

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Items 2, 4.1, 4.2, 5, 9

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

Forty-fourth Session

Dresden, Germany

(Comments by India)

AGENDA ITEM 2 MATTERS REFERRED TO THE COMMITTEE BY THE CODEX ALIMENTARIUS COMMISSION AND ITS SUBSIDIARY BODIES

1. India agrees that the Standard for Canned Baby Foods (CXS 73-1981) permits the use of the food additives listed in Part D of the Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses Intended for Infants and Young Children (CAC/GL 10-1979) in nutrient preparations.

Rationale: The scope of the CAC/GL 10-1979 covers the use of nutrients in foods for special dietary uses intended for infants and young children, which also includes the products covered by the STAN CXS 73-1981. Section D of the advisory lists clearly indicates that for the reasons of stability and safe handling of vitamins and other nutrients, the food additives included in the respective standards and the ones listed in the table in Section D may be used as nutrient carriers.

2. India submits that there is no technological need/justification of methacrylate copolymer, basic (BMC) in commodity standards in GSFA FCs 13.1, 13.2, and 13.3. as these have negligible use in our national legislation.

3. India agrees to all established NCF in an annex to CXS 234 and keep the nitrogen conversion factor of 6.38 for milk and milk products as proposed by CCMAS with the note for infant formula as it would enhance usability.

AGENDA ITEM 4.1 GENERAL PRINCIPLES FOR THE ESTABLISHMENT OF NRVS-R FOR PERSONS AGED 6 –36 MONTHS (AT STEP 7)

1. India proposes to revise the definition of Adequate Intake as followed:

Adequate Intake (AI) is a reference value for a specified population based on observed or experimentally determined approximations or estimates of nutrient intakes by a group (or groups of presumably healthy people **aged 6-36 months** with no known evidence of deficiency.

Rationale: Specifying the age limit will reduce the chances of ambiguity.

2. India supports the EWG's recommendation for selection of Option 3 (The combined NRV-R value for persons aged 6-36 months should be determined by selecting the mean value of the proposed NRVs-R for older infants and young children).

Rationale: This addresses concerns about this vulnerable age group getting 'too much' or too little' and so represents the most appropriate option.

AGENDA ITEM 4.2 NRVS-R FOR PERSONS AGED 6 – 36 MONTHS

1. India supports Approach 1 [The Stepwise Process is applied using data from FAO/WHO and data published by RASBs over the past 10 years] as a suitable way for determining the combined NRVs-R.

Rationale: This is in line with the general principles, which state that "relevant DIRVs that reflect a recent independent review of the science from RASBs can be considered.

2. India does not support the NRVs-R values for Vitamin A, Vitamin D, Thiamin, Riboflavin, Niacin, Vitamin B6, Calcium, Magnesium, Iron and Iodine as mentioned in the Summary Table 1 of the Appendix I of the Agenda.

Rationale: As per the Nutrient Requirements for Indians, the Recommended Dietary Allowances (RDA) and the Estimated Average Requirements (EAR), ICMR - NIN, 2020 the values of RDA for all these nutrients are higher as compared to those given in Summary Table 1 of the document. India proposes to submit data for the review of these values.

AGENDA ITEM 5 TECHNOLOGICAL JUSTIFICATION FOR SEVERAL FOOD ADDITIVES

India supports the decision of the EWG to endorse that there is no technological need for the use of guar gum (INS 412), distarch phosphate (INS 1412), phosphated distarch phosphate (INS 1413), acetylated distarch phosphate (INS 1414) and hydroxypropyl starch (INS 1440) in foods conforming to CXS 72-1981 and inform

CCFA accordingly.

Rationale: The use of these additives is negligible in India for infant formula and formulas for special medical purposes intended for infants. Further, we endorse the widely agreed principle that the use of food additives in infant formula should be restricted and limited to where technologically essential with proven safety considerations in the sensitive consumer using the products.

AGENDA ITEM 9 DISCUSSION PAPER ON METHODS OF ASSESSING THE SWEETNESS OF CARBOHYDRATE SOURCES IN THE STANDARD FOR FOLLOW-UP FORMULA (CXS 156-1987)

India is of the opinion that the EWG recommendation for the use of ISO 5495 as a method for assessing the relative sweetness of carbohydrate sources with lactose may be useful until a more scientifically validated method is developed. However, we would like to flag that since this method cannot be validated scientifically, practical implementation of this method and consequentially the provision in the “*Standard for Follow-up formula, Section B: Drink for young children with added nutrients or Product for young children with added nutrients or Drink for young children or Product for young children*” will be difficult when converted into national legislations. Therefore, India would like to take expert advice from ISO before referring to CCMAS regarding the appropriate method, considering the following points:

- ISO5495 has not been specifically validated for the assessment of relative sweetness of a carbohydrate ingredient against lactose as a reference.
- As highlighted by the Discussion paper, this kind of sensory testing is applied in the food industry as a sensory test to choose the sample that is perceived higher in the specified sensory attribute. However, the discussion paper fails to emphasize that in the case of finished products such as products for young children, these sensory trials are 1) conducted for the finished products and 2) not intended for regulatory compliance purposes. We do not see how this method can be of use for individual carbohydrate sources by controlling authorities or for trade dispute purpose.
- There are no sensory intensity reference values for sweetness of carbohydrate sources that can be defined as an indicator of sweetness in product for young children as it is unfeasible to define an accurate sweetness reference value or selectively measure perceived sweetness of carbohydrate sources in these products due to individual variability.
- The method also ignores factors affecting the perception of sweet taste (for example the taste of other ingredients, heat treatment, matrix effects, etc.).
- The method ignores compositional requirements by relying on higher concentration levels that can ‘artificially’ generate differences in sweet taste that would be imperceptible in the finished product.
- Indeed, perceived sweetness of a carbohydrate source dissolved in an aqueous solution does not necessarily indicate the sweetness which would be present in the final product.