

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 4

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

Twenty-ninth Session

Geneva, Switzerland, 3 – 7 July 2006

COMMENTS ON DRAFT STANDARDS AND RELATED TEXTS SUBMITTED TO THE COMMISSION FOR ADOPTION

(Comments submitted as of 6 June 2006)

CODEX COMMITTEE ON CEREALS, PULSES AND LEGUMES / COMITÉ DU CODEX SUR LES CÉRÉALES, LES LÉGUMES SECS ET LES LÉGUMINEUSES / COMITÉ DEL CODEX SOBRE CEREALES, LEGUMBRES Y LEGUMINOSAS (CCCLPL)

Draft Standard for Instant Noodles (CL 2006/15-CPL)

Indonesia

Referring to the CL 2006/15-CPL subject: **Draft Standard for Instant Noodles at Step 8 and Step 5/8**, Indonesia strongly supports the final adoption of the draft standard for instant noodles at Step 8 (most of the sections except for Section 4 and Section 9) and Step 5/8 (Section 4 and Section 9) by the 29th Session of the Codex Alimentarius Commission.

CODEX COMMITTEE ON FOOD ADDITIVES AND CONTAMINANTS / COMITÉ DU CODEX SUR LES ADDITIFS ALIMENTAIRES ET LES CONTAMINANTS / COMITÉ DEL CODEX SOBRE ADITIVOS ALIMENTARIOS Y CONTAMINANTES DE LOS ALIMENTOS (CCFAC)

Draft Maximum Levels for Cadmium in marine bivalve molluscs (excluding oysters and scallops) and in cephalopods (without viscera) and in polished rice (ALINORM 06/29/12, Appendix XXV)

Japan

The Government of Japan strongly supports the final adoption of the draft ML for cadmium in polished rice at 0.4 mg/kg and in marine bivalves (excluding oysters and scallops) and cephalopods (without viscera) at 2 mg/kg by 29th Commission for the reasons below:

For reasons of economy, this document is produced in a limited number of copies. Delegates and observers are kindly requested to bring it to the meetings and to refrain from asking for additional copies, unless strictly indispensable.

Most Codex meeting documents are available on Internet at www.codexalimentarius.net

General aspects

The *Risk Analysis Principles Applied by the Codex Committee on Food Additives and Contaminants* stipulates in paragraph 8 that Codex Committee on Food Additives and Contaminants (CCFAC) shall base its risk management recommendations on risk assessments by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) of naturally occurring toxicants and contaminants in foods. Section 1.4.3 of the *General Standard for Contaminants and Toxins in Foods (GSCTF)* also states the necessity of JECFA evaluation for CCFAC decision.

Annex I of the GSCTF states, “MLs shall be set as low as reasonably achievable and that providing it is acceptable from the toxicological point of view, MLs shall be set at a level which is (slightly) higher than the normal range of variation in levels in foods that are produced with current adequate technological methods, in order to avoid undue disruptions of food production and trade.”

Specific aspects

Available analytical data together with the ALARA principle justify the maximum level in polished rice at 0.4 mg/kg and in marine bivalves and cephalopods at 2 mg/kg.

The 27th CAC requested CCFAC to take account of the results of the evaluation by the 64th JECFA. The 64th JECFA concluded that the effect of different MLs on overall intake of cadmium would be very small and noted that the total intake of cadmium was 40-60% of the PTWI of 7 µg/kg bw per week; therefore, a variation of 1-6% due to the use of the proposed MLs is of no significance in terms of risk to human health (JECFA/64/SC).

Based on these scientific findings, the 38th CCFAC agreed to advance the draft MLs in polished rice of 0.4 mg/kg and in marine bivalves and cephalopods of 2 mg/kg to Step 8, as they can adequately protect the health of consumers.

Peru

El Perú se ratifica en la posición del LMR 0,4 mg/kg para arroz pilado, para ser adoptado en la 29º Periodo de Sesiones de la Comisión del Codex Alimentarius (CAC).

Codex General Standard for Contaminants and Toxins in Foods, including Schedule I (ALINORM 06/29/12, Appendix XVIII)

Japan

We affirm that Schedule I provides a useful information and reference to member governments concerning the maximum levels of contaminants adopted by the Codex Alimentarius Commission. Therefore, we strongly support the adoption of the Codex General Standard for Contaminants and Toxins in Foods, including Schedule I.

CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS / COMITÉ DU CODEX SUR LES SYSTÈMES D'INSPECTION ET DE CERTIFICATION DES IMPORTATIONS ET DES EXPORTATIONS ALIMENTAIRES / COMITÉ DEL CODEX SOBRE SISTEMAS DE INSPECCIÓN Y CERTIFICACIÓN DE IMPORTACIONES Y EXPORTACIONES DE ALIMENTOS (CCFICS)

Proposed draft Principles and Guidelines for Imported Food Inspection Based on Risk (ALINORM 06/29/30, Appendix II)

Australia

Australia supports the adoption of the *Proposed draft Principles and Guidelines for Imported Food Inspection Based on Risk* at Steps 5/8. We consider that these principles and guidelines, in conjunction with existing Codex texts, will provide helpful guidance to governments in developing and implementing inspection systems for imported food that are based on risk.

Brazil

Brazil supports the adoption of The Proposed Draft Principles And Guidelines For Imported Food Inspection Based On Risk at step 5/8 and would like to suggest a small amendment in order to improve the wording of paragraph 13:

“13. When an importing country does not have prior knowledge of an exporting country’s processing controls or of the food itself, that is those items listed in paragraph 6, ~~a compliance history~~ is lacking or such information is available.”

Rationale: this item - ‘ a compliance history - is already listed in paragraph 6.

Guatemala

Guatemala solicita que en el documento Anteproyecto de Principios y Directrices para la Inspección de Alimentos Importados basada en el Riesgo, en la Sección 3 PRINCIPIOS, numeral 5, cuarto bullet, se elimine la frase "dentro de lo posible", en vista que esta frase no forma parte de la versión en inglés del documento. Este bullet quedaría redactado de la siguiente manera:

Los planes de muestreo y métodos de análisis, deberían, estar basados en las normas, directrices y recomendaciones del Codex. Si no hubiera planes de muestreo del Codex, se debería hacer referencia a planes de muestreo aceptados internacionalmente o de base científica, cuando sea viable.

Malaysia

Malaysia would like to thank United States for drafting the text. Generally, Malaysia supports the draft to be advanced to steps 5/8 of the Codex Procedure, with the omission of Steps 6 and 7.

New Zealand

New Zealand raised concerns in regard to these draft principles and guidelines during the 14th session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS 14). At the conclusion of the CCFICS 14 discussions a number of concerns remained and these are recorded in ALINORM 06/29/30, paragraph 49.

While New Zealand will not object to the progress of these draft principles and guidelines at CAC 29 we do believe that the matters we raised, particularly as regards the definition of terms such as ‘risk-based’ (or ‘based on risk’ as it is now used in the draft principles and guidelines), will need to be addressed by Codex in the future. We note that the 23rd session of the Codex Committee on General Principles (CCGP 23), to be held in Paris 10-14 April 2006, will consider a paper *Proposed new Definitions of Risk Analysis Terms Related to Food Safety* (CX/GP 06/23/9) prepared by New Zealand. Following the discussion at CCGP 23, New Zealand will be in a position to consider what suggestions could be put forward to address the concerns we raised at CCFICS 14. New Zealand can, therefore, be expected to bring our suggestions to the attention of CAC 29 during discussion on the adoption of the *Proposed draft Principles and Guidelines for Imported Food Inspection Based on Risk* at Step 8 of the Codex Procedure.

United States of America

The United States supports adoption of the *Proposed Draft Principles and Guidelines for Imported Food Inspection Based on Risk* at Steps 5/8 as drafted. We believe these Principles and Guidelines, in conjunction with other Codex texts, will provide helpful guidance to governments in developing and implementing a risk-based.

International Dairy Federation (IDF)

The IDF endorses the adoption.

Proposed draft Principles for Traceability/Product Tracing as a Tool within a Food Import and Export Inspection and Certification System (ALINORM 06/29/30, Appendix III)

Australia

Australia supports the adoption of the *Proposed Draft Principles for Traceability/Product Tracing as Tool within a Food Import and Export Inspection and Certification Systems* at Step 5/8. We consider that the Principles will provide valuable information to countries when considering the establishment and implementation of traceability/product tracing systems within the context of a food import and export inspection and certification system.

Brazil

Brazil supports the adoption of The Proposed Draft Principles For Traceability/Product Tracing As A Tool Within A Food Inspection And Certification System at step 5/8 and would like to suggest a small amendment in paragraph 6, in order to make the text more concise:

“ 6. It should not be mandatory for an exporting country to replicate (i.e. establish the same) the traceability/product tracing tool as used by the importing country, ~~when applicable.~~”

Guatemala

Guatemala solicita que en el documento de Anteproyecto de Principios para la Rastreabilidad/Rastreo de Productos como Herramienta en el Contexto de la Inspección y Certificación de Alimentos, se recomienda en el numeral 8 la modificación siguiente:

8. La rastreabilidad/rastreo de productos es una herramienta que, ~~de suyo per se~~, no proporciona mejores resultados en lo referente a la inocuidad de los alimentos, a no ser que se aplique con otras medidas y requisitos apropiados. Puede contribuir, sin embargo, a la eficacia y/o eficiencia de medidas relacionadas con la inocuidad de los alimentos.⁶

Por lo que agradeceré mucho tome en consideración la propuestas de nuestro país, ya que se adecúa mucho mejor al idioma español y al espíritu de la redacción.

