CODEX ALIMENTARIUS COMMISSION

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World Health Organization

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Agenda item 4d **CX/NFSDU 19/41/5 Add.1**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES
Forty-first Session
Düsseldorf, Germany, 24 - 29 November 2019

REVIEW OF THE STANDARD FOR FOLLOW-UP FORMULA: PROPOSED DRAFT FOLLOW-UP FORMULA FOR OLDER INFANTS AND [PRODUCT] FOR YOUNG CHILDREN

Comments in reply to CL 2019/78-NFSDU

Comments of Australia, Brazil, Burkina Faso, Canada, Colombia, Costa Rica, Guatemala, Iran, Indonesia, Malaysia, Mali, Nepal, Peru, Philippines, Senegal, Sri Lanka, United States of America, Vietnam, CCTA, ISDI, EU Specialty Food Ingredients, HKI

Background

1. This document compiles comments received through the Codex Online Commenting System (OCS) in response to CL 2019/78-NFSDU issued in September 2019. Under the OCS, comments are compiled in the following order: general comments are listed first, followed by comments on specific sections.

Explanatory notes on the appendix

2. The comments submitted through the OCS are hereby attached as **Annex I** and are presented in table format.

ANNEX I

GENERAL COMMENT	MEMBER/OBSERVER
Australia supports the timely progression of the proposed draft standard. In this regard Australia supports Recommendations 3, 4b, 5, 6, 7, 8a, 10b, 11, 13, 14, 15. Specific comments For the remaining eWG recommendations (1, 2, 4a, 8b, 9, 10a, 12), Australia has the following specific comments. We also have suggested edits to the draft table for Section 4 - Food Additives in Appendix II.	**Australia**
We would like to reiterate your previous concern that the CCNFSDU did not set a sodium maximum to ensure the nutritional integrity of [product name] for young children. If a sodium limit is established, the subcommittee supports maintaining the sentence [sodium concentrations derived from vitamin and mineral ingredients shall comply with the limits set for sodium in Section 3.2.6].	**Colombia**
In addition to the US responses to the 15 recommendations below, the United States would like to request clarification regarding "optional ingredients." Specifically, we note that the topic of allowed optional ingredients remains unclear for (Name of Product) for young children and second, we recommend clarity on the labeling of optional ingredients for both products. How is the inclusion of optional ingredients to be communicated to the consumer?	**USA**
Paragraph 3.2.1 of the "Optional Ingredients" section deals with the addition of ingredients or substances to achieve a "particular nutritional purpose" in relation to the beneficial effect. This is the purpose of adding them. The text added in brackets is inconsistent with this, since imparting or enhancing a sweet taste is not a nutritional purpose. In addition, the use of flavouring substances and food additives is managed, respectively, by the provisions on flavouring substances and food additives in the Standard.	**Peru**

SPECIFIC COMMENTS	MEMBER / OBSERVER AND RATIONALE
Recommendation 1	
Dextrose Equivalent Australia supports the text proposed by the Chair. We agree compositional requirements in a standard should be science based and enforceable, and note dextrose equivalent (DE) is difficult to enforce, with no evidence to support DE as a measure of sweetness. In addition there are already agreed provisions to both limit mono-and disaccharides for [name of product] for young children and the prohibition on adding sucrose and/or fructose. Sentence in square brackets Editorial comment Australia notes a minor edit in proposed footnote 4 is needed. 'Carbohydrates' should be singular not plural so the sentence should be 'Lactose should be the preferred carbohydrates in…' Clean copy: 4) Lactose should be the preferred carbohydrate in [name of product] based on milk protein. For products not based on milk protein glucose polymers should be the preferred carbohydrates used	**Australia** Australia supports retaining the sentence in square brackets as a compromise position. We note the Chairs comment that limit on mono- and disaccharides for [name of product] for young children is more restrictive than the limit for infant formula and follow-up formula for older infants. We consider inclusion of the sentence does add value as it is consistent with the approach used for both the draft standard follow-up formula for older infants (REP19/NFSDU, Appendix II) and infant formula (CODEX STAN 72-1981).
	Brazil Brazil is of the opinion that the establishment of limits for mono- and disaccharides and the prohibition of adding sucrose and fructose would limit the sweetness of products not based on milk protein. Therefore, we agree with the text. Regarding the sentence in square brackets, we consider that the

	guidance to include glucose polymers as the preferred carbohydrates for products not on milk protein could be a complementary requirement.
	Burkina Faso Burkina Faso fully supports the proposed text with the deletion of the brackets: “4) In milk protein-based [product name], lactose must be the preferred source of carbohydrate. In products that are free from milk protein, glucose polymers shall be the preferred source of carbohydrate.” Monosaccharides and disaccharides, apart from lactose, must not exceed 2.5 g/100 kcal (0.60 g/100 kJ). National and/or regional authorities may limit these figures to 1.25 g/100 kcal (0.30 g/100 kJ). Sucrose and/or fructose must not be added.
	Canada Canada would like to re-iterate that there is no direct link with the dextrose equivalent (DE) value of a carbohydrate and its relative sweetness. Furthermore, if the lactose has been reported to have a relative sweetness range of 15-40, then setting a DE maximum of 15 would be overly restrictive. Canada supports Option 1 as we are of the opinion that the limit for mono-and disaccharides and the prohibition on using sucrose and fructose are adequate to limit the sweetness of products not based on milk protein for young children and no further restrictions are required. Canada recommends deleting the sentence in square brackets, however would not be strongly opposed if the sentence remains.
4) Lactose should be the carbohydrate of choice in [product name] based on milk proteins. ***[In low-lactose products ~~which are~~ and products not ~~produced using~~based on milk protein ~~proteins~~, glucose polymers should be the preferred carbohydrates for use.]***	**Colombia** Recommendation 1 is partially supported and the proposed text is appreciated. One addition to the text is suggested: In low-lactose products and products not based on milk protein, glucose polymers should be the preferred carbohydrates for use.
	Costa Rica Costa Rica supports recommendation 1 with the following amendment: 4) Lactose should be the carbohydrate of choice in [product name] based on milk protein. [For low-lactose products and products that are not based on milk proteins, glucose polymers should be the carbohydrates preferably used.].
	Guatemala Guatemala, for recommendation 1, requests that the declaration "low-lactose" be added since it should be taken into account that some existing milk-based products are also low in lactose, and therefore this type of products would not be included and would remain outside the standard. Therefore, the proposed wording is “[In low-lactose products and products that are not produced based on

