

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 2, 4a, 4b, 4c, 4d, 6

NFSDU/42 CRD 10

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

Forty-second Session

Virtual

19 - 25 November and 1 December 2021

Comments by Helen Keller International

AGENDA ITEM 2: Matters Referred to the Committee by the Codex Alimentarius Commission and/or Other Subsidiary Bodies

CCFL has requested CCNFSDU to consider whether exclusion of the term “product” in the name “drink for young children” was an omission. Helen Keller International notes that this was raised by Nigeria at the 2019 meeting, but the Chair stopped the conversation before it was concluded. Helen Keller International supports the addition of ‘product’ to the second name option as we believe it makes it consistent with the first name option and is more accurate in reflecting the name.

AGENDA ITEM 4a / 4.2: Proposed draft revised standard for follow up formula for older infants and drink/product for young children with added nutrients or drink for young children: remaining sections (at Step 4)

RECOMMENDATION 1: DEXTROSE EQUIVALENT

Helen Keller International supports the proposed text with the deletion of the square brackets.

The text to read: ⁴⁾ *Lactose should be the preferred carbohydrates in [name of product] based on milk protein. For products not based on milk protein glucose polymers should be the preferred carbohydrates used. Mono- and disaccharides, other than lactose, should not exceed 2.5 g/100kcal (0.60 g/100kJ). National and/or regional authorities may limit this level to 1.25 g/100 kcal (0.30 g/100 kJ). Sucrose and/or fructose should not be added.*

RECOMMENDATION 2: SENTENCE IN SECTION 3.2.1 FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the retention of the proposed text included in the square brackets in order to ensure future proofing of the text. This is a critical issue as the world increasingly faces and is required to address the issue of overweight and obesity in children – it is estimated that by 2030 250 million children worldwide will be obese – and that the period 12-36 months is critical in ensuring children do not become conditioned to sweet tastes.

The text to be retained is: *Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]*

RECOMMENDATION 3a: PURITY REQUIREMENTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text, noting the need for modification and separation of the relevant age groups depending on the final structure of the standard.

The text to read: All ingredients shall be clean, of good quality, safe and suitable for ingestion by older infants. They shall conform with their normal quality requirements, such as colour, flavour and odour.

RECOMMENDATION 3b: PURITY REQUIREMENTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text, noting the need for modification and separation of the relevant age groups depending on the final structure of the standard.

The text to read: All ingredients shall be clean, of good quality, safe and suitable for ingestion by young children. They shall conform with their normal quality requirements, such as colour, flavour and odour.

RECOMMENDATION 4a: VITAMIN COMPOUNDS AND MINERAL SALTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *Vitamin compounds and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 should be selected from the Advisory List for Mineral Salts and Vitamin Compounds for Use in Foods for Infants and Children approved by the Codex Alimentarius Commission (CXG 10-1979).*

The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.1.

RECOMMENDATION 4b: VITAMIN COMPOUNDS AND MINERAL SALTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text including the deletion of the second sentence.

The text to read: *Vitamin compounds and mineral salts used in accordance with Sections 3.3.1 and 3.3.2 should be selected from the Advisory List for Mineral Salts and Vitamin Compounds for Use in Foods for Infants and Children approved by the Codex Alimentarius Commission (CXG 10-1979).*

RECOMMENDATION 5a: CONSISTENCY AND PARTICLE SIZE FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *When prepared according to the directions of use, the product shall be free of lumps and of large, coarse particles.*

RECOMMENDATION 5b: CONSISTENCY AND PARTICLE SIZE FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *When prepared according to the directions of use, the product shall be free of lumps and of large, coarse particles.*

RECOMMENDATION 6a: SPECIFIC PROHIBITIONS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *The product and its components shall not have been treated by ionizing radiation.*

RECOMMENDATION 6b: SPECIFIC PROHIBITIONS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *The product and its components shall not have been treated by ionizing radiation.*

RECOMMENDATION 7a: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposal to retain the permissions for food additives (excluding flavourings) in the current Follow-up Formula Standard (CXS 156-1987), for follow-up formula for older infants, noting these will be replaced by a reference to the corresponding sections of the GSFA following the completion of the alignment work.