Malaysia

Malaysia would like firstly to congratulate Australia for drafting the text. Malaysia supports advancement of the document but through the normal step procedure to give more time to Member Countries to study and provide comments on the document.

New Zealand

New Zealand supports the adoption of these draft principles at Step 8 of the Codex Procedure. We note that CCFICS has been considering these principles for some time and believe that as now drafted the principles will prove helpful to Codex members.

United States of America

The United States supports adoption of the *Proposed Draft Principles for Traceability/Product Tracing as a Tool within a Food Import and Export Inspection and Certification System* as drafted. We believe the Principles will provide helpful information to countries when establishing and implementing traceability/product tracing systems.

World Organisation for Animal Health (OIE)

As an observer Organisation, the World Organisation for Animal Health (OIE) would like to thank the *Codex Alimentarius* Commission (CAC) for the opportunity to contribute to its standards development process. In conformity with the Uniform Procedure for the Elaboration of Codex Standards and Related Texts and the Guide to the Consideration of Standards at Step 8 of the Procedure for the Elaboration of Codex Standards, the OIE would like to propose some amendments to Appendix III of ALINORM 06/29/30 (Proposed draft principles for traceability / product tracing as a tool within a food inspection and certification system).

The OIE has already submitted these comments to the 14th Session of the Codex Committee on Food Import and Export Inspection and Certification Systems (CCFICS) but the Committee did not endorse the OIE proposals.

The OIE considers that these comments are not of a technical nature but rather address the principle of a seamless control of hazards throughout the food chain. The OIE believes that Member Countries should be provided with guidance in setting up a traceability system that covers the entire food chain, including live animals. To this end the CAC and the OIE need to work together, not only in the field of traceability but in all the animal production food safety issues. This need was recognised by the 55th Session of the Executive Committee via a set of recommendations and consequently endorsed by the CAC in 2005.

The OIE would like to inform the CAC on the progress made on the OIE standards on animal identification and traceability with the support of FAO experts. The document on OIE activities submitted to the CAC Secretariat contains this information.

Comments on Appendix III of ALINORM 06/29/30

The OIE emphasises the need for the CAC and the OIE to work together in order to ensure a continuum in the food production chain. It is essential that Member Countries be provided with guidance in setting up a traceability system that encompasses the entire food chain without gaps and duplications. Therefore the OIE believes that it is important that a reference to the relevant international standards produced by the “three sisters” under the SPS Agreement is made. Paragraph 1 could accordingly be modified:

“1. This document elaborates a set of principles to assist competent authorities in utilising traceability/product tracing as a tool within their food inspection and certification system. This document should be read in conjunction with all relevant Codex ~~texts~~, IPPC and OIE texts.”

International Dairy Federation (IDF)

The IDF endorses the adoption.

CODEX COMMITTEE ON MILK AND MILK PRODUCTS / COMITÉ DU CODEX SUR LE LAIT ET LES PRODUITS LAITIERS / COMITÉ DEL CODEX SOBRE LA LECHE Y LOS PRODUCTOS LÁCTEOS (CCMMP)

Draft Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat (ALINORM 06/29/12, Appendix III)

Draft Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form (ALINORM 06/29/12, Appendix IV)

Draft Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat (ALINORM 06/29/12, Appendix V)

Malaysia

Malaysia supports the adoption by the Codex Alimentarius Commission at Step 8 for the following three proposed draft standards:

Draft Standard for a Blend of Evaporated Skimmed Milk and Vegetable Fat

Draft Standard for a Blend of Skimmed Milk and Vegetable Fat in Powdered Form

Draft Standard for a Blend of Sweetened Condensed Skimmed Milk and Vegetable Fat

Proposed draft Revised Standard for Emmental (C-9) (ALINORM 06/29/12, Appendix XIII)

Switzerland

Switzerland welcomes the opportunity to submit comments on the proposed draft individual cheese standards.

Switzerland wants to make two comments on different aspects concerning individual cheese standards.