	milk protein, glucose polymers should be the carbohydrates of choice].
4) Lactose should be the preferred carbohydrates in [name of product] based on milk protein. ***~~[For~~ For products not based on milk protein and products with reduced lactose, glucose polymers should be the preferred carbohydrates used.~~]~~***	**Indonesia** Indonesia proposes to open the square bracket and proposes to modify the sentences as follow:
	Iran Iran agree with recommendation 1.
	Malaysia Malaysia suggest an addition to the text as follows: 4) Lactose should be the preferred carbohydrates in [name of product] based on milk protein. [For products with reduced lactose and 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.
	Mali Mali supports the proposed text and the deletion of the brackets. Therefore, the text will read "Lactose should be the preferred source of carbohydrate in milk protein-based [product name]. In products that are not milk protein-based, glucose polymers will be the preferred source of carbohydrate." Footnote 4) Mali supports the proposed text and the deletion of the brackets. Therefore, the text will read "Lactose should be the preferred source of carbohydrate in milk protein-based [product name]. In products that are not milk protein-based, glucose polymers will be the preferred source of carbohydrate."
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.]***	**Nepal** Nepal supports the proposed text.
4) Lactose should be the carbohydrate of choice in [product name] based on milk proteins. ***[In low-lactose products and products that are not produced based on milk proteins, glucose polymers should be the carbohydrates of choice.]***	**Peru** We recommend amending the wording as follows: Lactose should be the carbohydrate of choice in products based on milk proteins. [In low-lactose products and products that are not produced based on milk proteins, glucose polymers should be the carbohydrates of choice.] *Low-lactose milk-based products for young children are currently available on the market.
	Philippines We support Option 1with deletion of the brackets as this was our previous position:

	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.
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.]~~***	**Senegal** Senegal approves the proposed text and the deletion of the brackets.
	Sri Lanka Sri Lanka supports the proposed text with the deletion of the square brackets
Footnote 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).	**USA** In addition to the US responses to the 15 recommendations below, the United States would like to request clarification regarding "optional ingredients." Specifically, we note that the topic of allowed optional ingredients remains unclear for (Name of Product) for young children and second, we recommend clarity on the labeling of optional ingredients for both products. How is the inclusion of optional ingredients to be communicated to the consumer? The United States agrees with the sentence in bold and brackets and supports the deletion of the brackets because purpose of the carbohydrate in the [Name of Product] for young children is to provide energy, regulate blood glucose, spare protein, and assist in the breakdown of fats to prevent ketosis. For non-milk-based products which tend to have a bitter taste, use of other mono and disaccharides and/or glucose polymers should be permitted within the carbohydrate level constraints. The constraint of 10% of total calories from sugars (2.5 g 100kcal) and the maximum carbohydrate level limits sweetness in the product and we are not aware of a scientific basis for the exclusion of sucrose and/or fructose. The United States suggests deleting the last statement of the footnote: "Sucrose and/or fructose should not be added."
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.~~***	**USA**
	Vietnam Vietnam in general supports recommendation 1. However, Vietnam suggests an addition to the bold text as follows: 4) Lactose should be the preferred carbohydrates in [name of product] based on milk

	protein. [For products with reduced lactose and 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. Rationale: There are milk-based [name of product] for young children with reduced lactose on the market at present time.
	EU Specialty Food Ingredients To our opinion the sentence [For products not based on milk protein glucose polymers should be the preferred carbohydrates used.] should be deleted, as the aim of limiting the sweetness is already sufficiently addressed by the restriction of sucrose and fructose.
4) Lactose should be the preferred carbohydrates in [name of product] based on milk protein. ***F[For or products not based on milk protein glucose polymers should be the preferred carbohydrates used.]***	**HKI** 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.
4) Lactose should be the preferred carbohydrates in [name of product] based on milk protein. ***[For products with reduced lactose and products not based on milk protein glucose polymers should be the preferred carbohydrates used.]***	**ISDI** ISDI partially supports recommendation 1 and appreciates the proposed wording. ISDI would like to suggest an addition to the text as follows: 4) Lactose should be the preferred carbohydrates in [name of product] based on milk protein. [For products with reduced lactose and 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. ISDI proposes this additional wording because there are currently milk-based [name of product] for young children with reduced lactose on the market. Footnote4)
Recommendation 2	
	Australia Australia supports retaining the sentence in square brackets in the interest of future proofing the standard. This takes into account possible future technological innovations, the situation where ingredients may have multiple purposes, and the current momentum to develop non-sugar ingredients that can impart or enhance a sweet taste.

	Brazil Brazil considers it important to retain the text considering future technological innovations, and thus, to prevent the use of substances or ingredients that could be added with the purpose to impart or enhance sweet taste in [name of product] for young children. However, representatives from the industry raised concerns regarding the difficulty to enforce the requirement because there is no definition or standardized method of analysis for measuring sweetness and how to evaluate if an ingredient was added with the purpose of imparting or enhancing a sweet taste.
.	**Canada** Canada agrees with retaining the sentence in square brackets in Recommendation 2, although Canada is unaware of substances or ingredients that are not classified as carbohydrates or food additives that could be added with the purpose of imparting or enhancing the sweet taste in products for young children. Canada supports the view that retaining the sentence would ensure that if such ingredients became available in the future they would not be permitted
	Mali Mali is in favour of retaining the proposed text, including the words in brackets, to ensure its longevity. In view of the global interest in this matter and the need to tackle the problem of childhood obesity and children being overweight, this issue is critical.
	Guatemala Guatemala, for recommendation 2, indicates that the sentence "[Substances for sweetening purposes should not be added to [product name]]" should be deleted, since this statement is considered to belong in the sections on flavours and sweeteners, as it does not apply to this section.
	Indonesia Considering the discussion of the EWG, Indonesia is of the view that there are different view between member of EWG related to substance or ingredients which that are not classified as carbohydrates or food additives that could be added with the purpose to impart or enhance sweet taste in [name of product] for young children. Therefore, Indonesia would like to further clarify the definition of substances which are intended to imparting or enhancing sweet taste.
	Iran The sentence in square brackets [[Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name

	of product]] should be deleted because imparting or enhancing a sweet taste is not a nutritional purpose.
	Malaysia Malaysia noted the inconsistency of the wording 'substances and ingredients' used in the eWG consultation paper. It was pointed out that in some places, the phrase 'substances or ingredients' is used, whereas in others, the word 'substance' is used. Malaysia is of the view that it would be better to use 'substances and ingredients' to capture anything that is not intended to be added, when referring to imparting sweetness. The words 'substances and ingredients' should be used if the intention was not to make the product sweet and not to encourage excessive consumption. Malaysia seek clarification on the wording 'substances and ingredients'
	Nepal Nepal supports the proposed text.
	Philippines The Philippines is of the opinion that the bracketed statementSubstances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product] should be deleted since it is already clear that only substances and ingredients added for particular nutritional purposes should be under optional ingredient. The paragraphs 3.2.1 of the "optional ingredients" section deal with the addition of ingredients or substances to achieve a "particular nutrition purpose" in relation to beneficial effect as the purpose of their addition. The added text in square brackets is not consistent with this since imparting or enhancing a sweet taste is not a nutritional purpose. Furthermore, the use of flavouringsubstances and food additives are managed, respectively, by the flavouring and food additive provisions within the Standard
	Senegal Senegal agrees with retaining the proposed text including the words in brackets.
	Sri Lanka Sri Lanka supports the retention of the proposed text included in the square brackets in order to ensure future proofing of the text. 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]
That CCNFSDU considers whether the sentence ***~~[Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]]~~*** should be retained	**USA**