RECOMMENDATION 7b: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposal to retain the permissions for food additives (excluding flavourings) in the current Follow-up Formula Standard (CXS 156-1987), for [name of product] for young children, noting these will be replaced by a reference to the corresponding sections of the GSFA following the completion of the alignment work.

RECOMMENDATION 8a: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International agrees to administrative changes i – iii, and to aligning the names of food additives in the current Follow-up Formula Standard with those in the GSFA and the changes in Appendix II.

RECOMMENDATION 8b: FOOD ADDITIVES (EXCLUDING FLAVOURINGS) FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports retaining the text on packaging gases in the Food Additive section, and it being listed under the appropriate functional class and supports retaining them in Section 7 on Packaging.

RECOMMENDATION 9a: CARRY-OVER FOOD ADDITIVES AND NUTRIENT CARRIERS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports Option 1 of referencing Section 4 of the Preamble of the GSFA (CXS 192-1995) as this would as per the note of the Chair ensure that Section 4.3 is read in the context provided by the entire Section 4 and would follow the principle to reference existing texts rather than to repeat requirements included in commodity standards.

RECOMMENDATION 9b: CARRY-OVER FOOD ADDITIVES AND NUTRIENT CARRIERS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports Option 1 of referencing Section 4 of the Preamble of the GSFA (CXS 192-1995) as this would as per the note of the Chair ensure that Section 4.3 is read in the context provided by the entire Section 4 and would follow the principle to reference existing texts rather than to repeat requirements included in commodity standards.

RECOMMENDATION 10a: FLAVOURINGS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International strongly objects to the text proposed regarding flavourings permitted in [name of product] formula for young children.

No flavourings should be permitted in these products as they replace the liquid part of the diet and are considered breast-milk substitutes and not complementary foods. As such, the standards for [name of products] should be in line with the provisions for infant formula which does not permit flavourings. It is also important to note that a critical health and nutrition rationale for not permitting flavourings. These flavourings can contribute to developing sweet taste preferences. Any sweet flavouring that results in developing a preference for sweet tastes, at this vital stage of life, is not recommended and can have a negative impact on food choices and health outcomes throughout the child's life and into adulthood.

If such flavourings are permitted, they may predispose children to a preference for flavours that, in the beverage/liquid food category, are found in sweetened and flavoured milks, fruit juices and sodas. These are not healthy choices for children, relative to regular milk and water, neither of which are flavoured.

[Note: Two references to support this are Ventura AK, Worobey J. Early influences on the development of food preferences. *Curr Bio.* 2013;23(9):R401-8. and Beauchamp GK, Mennella JA. Early flavor learning and its impact on later feeding behavior. *J Pediatr Gastroenterol Nutr.* 2009;48 Suppl 1:S25-30.]

We draw attention to the recently (September 2019) released 'Technical Scientific Report: Healthy Beverage Consumption in Early Childhood – Recommendations from Key National Health and Nutrition Organisations'. The consensus statement, developed by an expert panel of representatives from (in alphabetical order) the Academy of Nutrition and Dietetics (AND), the American Academy of Pediatric Dentistry (AAPD), the American Academy of Pediatrics (AAP), and the American Heart Association (AHA), provides authoritative guidance on optimal beverage consumption during early childhood and supports a life course approach to the development of healthy dietary patterns and prevention of chronic disease.

(Full report available at <https://healthysdrinkshealthykids.org/app/uploads/2019/09/HER-HealthyBeverageTechnicalReport.pdf>)

This expert recommendation clearly states that for children 0-12 months "Do not consume milk (flavoured or plain)" and for 12-60 months "Consume only plain, pasteurized milk; flavoured milk is not recommended." The rationale provided includes "the expert panel considered it appropriate to recommend avoiding flavoured milk in order to minimize intake of added sugars and to avoid contributing to early establishment of a preference for sweet taste as well as potential negative impacts on nutrient intake and diet quality. The expert panel recommends that after cow's milk is introduced at 1 year of age, only plain, pasteurized milk be consumed by young children." With regards to what the report refers to as toddler milk, the recommendations are equally clear: "0-12 months: Avoid supplementation with "transition" or "weaning" formulas; nutrient needs should be met primarily through human milk and/or infant formula." and for 12-60 months: "Toddler milk is not recommended; nutrient needs should be met primarily through nutritionally adequate dietary patterns."