1. Emmental

It is well known that Emmental cheese is historically originating from Switzerland. The valley of the river Emme (in German: Emmental) is situated in the Canton of Berne in central Switzerland.

In the present Emmental standard (STAN C-9-1967) Switzerland is explicitly designated as the country of origin. The former meaning of the “country of origin” was the historical origin of a cheese (and not where the cheese was manufactured). Therefore the present Emmental standard is one of many proofs that Switzerland is the country where the real, authentic and original Emmental is coming from. Furthermore according to the present Emmental standard the manufacturing country of all cheese has to be declared on the product, except for Emmental produced in Switzerland. The rationale behind this provision is that consumers must be given appropriate information about the country of production of this kind of cheese, except if they buy Emmental from Switzerland, the country of (historical) origin.

In addition, the fact, that Emmental is a Swiss cheese, is reflected by several bilateral and multilateral treaties that Switzerland has concluded with several countries, which have thereby recognized the Swiss origin of Emmental cheese.

In conclusion, Switzerland does not and will not consider Emmental as a common name of a type of cheese.

Therefore, Switzerland requests the standard on Emmental (C9) to be revoked and replaced by a new, general standard for all hard cheese types with holes.

In case the Emmental standard is maintained or replaced by a new Emmental standard, Switzerland insists that the privilege of the country of historical origin must be maintained.

Therefore a sentence shall be included in the labeling provisions of the text saying:

“Emmental is historically and geographically originating from Switzerland. Therefore, in the case of Emmental from Switzerland, the country of origin does not have to be indicated in the labelling of the product”.

2. Country of origin labelling regarding the individual cheese standards

Not declaring the country of origin regarding the individual cheese standards can in some cases mislead the consumers¹. Consumers associate some cheese names with a certain region of origin, and therefore the manufacturing country shall be declared in all cases where consumers could be misled, especially where the cheese is not produced in the country of its historical origin.

The Codex Committee on Food Labelling endorsed the individual cheese standards without the particular section regarding the country of origin labelling. For Switzerland the omission of the country of origin is not acceptable.

The Milk and Milk Product Committee explained comprehensively in its report why the country of origin labelling for individual cheeses is important and declared it therefore as mandatory. Hence for Switzerland it is not acceptable that the Food Labelling Committee did forward the standards to the Commission without the labelling provisions.

Switzerland therefore insists that the labelling of the country of origin (manufacturing country) is maintained, except for the country of historical origin e.g. in the case of cheese names, where this origin is established and has been recognized until now by earlier Codex decisions, and that the labelling provisions are endorsed at the same time as the rest of the standards.

The standard should only be endorsed as a whole, including the labelling provisions for country of origin as laid down in these comments.

As a minimum, a sentence shall be included in the labelling provisions of the relevant individual cheese standards saying:

¹ The General Standard for the Labelling of Prepackaged Foods (STAN 1-1985, Rev. 1991) states in 4.5.1: *“The country of origin of the food shall be declared if its omission would mislead or deceive the consumer.”*

“The country of origin of the cheese shall be declared. However, [Name of Cheese] is historically originating from [Name of Country]. Therefore, in the case of [Name of Cheese] from [Name of Country], the country of origin does not have to be indicated in the labelling of the product.

In summary, and as a compromise solution further to the Swiss statement made during the last CCMMP meeting (Alinorm 06/29/11, paragraph 77), the following steps could be envisaged:

1. **The standard on Emmental (C9) to be revoked and replaced by a new, general standard for all hard cheese types with holes.**
2. **Labelling provisions to be adopted together with the individual cheese standards which ensure that consumers are neither misled nor deceived and which respect the rights of the countries where the cheese is historically originating.**

CODEX COMMITTEE ON NUTRITION AND FOOD FOR SPECIAL DIETARY USES / COMITÉ DU CODEX SUR LA NUTRITION ET LES ALIMENTS DIÉTÉTIQUES OU DE RÉGIME / COMITÉ DEL CODEX SOBRE NUTICIÓN Y ALIMENTOS PARA REGÍMENES ESPECIALES (CCNFSDU)

Draft Revised Standard for Processed Cereal-Based Foods for Infants and Young Children (ALINORM 06/29/26, Appendix II)

Argentina

ENGLISH

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Essential composition

“3.1.1 Las cuatro categorías indicadas en 2.1.1 a 2.1.4 se preparan principalmente con uno o mas productos molidos de cereales, como trigo arroz, cebada, avena centeno maíz, mijo sorgo y alforfón. También podrán contener leguminosas (legumbres), raíces amiláceas (como arroz, ñame, mandioca) o tallos amiláceos, o semillas oleaginosas en menor proporción.”

