

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



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Agenda Item 7

**CX/NFSDU 03/7-Add. 2
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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Twenty-fifth Session

Bonn, Germany, 3- 7 November 2003

**PROPOSED DRAFT REVISED STANDARD FOR PROCESSED CEREAL-BASED FOODS FOR
INFANT AND YOUNG CHILDREN**

- Comments at Step 3 of the Procedure -

Comments from:

ISDI – INTERNATIONAL SPECIAL DIETARY FOODS INDUSTRIES

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ISDI PROPOSAL	JUSTIFICATION
<p><u>2. DESCRIPTION</u></p> <p>Processed cereal-based foods are prepared primarily from one or more milled cereals, which should constitute at least 25% of the final mixture on a dry weight basis</p>	<p>The word “primarily” should be deleted. There are other very nutritive ingredients such as milk or pulses that can be used in these products.</p>
<p><u>3.1. Essential Composition</u></p>	<p>ISDI has provided its comments on this section in a separate document (ISDI ref 03/140).</p>
<p><u>4. FOOD ADDITIVES</u></p>	<p>ISDI has provided comments to Switzerland leading the working group on this matter.</p>
<p>8. LABELLING (current) 8.1.1</p> <p>{The requirements of the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985 (Rev. 1-1991), Codex Alimentarius Volume 1) apply to this standard.</p> <p>In addition to the requirements of the Codex General Standard for the Labelling and Claims for Prepackaged foods for special dietary uses (CODEX STAN. 146-1985) the following specific provisions apply:</p> <p>With specific reference to section 7 of that Standard national jurisdictions may further restrict the use of pictorial devices].</p> <p>Or</p> <p>{The label shall have no pictures or text which idealizes or suggests an inappropriate age of</p>	<p>Codex STAN 146-1985 contains a number of specific provisions, which apply to processed cereal-based foods. In addition, CODEX STAN 146-1985 extensively refers back to the General Standard for Labelling (CODEX STAN 1-1985) where appropriate. ISDI therefore believes it is sufficient to refer to CODEX STAN 146-1985 and seeks clarification from the Codex Secretariat on this matter.</p> <p>This is already covered by Section 7 of Codex General Standard for the Labelling for Prepackaged foods (CODEX STAN. 1-1985 rev 1-1991) with reference to section 3 of the same standard¹.</p> <p>This sentence should be deleted.</p> <ul style="list-style-type: none"> • Pictures of young children should be allowed on labels for complementary

¹ Section 3.1 reads “Prepackaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect.”

<p>introduction of these products.]</p>	<p>foods. A picture is the simplest and most effective way to communicate for whom the product is intended. This is important where literacy rates may be low.</p> <ul style="list-style-type: none"> • As stated in point 8.7 of this section, processed cereal-based foods are not breast- milk substitutes, and a picture of a young child on the label, cannot be construed as an impediment to breastfeeding. • Such provision are already covered in other sections of this Standard for instance 8.6.4, and by Codex STAN 146-1985 (Codex General Standard for the Labelling of and Claims for Pre-packaged Foods for Special Dietary Uses
<p>[No nutrition and health claims shall be made regarding the dietary properties of the products covered by the provision of this standard</p> <p>In order to provide information concerning the composition and the specific properties of processed cereal-based foods, nutrition and health claims are permitted insofar as they are</p> <ul style="list-style-type: none"> - truthful; - not misleading; - scientifically substantiate 	<p>This sentence should be deleted and replaced by the wording proposed.</p> <ul style="list-style-type: none"> • Claims provide important and useful information concerning the composition and specific properties of the product and can help parents avoid choosing inappropriate foods for their infants and young children. • Some governments already allow certain health and nutritional claims for products intended for healthy infants. • Guidelines for the scientific substantiation of claims for foods for infants and young children, can be developed along the lines of the work already undertaken by CCNFSDU. • According to the draft Guidelines for Use of Nutrition and Health Claims currently under discussion at CCFL (Alinorm 03/22A) if nutrition and health claims are to be made for foods for infants and young children, they must be specifically provided for in relevant Codex Standards or national legislation
<p>8.1.2 The name of the food</p> <p>Any indication required in the labelling should be</p>	<p>This is adequately covered in section 8 of</p>

<p>made in the appropriate language(s) of the country in which the product is sold.</p>	<p>CODEX 146-1985 and in section 8.2 of the General Standard (CODEX STAN 1-1985).</p>
<p>8.5 Date marking and storage instructions 8.5.3. Where practicable, storage instructions shall be in close proximity to the date marking.</p>	<p>This type of provisions is fully described in the General Standard for the Labelling of and Claims for prepackaged Foods for Special Dietary Uses (CODEX STAN 146-1985) and is not needed here.</p>
<p>8.6 Information for utilization 8.6.2. For products covered by 2.1.1, directions on the label shall state “Milk or formula but no water alone shall be used for dilution or mixing” or any equivalent statement.</p>	<p>The word “alone” should be added. Water is used in the reconstitution of infant formula, which is one of the nutritious liquids recommended for the dilution of cereals.</p>
<p>8.6.3. “The presence or absence of gluten should be indicated on the label”</p>	<p>The labelling of the presence of ingredient containing gluten is already obligatory according to section 4.2.1.4 of Codex Standard CODEX STAN 1-1985</p> <p>The absence of gluten is regulated by Codex Standard for Gluten free foods 118-1981 rev 1983.</p>
<p>8.6.4. [The label shall indicate clearly from which age the product is intended for use. The label shall clearly state that the product is not recommended for use below 6 months. In addition the label shall include a statement indicating that the decision when precisely to begin complementary feeding, including any exception from that age limit, should be made in consultation with a {health worker}, based on the infant specific growth and development needs. Additional requirements in this respect may be made in accordance with the legislation of the country in which the product is sold. The labelling should</p>	<p>The second sentence should be deleted because this is already covered in the scope of this standard. In order to reflect the conclusion of the WHO Expert Consultation on “The optimal duration of exclusive breastfeeding” as referred to in the WHA Resolution 54.2., point 8.6.4 must be re-worded to ensure that the individual needs of all infants and young children are met.</p> <p>The last sentence should also be deleted because it</p>

<p>not be in conflict with the provision of this paragraph].”</p>	<p>is self evident.</p>
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