So, while it may be argued that standards for follow-up formula for older infants should permit flavouring, similar to processed cereal based foods for infants and young children which permits flavouring from a safety perspective, HKI believes that this argument is flawed. Codex should consider liquid foods and what effect flavoured follow-up formula for older infants (even if low in sugar) might have on the beverage preferences of children as they grow up.

We also note that the WHO is working on finalising a revised set of IYCF indicators for children under 24 months (we believe due to be published towards the end of the year). Among these, 'sweet beverage

consumption' is an indicator of an unhealthy young child diet 'Sweetened milks' are also included in the category of unhealthy foods.

RECOMMENDATION 10b: FLAVOURINGS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International strongly objects to the text proposed regarding flavourings permitted in [name of product] formula for young children.

No flavourings should be permitted in these products as they replace the liquid part of the diet and are considered breast-milk substitutes and not complementary foods. As such, the standards for [name of products] should be in line with the provisions for infant formula which does not permit flavourings. It is also important to note that a critical health and nutrition rationale for not permitting flavourings. These flavourings can contribute to developing sweet taste preferences. Any sweet flavouring that results in developing a preference for sweet tastes, at this vital stage of life, is not recommended and can have a negative impact on food choices and health outcomes throughout the child's life and into adulthood.

If such flavourings are permitted, they may predispose children to a preference for flavours that, in the beverage/liquid food category, are found in sweetened and flavoured milks, fruit juices and sodas. These are not healthy choices for children, relative to regular milk and water, neither of which are flavoured.

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(Full report available at <https://healthydrinkshealthykids.org/app/uploads/2019/09/HER-HealthyBeverageTechnicalReport.pdf>)

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So, while it may be argued that standards for follow-up formula for older infants should permit flavouring, similar to processed cereal based foods for infants and young children which permits flavouring from a safety perspective, HKI believes that this argument is flawed. Codex should consider liquid foods and what effect flavoured follow-up formula for older infants (even if low in sugar) might have on the beverage preferences of children as they grow up.

We also note that the WHO is working on finalising a revised set of IYCF indicators for children under 24 months (we believe due to be published towards the end of the year). Among these, 'sweet beverage consumption' is an indicator of an unhealthy young child diet 'Sweetened milks' are also included in the category of unhealthy foods.

RECOMMENDATION 11a: CONTAMINANTS FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *The products covered by this Standard shall comply with the Maximum levels of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products covered by this Standard shall comply with the maximum residues limits for pesticides established by the Codex Alimentarius Commission.*

RECOMMENDATION 11a: CONTAMINANTS FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *The products covered by this Standard shall comply with the Maximum levels of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products covered by this Standard shall comply with the maximum residues limits for pesticides established by the Codex Alimentarius Commission.*

RECOMMENDATION 12a: HYGIENE FOR FOLLOW UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text and to retain the text in square brackets for future proofing.

The text to read: *It is recommended that the product covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), and other relevant Codex texts such as the Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008) the Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low-acid Canned Foods (CXC 23-1979).*

The products should comply with any microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).

RECOMMENDATION 12b: HYGIENE FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text and to retain the text in square brackets for future proofing.

The text to read: *It is recommended that the product covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969), and other relevant Codex texts such as the Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008) the Code of Hygienic Practice for Aseptically Processed and Packaged Low-acid Foods (CXC 40-1993) and the Code of Hygienic Practice for Low and Acidified Low-acid Canned Foods (CXC 23-1979).*

The products should comply with any microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).

