CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Items 2, 9 **CRD35**

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

Forty-fourth Session

Dresden, Germany

(Comments by ISDI)

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

7. 53rd Session of the Codex Committee on Food Additives (CCFA53) 5 7. CCFA53(2023) agreed to request CCNFSDU to consider whether CXS 73-1981 permits the use of the food additives listed in CXG 10-1979 Part D as nutrient carriers; noting that the CCFA EWG could not agree on whether CXS 73-1981 permits the use of the food additives listed in CXG 10-1979 Part D as nutrient carriers or not.

ISDI Comments

ISDI is of the opinion 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.

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 **in addition to the ones listed in the table in Section D may be used as nutrient carriers**.

The request from CCFA53 comes because Section 4 of the Standard on Canned Baby Foods did not specifically refer to CXG 10-1979 prior to alignment, unlike Section 4 of the Standard for Processed Cereal Based Foods for Infants and Young Children (CXS 74-1981) which did.

Section 4 of CXS 73-1981 prior to alignment:

The following additives are permitted in the preparation of canned baby food with the restrictions stated below […]

Compared to Section 4 of CXS 74-1981 prior to alignment:

Only the food additives listed in this Section or in the Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Children (CXG10-1979) may be present in the foods described in Section 2.1 of this Standard, as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions: […]

ISDI noted at CCFA53 that Section 3.1.2.1 of the Standard for Canned Baby Foods (CXS 73-1981) refers to CAC/GL 10-1979:

3.1.2.1 Vitamins and/or minerals added in accordance with Section 3.1.2 should be selected from the Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Children (CXG 10-1979).

While CCFA53 recognised that Section 3.1.2.1 of CXS 73-1981 did refer to CXG 10-1979, this was not deemed sufficiently clear as to the intent of CCNFSDU. On this basis, CCFA53 recommended that CCFA seek clarity from CCNFSDU as to whether CXS 73-1981 allows food additives listed in CXG 10-1979 Part D as nutrient carriers or not.

To support ISDI's position that substances in Part D of CAC/GL 10-1979are permitted as a nutrient carrier in CXS 73-1981, we note that:

(1) The scope of the CAC/GL 10-1979 covers the use of nutrient in foods for special dietary uses intended for infants and young children, which also includes the products covered by the STAN CXS 73-1981.

(2) Part D of CAC/GL 10-1979 allows certain food additives to be used, **in addition to** those additives listed in the GSFA Food Category 13.2, to **prepare suitable preparations of some vitamins and other nutrients**. The justification is to support the stability and safe handling of these preparations.

Consequently, ISDI is of the opinion that Part D applies, and the food additives included in Appendix D can be used as additives in nutrient preparations used in products covered by CXS 73-1981.

RECOMMENDATION

CCNFSDU should confirm to CCFA that CXS 73-1981 permits the use of the food additives listed in CXG 10-1979 Part D as nutrient carriers.

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

ISDI Comments

ISDI is concerned by the current work on appropriate methods for assessing sweetness of carbohydrates sources in non-dairy based “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”.

ISDI believes that further discussion is necessary as the publication of the Discussion Paper did not adhere to Codex procedural requirements. These procedures are designed to ensure that Codex members and observers have sufficient time to review any recommendations before proceeding. Further, it would be appropriate to request expert advice from ISO, before consulting CCMAS.

ISDI continues to oppose the need for this specific provision regarding sweet taste in the standard and considers that recommending an inappropriate method based on non- scientific criteria offers no public health nor safety benefits

The method identified is neither appropriate nor practical.

- 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. ISDI does not see how this method can be of use for individual carbohydrate sources by controlling authorities or for trade dispute purpose.

The Discussion Paper highlights the fact that sensory methods are applied to some **finished products** in Codex standards for fish and fishery products, which prescribe the use of CXG 31-1999 (Guidelines for the sensory evaluation of fish and shellfish in laboratories) and the Standard for olive oils and olive pomace oils (CXS 33-1981), and ISDI would like to better understand the appropriateness of such indirect references in the specific context of this discussion? Indeed ISDI notes that in the Codex Standard on Recommended Methods of Analysis and Sampling (CXS 234-1999) a sensory panel test method is only listed once for Olive oils and olive pomace oils for the **organoleptic characteristics of the finished product** (method COI/T.20/Doc. no. 15). In the case of olive oil, the reference sensory methods and vocabulary appears to be developed by the International Olive Council (COI) and not ISO.

Similar standards exist to generate sensory profile of finished products with glossary developed by professionals. However, there is currently no standard for describing the sensory properties of single ingredients, such as sucrose or NaCl, in aqueous solutions. These ingredients have mono-sensory dimensions (sweet and salty, respectively) and are relatively easy to evaluate. The primary objective of developing such standards is to assist sensory practitioners in evaluating products with complex sensory profiles. This may include proposing a glossary or other tools to aid in the evaluation process such as mouth rinsing procedure for products with long lasting perceptions.

ISDI is questioning the prioritisation of this work at CCNFSDU and calling on CCNFSDU to dismiss this work at Codex Alimentarius considering the added value is highly limited, the scientific basis uncertain and the practical implementation by countries highly improbable. This opinion is based on several key scientific points that CCNFSDU must consider:

- 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.

It seems difficult to imagine that a national authority would invest and organize panels with around 50 sensory experts specifically trained to control a criterion that is not linked to public health or food safety for a product with the most restrictive framework at Codex in terms of carbohydrate content.