

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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World Health
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

Agenda Item 4d, 5a, 5b, 6a, 6b, 7, 9a, 11 and 12

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

Forty-first Session

Dusseldorf, Germany
24 – 29 November 2019

Comments by the Russian Federation

Agenda Item 4d

The Russian Federation supports work and participated in the electronic working group (eWG) chaired by New Zealand. We express following opinion regarding the current recommendations of the eWG:

Recommendation 1

The Russian Federation supports proposed text of recommendation 1 and notes that low lactose formulated products for young children are in use in a significant number of countries. We propose the following text:

4) Lactose has to be a preferred carbohydrate in the milk protein-based products. For products with low lactose content or not based on milk protein, glucose polymers are allowed as carbohydrates. In this case mono- and disaccharides total, excluding lactose, should not exceed 2.5 g/100 kcal (0.60 g/100 kJ). National or regional competent authorities might decrease this level to 1.25 g/100 kcal (0.30 g/100 kJ). Addition of sucrose or fructose is not allowed.

Recommendation 2

The Russian Federation considers that proposed text “**Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]**” should be excluded from the draft.

Sub-section 3.2.1. of section 3.2. Optional Ingredients relates to ingredients or substances that are added in order to support certain effect in the finished product. Imparting or enhancing sweet taste is not one of these functions.

Moreover, “sweetness” of the product is the subjective parameter, and currently no objective method for its evaluation is available. Within the electronic working group opinion that compositional requirements have to be scientifically based and objective was expressed on numerous occasions.

Recommendation 3

The Russian Federation supports Recommendation 3.

Recommendation 4

The Russian Federation supports Recommendation 4a. With regard to the recommendation 4b, we consider it necessary to note that maximum level of sodium in the product is not yet established by the Committee.

If the limit is established, the Russian Federation is aligned with the text proposed “The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.2.6”.

Recommendation 5

The Russian Federation supports Recommendation 5.

Recommendation 6

The Russian Federation supports Recommendation 6.

Recommendation 7

The Russian Federation supports Recommendation 7.

Recommendation 8

Russian Federation supports Recommendation 8a. With regard to the Recommendation 8b we consider that Packaging gases should be included in the GSFA according to the functional class. Alternatively, they could be placed in the text of the standard under discussion either in Food Additives or Packaging sections.

Recommendation 9

The Russian Federation supports option 2 as it is already in practical use for the evaluation of the products of this category.

Recommendation 10

The Russian Federation supports Recommendation 10.

Recommendation 11

The Russian Federation supports Recommendation 11.

Recommendation 12

The Russian Federation is aligned with the text of the recommendation, but proposes correction to account for specific requirements for products in the liquid form:

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) and in the case of liquid formula that has been commercially sterilised the appropriate sections of 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 13

The Russian Federation supports Recommendation 13.

Recommendation 14

The Russian Federation supports Recommendation 14.

Recommendation 15

The Russian Federation supports Recommendation 15.

With regard to the minimum protein level, the Russian Federation agrees to the change in the footnote text that would allow regional competent authorities to approve products with protein level of 1.6 to 1.8 g/100 kcal and with hydrolyzed protein level below 2.25 g/100 kcal based on scientific data and clinical evaluation.

We also support the eWG proposal on micronutrients.

Agenda Item 5a

The Russian Federation welcomes the document developed by the eWG co-chaired by South Africa, Senegal and Uganda.

Supporting guidelines development in general, we consider it necessary to draw Committee's attention to the reference to the GMP requirements in the document's Section 9. A number of countries impose GMP requirements exclusively on manufacturing process of pharmaceuticals and medical devices. Clearly, in those countries GMP could not be associated with food manufacturing. In this regard, we suggest to remove this point from the guidelines, substituting with reference to HACCP requirements where appropriate.

Agenda Item 5b

The Russian Federation supports the eWG proposal to establish quantitative criterion for free of trans-fat claim in all foods at 1 g per 100 g of total fat. We also support introduction of condition for use of the claim that requires products to comply with quantitative criterion for low content of saturated fat, namely, less than 1.5 saturated fat per 100 g of solid product or 0.75 g per 100 ml of liquid product. This corresponds to the criterion implemented in the Eurasian Union Regulation TR TS 021/2011 On food safety.

Agenda Item 6a

The Russian Federation expresses gratitude to Canada for preparation of insightful overview of regulatory strategies for lowering trans-fatty acids content in finished foods.