Argentina considers appropriate to replace the word **arroz** by **arrurruz** in the previous paragraph, of the Spanish version of the document. The correct translation would be the following:

3.1.1 Las cuatro categorías indicadas en 2.1.1 a 2.1.4 se preparan principalmente con uno o más productos molidos de cereales, como trigo arroz, cebada, avena centeno maíz, mijo sorgo y alforfón. También podrán contener leguminosas (legumbres), raíces amiláceas (como arrurruz, ñame, mandioca) o tallos amiláceos, o semillas oleaginosas en menor proporción.

3.3 Proteins

“3.3.1 El índice químico de la proteína añadida deberá ser equivalente por lo menos al 80 por ciento del índice de la caseína proteínica de referencia, o la proporción de eficiencia (PEP) de la proteína contenida en la mezcla deberá ser equivalente por lo menos al 70 por ciento de la caseína proteínica de referencia. En todo caso, se permite la adición de aminoácidos solo con el fin de mejorar el valor nutricional de la mezcla proteínica y solo en las proporciones necesarias para tal fin. Deberán emplearse únicamente formas de L-aminoácidos.”

Argentina suggests modifying the wording of the paragraph in Spanish. The correct translation would be the following:

El índice químico de la proteína añadida deberá ser equivalente por lo menos al 80 por ciento del de la proteína de referencia caseína, o la relación de eficiencia proteínica (PER) de la proteína contenida en la mezcla deberá ser equivalente por lo menos al 70 por ciento del de la proteína de referencia caseína. En todos los casos, se permite la adición de aminoácidos sólo con el fin de mejorar el valor nutricional de la mezcla proteínica y sólo en las proporciones necesarias para tal fin. Deberán emplearse únicamente formas naturales de L-aminoácidos.

3.11 Consistency and particle size

3.11.1 “Una vez preparado de conformidad con las instrucciones para el uso indicados en la etiqueta, los alimentos elaborados a base de cereales deberán tener una consistencia adecuada para [la alimentación con cuchara de] los lactantes o niños pequeños, conforme a las edades para las que se destina el producto”.

Argentina agrees with deleting square brackets. Nevertheless, we would like to point out that they do not appear in the English version of the document.

4.0 FOOD ADDITIVES

Argentina considers appropriate to correct items 4.2.1, 4.2.2, 4.6.2, 4.6.4 of the food additives table, where it says “hidrogen-carbonato” it should say “bicarbonato” in the Spanish version, as this is the right translation.

8. LABELLING

Argentina does not agree with adding Health Claims to this type of food. Nevertheless, and since this paragraph is not under discussion, we would like to make the following observation:

8.1.1

“Taking into account **paragraph 1.4** of the Guidelines for Use of Nutrition and Health Claims, nutrition claims may be permitted under national legislation for the foods that are the subject of the standard provided that they have been demonstrated in rigorous studies with adequate scientific standards.”

Argentina suggests adding “**and 7.1.1**” to the wording of this paragraph:

8.1.1

“Taking into account **paragraph 1.4 and 7.1.1** of the Guidelines for Use of Nutrition and Health Claims, nutrition claims may be permitted under national legislation for the foods that are the subject of the standard provided that they have been demonstrated in rigorous studies with adequate scientific standards.”

SPANISH

Argentina agradece la posibilidad de realizar comentarios al presente documento.

3. COMPOSICIÓN ESENCIAL Y FACTORES DE CALIDAD

3.2 Composición esencial

“3.1.1 Las cuatro categorías indicadas en 2.1.1 a 2.1.4 se preparan principalmente con uno o mas productos molidos de cereales, como trigo arroz, cebada, avena centeno maíz, mijo sorgo y alforfón. También podrán contener leguminosas (legumbres), raíces amiláceas (como arroz, ñame, mandioca) o tallos amiláceos, o semillas oleaginosas en menor proporción.”

Argentina considera apropiado reemplazar en el párrafo anterior, de la versión en español del documento, el término arroz por arrurruz por ser la correcta traducción, resultando:

3.1.1 Las cuatro categorías indicadas en 2.1.1 a 2.1.4 se preparan principalmente con uno o más productos molidos de cereales, como trigo arroz, cebada, avena centeno maíz, mijo sorgo y alforfón. También podrán contener leguminosas (legumbres), raíces amiláceas (como arrurruz, ñame, mandioca) o tallos amiláceos, o semillas oleaginosas en menor proporción.

