

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 4.1, 4.2, 5, 6.1, 6.2, 6.21, 7, 8

CRD40

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

Forty-fourth Session

Dresden, Germany

(Comments by Ghana)

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

**Issue 1:** Definition of Adequate Intake

**Position:** Ghana agrees with the definition of Adequate Intake as provided by FAO/WHO and therefore supports that the text be retained with the square brackets removed.

**Rationale:** The definition provides the level of intake that is considered adequate for a healthy population of the age group that is expected to meet the amount of nutrients needed to maintain a nutritional state of the defined age group.

**Issue 2:** Consideration of Option 3

**Position:** Ghana agrees with Option 3, that is, the combined NRV-R value for persons aged 6-36 months should be determined by calculating the mean value of the proposed NRVs-R values of two age groups: 6-12 months and 12-36 months.

**Rationale:** The option allows for flexibility and broader application on the level of nutrients required for infants and young children as it addresses concerns on the level of nutrients for the vulnerable age group to ensure that it is not either excessive or insufficient. The text also aligns with the established procedure used for general population NRVs-R which are determined by calculating the mean values for the widest applicable age range.

Ghana also notes that guidance on how the combined NRVs-R for persons aged 6–36 months should be used will be outlined in relevant Codex documents to clarify the use of the NRVs-R for persons aged 6-36 months.

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

**Issue 1:** The Committee is invited to adopt the draft Stepwise Process presented in Appendix I, for use to establish NRVs-R for R for persons aged 6–12 months, 12–36 months and 6–36 months.

**Position:** Ghana accepts adoption of the draft stepwise process as recommended by the EWG with step 4 indicating Option 3 only.

**Rationale:** The draft Stepwise Process has been revised and aligned to section 3.1 and 3.2 in the draft General Principles with respect to establishment of NRV-R

**Issue 2:** The Committee is invited to: agree that Approach 1 should be used when applying the draft Stepwise Process so that more recent data from RASBs is used.

**Position:** Ghana agrees with the proposal of EWG chairs that Approach 1 should be used when applying the draft Stepwise Process so that more recent data from RASBs is used.

**Rationale:** Both options have been piloted and there seem to be no significant differences from the results other than for a few vitamins identified by the EWG. The advantage of using recent data is that it provides an opportunity to use data based on developments in science and technology.

**Issue 3:** Consider the NRVs-R for all nutrients established through the application of the Stepwise process using Approach 1 and presented in the Summary Table 1, Appendix I, and to be recommended as the established NRVs-R for a. Older Infants and b. Young Children.

**Position:** Ghana agrees with the recommendation of the EWG.

**Rationale:** The NRVs-R for Older Infants and b. Young Children have been obtained through piloting the stepwise process which is considered appropriate for deriving the NRVs-R. A similar stepwise approach was applied for the work on NRVs-R for the general population.

**Issue 4:** The NRVs-R for all nutrients established through the application of the Stepwise process using Approach 1 and in Option 3 (highlighted in the Summary Tables 2 and 2b, Appendix I) is recommended for the combined age range 6-36 months

**Position:** Ghana accepts the provided NRVs-R for the combined age group using Approach 1 and Option 3.

**Rationale:** The approach ensures that nutrient requirements for the combined age groups are sufficient.

**Issue 5:** CCNFSDU44 to agree that as part of the process when finalizing the NRVs-R to be established for 6-12 months, 12-36 months and 6-36 months, values should be rounded (as was undertaken when establishing NRVs-R for the general population).

**Position:** Ghana agrees with the proposal of the EWG on the presentation of NRVs-R values.

**Rationale:** This approach has already been used in deriving NRVs-R for the general population.

#### AGENDA ITEM 5 TECHNOLOGICAL JUSTIFICATION FOR SEVERAL FOOD ADDITIVES

**Issue:** There is no technological justification for the use of guar gum, distarch phosphate, phosphate distarch phosphate, acetylated distarch phosphate and hydroxypropyl starch in foods conforming to CXS 72-1981 (Infant formula).

**Position:** Ghana supports the recommendation of EWG to withdraw the use of these additives in CXS 72-1981.

**Rationale:** JECFA will not be able to conduct a risk assessment of these additives due to a lack of supporting data. In addition, the additives are not currently in use based on the feedback received after the circular letter was issued.

#### AGENDA ITEM 6.1 GUIDELINE FOR THE PRELIMINARY ASSESSMENT TO IDENTIFY AND PRIORITIZE NEW WORK FOR CCNFSDU

**Position:** Ghana supports the adoption by CCNFSDU of prioritization mechanisms of its work.

**Rationale:** The draft guideline for the preliminary assessment to identify and prioritize new work for CCNFSDU as presented has been improved taking into consideration the discussions and recommendation of CCNFSDU43. In particular, the draft has been fully aligned to the Codex procedural manual as evidenced by steps 5 to 6 as well as amendment of the questions in the decision tree such as question 1 which requires support of a Codex Member for any work to be initiated.

#### AGENDA ITEM 6.2 PROPOSALS FOR NEW WORK/EMERGING ISSUES (REPLIES TO CL 2024/52-NFSDU)

**Issue:** CCNFSDU44 is invited to consider the report to be produced by the PWG and the new work proposals in light of the prioritization mechanism (see CL 2024/52-NFSDU, Appendix I and CX/NFSDU 24/44/6, Annex I).

**Position:** Ghana supports the adoption of items in Annex 1 deliberated on during the 2023 PWG and CCNFSDU43 session. Consideration for revision/ amendment of the definition of dietary fibre included under paragraph 2 in the Guidelines on nutrition labelling (CXG 2-1985) and development of new work on: 1) General guidelines and principles for the nutritional composition of foods formulated with protein from non-animal sources and 2) Develop a Standard for Formulated Complementary Foods for Older Infants and Young Children.