Among proposed risk management options we consider reasonable to support option A (limiting maximum level of trans-fatty acids content in processed foodstuffs on voluntary basis) and option B (development of regulatory measures, intended for lowering of trans-fatty acids content in processed foodstuffs).

Agenda Item 7

The Russian Federation expresses gratitude to Zimbabwe and South Africa for preparation of the discussion paper and would like to note the following.

We are in agreement with the definition of biofortification proposed by the group, but we are yet not convinced which of the processes, mentioned in the definition, lead to biofortification. Type and nature of the process significantly affect relevance of biofortification, and, at the same time, absence of unified approach with this regard contradicts purpose of this work.

At the same time, we welcome proposal that national and regional regulatory authorities could define independently the processes permitted for biofortification.

Taking in account the opinion of the Committee on Food Labelling (CCFL) that terminology currently approved in the Codex documents is sufficient and introduction of the term *biofortification* is not necessary, and taking into account that food industry has a number of globally accepted and established biofortification processes in the area of livestock handling and aviculture, we consider that continuation of the work on the term biofortification is possible with condition that it is limited to specific processes in certain areas of agriculture, for example, in livestock handling.

Agenda Item 9a

The Russian Federation would like to thank the European Union for development of the discussion paper. As co-chairs of the working group we fully support proposed process for evaluation and justification of the technological need to use food additives in the products under the scope of CCNFSDU standards.

We are of opinion that the Committee has to complete discussion on the process and then use the newly established process for evaluation of technological necessity of INS 415, 418 and 440. Nevertheless, we have reviewed justification for the three additives provided by one observer and have several comments their conclusions (see separate document).

Agenda Item 11

The Russian Federation welcomes Argentina's effort in reworking of the discussion paper on harmonized probiotic guidelines for use in foods and dietary supplements in 2019.

In the text of reworked document proposed for discussion we still could observe the discrepancy with initially declared work objective, namely with development of principles of probiotics use as food ingredients. In particular, the document contains propositions regarding probiotics efficiency in the finished foodstuffs and particulars of probiotics declaration within the label of such products. In our opinion, these topics have to be discussed separately, in the context of the requirements towards the finished foodstuffs containing probiotics, which is not a subject of this specific Committee work.

We also consider that the proposed document does not take in account an unique specificity of probiotics, which are not only a food ingredient, but microbiological object as well. Based on the text of the discussion paper, it could be supposed that issues of probiotics biosafety, antibiotics resistance, use of the GM strains etc., might not be sufficiently covered by the development of such document.

At this stage we do not support development of specifications for probiotics in the foodstuffs. We are of opinion that many aspects of the probiotics use depend on national/regional regulations and on nutritional habits that have to be analyzed before discussing any harmonization work within CODEX.

For example, use of probiotics is broadly regulated in the Eurasian Economic Union, and in 2014 three Union member states accepted interstate standard GOST 32923-2014 on use of probiotics in dairy.

We also have to note that probiotics as such are not, in full sense of it, a standardization object within the CODEX framework, that forms requirements to the finished foodstuffs – commodities and nutrients, which does not include probiotics in many countries.

We recommend postpone the new work and, as we proposed in the previous Committee Session, initiate collecting information on how probiotics are regulated in the CODEX member countries. Only then we will be in position to reach consensus if this topic needs to be regulated on the global level.

Agenda Item 12

The Russian Federation thanks Costa-Rica, USA and Paraguay for the work done in 2019 for assembling the general database on food profiling that contains 97 models.

It has to be noted that the work is tightly connected to the discussion that continues in CCFL on front of the pack nutrition labelling (FOPNL). We previously stated both in CCFL and CCNFSDU our support of FOPNL guidelines development. At the same time, we are of opinion that proposed work on food profiling at CCNFSDU still depends on results of discussions within the Labelling Committee. Specifically, scale and scope of the FOPNL are still under consideration there.

Due to this we support recommendation of the working group to limit food profiles discussion within the context of their use in nutrition value labelling.

We consider specifically important to exclude from consideration all of the specialized nutrition products, including dietetic prophylactic nutrition, medical nutrition, baby nutrition, product for pregnant and lactating, sports nutrition, food supplements and mineral water, as well as food additives and raw materials for food production.

We also consider it useful to further align this work with the efforts of the Labelling Committee in creation of FOPNL guidelines. Obviously, this topic has to be addressed in structure and scope of future work.