

APPENDIX V

PROJECT DOCUMENT

Proposal for the development of standard for foods for older infants and young children

I. Purpose and Scope of the New Work

The purpose of this project is to develop a Standard for baby foods, and processed cereal-based foods, which include complementary foods, for older infants and young children (persons aged 6 months to 36 months).

The Guidelines on formulated complementary foods for older infants and young children (CXG 8-1991) defines Formulated Complementary Foods as foods that are suitable for use during the complementary feeding period. These foods should be specifically formulated with appropriate nutritional quality to provide additional energy and nutrients to complement family foods derived from the local diet and should provide nutrients which are either lacking or are present in insufficient quantities.

CXG 8-1991 defines the Complementary Feeding Period as the period when older infants and young children transition from exclusive feeding of breastmilk and/or breast milk substitutes to eating the family diet.

The scope of the proposed new standard would be:

- The standard applies to baby foods, and processed cereal-based foods, which includes complementary foods, for older Infants and young children, including but not limited to meat, vegetable, fruit or pulses-based products, and foods for older infants and young children. This standard does not apply to beverages (follow-up formula and product/drink) for older infants and young children. The foods in this standard can be provided in the form of baby foods, cereal based foods.

Breastmilk substitutes are a separate category of products from complementary foods and will not be considered in the proposed standard. In accordance with the Codex definition of complementary foods, complementary foods are intended to complement the feeding of breastmilk as older infants and young children make the transition from sole source nutrition from breastmilk or infant formula to dietary patterns composed of solid foods. Therefore, the products covered by the proposed standard are not breastmilk substitutes and should not be formulated or presented as such.

II. Relevance and Timeliness

Complementary feeding of children between the ages of 6 and 36 months is necessary for healthy growth and development at this critical period. In 2023 the WHO issued an update of the WHO Guideline for complementary feeding of infants and young children 6-23 months of age.¹ These guidelines use a food-based approach and recommend a diet diverse in daily animal-source foods, daily fruits and vegetables, and adequate pulses, nuts, and seeds. The Guideline also recommends limiting foods high in sugar, salt, and trans-fat.

In December of 2023 an expert consultation was held to consider the recommendations of the updated WHO Guideline and approaches to making food systems work for complementary feeding in low and middle-income countries, including through support from international assistance programs, such as USAID. This consultation concluded that food systems are not meeting the needs of children in low- and middle-income counties and that two in three children are not able to be fed diverse diets needed for healthy growth and development during this critical period of development. This same conclusion was reached in a 2021 report published by UNICEF.² When possible, food systems should be improved to provide affordable, locally grown, nutrient-dense foods needed for the nutritional needs of older infants and young children. When this is not possible, formulated complementary foods can play an important role in meeting dietary and nutritional needs of this age group.

¹ World Health Organization. "Guideline for complementary feeding of infants and young children 6-23 months of age." (2023): 96-96.

² United Nations Children's Fund (UNICEF). Fed to Fail? The Crisis of Children's Diets in Early Life. 2021 Child Nutrition Report. UNICEF, New York, 2021.

Market research has shown that complementary foods have increased in volume and diversity in the global trade.³ However, international standards to guide composition and labelling for complementary foods are lacking, outdated, or not followed. A recent report found that most commercially available fortified complementary foods are not nutritionally adequate.⁴

The Codex Secretariat's recent review of CCFSDU standards ([CX/NFSDU 24/4/7](#)) identified both the *Standard for canned baby-foods* (CXS 73-1981) and the *Standard for processed cereal based foods for infants and young children* (CXS 74-1981) as standards in need of revision and/or update. The proposed new standard would replace these standards and establish science-based nutrition, quality, and safety provisions for the foods currently covered by these outdated standards and for complementary foods for which there are no current Codex standards.

It is therefore both relevant and timely that Codex develop a Standard on Foods for Older Infants and Young Children.

