

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 4a, 4b, 6

NFSDU/42 CRD 17

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 Ghana

AGENDA ITEM 4a) 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

Comment: Ghana supports the eWG proposed text on Dextrose equivalent

Rationale: A maximum DE value that approximates the sweetness level of lactose provides a limit and safeguard against overly sweet tasting products.

Recommendation 2

Comment: Ghana support the sentence should be retained.

Rationale: Consistent with the objective of recommendation 1, this serves to safeguard the standard.

Recommendation 3

Comment: Ghana supports the eWG proposal on purity requirements.

Rationale: This is necessary for achieving optimum product quality and safety.

Recommendation 4

Comment: Ghana supports the adoption of the recommendation as presented by the eWG on Vitamin Compounds and Mineral Salts.

Rationale: The recommendation makes standard references to existing Codex text or borrows to those texts for similar products to guarantee safety.

Recommendation 5

Comment: Ghana support eWG proposal on consistency and particle size.

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

Recommendation 6

Comment: Ghana support eWG proposal for both products on specific prohibitions.

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

Recommendation 7

Comment: Ghana support eWG proposal on food additives (excluding flavourings)

Rationale: For consistency with other standards now and after completion of alignment work.

Recommendation 8

Comment a: Ghana supports the adoption of the recommendations as presented by the eWG

Rationale: This will lead to conformity and consistency by aligning the standard with those in the GSFA.

Comment b: Ghana does not support the inclusion of 'packaging gases'.

Rationale: Packaging gases are not part of the ingredients but rather processing aids.

Recommendation 9

Comment: Ghana support the adoption of option 2 for both Section A and Section B

Rationale: The text is specific and provides better guidance to users of the standard as it incorporates reference to section 4 of GSFA preamble as intended by option 1.

Recommendation 10

Comment: Ghana supports the adoption for both Section A and Section B on flavourings.

Rationale: For consistency with other standards since it make standard guidelines reference.

Recommendations 11 (Contaminants)

Comment: Ghana supports the adoption of the recommendation by the eWG.

Rationale: For consistency since it makes standard reference to relevant existing Codex text.

Recommendations 12 (Hygiene)

Comment: Ghana support eWG proposal for both products. However, additional references in [] is deemed not necessary for follow-up formula for older infants.

Rationale: It already makes reference to strict adherence of relevant existing Codex text under the respective clauses.

Recommendations 13 (Packaging)

Comment: Ghana support eWG proposal for using the same wording as in the follow-up formula for the two products.

Rationale: For consistency and to ensure other Codex packaging standards apply

Recommendations 14 (Fill of the container)

Comment: Ghana support proposal of the eWG to use same fill as in infant formula standard for both products with revision of ounces conversion factor.

Rationale: The recommendations give specific guidelines under the respective clauses.

Recommendations 15 (Method of analysis)

Comment: Ghana supports the adoption of the recommendation by the eWG

Rationale: For consistency with other standards as it reference relevant existing Codex text.

AGENDA ITEM 4b. REVIEW OF THE STANDARD FOR FOLLOW-UP FORMULA (CXS 156-1987): EWG-REPORT ON DRAFT PRODUCT DEFINITION OF DRINK/PRODUCT FOR YOUNG CHILDREN WITH ADDED NUTRIENTS OR DRINK FOR YOUNG CHILDREN; AND NITROGEN TO PROTEIN CONVERSION FACTORS

Recommendation 1

Comment: Ghana supports the proposed text - OPTION 1: (accept text in the square brackets):

Drink/product for young children with added nutrients or Drink for young children means a product manufactured for use as a liquid part of the diversified diet of young children {which may contribute to the nutritional needs of young children}

Rationale: Ghana is of the view that retaining the text in square brackets helps to differentiate these products from other beverages for young children which may not contribute to the nutritional needs of children and works to adequately describe the purpose of the product.

Recommendation 2

Comment: Ghana supports the proposed text that the NCF of 6.25 is retained 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'.

Rationale: There is no strong scientific basis to justify the change.

AGENDA ITEM 6: GENERAL PRINCIPLES FOR THE ESTABLISHMENT OF NRVs-R FOR PERSONS AGED 6 – 36 MONTH

a) Recommendation 1–5

Comments: Ghana support eWG proposal on general principles to guide the establishment of NRVs-R for persons aged 6 to 36 months.

Rationale: The recommendations would ensure the use of most rigorous scientific methods as well as show evidence of data with quality and strength.

b) **Comments:** Ghana is of the opinion that the principles relating to the establishment of NRVs for persons aged 0 to 36 months should not be integrated into annex 1, but rather be included in annex 2 of the CODEX Guideline on Nutrition labelling GXG 2-1985.

Rationale: The reference values are important for all parts of the population particularly for this specific and sensitive target group. For purposes of current discussions, the text needs to remain separate to facilitate smooth discussions but later to be integrated to take care of overlaps.

c) **Comments:** Ghana believes the NRVs for sodium and potassium for both older infants and young children should be included in the list and established.

Rationale: For both sodium and potassium, NRVs-R is appropriate as it is essential to ensure sufficient intake of these nutrients.