

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: [codex@fao.org](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Items 4.1, 5, 6.2, 6.21, 8, 11

CRD45

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

Forty-fourth Session

Dresden, Germany

(Comments by China)

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

**For Adequate Intake (AI):** Last year, China published the latest revised definition of Adequate Intake, where the content is very similar to the recommendation made by EWG. So China supports this definition.

**For Options 1, 2 and 3 regarding NRVs-R for persons aged 6-36 months:** For the younger ends of the age range 6-36 months, their main source of nutrition could still come from the breastfeeding. However, for the older ends of the age range, their main source of nutrition tends to come from a diverse variety of complementary foods. So, the selection of complementary foods during this stage is particularly important, and that's where food labeling plays an important role for the older ends of the combined age range. As defined in the Codex Guidelines on Nutrition Labelling, NRVs is the numerical values based on scientific data for purposes of nutrition labelling and relevant claims. Since the other options may lead to inadequate nutrient intake for the older ends of the age range and could potentially have negative impact on their health, China supports option 1 to better meet the nutritional needs of the combined age range 6-36 months and to ensure their sufficient nutrient intake.

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

Currently, China does not approve the use of aforementioned food additives in infant formula and formulas for special medical purpose intended for infants. So China supports the recommendation made by the EWG.

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

During the PWG which was held on Sept 30, 2024, the scope of the General Guidelines and Principles for the Nutritional Composition of Foods Formulated with Protein from Non-animal Sources (proposal 2.2 from Canada and the United States) has been narrowed down to focus on plant-based food only.

In China and many other countries and regions, there is a very long history of the consumption of plant-based food, which is already a part of the daily diet. Plant-based food in many countries and regions is not considered as a new food source and it is a very common and pervasive source of protein. Food management system and regulatory framework in China already consider and incorporate plant-based food in terms of safety and nutrition. And there is no existing data to prove that plant-based food has any urgent food safety and international trade issues.

Considering the limited sources of this Committee, China does not think there is the necessity to carry out new work on guidelines for the nutritional composition of plant-based food at this moment.

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

China would like to extend our appreciation to Argentina and Malaysia for their collaborative efforts in driving the progress of this discussion paper.

Based on the FAO/WHO guidelines published in 2001 and 2002, this newly drafted Codex guideline provides a harmonized guidance on definition, minimum characterization, safety requirements and labelling parameters of probiotics.

For Definition of this draft Codex guideline: It provides a standardized definition that can be used by Members to establish common ground when discussing probiotics.

For Minimum Characterization of this draft Codex guideline: The draft guideline will establish the characteristics and parameters needed to define or classify probiotics. This helps ensure consistency in how probiotics are identified across different countries and regions.

For Safety Requirements of this draft Codex guideline: Safety is a critical component, and the guideline will outline the necessary safety criteria that have to be met to ensure consumer protection.

For Labelling Parameters of this draft Codex guideline: The guideline will provide detailed instructions on labelling of probiotics to ensure that consumers are informed about the contents and qualities of probiotics. This will in turn help consumers to make the right choices through the harmonized labelling of probiotics.

It is clear that this guideline will only focus on providing the framework for the above mentioned elements, WITHOUT the intention to establish a "positive list" for probiotics. By doing so, it will significantly help Members in better incorporating the FAO/WHO guidelines when developing their own national regulation, contributing to human health, food safety, consumer protection and global trade in a coordinated and consistent manner.

Throughout the EWG's work, we received broad support from many Members, which underscores the importance of establishing such harmonized Codex guideline for probiotics. The majority of EWG Members—14 out of 17 which participated the EWG work—expressed their support or had no objections to this new work proposal which reflects a shared recognition of this guideline.

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

For Beta-Carotene: Beta-carotene is typically used as a source of Vitamin A and there is no existing scientific evidence that beta-carotene is required for the development and health of infants. In addition, beta-carotenes also can be used as food additive for colouring purpose. China concerned about the necessity of adding this nutrient as an individual ingredient in special dietary intended for infants, so, China does not support the recommendation for beta-carotene made by the EWG.

For Lycopene: Lycopene has not yet been approved for its safe use in special dietary intended for infants and young children in China. So, China does not support the recommendation for Lycopene made by the EWG.

#### **AGENDA ITEM 11 DATE AND PLACE OF THE NEXT SESSION**

For CCNFSDU 44, the meeting date (Oct 2-6, 2024) overlaps with China's National Day holiday, and China concerns that the next session may overlap again with the Chinese New Year holiday, given the general interval between CCNFSDU meetings. Therefore, China will be appreciated if the Secretariat can consult with members before making the final decision for the date of the next session.