under 3.2.1 Optional ingredients to capture the intent that no such substances or ingredients should be added to these products or be deleted.	The constraints on total calories and the maximum carbohydrate level limits sweetness in the [Name of Product] for young children. The United States agrees that the where possible, future proofing the Standard is desirable. However, potential future optional non-caloric or artificial sweetener- type ingredients that could impart "sweet taste" would be constrained by the requirement that a particular nutritional purpose is needed for addition and imparting "sweet taste" is not a nutritional purpose. In addition, sweet taste is subjective, has no definition, and is not enforceable. The United States requests deleting the sentence in square brackets as it does not provide future proofing of the Standard. We also note that artificial sweeteners have not been adequately studied for use in children and should not form a significant part of a child's diet according to the American Academy of Pediatrics as well as other associations.
	Vietnam Vietnam is of the view the sentence [Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]] should be deleted. The paragraphs 3.2.1 of the "optional ingredients" section deal with the addition of ingredients or substances to achieve a "particular nutrition purpose" in relation to beneficial effect. This is the purpose of their addition. The added text in square brackets is at odds with this since imparting or enhancing a sweet taste is not a nutritional purpose. Furthermore, the use of flavouring substances and food additives are managed, respectively, by the flavouring and food additive provisions within the Standard. As stated by the eWG's Chair in conclusion for the recommendation 1 above, "Compositional requirements in a standard should be science based and enforceable". New optional ingredients or substances must be safe and suitable for the target population according to the general principles established in the revised text. Codex standard must reflect state of the art science at the time it is set or revised
	CCTA In Recommendation 2, change "considers" to "consider", as similar to the others
	EU Specialty Food Ingredients To our opinion the sentence [Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]] should be deleted. Reason is that the optional ingredient provisions are for substances

	and ingredients added for particular nutritional purposes and that 'imparting or enhancing a sweet taste' is not a nutritional purpose.
That CCNFSDU considers whether the sentence ***[~~Substances~~ Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of ~~product]]~~product]*** should be retained under 3.2.1 Optional ingredients to capture the intent that no such substances or ingredients should be added to these products or be deleted.	**HKI** 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 increasing 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]
That CCNFSDU considers whether the sentence ***[~~Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]]~~*** should be retained under 3.2.1 Optional ingredients to capture the intent that no such substances or ingredients should be added to these products or be deleted.	**International Special Dietary Food Industries** ISDI is of the view the sentence [Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of product]] should be deleted. The paragraphs 3.2.1 of the "optional ingredients" section deal with the addition of ingredients or substances to achieve a "particular nutrition purpose" in relation to beneficial effect. This is the purpose of their addition. The added text in square brackets is at odds with this since imparting or enhancing a sweet taste is not a nutritional purpose. As stated by the eWG's Chair in conclusion for the recommendation 1 above, "Compositional requirements in a standard should be science based and enforceable". Optional ingredients or substances added must be safe and suitable for the target population according to the general principles established in the revised text. Codex standard must reflect state of the art science at the time it is set or revised. If an optional ingredient or a substance added for nutritional purpose would bring mono and di-saccharides, other than lactose, they shall not exceed 2.5 g/100kcal (0.60 g/100kJ), therefore limiting sweet taste. ISDI would like to take the opportunity to address the comments made in the eWG (included in section 2 of the Agenda Paper – CX/NFSDU 19/41/5). Sweeteners including steviol glycosides (INS 960) are not authorized as an additive for use in foods for infants and young children as per GSFA (CODEX STAN 192-1995, revision 2018), nor are any other additives with a functional class of sweetener. ISDI believes that the existing processes are effective at controlling which ingredients or substances are used.

	Flavouring substances are products that are added to food to impart, modify, or enhance the flavour of food and are chemically-defined substances either formed by chemical synthesis, or obtained from materials of plant or animal origin as defined in Guidelines for the Use of Flavourings (CXG 66-2008). The use of flavouring substances is governed by the Follow-up Formula Standard (CODEX STAN 156-1987, under revision) with the positive list of permitted substances including specific limits, where applicable (Natural Fruit Extracts, Vanilla extract, Ethyl vanillin, Vanillin). Any other flavouring substances are prohibited for use in foods for infants and young children.
Recommendation 3	
Recommendation 3a and 3b	**Brazil** Brazil agrees with the recommendation
	Canada Canada agrees with Recommendations 3 a) and 3 b) as the purity requirements align with those in the infant formula standard.
	Indonesia Indonesia agrees with this recommendation 3
	Iran Iran supports recommendation 3
	Mali Mali supports the proposed text, and stresses the need to change and separate the relevant age groups based on the finalised standard. The text should read: “All ingredients must be clean, of good quality, safe and suitable for ingestion by older infants. They must satisfy their normal quality requirements, for example in terms of colour, flavour and smell.”
	Malaysia Malaysia supports Recommendation 3
	Sri Lanka Sri Lanka supports the proposed text (recommendation 3 a and 3b), noting the need for modification and separation of the relevant age groups depending on the final structure of the standard
	EU Specialty Food Ingredients We agree with Recommendations 3a and 3b.
	International Special Dietary Food Industries Please note that ISDI supports recommendations 3, 5, 6, 7, 10, 11, 14 and 15. Therefore, we do not submit any comments on these recommendations.
Recommendation 3a	
	Nepal Nepal supports the proposed text.

