



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

Forty-fourth Session

Dresden, Germany

(Comments by IBFAN and ENCA)

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

ENCA strongly support the proposal from the European Union and Switzerland to develop methods to assess the sweetness of products. [1] <applewebdata://5D5B70B7-9E5D-4EEC-82D7-C5DBFB3F15E4#_ftn1> We believe this could be very helpful in reducing the sweetness of these unnecessary products. This is in line with our call for the removal of ALL free sugars from formulas and baby foods and ALL artificial sweeteners and flavouring agents.

The issue of sweetness is closely related to the new proposals on plant-based formulas where IBFAN and ENCA have several concerns. Plant-based formulas are being pushed as the sustainable, healthy option for children, and there is a risk that parents may opt for these products believing that they are helping the planet. While there are valid concerns about the role of dairy products in the climate crisis, plant-based formulas are far away from real plants and the healthy alternative that the term 'plant' implies. We are especially concerned that there should be no health, nutrition or greenwashing claims permitted for these products.

- Codex must acknowledge the risk of fortified Ultra Processed formulas, especially when artificially flavoured, plastic wrapped, sweetened with synthetic additives and other risky ingredients.
- Any assumption - implicit or otherwise - that cows' milk needs to be replaced with a fortified ultra-processed formula or drink, will lead to harmful messages about optimal child health that will undermine health and appropriate child development.
- Reliance on ultra-processed drinks and pureed products risks children's optimal development and undermines taste preferences for family foods. Children over 6 months are recommended to continue to be breastfed alongside bio-diverse family foods.²
- IBFAN and ENCA are calling for the removal of ALL free sugars, artificial sweeteners and flavouring agents from formulas and baby foods.

[1] <applewebdata://5D5B70B7-9E5D-4EEC-82D7-C5DBFB3F15E4#_ftnref1> For the 44th session of the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU44), the Chair of the Electronic Working Group (EWG) on Sweetness will propose the submission of the ISO 5495 method to the Codex Committee on Methods of Analysis and Sampling (CCMAS). The aim of this proposal is to include the method in the Recommended Methods of Analysis and Sampling (CXS 234-1999), to implement footnote 4 of Codex Standard CXS 156-1978.

2. WHO Guideline for complementary feeding of infants and young children 6–23 months of age. Geneva: World Health Organization; 2023.