RECOMMENDATION 13a: PACKAGING FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *The product shall be packed in containers which will safeguard the hygienic and other qualities of the food. When in liquid form, the product shall be packed in hermetically sealed containers; nitrogen and carbon dioxide may be used as a packing media.*

The containers, including packaging materials, shall be made only of substances which are safe and suitable for their intended uses. Where the Codex Alimentarius Commission has established a standard for any such substance used as packaging materials, that standard shall apply.

RECOMMENDATION 13b: PACKAGING FOR [NAME OF PRODUCT] FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *The product shall be packed in containers which will safeguard the hygienic and other qualities of the food. When in liquid form, the product shall be packed in hermetically sealed containers; nitrogen and carbon dioxide may be used as a packing media.*

The containers, including packaging materials, shall be made only of substances which are safe and suitable for their intended uses. Where the Codex Alimentarius Commission has established a standard for any such substance used as packaging materials, that standard shall apply.

RECOMMENDATION 14a: FILL OF CONTAINER FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text.

The text to read: *In the case of products in ready-to-eat form, the fill of the container shall be:*

- (i) *not less than 80% v/v for products weighing less than 150 g (5 oz.);*
- (ii) *not less than 85% v/v for products in the weight range 150-250 g (5-9 oz.); and*
- (iii) *not less than 90% v/v for products weighing more than 250 g (9 oz.) of the water capacity of the container. The water capacity of the container is the volume of distilled water at 20°C which the sealed container will hold when completely filled.*

RECOMMENDATION 14b: FILL OF CONTAINER FOR FOLLOW-UP FORMULA FOR YOUNG CHILDREN

Helen Keller International supports the proposed text.

The text to read: *In the case of products in ready-to-eat form, the fill of the container shall be:*

- (iv) *not less than 80% v/v for products weighing less than 150 g (5 oz.);*
- (v) *not less than 85% v/v for products in the weight range 150-250 g (5-9 oz.); and*
- (vi) *not less than 90% v/v for products weighing more than 250 g (9 oz.) of the water capacity of the container. The water capacity of the container is the volume of distilled water at 20°C which the sealed container will hold when completely filled.*

RECOMMENDATION 15a: METHOD OF ANALYSIS AND SAMPLING FOR FOLLOW-UP FORMULA FOR OLDER INFANTS

Helen Keller International supports the proposed text:

The text to read: *For checking the compliance with this Standard, the methods of analysis contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) relevant to the provisions in this standard, shall be used.*

RECOMMENDATION 15a: METHOD OF ANALYSIS AND SAMPLING FOR FOLLOW-UP FORMULA FOR YOUNG CHILDREN

Helen Keller International supports the proposed text:

The text to read: *For checking the compliance with this Standard, the methods of analysis contained in the Recommended Methods of Analysis and Sampling (CXS 234-1999) relevant to the provisions in this standard, shall be used.*

AGENDA ITEM 4b / 4.2: Draft scope, description and labelling for drink/product for young children with added nutrients or drink for young children (at Step 7)

DESCRIPTION

Helen Keller International has taken cognisance of the note that no discussion will be entered into regarding additional options for modifying the text under discussion and that the meeting will focus only on if the text in square brackets should or should not be included.

It always has been and remains our firm opinion that the text in square brackets is not necessary and not within Codex's mandate and should be deleted.

Justification:

1. The purpose of the definition is to fulfil the requirements of the Codex Procedural Manual that on p57 related to description that states: "*This section should contain a definition of the product or products with an indication, where appropriate, of the raw materials from which it is derived and any necessary references to processes of manufacture. It may also include references to types and styles of product and to type of pack. There may also be additional definitions when these are required to clarify the meaning of the standard.*"

The critical elements that should form part of the definition are, based on HKI's understanding of the above text, where appropriate/necessary, 4 things:

1. The raw materials from which it is derived.
2. Process of manufacture.
3. Types and styles of product and type of pack.
4. Additional definitions when these are required to clarify the meaning of the standard.