III. Main Aspects to be Considered

The proposed standard would incorporate the foods from the two existing standards related to foods (CXS 73-1981 and CXS 74-1981). The main aspects that this proposed standard would consider are as follows:

- Relevant updates in light of current scientific findings and recommendations for complementary feeding for persons aged 6-36 months
- foods for older infants and young children comprised of basic food groups including animal-source foods, fruits and vegetables, cereals and grains, pulses, nuts, and seeds as individual foods or in food group combinations
- Essential compositional and safety factors, including food group requirements and nutritional composition
- Additional food safety, quality, packaging, labelling, and analytical methods and sampling provisions, as appropriate
- Name and structure of the standard

IV. Assessment Against the Criteria for the Establishment of New Work Priorities General Criteria:

A standard on foods for older infants and young children will provide:

- Scientifically supported, evidence-based direction and guidance to Codex Members, policymakers, and non-governmental organizations who wish to establish and use up-to-date, science-based guidelines for the formulation of foods for older infants and young children and implement associated policies;
- Food business operators with a clear and consistent direction on nutritional criteria for product formulation; and
- Consumers with more consistent and nutritionally balanced products to reduce their risk of potentially inadequate or excess nutrient intakes.

Criteria applicable to general subjects:

a. Diversification of national legislation and apparent resulting or potential impediments to international trade

The lack of a science-based standard to guide the nutritional composition, safety, quality, and labelling for such foods as the market size of and consumption of these products grow⁵ has led to divergence and/or

³ <https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food>[https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food-trends-canada-united-states-mexico-cusma - atrends-canada-united-states-mexico-cusma#a](https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food-trends-canada-united-states-mexico-cusma-atrends-canada-united-states-mexico-cusma#a)

⁴ Masters WA, Nene MD, Bell W. Nutrient composition of premixed and packaged complementary foods for sale in low- and middle-income countries: Lack of standards threatens infant growth. *Matern Child Nutr.* 2017; 13:e12421. <https://doi.org/10.1111/mcn.12421>

⁵ <https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food>[https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food-trends-canada-united-states-mexico-cusma - atrends-canada-united-states-mexico-cusma#a](https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food-trends-canada-united-states-mexico-cusma-atrends-canada-united-states-mexico-cusma#a)

variability in approaches to managing the nutritional composition of these products. The absence of Codex guidance to promote more harmonized approaches can result in impediments to trade.

A 2017 report found that most commercially available fortified complementary foods are not nutritionally adequate, and a 2021 UNICEF report states that few affordable products are appropriately formulated in low-income countries.^{6,7} There is currently no international, science-based standard to ensure that the foods that are being traded meet the nutritional needs of the target population, resulting in health risks and impediments to international trade. Developing a Codex standard would help address issues of availability, affordability, and accessibility of appropriately formulated products. It is necessary to take action to develop a science-based, international standard to reduce existing and potential impediments to trade.

b. Scope and establishment of priorities between the various sections of the work

The proposed standard would include a food-based approach including animal-source foods, fruits and vegetables, cereals and grains, pulses, nuts, and seeds as individual foods or in food group combinations to provide nutritional composition guidance that is aligned with international, science-based dietary guidance for the target age group. Essential compositional and safety factors, including mandatory and optional nutrient addition and guidance on quality, packaging, labelling, analytical methods and sampling considerations would also be addressed with the aim of providing an international standard with which countries could harmonize their regulations for foods for older infants and young children.

All sections of the proposed standard are of high priority for the text to be maximally useful, but first priorities will be to develop a scope that covers all such foods and to update nutritional composition provisions to reflect current science.

c. Work that has already been undertaken by other international organizations in this field and/or suggested by the relevant international intergovernmental body(ies).