3.3 Proteínas

“3.3.1 El índice químico de la proteína añadida deberá ser equivalente por lo menos al 80 por ciento del índice de la caseína proteínica de referencia, o la proporción de eficiencia (PEP) de la proteína contenida en la mezcla deberá ser equivalente por lo menos al 70 por ciento de la caseína proteínica de referencia. En todo caso, se permite la adición de aminoácidos solo con el fin de mejorar el valor nutricional de la mezcla proteínica y solo en las proporciones necesarias para tal fin. Deberán emplearse únicamente formas de L-aminoácidos.”

Argentina sugiere modificar la redacción del párrafo por ser la correcta traducción del texto en español, resultando:

*El índice químico de la proteína añadida deberá ser equivalente por lo menos al 80 por ciento del **de la proteína de referencia caseína, o la relación** de eficiencia proteínica (**PER**) de la proteína contenida en la mezcla deberá ser equivalente por lo menos al 70 por ciento **del de la proteína de referencia caseína**. En **todos los casos**, se permite la adición de aminoácidos sólo con el fin de mejorar el valor nutricional de la mezcla proteínica y sólo en las proporciones necesarias para tal fin. Deberán emplearse únicamente formas naturales de L-aminoácidos.*

3.11 Consistencia y tamaño de las partículas

3.11.1 *“Una vez preparado de conformidad con las instrucciones para el uso indicados en la etiqueta, los alimentos elaborados a base de cereales deberán tener una consistencia adecuada para **[la alimentación con cuchara de]** los lactantes o niños pequeños, conforme a las edades para las que se destina el producto”.*

Argentina está de acuerdo en eliminar los corchetes. Sin embargo desea señalar que los mismos no figuran en el documento en su versión en inglés.

4.0 ADITIVOS ALIMENTARIOS

Argentina considera apropiado corregir en la tabla de aditivos alimentario, en la versión en español, en los puntos 4.2.1, 4.2.2, 4.6.2, 4.6.4, donde dice “**hidrogen-carbonato**” debería decir “**bicarbonato**” por ser la correcta traducción.

8. ETIQUETADO

Argentina no comparte la incorporación de CLAIMs Saludables en este tipo de alimentos. No obstante y dado que este párrafo no se encuentra en discusión, se realiza la siguiente observación:

8.1.1

*“Teniendo en cuenta el **párrafo 1.4** de las directrices para el Uso de Declaraciones de Propiedades Nutricionales y Saludables se permitirán en la legislación nacional declaraciones de propiedades nutricionales aplicables a los alimentos regulados por la Norma, siempre que estén demostrados por estudios rigurosos conforme a normas científicas apropiadas.”*

Argentina sugiere agregar al texto de este párrafo la siguiente frase, “**y el 7.1.1**” resultando:

8.1.1

*“Teniendo en cuenta el **párrafo 1.4 y el 7.1.1** de las directrices para el Uso de Declaraciones de Propiedades Nutricionales y Saludables se permitirán en la legislación nacional declaraciones de propiedades nutricionales aplicables a los alimentos regulados por la Norma, siempre que estén demostrados por estudios rigurosos conforme a normas científicas apropiadas”.*

China

Alinorm 06/29/26, Appendix II	JUSTIFICATION
8.1.1 National legislation	– No objections

Peru

Perú está de acuerdo con el texto del Anteproyecto de Recomendaciones antes señalado, debiéndose corregir en el numeral 4 Aditivos Alimentarios el texto “salvo indicación en contrario por “salvo indicación contraria”.

United States of America

This letter provides United States comments regarding forwarding of the Draft Revised Standard for Processed Cereal-Based Foods for Infants and Young Children to Step 8 for adoption by the 29th Session of the Codex Alimentarius Commission (ALINORM 06/29/26, para 63). The United States supports adoption of the Draft Revised Standard for Processed Cereal-Based Foods for Infants and Young Children (ALINORM 06/29/26, Appendix II) with the following revisions in Section 8.1.1:

8.1.1 The requirements of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985 (Rev.1-1991), Codex Alimentarius Volume 1), the Codex Guidelines on Nutrition Labelling (CAC/GL 2-1985 (Rev. 1-1993) and Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997 (Rev. ~~12-2004~~ 2-2004)) apply to this standard. With specific reference to section 7 of the Codex General Standard for the Labelling of Prepackaged Foods national jurisdictions may further restrict the use of pictorial devices.

Taking into account paragraph 1.4 of the Guidelines for Use of Nutrition and Health Claims, nutrition **and health** claims may be permitted under national legislation for the foods that are the subject of the standard provided that they have been demonstrated in rigorous studies with adequate scientific standards.