It is HKI's view that, considering the above:

- No 1. related to raw materials is currently not covered in the description but is addressed elsewhere in the standard so is not required in the definition.
- No 2. Process of manufacture is covered in the text of 2.1.2 so not required in the definition.
- No 3. Types and styles could be considered covered in part of 2.1.1 namely "...for use as the liquid part of the..." and part of 2.1.2 namely "...so packaged as to prevent spoilage or contamination..." It therefore does not need to be covered in the definition.

- No 4. We believe 2.2.1 covers this by providing a definition for 'young children'. It therefore does not need to be included in the definition.

We therefore do not believe that the role or purpose of the product in the diets of young children is necessary in the description as per the procedural manual. Further, a definition should be clear, precise and unambiguous, and does not benefit from a statement about what the product may or may not do, depending on the circumstances – without those circumstances being clearly articulated. The text in square brackets is extraneous and should be deleted.

2. The text in square brackets should be deleted as the World Health Assembly (WHA), the world's highest health policy setting body, has agreed that these products are unnecessary. By including the text in square brackets, the impression is given by Codex that these products do in fact have a role to play in the diets of young children, which is not the case – they are unequivocally unnecessary.
3. It is critical to note that mandating certain nutrients to be included or specifying the inclusion or exclusion of certain ingredients or specifying levels in the composition of these products, is a normal part of the Codex standard setting process and therefore does not need to be highlighted in the definition, nor does it mean that the product offers specific benefits. This precedent is set with the definition of follow-up formula for older infants "*means a product, manufactured for use as a breastmilk substitute, as a liquid part of a diet for older infants when progressively diversified complementary feeding is introduced.*" There are many mandated nutrients and specific levels set in the composition of this product, but this is correctly not highlighted in the definition. As the drink/product for young children under discussion is a similar product but for the next age category and to be Part A and Part B of the same standard, the definitions should be aligned and consistent and should therefore not include the text in square brackets and should read "means a product manufactured for use as a liquid part of the diversified diet of young children."
4. The fact that the addition of certain nutrients is mandated, and specific levels set for certain nutrients, does not mean that overall, these products can be considered necessary. It has been agreed by Member States that they are unnecessary no matter their composition. The benefits of these products over and above continued breastfeeding, that is recommended for this age group, has not been shown while there is a body of evidence of the benefits of continued breastfeeding. There is also evidence that these products replace breastmilk in the diet, resulting in a net reduction in the recommended nutritional intake from breastmilk which is contrary to this proposed text. In addition, it must be noted that 3.2 of the standard permits optional ingredients to be added.

This might indeed change the overall profile of the product especially as the evidence regarding a range of ingredients and the ultra-processing of foods is raising a number of concerns. The text in square brackets may in fact be proven untrue and so must be deleted.

5. It is critical to note that any contribution of these products to the diets of young children does not apply equally across all countries and as such is misleading. As recognised by the Committee, in some situations these products could make a positive nutritional contribution to the diet.

However, in many situations, they are not required and may have a negative impact due to interference with continued breastfeeding and concerns around some of the ingredients and their ultra-processing. The proportion of the children who may be positively or negatively impacted can vary significantly between member states, and while the statement may be accurate for some, for others it will be factually incorrect or misleading. It is therefore inappropriate that a statement that does not apply equally to all Member States be included in the definition in a Codex document and must be removed. If it were to be retained, it should read "...may or may not contribute..." Further, the inclusion of the square brackets text is outside the mandate of Codex – Codex should not be setting a universal principle as to the nutritional needs of young children. It is up to Member States to determine what foods / beverages contribute to the nutritional needs of their specific population / sub-population groups.

6. When Helen Keller International and many other country delegations and observers strongly stated that this definition should include the fact that these products function as breastmilk substitutes and are defined as such in many countries, this was not accepted as it was stated this was not the case in other countries. It was decided that in order to reach consensus "*Codex remain silent on the issue of whether the product was or was not to be described as a breast-milk substitute.*" We therefore believe that following the same principle in order to reach consensus, this definition should remain silent on whether or not this product may or may not contribute to the nutritional needs of young children.

Thus, the text should read:

*Drink/product for young children with added nutrients or Drink/product for young children means a product manufactured for use as a liquid part of the diversified diet of young children.*¹

¹ In some countries these products are regulated as breast-milk substitutes.