	Philippines We pose no objection to Recommendation 3 on Purity Requirements since these are consistent with other Codex Standards for older infants and young children:
All ingredients shall be clean, of good quality, safe and suitable for ingestion by **~~[older]~~**older infants **~~from the 6th month on and young children~~.** They shall conform with their normal quality requirements, such as colour, flavour and odour.	**USA** The United States agrees with the Purity Requirements as they are identical to the those in the Infant Formula Standard, with the clarification of the age range for the older infant of 6-12 months and accepts the removal of the brackets [older] to retain the term "older" to differentiate the age range appropriately.
	HKI 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.
	Senegal Senegal supports the proposed text, and stresses the need to change and separate the relevant age groups based on the finalised standard.
All ingredients shall be clean, of good quality, safe and suitable for ingestion by **~~[older]~~**older infants **~~from the 6th month on and young children~~.** They shall conform with their normal quality requirements, such as colour, flavour and odour.	**HKI**
Recommendation 3b	
	Nepal Nepal supports the proposed text.
	USA The United States agrees with the Purity Requirements as they are consistent other relevant Codex documents with the clarification of the age range for young children. The US will support removal of the brackets when the "name of product" has been decided because we support the effort to differentiate the age range appropriately.
	HKI 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 4	
"Vitamin and minerals added in accordance with Section 3.3.1 (d and e) and other nutrients added in accordance with 3.2.1 should be selected from the Advisory List for Mineral Salts and Vitamin Compounds for Use in Foods for Infants and Children (CXG 10-1979). "	**Australia** Australia supports retaining both provision 3.4.2.1 and 3.4.2.2 We could also support the suggestion to use the exact text from provision 3.4 from Codex Standard 72-1981 as copied below as it is broader and includes the permitted forms of 'other nutrients'.
Recommendation 4a and 4b	**Brazil** Brazil agrees with the recommendation
	Canada Canada agrees with Recommendations 4 a) and 4 b).
	Colombia We would like to reiterate your previous concern that the CCNFSDU did not set a sodium maximum to ensure the nutritional integrity of [product name] for young children. If a sodium limit is established, we support maintaining the sentence [sodium concentrations derived from vitamin and mineral ingredients shall comply with the limits set for sodium in Section 3.2.6].
	Mali Mali supports the proposed text, which should read: "The combinations of vitamins and minerals used in accordance with Sections 3.3.1 and 3.3.2 must be selected from the Advisory List of Mineral Salts and Compound Vitamins for Use in Foods for Infants and Young Children approved by the Codex Alimentarius Commission (CXG 10-1979). The amounts of sodium originating from vitamins and minerals must not exceed the sodium limit specified in Section 3.1."
	Nepal Nepal supports the proposed text.
	Indonesia Indonesia agrees with recommendation 4.
	Iran Iran supports recommendation
	Peru Recommendation 4 b. With respect to this recommendation, we suggest that CCNFSDU has not established a sodium maximum to ensure the nutritional integrity of the product for young children. If a sodium limit is established, we support maintaining the statement [sodium concentrations derived from vitamin and mineral ingredients shall comply with the limits set for sodium in Section 3.2.6].

	Philippines The Philippines supports Recommendation 4 and agree to the following texts for Vitamin compounds and minerals salts including adoption of the statement on the amount of sodium derived from vitamin and mineral ingredient that should be within the limits for sodium in Follow-up Formula for Older Infants. We likewise support the retention of provision 3.4.2.1 of the current FUF Standard to follow-up formula for young children. But if still possible, we recommend the retention of the strike-through texts. The requirements for sodium of older infants 6-11 months old (200 mg) is not far from the requirements for sodium of young children 1-2 years old (225 mg) based on the Philippine Dietary Reference Intakes 2018. Thus, we are of the opinion that both should be regulated/limited. a) Follow-up formula for older infants: Vitamin compounds and mineral salts 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. b) [Name of product] for young children: That CCNFSDU agree to the following text for 'Vitamin Compounds and Mineral Salts' for [name of product] for young children; Vitamin compounds and mineral salts 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). However, if limit for sodium would be established, we support to maintain the statement [the amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.2.6 of the current Follow-Up Formula Standard.
	Senegal Senegal supports the proposed text.
	Sri Lanka <u>Recommendation 4a</u> Sri Lanka support the proposed text. <u>Recommendation 4b</u> Sri Lanka supports the proposed text including the deletion of the second sentence

	USA The United States agrees with Recommendation 4 to use the text found in the Infant Formula Standard regarding Vitamin Compounds and Mineral Salts as it is consistent with the committee's agreement to use text from the Infant Formula Standard wherever appropriate. However, the United States requests clarification on what sections of the proposed Standard are being referred to by mention of "Sections 3.3.1 and 3.2.2." With regard to Recommendation 4b) The United States agrees with Recommendation 4 to use the text found in the Follow-up Formula Standard regarding "Vitamin Compounds and Mineral Salts." However, the United States requests clarification on what sections of the proposed Standard are being referred to by mention of "Sections 3.3.1 and 3.2.2." In addition, the current draft Standard for [Name of Product] for young children includes a prohibition on the addition of sodium chloride; therefore, we also support the deletion of the following phrase: "The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.2.6" in the proposed Standard for [Name of Product] for young children because it is not needed.
	Vietnam Vietnam supports recommendation 4a. However, regarding to the recommendation 4b, Vietnam is concerning that CCNFSDU did not establish a maximum for sodium to ensure nutritional integrity for [name of product] for young children. If limit for sodium would be established, Vietnam supports to maintain the statement [the amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.2.6].
	EU Specialty Food Ingredients We agree with Recommendations 4a and 4b. as there is no limit for sodium set for young children, it's important to remove the last sentence from recommendation 4b.
	HKI 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.

	International Special Dietary Food Industries ISDI supports recommendation 4a. However, concerning recommendation 4b, ISDI would like to reiterate its previous concern that CCNFSDU did not establish a maximum for sodium to ensure nutritional integrity for [name of product] for young children. If limit for sodium would be established, ISDI supports to maintain the statement [the amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.2.6].
Recommendation 5	
	Brazil Brazil agrees with the recommendation
	Canada Canada agrees with Recommendations 5 a) and 5 b).
	Iran We support this recommendation and we propose to add some other quality specification to the product. For example: 1) Insolubility index : The EWG can provide an acceptable range for insolubility index for follow up formula. There is an ISO standard for determination of insolubility index: ISO 8156: 2005/ IDF 129 : 2005 Dried milk and dried milk products – Determination of insolubility index 2) Scorched particles: Acceptable limit = 0 There is an test method for determination of Scorched particles: ADPI. (1990). Determination of scorched for powder milk. 3) Dispersibility and wettability: The EWG can provide an acceptable limit for dispersibility and wettability for follow up formula. There is an ISO standard for determination of Dispersibility and wettability: ISO/Ts 17758 Instant dried milk — Determination of the dispersibility and wettability.
	Indonesia Indonesia agrees with recommendation 5.
	Malaysia Malaysia supports Recommendation 5
	Mali Mali supports the proposed text. The text should read: “When prepared as directed, the product must be free from lumps and coarse particles.”
	Nepal Nepal supports the proposed text.
	Philippines We agree with Recommendation 5 on the following text for “Consistency and Particle Size as this is our previous position

	Senegal Senegal supports the proposed text. The text should read: “When prepared as directed, the product must be free from lumps and coarse particles.”
	Sri Lanka Sri Lanka supports the proposed text.
	USA <u>Recommendation 5a</u> The United States agrees with Recommendation 5 to have the product free of lumps and large coarse particles as proposed because such components can lead to gagging, choking, and/or product refusal by the infant consuming follow-up formula for older infants’ products. <u>Recommendation 5b</u> The United States agrees with Recommendation 5 to have the product free of lumps and large coarse particles as proposed because such components can lead to gagging, choking, and/or product refusal by young children consuming the [Name of Product].
	HKI 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 6	
	Brazil Brazil agrees with the recommendations 6a and b
	Canada Canada agrees with Recommendations 6 a) and 6 b).
	Iran Iran supports recommendation 6
	Indonesia Indonesia agrees with recommendation 6
	Malaysia Malaysia supports Recommendation 6
	Nepal Nepal supports the proposed text.
	Philippines The Philippines supports Recommendation 6 on Specific prohibitions on use of ionizing radiation as it is supported by majority of the EWG members and it is also consistent with Standard for Processed Cereal-based Foods for Infants and Young Children
	Senegal Senegal supports the proposed text.