The WHO recently updated its guidelines on complementary infant feeding.⁸

d. Amenability of the subject of the proposal to standardization

Codex has developed standards for specific categories of foods for older infants and young children in the past—the *Standard for canned baby-foods* (CXS 73-1981) and *Standard for processed cereal based foods for infants and young children* (CXS 74-1981)—so it is clear that this category of foods is amenable to standardization. As established in the introduction and paragraph on relevance/timeliness, foods for older infants and young children have expanded to encompass more food groups and product varieties and an international standard that covers all these products is needed. Based on the success of past work to develop standards for such foods, there is no reason to question the amenability of the subject of this proposal to standardization.

e. Consideration of the global magnitude of the problem

The recently updated WHO guideline demonstrated through its dietary modelling work that nutrient gaps exist even in best-case food patterns. A further consultation supported by USAID found that food systems are not meeting the nutritional needs of children in low- and middle-income countries and that two in three children in the target group (aged 6-36 months) are not able to be fed diverse diets needed for healthy growth and development during this critical period. Recent UNICEF findings confirm this is a global public health challenge and other studies have found that most commercially available fortified complementary foods are not nutritionally adequate.⁹ Developing a Codex standard for complementary foods to ensure they are nutritionally adequate and safe can help address these global issues in a timely manner.

⁶ Masters WA, Nene MD, Bell W. Nutrient composition of premixed and packaged complementary foods for sale in low- and middle-income countries: Lack of standards threatens infant growth. *Matern Child Nutr.* 2017; 13:e12421. <https://doi.org/10.1111/mcn.12421>

⁷ United Nations Children's Fund (UNICEF). Fed to Fail? The Crisis of Children's Diets in Early Life. 2021 Child Nutrition Report. UNICEF, New York, 2021.

⁸ [https://cdn.who.int/media/docs/default-source/nutrition-and-food-safety/complementary-feeding/cf-guidelines/dietary-](https://cdn.who.int/media/docs/default-source/nutrition-and-food-safety/complementary-feeding/cf-guidelines/dietaryhttps://cdn.who.int/media/docs/default-source/nutrition-and-food-safety/complementary-feeding/cf-guidelines/dietary-modelling.pdf?sfvrsn=8e2abbff_3modelling.pdf?sfvrsn=8e2abbff_3)
[modelling.pdf?sfvrsn=8e2abbff_3](https://cdn.who.int/media/docs/default-source/nutrition-and-food-safety/complementary-feeding/cf-guidelines/dietary-modelling.pdf?sfvrsn=8e2abbff_3)

⁹ United Nations Children's Fund (UNICEF). Fed to Fail? The Crisis of Children's Diets in Early Life. 2021 Child Nutrition Report. UNICEF, New York, 2021.

V. Relevance to the Codex Strategic Plan's¹⁰ Goals and Objectives

The proposed work is consistent with the Commission's mandate to develop standards, guidelines and other international recommendations to protect consumer health and to ensure fair practices in the food trade. The new standard will contribute to the achievement of Strategic Goals 1, 2, 3, and 4.

- **Goal 1: Address current, emerging and critical issues in a timely manner**

Recent research has found that food systems are not meeting the complementary feeding needs of children, especially in low- and middle-income countries. Two in three children in the target group are not able to be fed diverse diets needed for healthy growth and development during this critical period.¹¹ Complementary foods have increased in volume and diversity in the global trade,¹² but most commercially available fortified complementary foods are not nutritionally adequate¹³ and not all foods currently marketed are covered by existing Codex standards. While food systems should be improved to provide affordable, locally grown, nutrient-dense foods, this proposal recognizes that critical issues have emerged in older infant and young child nutrition and that developing a Codex standard for such foods to ensure they are nutritionally adequate and safe can help address these issues in a timely manner.

- **Goal 2: Develop standards based on science and Codex risk-analysis principles**

The proposed standard would be based on recent science and Codex risk analysis principles. This project may seek scientific advice if needed to set composition requirements for individual foods or food groups for the target population. The standard will seek and rely on globally representative nutrition data and input from all Codex Members and may request additional scientific advice from the Joint Expert Meeting on Nutrition (JEMNU) as required to complete the work.

