

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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**Agenda Item 4.10**

**CX/CAC 24/47/12 Add.1**

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**ORIGINAL LANGUAGE ONLY**

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

Forty-seventh Session

Geneva, Switzerland, CICG

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### COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED BY THE 44TH SESSION OF THE COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES FOR ADOPTION BY THE 47TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION

#### BACKGROUND

1. This document compiles the comments on the draft standards submitted at Step 8 and 5/8 of the Procedure and other matters as indicated in the relevant Circular Letter ([CL 2024/86-CAC](#)). The comments are those received through the Codex Online Commenting Systems (OCS)<sup>1</sup>, or via email by the time this document was issued. The comments are as shown in Appendix I.

#### EXPLANATORY NOTES ON APPENDICES I AND II

2. The comments received are presented in a table format, with two columns as follows:
  - **First column** – Presents the comments with the rationale.
  - **Second column** – Presents the provider of the comments (name of member or observer)

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<sup>1</sup> OCS is an online tool that enables Codex Contact Points to submit comments on draft texts in a standardised way, thus providing more transparency and better management of comments on different Codex texts as requested through Circular Letters. Since its launching at CAC39 (2016), the OCS has been used for different Codex Committees.

## Appendix I

**REQUEST FOR COMMENTS ON TEXTS SUBMITTED BY THE 44TH SESSION OF THE COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES FOR ADOPTION BY THE 47TH SESSION OF THE CODEX ALIMENTARIUS COMMISSION**

**COMMENTS IN REPLY TO CL 2024/86-CAC**

*Comments by Azerbaijan, Brazil, Burundi, Costa Rica, Egypt, Iraq, Paraguay, Peru, Saudi Arabia, Thailand, United Arab Emirates and European Vegetable Protein Association, and ICUMSA*

<b>COMMENT</b>	<b>MEMBER / OBSERVER</b>
Burundi supports the adoption of standards, related texts and consequential amendments to CXG 2-1985 and CXS 72-1981 as well as the approval of the proposal for development of a standard for foods for older infants and younger children as recommended by CCFSDU44.	<b>Burundi</b>
Costa Rica supports the advancement of the proposals to the Step 8 and 5/8 process.	<b>Costa Rica</b>
Agree	<b>Iraq</b>
Paraguay apoya la adopción en el trámite 8 de los Principios Generales para su inclusión en las Directrices sobre etiquetado nutricional (CXG 2-1985), así como la adopción en el trámite 5/8 de VRN-N para personas de entre 6 y 36 meses de edad para las vitaminas A, B6, D y E, la tiamina, la riboflavina, la niacina, el ácido pantoténico, el calcio, el cobre, el yodo, el potasio, el zinc y las proteínas y las Enmiendas a la norma CXS 72-1981, respetando las conclusiones del REP24/NFSDU.	<b>Paraguay</b>
El Perú agradece al Comité del Codex sobre Nutrición y Alimentos para Regímenes Especiales. (CCNFSDU), presidido por Alemania, por el esfuerzo emprendido a la fecha y que se encuentran plasmados en Informe de la 44 <sup>o</sup> . Reunión del Comité del Codex sobre Nutrición y Alimentos para Regímenes Especiales (REP 24/NFSDU), y en atención y respuesta al documento CL 2024/86-CAC los miembros de la Comisión Técnica Nacional sobre Alimento para regímenes especiales, refieren que no presentan observaciones al documento enviado por el Codex.	<b>Peru</b>
General principles for establishing Nutrient Reference Values - Requirements (NRVs-R) for persons aged 6 – 36 months (inclusion in CXG 2-1985 as Annex 1, Part B)  Amendments to the Standard for infant formula and formulas for special medical purposes intended for infants (CXS 72-1981)  Adoption Inclusion of the nitrogen to protein conversion factor for follow-up formula for older infants and products for young children in the annex in CXS 234-1999  NRVs-R for persons aged 6 – 36 months: Vitamins A, B6, D and E, thiamin, riboflavin, niacin, pantothenic acid, calcium, copper, iodine, potassium, zinc and protein (CXG 2-1985).	<b>United Arab Emirates</b>
The texts appear ready for adoption but more clarity around revocation or removal and suitability of methods would be helpful for future revisions.	<b>ICUMSA</b>
<b>General principles for the establishment of NRVs-R for persons aged 6-36 months (at Step 8)</b>	
The Republic of Azerbaijan expresses its support for the adoption of all texts outlined in CL 2024/86-CAC in their current form, considering them to be ready for adoption. In particular, the following points should be noted:	<b>Azerbaijan</b>