	Sri Lanka Sri Lanka supports the proposed text
Specific prohibitions The product and its components shall not have been treated by ionizing ~~radiation~~radiation unless such radiations were rendered safe for young children and permitted in other appropriate Codex Standard.	**USA** Recommendation 6a The United States agrees with Recommendation 6 that follow-up formula and its components for older infants be specifically prohibited from being treated by ionizing radiation consistent with other Codex Standards for foods for infants. Recommendation 6b The United States agrees with Recommendation 6 that the [Name of Product] for young children and its components for young children be specifically prohibited from being treated by ionizing radiation consistent with other Codex Standards for foods for young children. However, we suggest consistency in the text for both follow up formula for older infants and [Name of Product] for young children copied below. Specific prohibitions The product and its components shall not have been treated by ionizing radiation unless such radiations were rendered safe for young children and permitted in other appropriate Codex Standard.
Recommendation 6a and 6b	**HKI** 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 7	
	Brazil Brazil agrees with the recommendation. Nevertheless, we call the attention about the importance of considering the ongoing work in the CCNFSDU on the framework for the technological justification of food additives
	Australia Comment on Appendix II: SECTION 4 FOOD ADDITIVES Australia suggests two edits to the draft table of food additives in Section 4 as provided in Appendix II 1) Lecithin: Australia notes INS 322 covers both 322(i) and 322(ii). However, only INS 322(i) has a JECFA monograph and safety evaluation. Additionally, the GSFA specifies that INS 322(i) Lecithin is permitted in FC 13.1.2. Therefore, the entry for Lecithin should be as shown below: 322(i) Lecithin 0.5 g 2) Sodium ascorbate INS 301, Australia notes sodium ascorbate is a source of sodium. Therefore, for follow up formula for older infants, it should have the accompanying sodium footnote to be consistent with the other sources of sodium included in the table as follows: 301 Sodium ascorbate Within the limits for sodium in Section 3.1*

	*Applicable to Follow-up Formula for Older Infants only.
	Canada Recommendation 7a Canada agrees. Note that proposing new food additives will require the finalization of the CCNFSDU's framework on the technological justification for additives. Recommendation 7b Canada agrees. Case-specific concerns about the safety of any additive added to these products could be addressed if raised in the future.
	Guatemala Guatemala agrees with recommendations 7 a and 7 b to maintain food additive authorisations, excluding formulated complementary foods for older infants and young children from the current Standard for Formulated Complementary Foods.
	Indonesia Indonesia agrees with recommendation 7
	Iran Iran supports the recommendation 7
	Malaysia Malaysia supports Recommendation 7
	Mali Mali supports the proposal that for follow-up formula for older infants, authorisations for food additives (excluding flavouring) should be retained in the current Standard for Follow-up Formula (CXS 156-1987), but points out that these will be replaced by a reference to the corresponding sections of the GSFA when harmonisation is complete.
	Nepal Nepal supports the proposed text
	Philippines We support Recommendation 7 on retaining the permission for food additives as majority of the EWG members also supported it:
Recommendation 7a and b	**Senegal** Senegal agrees with the proposal to retain the authorisations for food additives (excluding flavourings) in the current Standard for Follow-up Formula (CXS 156-1987).
	Sri Lanka Sri Lanka 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 and 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.
	USA Recommendation 7a The United States agrees with Recommendation 7 that follow-up formula for older infants retain the permissions for food additives as stated above: That CCNFSDU agree 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 The United States agrees with Recommendation 7 that the product for young children as stated above: That CCNFSDU agree 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.
	EU Specialty Food Ingredients We agree with Recommendations 7a and 7b.
	HKI Recommendation 7a 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 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 8	
	Brazil Brazil agrees with the recommendation
	Australia For clarity and to avoid any confusion, Australia supports the inclusion of packaging gases in the food additives section and to also

	retain references to nitrogen and carbon dioxide in the text in section 7.1. This approach is consistent with the Infant Formula Standard.
	Canada Recommendation 8a Canada agrees with recommendation 8a Recommendation 8b Canada agrees. Although redundant, there is no inaccuracy in the additional clarifying text in the Food Additive Section.
	Colombia We support recommendation 8 a. Recommendation 8 b We would like to request that "packaging gases" be included in the Food Additives section under the relevant functional class. There is no need to also keep them in Section 7 on Packaging, but it may be acceptable for them to be listed in both places, as is the case in the Standard for Infant Formula.
	Guatemala Guatemala points out that it does not agree with recommendation 8 b since packaging gases of this type are not considered to be part of the product, as additives are. Their suggestion, therefore, is to add them to the corresponding area, which is Section 7 on packaging, or if they need to be included in the section on additives, they request that they be added to Section 7, as is currently the case in the Standard for Infant Formula. Guatemala indicates that packaging gases should be listed only in the additives section to avoid repetition.
	Indonesia Indonesia agrees with recommendation 8. Packaging gas should be included in section of food additives since recommendation 13 is related to packaging gases
	Iran Iran supports recommendation 8 About (8b) Packaging-gases being listed in both places (food additive and Section 7 Packaging).
	Malaysia Malaysia supports Recommendation 8a)
	Mali Mali agrees with administrative amendments (i) to (iii) and with the harmonisation of the names of food additives in the current Standard for Follow-up Formula in line with those of the GSFA and the changes introduced in Appendix II.
	Nepal Nepal supports the proposed text

