Standard is divided into two sections. Section A refers to Follow-up Formula for Older Infants, and Section B deals with Drink for Young Children with Added Nutrients, or Product for Young Children with Added Nutrients, or Drink for Young Children, or Product for Young Children.

[The application of this Standard should be consistent with national health and nutrition policies and relevant national/regional legislation and take into account the recommendations made in the International Code of Marketing of Breast-milk Substitutes, as per the national context.]

[Relevant World Health Organization (WHO) guidelines and policies and World Health Assembly (WHA) resolutions were considered in the development of this Standard and may provide further guidance to countries.]

**Position:** Ghana appreciates the efforts that have gone into facilitating consensus on the Preamble. Ghana accepts the texts in square brackets in paragraph 3 of the Preamble and the final adoption of the standard.

However, Ghana thinks that the paragraph 2 preamble text in square brackets should be limited to [The application of this Standard should be consistent with national health and nutrition policies and relevant national/regional legislation]

**Rationale:** The Preamble in this standard is important in advising governments on the need to protect, promote and support breastfeeding. Reference to relevant WHO/WHA resolutions is important to ensure policy alignment, and reinforces the need for implementation of these resolutions which Member States have signed up to.

**AGENDA ITEM 5: GENERAL PRINCIPLES FOR THE ESTABLISHMENT OF NRVS-R FOR PERSONS AGED 6 – 36 MONTHS (AT STEP 4) CX/NFSDU 23/43/5****Recommendation 1: Preamble, definitions and principles**

**Position:** Ghana supports the adoption of the preamble, definitions and principles for the establishment of NRVs-R for older infants and young children. Ghana also supports the opening of square brackets in the preamble section.

**Rationale:** The text developed by the EWG is fully aligned with principles for the establishment of NRVs-R for the general population as annexed in CXG 2-1985 and only deviating from the age as recommended by CCNFSDU. In addition, opening the square brackets in the preamble will allow for flexibility on how the NRVs-R may be presented especially where governments choose to establish their NRVs-R based on the documented principles.

**Recommendation 2: Stepwise approach on the application of the draft general principles to establish NRVs-R for persons aged 6–36 months.**

**Position:** Ghana supports the steps defined in the stepwise approach model to be used in the establishment of the NRVs-R for persons aged 6–36 months.

**Rationale:** The steps have chronologically prioritized evidence and sources of DIRVs to be used in establishing the NRV-Rs. The approach recognizes FAO/WHO data as the primary source except where data from RASBs is based on physiological evidence which is considered stronger. In cases where none is based on physiological evidence, data from FAO/WHO is taken as primary evidence.

**Recommendation 3: Proposed NRVs-R for persons aged 6–36 months applying the draft General Principles using the revised stepwise approach.**

**Position:** Ghana supports the adoption of the established NRVs-R and recommends the Committee consider uniform nomenclature for the vitamins.

**Rationale:** All the NRVs-R as derived complied with both the stepwise approach and the technical FAO (2021) report on the *Review of derivation methods for dietary intake reference values for older infants and young children* both of which are sound scientific criteria for establishing the NRVs-R for this age group.

**AGENDA ITEM 7: PRIORITIZATION MECHANISM / EMERGING ISSUES OR NEW WORK PROPOSALS CX/NFSDU 23/43/8**

**Position:** Ghana supports the adoption of the draft guideline for the preliminary assessment to identify and prioritize new work for CCNFSDU with the following improvements:

**Para 6 (Global Impact):** There is a need to add clarity to the description 'reduce a global issue' as provided in the further information column to avoid ambiguity of its interpretation.

**Ghana thinks that at step 4 on the DECISION TREE FOR THE PRELIMINARY ASSESSMENT OF NEW WORK PROPOSALS FOR CCNFSDU, there should be broken lines indicating the next action after a committee request for self-assessment of a proposal.**

**NEW WORK PROPOSALS CX/NFSDU 23/43/7**

**Position:** Ghana supports the new work items as submitted to the Committee.

**Rationale:** The Member States parties have submitted detailed project documents, discussion paper and self-assessment as required in the draft guideline for the preliminary assessment to identify and prioritize new work for CCNFSDU. eWG proposal for both products on specific prohibitions.

**Rationale:** For consistency with the current follow-up formula standard.