Comment: The Guidelines for Use of Nutrition and Health Claims was revised in 2004 (CAC/GL 23-1997 (Rev.1-2004)). The most recent revision should be referenced in this standard. See following comment regarding the need for correction of the number of the revised guidelines.

Comment: We request clarification of the numbering of the Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997 (Rev.1-2004)). This is the second revision of these guidelines, as described in footnote 1 of the revised guidelines. The correct number should be referenced in the Processed Cereal-Based Foods for Infants and Young Children.

Comment: The words “and health” should be added to Section 8.1.1, as shown above.

Rationale: As written, the Draft Revised Standard (ALINORM 06/29/26 Appendix II) implies that health claims would not be allowed under national legislation. This is inconsistent with the recently adopted Guidelines for Use of Nutrition and Health Claims (CAC/GL 23-1997 (Rev. 2-2004)).

Venezuela

- **3.4 Carbohidratos**

3.4.1 Sin observaciones.

- **3.6 Minerales**

3.6.1 Relacionado con el contenido de sodio de los productos descritos en 2.1.1 a 2.1.4, sin modificación.

3.6.2 Sin observaciones.

3.6.3 Sin observaciones.

- **3.7 Vitaminas**

3.7.1 Sin observaciones.

3.7.2 Para las vitaminas A y D, sin observaciones.

European Network of Childbirth Associations (ENCA)

1. Scope

ENCA support the text as it is, but suggests 2 changes to improve the clarity of the text.

- Delete in the second line:” taking into account infants’ individual nutritional requirements”. Because, this cannot be handled in an international standard.
- **Restore the text “and WHA 55.25 (2002)”at the end of the text. This is critically important to mention as this Resolution contains the following important sentence:**

“the introduction of micronutrient interventions and the marketing of nutritional supplements do not replace, or undermine support for the sustainable practice of, exclusive breastfeeding and optimal complementary feeding” (WHA 55.25, May 2002).

2. Description

It is very unclear what the other 75% should or can be as the name of the product is processed cereal-based foods. Cereals should be the main ingredient on a dry weight base. This description is in contradiction with 3.1.1 (essential composition) ENCA supports a minimum of over 50% of milled cereals and would favour even a higher minimum content.

3.4. Carbohydrates

3.4.1. and 3.4.2. The sugar content should be lower in order not to favour a preference for sweet food. Lowering the sugar content would be a practical contribution of Codex to implement the global strategy on Diet, Physical activity and Health by preventing the creation of a preference for industrially prepared sweet food

3.6. Minerals

3.6.1. The sodium content should be lower as children could acquire a preferred taste for salty food.

3.8 Optional Ingredients

3.8.1. A standard for infants and young children should not allow unspecified optional ingredients. All ingredients should be specified and meet Codex standards. Scientific proof should exist from independent research that their use is safe in infants and young children. If this is not the case precaution should be applied until the evidence is available.

Reinsert 3.8.3. Products containing cocoa should be used only after 12 months

We could not find a single paper that demonstrates the safety of cocoa use in products for infants and young child feeding. (Full references available in CX/NFSU 05/27/5)

Reinserting this sentence would be a practical contribution of Codex to implement the global strategy on Diet, Physical activity and Health by preventing a too young exposure to flavors often being part of junk food.

5. Contaminants

The maximum values as set in the directive of the European Commission should be applied here, as this offers the best achievable protection of infants and young children from pesticide and other contaminants leftovers.

6. Hygiene

As *Enterobacter sakazakii* has now even been shown to be present in cereal based food of category 2.1.2, special hygiene measures should be drafted and **information for care givers should be included in labelling provisions of products of category 2.1.2.**

8. Labelling

8.1.1. The last sentence of the first para should be replaced to read: The label shall have no pictures or text which idealizes or suggest an inappropriate age of introduction of these products. (See 8.1.2 for the use of pictograms in the instructions for preparation)

The possibility given in this standard to national legislation to allow nutrition claims could divert parents from feeding their infants with safe indigenous family foods. The promotion of packaged foods for infants can place too great a financial burden on families exacerbating family poverty and increasing the risks of malnutrition of other family members.

The World Health Assembly has repeatedly stressed how infant and young-child mortality can be reduced by: “exclusive breastfeeding for the first six months with nutritionally adequate and safe complementary feeding through the introduction of safe and adequate amounts of indigenous foodstuffs and local foods while breastfeeding continues up to the age of two years or beyond” (WHA Resolution 54.2, May 2001)

Therefore the sentence in 2nd para should be deleted.

8.1.2 Add the following: Pictograms explaining the whole mode of preparation must be added to the written instructions for preparation.