	Peru Recommendation 8 b. There is no need to also keep them in Section 7, but it may be acceptable for them to be listed in both places, as is the case in the Standard for Infant Formula.
	Philippines The Philippines is in agreement of Recommendation 8 as this has support of the majority of the EWG members:
	Senegal <u>Recommendation 8 a)</u> Senegal agrees with administrative amendments (i) to (iii) and with the harmonisation of the names of food additives in the current Standard for Follow-up Formula in line with those of the GSFA and the changes introduced in Appendix II. <u>Recommendation 8 b)</u> Senegal is in favour of retaining the text about packaging gas in the "Food additives" section, and of classifying it appropriately and retaining it in Section 7 on packaging.
	Sri Lanka <u>Recommendation 8a</u> Sri Lanka 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. <u>Recommendation 8b</u> Sri Lanka 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.
	USA The United States agrees with both part a and b under Recommendation 8 as stated
	Vietnam Vietnam supports recommendations 8a). With respect to recommendation 8b) Vietnam strongly prefers for 'Packaging gases' to be included in the Food Additive section under the appropriate functional class. Vietnam is of the view that they do not also need to be retained in Section 7 Packaging but can accept them being listed in both places as is the case in the infant formula standard.
	EU Specialty Food Ingredients We agree with Recommendation 8a.
	International Special Dietary Food Industries ISDI supports recommendations 8a). With respect to recommendation 8b) ISDI strongly prefers for 'Packaging gases' to be included in the Food Additive section under the appropriate

	functional class. ISDI is of the view that they do not also need to be retained in Section 7 Packaging but can accept them being listed in both places as is the case in the infant formula standard. 1) In regard to 322 Lecithin, ISDI would like to note that the correct INS number is 322(i). INS 322 encompasses both INS 322(i) and 322(ii). However, only INS 322(i) has a JECFA monograph and safety evaluation. Additionally, the GSFA specifies that INS 322(i) Lecithin is permitted in FC 13.1.2, Therefore, this entry in the commodity standard should be for INS 322(i) Lecithin as shown below: 322(i) Lecithin 0.5 g 2) Concerning, 301 Sodium ascorbate, ISDI would like to note that Sodium ascorbate is a source of sodium. For older infants, it should have the accompanying sodium note as in the current standard. Practically, this should be shown as follows: 301 Sodium ascorbate Within the limits for sodium in Section 3.1* *Applicable to Follow-up Formula for Older Infants only.
	HKI <u>Recommendation 8a</u> 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. <u>Recommendation 8b</u> 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	
Recommendations 9a and b	**Brazil** Brazil agrees with option 1. We note that the CAC/GL 10-1979 allows the use of some food additives as nutrient carriers which are not permitted in the infant formulae standards. Therefore, it is necessary to promote alignment between provisions
	Australia For clarity and consistency in approach with follow up formula for older infants, Australia supports option 2.
	Canada <u>Recommendation 9a</u> Consistent with our prior comments, Canada supports Option 1 as we believe all of Section 4 of the GSFA applies to follow-up formula, and that making a general reference is the best way to avoid

	creating text that could be interpreted differently than what is described in Section 4 of the GSFA. Recommendation 9b As per our comment to Recommendation 9 a) Canada supports Option 1.
	Colombia Recommendation 9 a. The subcommittee supports option 2 as it may provide more clarity within the text of the Standard for Infant Formula and the Standard for Processed Cereal-Based Foods for Infants and Young Children in relation to the carry-over of food additives and inert nutrient carriers. However, the following clarification should be added to the text: ...carry-over of additives listed in the preamble to the General Standard for Food Additives (CODEX/STAN 192-1995, provision 4.3).
	Guatemala For recommendation 9, Guatemala indicates that it agrees with option 2 for points a and b, which establish that it should be included in the Standard as currently found in the other mentioned Standards.
	Indonesia Indonesia prefers to use option 2 of recommendation 9.
	Iran Iran supports option 2, Because it is more transparent and easier for the standard user.
	Mali Mali is in favour of Option 1, which entails referring to Section 4 of the Preamble of the GSFA (CXS 192-1995). As noted by the Chairperson, this would ensure that Section 4.3 is read within the context of Section 4 in its entirety and that it conforms to the principle of referring to existing terms rather than repeating requirements that are already in product standards.
	Nepal Nepal supports option 1.
	Peru Recommendation 9 a. Option 2 is admitted as it may provide greater clarity within the standard, i.e. adopting the text of the Standard for Infant Formula and the Standard for Processed Cereal-Based Foods for Infants and Young Children in relation to the carry-over of food additives and nutrient carriers. Recommendation 9 b. Option 2 is admitted as it may provide greater clarity within the standard, i.e. adopting the text of the

	Standard for Infant Formula and the Standard for Processed Cereal-Based Foods for Infants and Young Children in relation to the carry-over of food additives and nutrient carriers.
	Philippines The Philippines prefers Option 2to improve clarity to the Standard as these provisions are consistent with the Infant Formula Standard and Standard for Processed Cereal-based Foods for Infants and Young Children:
	Senegal Senegal supports Option 1.
	Sri Lanka <u>Recommendation 9a</u> Sri Lanka supports Option 1 <u>Recommendation 9b</u> Sri Lanka 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.
	USA <u>Recommendation 9a</u> The United States agrees with Recommendation 9 with support for Option 2 as recommended by the Chair. Option 2 which corrects the reference in the appropriate sections from the Preamble of the GSFA (Section 4 (CXS 192-1995)) are included in the proposed Standard for Follow-up Formula for older infants. <u>Recommendation 9b</u> The United States agrees with Recommendation 9 with support for Option 1, as young children are already consuming foods for the general population.
	HKI <u>Recommendation 9a</u> 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.
	International Special Dietary Food Industries ISDI supports option 2 as it may offer improved clarity within the Standard i.e. to adopt the text from the Infant Formula Standards and the Standard for Processed Cereal-based foods for Infants and

	Young Children for the carry-over of food additives and nutrient carriers.
Recommendation 10	
	Brazil Brazil agrees with the recommendation
	Australia Australia supports alignment with the infant formula standard for this age group as follow-up formula for older infants is a breastmilk substitute. As there are no permissions for flavourings in infant formula, we do not support this recommendation.
	Canada Recommendation 10a Canada does not support the addition of flavourings in follow-up formulas for older infants as these products are breastmilk substitutes and flavourings should not be permitted as they are also not permitted in infant formula as per the Codex Infant Formula Standard. Canada has not allowed flavourings in formulas targeted for this age group. Recommendation 10b Canada agrees with retaining the wording in the square brackets.
	Indonesia Indonesia agrees with recommendation 10
	Iran We suppport this recommendation
	Malaysia Malaysia supports Recommendation 10a)
	Mali Mali is strongly opposed to the proposed text about authorised flavourings in [product name] for young children. No flavourings should be authorised for these products, because they replace the liquid part of the diet and are regarded as substitutes for breast milk, not as complementary foods. As such, the standards for [product name] must conform to the provisions imposed for infant formulas, which do not permit flavourings. It is equally important to note that the fundamental rationale where health and nutrition are concerned is not to permit flavourings. These flavourings can cause infants to develop a preference for sweet-tasting foods. All sweet flavourings that encourage a preference for sweet foods, at this vital stage of life, are not recommended and can have a negative effect on food choices and health throughout childhood and on into adulthood. If these flavourings are authorised, they can predispose children to a preference for flavourings encountered in sweetened and flavoured milk, juice and fizzy drinks in the beverages/liquid foods