1. General Principles for the Establishment of NRVs-R for Persons Aged 6–36 Months (REP24/NFSDU, paragraph 38, Appendix II, Part A) Azerbaijan supports final adoption of the general principles at Step 8 for inclusion in the Guidelines on Nutrition Labelling (CXG 2-1985).	
In accordance with the agreements reached at CCNFSDU44 (REP24/NFSDU), Brazil expresses no objections to the following: <ul style="list-style-type: none"> <li>Adoption at Step 8 of the general principles for inclusion in the Guidelines on nutrition labelling (CXG 2-1985), REP24/NSFSDU, paragraph 38 and Appendix II, Part A.</li> </ul>	<b>Brazil</b>
Egypt agrees the adoption at step 8 for the general principles for inclusion in the Guidelines on nutrition labelling (CXG 2-1985), REP24/NSFSDU( paragraph 38 and Appendix II, Part A.)	<b>Egypt</b>
<b>Adoption at Step 8:</b> the general principles for inclusion in the <i>Guidelines on nutrition labelling</i> (CXG 2-1985), REP24/NSFSDU, paragraph 38 and Appendix II, Part A. Saudi Arabia supports the adoption of this document at step 8.	<b>Saudi Arabia</b>
Thailand does not object the adoption of the general principles for inclusion in the Guidelines on nutrition labelling (CXG 2-1985), REP24/NSFSDU, paragraph 38 and Appendix II, Part A at step 8.	<b>Thailand</b>
<b>NRVs-R for persons aged 6-36 months (at Step 5/8)</b>	
2. NRVs-R for Persons Aged 6–36 Months (REP24/NFSDU, paragraph 67(i), Appendix II, Part B) The proposed NRVs-R values for vitamins, minerals, and protein for this age group, as outlined for adoption at Step 5/8, are comprehensive and scientifically justified. Azerbaijan finds these values appropriate for inclusion in CXG 2-1985	<b>Azerbaijan</b>
<ul style="list-style-type: none"> <li>Adoption at Step 5/8 of the NRVs-R for persons aged 6 – 36 months for Vitamins A, B6, C and E, thiamin, riboflavin, niacin, pantothenic acid, calcium, copper, iodine, potassium, zinc and protein for inclusion in CXG 2-1985, REP24/NSDU, para 67i and Appendix II, Part B.</li> </ul>	<b>Brazil</b>
Egypt agrees the adoption at step 5/8 for NRVs-R for persons aged 6 – 36 months for Vitamins A, B6, C and E, thiamin, riboflavin, niacin, pantothenic acid, calcium, copper, iodine, potassium, zinc and protein for inclusion in CXG 2-1985, (REP24/NSDU, para 67i and Appendix II, Part B).	<b>Egypt</b>
<b>Adoption at Step 5/8:</b> NRVs-R for persons aged 6 – 36 months for Vitamins A, B6, C and E, thiamin, riboflavin, niacin, pantothenic acid, calcium, copper, iodine, potassium, zinc and protein for inclusion in CXG 2-1985, REP24/NSDU, para 67i and Appendix II, Part B. Saudi Arabia supports the adoption of this document at step 5/8.	<b>Saudi Arabia</b>
Thailand does not object the adoption of NRVs-R for persons aged 6 – 36 months for Vitamins A, B6, C and E, thiamin, riboflavin, niacin, pantothenic acid, calcium, copper, iodine, potassium, zinc and protein for inclusion in CXG 2-1985, REP24/NSDU, para 67i and Appendix II, Part B at step 5/8.	<b>Thailand</b>
<b>Amendments to CXS 72-1981</b>	
3. Amendments to CXS 72-1981 (REP24/NFSDU, paragraph 141(v), Appendix VI) Azerbaijan is in favour of the adoption of these amendments, which serve to enhance consistency and alignment with the most recent nutritional	<b>Azerbaijan</b>