- **Goal 3: Increase impact through the recognition and use of Codex standards**

This proposed new work would need to incorporate and update the relevant information from the existing related Codex standards and would be complementary to the work CCNFSDU has completed in the development of the *Standard on infant formula and formulas for special medical purposes intended for infants* (CXS 72-1981) and the *Standard on follow-up formula for older infants and product for young children* (CXS 156-1987) providing guidance to governments to ensure that foods for infants and young children are safe and nutritionally appropriate. This will fill important gaps and thereby increase the impact and use of Codex standards.

- **Goal 4: Facilitate the participation of all Codex Members through the standard setting process**

Foods for older infants and young children are relevant to all Codex Members and regions. In particular, the proposed standard would provide a food-based approach, either as individual foods or food group combinations, applicable globally. The participation of all Codex Members is necessary to set a standard that serves all Codex regions and the development of a proposed standard that is relevant to all Members encourages and facilitates participation in the standard setting process. The proposed new work would seek to use all available means, electronic, virtual, and physical, to reduce barriers to active participation in this standard setting process.

VI. Relationship Between This Proposal and Other Existing Codex Documents

CCNFSDU has three texts related to complementary feeding of older infants and young children: *Guidelines on formulated complementary foods for older infants and young children* (CXG 8-1991), *Standard for canned baby-foods* (CXS 73-1981), and *Standard for processed cereal based foods for infants and young children* (CXS 74-1981).

CXG 8-1991 provide nutrient targets for complementary foods that are based on WHO/FAO data that are two decades old.¹⁴ The Codex Secretariat's recent review of CCNFSDU standards ([CX/NFSDU 24/4/7](#)) identified both the CXS 73-1981 and the CXS 74-1981 as standards in need of revision and/or update. CXS 73-1981

¹⁰ For more information, please see the [Codex Strategic Plan 2021-2025](#)

¹¹ Choudhury, Samira, Derek D. Headey, and William A. Masters. "First foods: Diet quality among infants aged 6–23 months in 42 countries." *Food Policy* 88 (2019): 101762.

¹² <https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food>[https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food-trends-canada-united-states-mexico-cusma - atrends-canada-united-states-mexico-cusma#a](https://agriculture.canada.ca/en/international-trade/market-intelligence/reports/customized-report-service-baby-food-trends-canada-united-states-mexico-cusma-atrends-canada-united-states-mexico-cusma#a)

¹³ Masters WA, Nene MD, Bell W. Nutrient composition of premixed and packaged complementary foods for sale in low- and middle-income countries: Lack of standards threatens infant growth. *Matern Child Nutr.* 2017; 13:e12421. <https://doi.org/10.1111/mcn.12421>

¹⁴ World Health Organization. *Vitamin and mineral requirements in human nutrition.* World Health Organization, 2004.

and CXS 74-1981 provide requirements for composition of canned baby foods and cereal-based foods; they only cover canned baby foods without a designated age range and cereal-based foods for infants and young children. Codex standards are lacking for other complementary foods, such as meat, vegetable, fruit or pulses-based products. Other related texts are the *Advisory list of nutrient compounds for use in foods for special dietary uses intended for infants and young children* (CXG 10-1979), *General principles for the addition of nutrients to foods* (CXG 9-1987), and the Committee's ongoing work to establish General Principles and Nutrient Reference Values-Requirements (NRVs-R) for persons aged 6-36 months.

The new work will take into consideration all the existing Codex texts in developing a single new standard for foods for older infants and young children. It will incorporate and update the relevant aspects of existing texts and replace two Codex texts: CXS 73-1981 and CXS 74-1981.

VII. Requirement for and Availability of Expert Scientific Advice

CCNFSDU may need scientific advice from the Joint Expert Meeting on Nutrition (JEMNU).

VIII. Need for Technical Input to the Standard from External Bodies

None anticipated.

IX. Proposed Timeline

The work can be completed in four (4) sessions, with final adoption at Step 8 by 2029.