	category. These are not healthy choices for children compared with ordinary milk and water, neither of which are flavoured. [Note: Two references supporting this assertion are Ventura AK, Worobey J. Early influences on the development of food preferences. Curr Biol. 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 wish to draw your attention to the recently published "Technical Scientific Report: Healthy Beverage Consumption in Early Childhood - Recommendations from Key National Health and Nutrition Organizations" (September 2019). This Consensus Statement, written by an expert panel consisting 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 advice on the optimum consumption of beverages in early childhood, and supports a lifelong approach to encourage the development of healthy dietary patterns and prevent chronic illness. (The full report is available at https://healthydrinkshealthykids.org/app/uploads/2019/09/HER-HealthyBeverageTechnicalReport.pdf) These expert recommendations clearly state: "0-12 months: Do not consume milk (flavored or plain)" and "1-5 years (12-60 months): Consume only plain, pasteurized milk*; flavored milk is not recommended." The rationale provided includes the words: "the expert panel considered it appropriate to recommend avoiding flavored milk in order to minimize intake of added sugars and 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." The recommendations are also clear for what the report refers to as "toddler milk": "0-12 months: Avoid supplementation with 'transition' or 'weaning' formulas; nutrient needs should be met primarily through human milk and/or infant formula," and "1-5 years (12-60 months): Toddler milk is not recommended; nutrient needs should be met primarily through nutritionally adequate dietary patterns." Therefore, although a case could be made that standards for follow-up formula for older infants should permit flavourings in the same way as processed cereal-based food for infants and young children, for which flavourings are deemed safe, the HKI believes this is a

	flawed argument. The Codex should examine liquid foods and the effects of flavoured follow-up formulas for older infants (even if they do not contain much sugar) on the beverage preferences of children as they grow up. We also note that the WHO is currently compiling a revised list of IYCF (infant and young child feeding) indicators for children under 24 months, due to be published at the end of this year. On this list, the "consumption of sugar-sweetened beverages" is an indicator of an unhealthy diet for young children. "Sweetened milks" also come under the unhealthy food category.
	Nepal Recommendation 10a Nepal does not support the proposed text of flavoring in follow up formula for older infants. As these products are breast milk substitute, any addition of flavors will aid in the inappropriate marketing of these foods. Nepal is strong supporter of WHA 69.9 resolution with provided guidance on ending inappropriate promotion of foods for infants and young children. Nepal believes that addition of these additives will increase the sweetness of the product, which will encourage care givers to use these products. As Nepal aims to promote, protect and support breast feeding, and discourage use of breast milk substitute, Nepal strongly objects the proposed text. Recommendation 10b Nepal does not support the proposed text of flavoring in [name of product] for young children. Nepal strongly believes that these products are breast milk substitute, any addition of flavors will aid in the inappropriate marketing of these foods. Nepal is strong supporter of WHA 69.9 resolution with provided guidance on ending inappropriate promotion of foods for infants and young children. Nepal believes that addition of these additives will increase the sweetness of the product, which will encourage care givers to use these products. As Nepal aims to promote, protect and support breast feeding, and discourage use of breast milk substitute, Nepal strongly objects the proposed text.
	Philippines We support Recommendation 10 retaining the bracketed statement "The flavourings used in products covered by standard should comply with the Guidelines for the Use of Flavourings (CxG-66-2008).
	Senegal Recommendation 10 a)

	Senegal does not support the proposed text on the addition of authorised flavourings in [product name] for young children. These flavourings are regarded as substitutes for breast milk, not as complementary foods. Recommendation 10 b) Senegal does not support the proposed text on authorised flavourings in [product name] for young children.
	Sri Lanka Sri Lanka 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
~~[The~~ The flavourings used in products covered by this standard should comply with the Guidelines for the Use of Flavourings (CXG ~~66-2008)]~~66-2008) ***~~[The~~ The flavourings used in products covered by this standard should comply with the Guidelines for the Use of Flavourings (CXG ~~66-2008)]~~66-2008)***	**USA** Recommendation 10a The United States agrees with Recommendation 10 regarding section 4.5 Flavourings and supports the removal of the brackets and acceptance of the sentence as stated for inclusion in the proposed Standard for Follow-up Formula for Older Infants: The flavourings used in products covered by this standard should comply with the Guidelines for the Use of Flavourings (CXG 66-2008). The U.S. is not clear if the options for flavourings is limited to those above or if other options are permitted. We do not understand the basis for limiting the types of flavors. Recommendation 10b The United States agrees that the proposed Standard for [Name of Product] for young children should include: The flavourings used in products covered by this standard should comply with the Guidelines for the Use of Flavourings (CXG 66-2008). However, we question the need for the inclusion of the list of specific flavourings under 4.5 since young children are exposed to many other flavors in complementary foods consumed by young children.
	HKI Recommendation 10b 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://healthydrinkshealthykids.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 11	
	Brazil Brazil agrees with the recommendation
	Canada Canada agrees with Recommendations 11 a) and 11 b).
	Indonesia Indonesia agrees with recommendation 11
	Iran Iran supports this recommendation
	Malaysia Malaysia supports Recommendation 11
	Mali Mali supports the proposed text. The text should read: "The products covered by this standard must comply with the maximum limits of the General Standard for Contaminants and Toxins in Food and Feed (CXS 193-1995). The products addressed by this standard must comply with the Maximum Residue Limits for Pesticides adopted by the Codex Alimentarius Commission."
	Nepal Nepal supports the statement in recommendation 11a and b.
	Phiilppines The Philippines supports Recommendation 11 as majority of the EWG members also supported this and it is consistent with the Codex Standard for Infant Formula
	Sri Lanka Sri Lanka supports the proposed text.

