

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 4, 5, 6, 7

NFSDU/43 CRD31

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Forty-third Session

Düsseldorf, Germany

7 – 10 March with report adoption by virtual mode on 15 March 2023

Comments by Russian Federation

The Russian Federation requests to take into account the position presented in this document on some issues on the agenda of the 43rd session of the CODEX Alimentarius Commission Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU)

AGENDA ITEM 4: REVIEW OF THE STANDARD FOR FOLLOW-UP FORMULA (CXS 156-1987)

Regarding the structure of the document, the Russian Federation confirms the position previously voiced and supports Option 2 for the development of two separate standards: Follow-up Formula for Older Infants, and Product for Young Children.

Regarding the preamble, we note that there is a fundamental disagreement among member countries on the issue of referencing/quoting documents of the World Health Organization (WHO) and World Health Assembly (WHA). Taking into account that Codex Alimentarius Commission documents are technical and regulatory, we consider it unnecessary to keep in the document the debated reference to WHO documents regarding breastfeeding.

AGENDA ITEM 5: GENERAL PRINCIPLES FOR THE ESTABLISHMENT OF NRVS-R FOR PERSONS AGED 6 – 36 MONTH

The Russian Federation would like to support the text of the draft standard and proposes the following NRVs-R values for vitamin B12, iodine, vitamin B6, riboflavin, thiamine, nicotinic acid and vitamin C for children aged 6 to 36 months in accordance with methodological recommendations MR 2.3.1-0253-21 "Standard physiological requirements for energy and nutrients for various population groups in the Russian Federation":

Nutrient	Children aged 6 to 12 months	Children aged 12 to 36 months
Vitamin B12, µg	0.5	0.7
Iodine, µg	90	90
Vitamin B6, mg	0.6	0.9
Riboflavin, mg	0.6	0.9
Thiamine, mg	0.5	0.8
Niacin, mg NE	7	8
Vitamin C, mg	40	45

AGENDA ITEM 6: TECHNOLOGICAL JUSTIFICATION FOR SEVERAL FOOD ADDITIVES

The Russian Federation supports the technological justifications presented in the circular letter CL 2022/80/OCS-NFSDU for the food additives specified in this document (low acyl clarified gellan gum, ascorbyl palmitate, mixed tocopherol concentrates and phosphates).

The Russian Federation is the co-chair of the working group on the development of technological justifications for the use of food additives in children's nutrition products. This issue is fundamental to the further development of the regulation of food additives in specialized nutrition, including children's nutrition. We consider it necessary to continue the work in this group under the co-chairmanship of Russia.

AGENDA ITEM 7: PRIORIZATION MECHANISM / EMERGING ISSUES OR NEW WORK PROPOSALS

- *Proposal 1.2: Align the permitted uses of the folic acid source calcium-l-methyl- folate with those of n-pteroyl-l-glutamic acid in the advisory list of nutrient compounds for use in foods for special dietary uses intended for infants and young children*

The Russian Federation considers it possible to support the start of this work, given that earlier this source of folic acid was included by the Russian Federation in proposals to expand the list of vitamin sources in the technical regulation TR TS 027/2012 "On safety of certain specialized food types, including foods for therapeutic and preventative diet uses".

- *Proposal 2.2: Guidelines including General Principles for the Nutritional Composition of foods and beverages made from plant-based and other alternative protein sources*

The Russian Federation confirms its position and supports the start of this work. We believe that this issue is relevant, because at the moment there is a wide range of products and beverages on the market, positioned as a substitute for animal products (*milk, meat and fish substitutes, etc.*), while the requirements for their composition, energy and nutritional value are not regulated.

- *Proposal 2.3: Discussion paper on general guidelines to establish nutrient profiles for front-of pack nutrition labelling (FOPNL)*

Given that the Codex Alimentarius Commission Committee on Food Labelling has already notified the CCNFSDU that the said work is no longer required for the preparation of the Guidelines for Front-of-Package Labelling, the Russian Federation considers it appropriate not to include this issue in the list of new CCNFSDU work.

We do not support the proposal by Costa Rica, the United States, the EU and Paraguay to expand the scope of nutrient profiles, which were originally considered solely for food labelling purposes, to other applications, including restrictions on composition, sales, advertising, etc. We believe that such applications are irrelevant to food safety, and thus to the documents of the Codex Alimentarius Commission.