8.6. Information for utilisation

8.6.2. Add “breastmilk” to the liquids to be added to the dry product, as this is practised by mothers all over the world.

8.6.4. We support the existing wording of the 2 first lines and ask for deletion of the rest of the paragraph

Additional paragraphs to be included:

8.6.5 for products defined under 2.1.2 see comments to 6. Hygiene

Important notice: This product is not sterile, discard leftovers to protect infants from health hazards.

8.6.6

Important notice:

For optimum child nutrition and health, breastfeeding should continue along with feeding this food.

This sentence is an important safeguard which will make sure that these products do not replace breastmilk.

International Lactation Consultant Association (ILCA)

1. Scope ILCA support the text as it is, but suggests 2 changes to improve the clarity of the text.

- Delete in the second line:” taking into account infants’ individual nutritional requirements”. Because, this cannot be handled in an international standard.
- **Restore** the text “*and WHA 55.25 (2002)*”at the end of the text. **This is critically important to mention as this Resolution contains the following important sentence:**

“the introduction of micronutrient interventions and the marketing of nutritional supplements do not replace, or undermine support for the sustainable practice of, exclusive breastfeeding and optimal complementary feeding” (WHA 55.25, May 2002).

3.4.1. and 3.4.2. The sugar content should be lower in order not to favour a preference for sweet food. Lowering the sugar content would be a practical contribution of Codex to implement the global strategy on Diet, Physical activity and Health by preventing the creation of a preference for industrially prepared sweet food

Reinsert 3.8.3. Products containing cocoa should be used only after 12 months

Reinserting this sentence would be a practical contribution of Codex to implement the global strategy on Diet, Physical activity and Health by preventing a too young exposure to flavors often being part of junk food.

3.10.1 ILCA welcomes the fact cereal based food should have a texture appropriate for spoon feeding; this can protect continued breastfeeding (see proposal for adding text in 8.6.6) and prevents a too early introduction of cereals.

6. Hygiene As *Enterobacter sakazakii* has now even been shown to be present in cereal based food of category 2.1.2, special hygiene measures should be drafted and **information for care givers should be included in labelling provisions of products of category 2.1.2.**

8.1.1. The last sentence of the first para should be replaced to read: The label shall have no pictures or text which idealizes or suggest an inappropriate age of introduction of these products. (See 8.1.2 for the use of pictograms in the instructions for preparation)

The possibility given in this standard to national legislation to allow nutrition claims could divert parents from feeding their infants with safe indigenous family foods. The promotion of packaged foods for infants can place too great a financial burden on families exacerbating family poverty and increasing the risks of malnutrition of other family members.

The World Health Assembly has repeatedly stressed how infant and young-child mortality can be reduced by: “exclusive breastfeeding for the first six months with nutritionally adequate and safe complementary feeding through the introduction of safe and adequate amounts of indigenous foodstuffs and local foods while breastfeeding continues up to the age of two years or beyond” (WHA Resolution 54.2, May 2001)

The sentence in the 2nd para has to be deleted

8.1.2 Add the following: Pictograms explaining the whole mode of preparation must be added to the written instructions for preparation.

8.6.2. Add “breastmilk” to the liquids to be added to the dry product, as this is practised by mothers all over the world.

8.6.4. We support the existing wording of the 2 first lines and ask for deletion of the rest of the paragraph

Additional paragraphs to be included:

8.6.5 for products defined under 2.1.2 see comments to 6. Hygiene

Important notice: This product is not sterile, discard leftovers to protect infants from health hazards.

8.6.6

Important notice:

For optimum child nutrition and health, breastfeeding should continue along with feeding this food.

This sentence is an important safeguard which will make sure that these products do not replace breastmilk.

CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN FOODS / COMITÉ DU CODEX SUR LES RÉSIDUS DE MÉDICAMENTS VÉTÉRINAIRES DANS LES ALIMENTS / COMITÉ DEL CODEX SOBRE RESIDUOS DE MEDICAMENTOS VETERINARIOS EN LOS ALIMENTOS (CCRVDF)

Draft Maximum Residue Limits, at Step 8 (ALINORM 06/29/31; Appendix II)

Australia

Australia supports the adoption of the MRLs for trichlorfon, pirlimycin, cypermethrin, alpha-cypermethrin and doramectin by the Codex Alimentarius Commission at Step 8.

Compendium of Methods of Analysis Identified as Suitable for Support to Codex MRLs, for adoption (para. 77 and Appendix IX)

Australia

Australia supports the adoption of the Compendium of Methods of Analysis Identified as Suitable for Support to Codex MRLs for adoption by the Codex Alimentarius Commission at Step 8.