	Senegal Senegal supports the proposed text.
	USA The United States agrees with the text provide under Recommendation 11a and b
	HKI Helen Keller International supports the proposed text in recommendation 11a and b.
Recommendation 12	
	Brazil Brazil agrees with the recommendation. Regarding the inclusion of CXC 40-1993 and CXC 23-1979, we suggest requesting CCFH if it is appropriate to reference it
	Canada Canada agrees with Recommendations 12 a) and 12 b) and supports retaining the text in square brackets in order to include liquid infant formulas that have been commercially sterilized.
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)*~~*Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008), and, in the case of liquid preparations that have been commercially sterilised, in accordance with 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)].* **Recommendation 12 b** 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)~~66-2008 and, in the case of liquid preparations that have been commercially sterilised, in accordance with 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)].*	**Colombia** Adjustments are made to the proposal to ensure that liquid prepared products are included.
	Guatemala For recommendation 12, Guatemala recommends that reference be made to 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). Referring to 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) does not add value to the text. If they need to be referred to, the text should read: "It is recommended that the

	product covered by 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 other relevant Codex texts such as 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 40-1993). The product must comply with all the microbiological criteria set out in the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997)".
and in the case of liquid formula that has been commercially sterilized should also consider 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)]*	**Indonesia** Indonesia proposes to modify the sentences as follow:
	Iran Iran recommend that reference to 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) is made. But it is not necessary that bring the reference to 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 because they do not have additional information. Iran proposes adding the following sentence: "It is suggested that the manufacturing unit implement HACCP principles."
	Mali Mali supports the proposed text and the retention of the wording in brackets, so it can be examined at a future date. The text reads as follows: “It is recommended that the product covered by the present standard is prepared and handled in conformity with the appropriate sections of the General Principles of Food Hygiene (CXC 1-1969) and other suitable parts of the Codex, for example: Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CXC 66-2008), Code of Hygienic Practice for Aseptically Processed and Packaged Low-Acid Foods (CXC 40-1993), and Code of Hygienic Practice for Low and Acidified Low Acid Canned Foods (CXC 23-1979). The products must satisfy all microbiological criteria established in the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).”

Recommendation 12a and b	**Nepal** Nepal supports the statement.
	Peru Recommendation 12: Reference should be made to 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). We believe that referring to 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) does not add value to the text. If the Committee would still rather refer to the two additional texts, the section should read as follows: It is recommended that the product covered by 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)]. Products must comply with the microbiological criteria established in accordance with the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).
	Philippines We are in agreement with Recommendation 12 as this is consistent with the Codex Standard for Infant Formula and has the support of the majority of the EWG members
Recommendation 12a and b	**Senegal** Senegal approves the proposed text and the retention of the text in brackets.
Recommendation 12a and b	**Sri Lanka** Sri Lanka supports the proposed text and to retain the text in square brackets for future proofing.
Recommendation 12a and b [~~the~~ **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)*]	**USA** The United States agrees with Recommendation 12 and supports the removal of the brackets so that the additional relevant processing and packaging hygienic practices are included (CXC-40-1993) and (CXC23-1979) in the proposed standard for Follow-up Formula for Older Infants.

	Vietnam Vietnam suggests that Codex has the documents such as 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) In case the Committee prefers to reference the two additional texts, the section may read as follows: 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 12a and b	**HKI** 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).
	International Special Dietary Food Industries ISDI would recommend that reference to 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) is made. ISDI believes that the reference to 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 do not bring any additional value to the text. In case the Committee prefers to reference the two additional texts, the section should read as follows: 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	
	Brazil Brazil agrees with the recommendation
	Canada Canada agrees with Recommendations 13 a) and 13 b). As per our comments in 8b, Canada would have no objections to the inclusion of 'Packaging Gases' in both Section 4 Food Additives (listed under the appropriate functional class) as well as Section 7 Packaging.
	Indonesia Indonesia agrees with recommendation 13
	Iran Iran supports recommendation 13
	Mali Mali supports the proposed text. The text should read: "The product must be packaged in containers that preserve the food's hygienic and other qualities. In liquid form, the product must be packaged in hermetically sealed containers; nitrogen and carbon dioxide may be used for packaging. Containers and packaging may only be made of materials that are safe and suitable for their intended use. If the Codex Alimentarius Commission has defined a standard for all materials of this kind used for packaging, this standard shall apply."
	Nepal Nepal supports the statement.

	Peru Recommendation 13: It is preferable for packaging gases to be listed only in the additives section to avoid repetition, but it may be acceptable for them to be listed here, as is the case in the Standard for Infant Formula.
	Philippines We also support Recommendation 13 on packaging including the provision on packaging media:
	Senegal Senegal supports the proposed text.
	Sri Lanka Sri Lanka supports the proposed text.
	USA The United States agrees with Recommendation 13
	Vietnam Vietnam in the point of view that the packaging gases are only listed in the additives section to avoid repetition but can accept them being listed here as well as is the case in the Infant Formula Standard.
	HKI Helen Keller International supports the proposed text.
	International Special Dietary Food Industries ISDI prefers that the packaging gases are only listed in the additives section to avoid repetition but can accept them being listed here as well as is the case in the Infant Formula Standard.
Recommendation 14	
	Brazil Brazil agrees with the recommendation
	Canada Canada agrees with Recommendations 14 a) and 14 b).
	Indonesia Indonesia agrees with recommendation 14
	Iran We support the recommendation
	Malaysia Malaysia supports Recommendation 14
	Mali Mali supports the proposed text. The text should read: “Where ready-to-eat products are concerned, the container filling must be: (iv) at least 80% v/v for products weighing less than 150 g (5 oz); (v) at least 85% v/v for products weighing 150-250 g (5-9 oz); and (vi) at least 90% v/v for products weighing more than 250 g (9 oz) of

	the water capacity of the receptacle. The water capacity of the receptacle is the volume of distilled water at 20 °C that the sealed receptacle will hold when it is completely full.”
	Nepal Nepal supports the statement.
	Philippines We support Recommendation 14 retaining the provision in the current Follow-up Formula Standard
	Senegal Senegal supports the proposed text.
	Sri Lanka Sri Lanka supports the proposed text.
	USA The United States agrees with Recommendation 14 regarding the fill of containers for the proposed Standard for Follow-up Formula for Older Infants. The United States agrees with Recommendation 14 regarding the fill of containers for the proposed Standard for [Name of Product] for young children. We also note that because the standards are planned to be separated, the numbering will need to be updated.
	HKI Helen Keller International supports the proposed text. The text to read: In the case of products in ready-to-eat form, the fill of 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 15	
	Brazil Brazil agrees with the recommendation
	Canada Canada agrees with Recommendations 15 a) and 15 b).
	Indonesia Indonesia agrees with recommendation 15
	Iran Iran supports the recommendation
	Malaysia Malaysia supports Recommendation 15

	Mali Mali supports the proposed text. The text should read: “To verify compliance with the current standard, the analytical methods set out in the Recommended Methods of Analysis and Sampling (CXS 234-1999) shall be used, in accordance with the requirements of the current standard.”
	Nepal Nepal supports the statement.
	Philippines We pose no objection to Recommendation 15 retaining the provision on Methods of Analysis and Sampling in the current Follow-up Formula Standard
	Senegal Senegal supports the proposed text.
	Sri Lanka Sri Lanka supports the proposed text.
	USA The United States agrees with Recommendation 15
	HKI Helen Keller International supports the proposed text