recommendations.	
<ul style="list-style-type: none"> <li>Amendments to the Standard for infant formula and formulas for special medical purposes intended for infants (CXS 72-1981), paragraph 141v and Appendix VI.</li> </ul>	<b>Brazil</b>
Egypt agrees the adoption the amendments to the Standard for infant formula and formulas for special medical purposes intended for infants (CXS 72-1981),(paragraph 141v and Appendix VI).	<b>Egypt</b>
<b>Adoption:</b> amendments to the <i>Standard for infant formula and formulas for special medical purposes intended for infants</i> (CXS 72-1981), paragraph 141v and Appendix VI. Saudi Arabia supports the adoption of amendment to this document.	<b>Saudi Arabia</b>
Thailand agrees with the adoption of the amendments to the Standard for infant formula and formulas for special medical purposes intended for infants (CXS 72-1981), paragraph 141v and Appendix VI.	<b>Thailand</b>
<b>Nitrogen conversion factors</b>	
<p>4. Nitrogen Conversion Factors (REP24/NFSDU, paragraph 190(i), Appendix VII, Part C)</p> <p>Azerbaijan concurs with the proposal to incorporate the proposed nitrogen conversion factors into the annex of CXS 234-1999, as they are regarded as a pragmatic addition that will facilitate methodological consistency.</p> <p>In conclusion, Azerbaijan appreciates the efforts in advancing these important texts and looks forward to their swift adoption to support improved nutrition labelling and dietary standards globally.</p>	<b>Azerbaijan</b>
<ul style="list-style-type: none"> <li>Proposal to include the nitrogen conversion factors for follow-up formula for older infants and product for young children in the annex in CXS 234-1999, REP 24/NFSDU, paragraph 190i and Appendix VII, Part C (the annex refers to the annex recommended by CCMAS for adoption by CAC47, see REP24/MAS, paragraph 76(i) and Appendix II, Part 3).</li> </ul>	<b>Brazil</b>
Egypt agrees the proposal to include the nitrogen conversion factors for follow-up formula for older infants and product for young children in the annex in CXS 234-1999, REP 24/NFSDU, paragraph 190i and Appendix VII, Part C.	<b>Egypt</b>
<p><b>Adoption:</b> proposal to include the nitrogen conversion factors for follow-up formula for older infants and product for young children in the annex in CXS 234-1999, REP 24/NFSDU, paragraph 190i and Appendix VII, Part C (the annex refers to the annex recommended by CCMAS for adoption by CAC47, see REP24/MAS, paragraph 76(i) and Appendix II, Part 3).</p> <p>Saudi Arabia acknowledges the importance of including nitrogen-to-protein conversion factors in the annex of CXS 234-1999 as a step toward ensuring accurate and consistent estimation of protein content in food products. This is particularly significant for products such as follow-up formula for older infants and products for young children, where precise nutritional information is critical. In reviewing the proposal, we wish to raise two critical points for consideration:</p> <p>1. Technological Limitations: Current analytical methods predominantly measure total nitrogen without distinguishing between protein-bound and non-protein nitrogen sources. This limitation can lead to inaccurate protein content estimates, highlighting the need for more precise measurement techniques to enhance the reliability of nutritional information.</p> <p>2. Regulatory Disparities: Varying nitrogen-to-protein conversion factors adopted across different regions, based on food product types and protein sources, introduce inconsistencies in global trade and regulatory compliance.</p>	<b>Saudi Arabia</b>

<p>Establishing standardized conversion factors specific to different food products can promote transparency and facilitate smoother trade practices.</p> <p>By addressing these concerns and incorporating standardized conversion factors into CXS 234-1999, we can improve the accuracy and consistency of protein content estimation, ultimately benefiting both regulatory authorities and consumers.</p>	
<p>We agree with the adoption of the inclusion of the nitrogen to protein conversion factors for follow-up formula for older infants and products for young children in the annex of Recommended Methods of Analysis and Sampling (CXS 234-1999).</p>	<p><b>Thailand</b></p>
<p>EUVEPRO supports the inclusion of the nitrogen conversion factors for follow-up formula for older infants and product for young children in the annex in CXS 234-1999, as per REP 24/NFSDU, paragraph 190i and Appendix VII, Part C.</p> <p>However, relating to Appendix VII, Part C, we note a number of inconsistencies in the other listed nitrogen conversion factors.</p> <p>In agenda item 4.6 of CAC47, the Commission is invited to adopt this annex. EUVEPRO believes the Annex would need correction before adoption by CAC47.</p> <p>For reference, EUVEPRO's comments in reply to CL 2024/76-CAC flagging inconsistencies in the proposed list can be found under item 4.6 of CAC47 in CX/CAC 24/47/8 Add.1.</p>	<p><b>European Vegetable Protein Association</b></p>