Note:

Helen Keller International believes that if the Committee does decide to retain the text in square brackets it would be absolutely necessary that there is additional consultation and discussion on this text due to the fact that as it is currently written it is misleading and undermines prior discussions and consensus by the Committee on similar issues (e.g., use of “formulated”).

NITROGEN TO PROTEIN CONVERSION FACTOR (NCF)

Helen Keller International supports the retention of the NCF of 6.25 in the standard(s) for Follow-up Formula for older infants and ‘Drink/Product for young children with added nutrients’ and ‘Drink for young children’ as per Recommendation 2, Appendix I.

AGENDA ITEM 4c / 4.3: Draft scope, description and labelling for follow-up formula for older infants (held at Step 7)

This agenda item is not for discussion as this text has been completed and held at step 7 for remaining text to be completed.

AGENDA ITEM 4d / 4.4: Essential composition requirements for follow-up formula for older infants and drink/product for young children with added nutrients or drink for young children (held at Step 7)

This agenda item is not for discussion as this text has been completed and held at step 7 for remaining text to be completed.

AGENDA ITEM 6: General Principles for the establishment of NRVs-R for persons aged 6 – 36 months

RECOMMENDATION 1: Helen Keller International supports the use of a three category ranking system as proposed. This hierarchy reflects the degree of scientific rigour and evidence for derivation of NRVs and will therefore be a useful tool for the Committee.

RECOMMENDATION 2: Helen Keller International supports maintaining the General Principles for NRVs-R as a separate annex.

RECOMMENDATION 3: Helen Keller International acknowledges the confusion that may arise from multiple sets of NRVs present on labels. The use of one set of NRVs on a label in accordance with the recommended age of use of the product would reduce this confusion. Helen Keller International in theory supports the development of the following sets of NRVs: 1) for older infants; 2) for young children; 3) for older infants and young children combined, noting that the last set would only be applicable to products that are recommended for an age group overlapping older infants and young children. However, Helen Keller International also recommends that there be detailed discussion on how to practically combine two different NRVs for these age groups for the 3rd set, and that these methods for combining should be noted in the General Principles. Because NRVs may differ for different age groups (i.e., iron) careful consideration needs to be given for selection of a value that optimizes health and safety of older infants and young children.

RECOMMENDATION 4: Helen Keller International supports the use of the NRVs-R established for labelling as reference criteria for vitamin and mineral composition, but not protein, in the Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991).

RECOMMENDATION 5: Helen Keller International supports the inclusion of sodium in the NRVs to be set for older infants and young children. Sodium is a nutrient of public health concern, including for this young age group. Elevated salt/sodium intake early in life has been shown to correlate with high blood pressure in childhood and can increase the risk of NCDs later in life. Taste preferences are established during early infancy and childhood, so exposure to heightened levels of sodium/salt has the potential to establish longer-term unhealthy dietary patterns. Given these concerns, Helen Keller would support the development of an NRV-NCD for sodium.

Helen Keller International will follow the discussion on items 2. related to the type of NRV for sodium and potassium.

Helen Keller International supports that the NRVs-R be limited to labelling purposes in FSDU texts other than the Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991).

SECTION 1 – PREAMBLE: Helen Keller International supports this text.

SECTION 2 – DEFINITIONS: Helen Keller International supports this text.

SECTION 3.1 - SELECTION OF SUITABLE DATA SOURCES TO ESTABLISH NRVS: Helen Keller International supports this text.

SECTION 3.2 - APPROPRIATE BASIS FOR ESTABLISHING NRVS: Helen Keller International supports the use of the three-category ranking system to reflect the hierarchy in methods used to derive NRVs. Helen Keller notes that use of one set of NRVs on labels would be beneficial to avoid confusion among caregivers and recommends that the methods to combine separate sets of NRVs for older infants versus young children be established in the general principles.

SECTION 3.3 - CONSIDERATION OF UPPER LEVELS OF INTAKE: Helen Keller International supports this text.