**Rationale:** The draft guideline for the preliminary assessment to identify and prioritize new work for CCNFSDU was agreed to as another approach for use in identifying and prioritizing new work and revision/amendment of the texts/standards under the purview of CCNSFSDU and was also agreed to by the Codex Secretariat.

#### AGENDA ITEM 6.21 DISCUSSION PAPER ON HARMONIZED PROBIOTIC GUIDELINES FOR USE IN FOODS AND FOOD SUPPLEMENTS

**Position:** Ghana supports further work to establish Guidelines on Probiotics for Use in Foods and Dietary Supplements. There is a need to develop guidelines and a harmonized framework for probiotics, including general specifications and provisions, to ensure and maintain the quality of probiotic products globally.

**Rationale:** The WHO and FAO have indicated probiotics are live microorganisms that, when administered in adequate amounts, produce a physiological benefit in the host.

Probiotics are resistant to stomach acid and pancreatic juices and effective in boosting immunity, preventing and treating certain types of diarrhoea.

Given the considerable growth in the global market for probiotics, there is a need to develop guidelines and a harmonized framework for probiotics, including general specifications and provisions, to ensure and sustain

the quality of probiotic products worldwide. This objective is in line with Codex's core values of collaboration, inclusiveness, consensus-building and transparency, and follows the principles set out in the Codex Scientific Foundation, as listed in the Codex Alimentarius Commission's Strategic Plan 2020-2025.

#### AGENDA ITEM 7 REVIEW OF TEXTS UNDER THE PURVIEW OF CCNFSDU

**Issue:** CCNFSDU is invited to consider the recommendations from the Codex Secretariat on the process of revision/ amendment of the standards under the Committee.

**Position:** Ghana supports the recommendations below from the Codex Secretariat on the revision, amendment and update of Codex standards under CCNFSDU.

- i) to use the existing procedures to review standards under the purview of CCNSFSDU
- ii) encourage Members (and Observers) to propose revisions/amendments to existing standards, where needed, in response to the regular circular letter requesting new work proposals with initial screening exercises could be considered to guide new work proposals
- iii) request the Codex Secretariat to submit the consequential amendments identified for CXS 72-1981 and/or any other editorial amendments for consideration and approval by CAC47; and
- iv) request the CCNFSDU host country Secretariat to include the existing standards developed by CCNFSDU in the inventory of proposals and potential areas of work as proposed in the "Process for compiling new work proposals" (CL 2024/52-NFSDU)

**Rationale:** Given that there are existing procedures and guidance in the Procedural Manual for proposals for new work (including revision/amendment of standards) and that CCNFSDU has embarked on a process of prioritization of new work / emerging issues including the revision/amendment of existing standards and the issuance of a regular circular letter calling for proposals for new work since 2020. With the limited number of existing CCNFSDU standards, a specific mechanism to review standards under the purview of CCNSFSDU is not necessary. Maintaining an inventory list as introduced with the draft Guideline for the preliminary assessment to identify and prioritize new work for CCNFSDU could be sufficient to create transparency on the need for updates.

#### AGENDA ITEM 8 DISCUSSION PAPER ON USE OF FRUCTANS, BETA-CAROTENE, LYCOPENE IN STANDARD FOR INFANT FORMULA AND FORMULAS FOR SPECIAL MEDICAL PURPOSE INTENDED FOR INFANTS (CXS 72-1981)

Recommendations for consideration:

- i. beta-carotene is a suitable optional ingredient as defined in CXS 72-1981 and listed in the Advisory lists of nutrient compounds for use in foods for special dietary uses intended for infants and young CX/NFSDU 24/44/8 2 children (CXG 10-1979), and requesting CCMAS to endorse AOAC 2016.13 / ISO DIS 23443 (beta carotene and lycopene) for use with beta-carotene in the CXS 72-1981 as a Type II method;
- ii. Fructo-oligosaccharides (FOS), Oligofructose (OF), and Oligofructan are nutrient compounds consistent with the provisions established in CXG 10-1979 and suitable optional ingredients as defined in CXS 72-1981, and requesting CCMAS to endorse AOAC 2016.14/ISO DIS 22579 | IDF 241 (Fructans) for use with CXS 72-1981 as a Type II method;
- iii. CCNFSDU could not determine a rationale to endorse the method of analysis; AOAC 2016.13 / ISO DIS 23443 (beta-carotene and lycopene) for use with lycopene at this time.
- iv. **Position on (i):** Ghana supports the first recommendation of the EWG.

**Position on (ii) and (iii):** Ghana does not support the use of fructans and lycopenes in CXS 72-1981.

**Rationale i) (beta-carotene):** The safety of this pro-vitamin A has already been established and it meets the requirements of optional ingredient as defined in CXS 72-1981 and is listed in the Advisory lists of nutrient compounds for use in foods for special dietary uses intended for infants and young CX/NFSDU 24/44/8 2 children (CXG 10-1979).

**ii) (Fructans and lycopene):** Discussions during the EWG consultations show that member states were not able to provide scientific evidence that these nutrient compounds meet the requirements of the provisions established in section 2 and section 3 of: The advisory list of nutrient compounds for use in foods for special dietary uses intended for infants and young children (CXG 10-1979). This implies that they may or may not be suitable for inclusion in the Standard for infant formula and formulas for special medical purposes intended for infants (CXS 72- 1981) of safe use. Scientific evidence needs to be availed first before these nutrients can be allowed to be included in CXS 72-1981.