

codex alimentarius commission



FOOD AND AGRICULTURE
ORGANIZATION
OF THE UNITED NATIONS

WORLD
HEALTH
ORGANIZATION



JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 5

**CX/NFSDU 02/5
September 2002**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL DIETARY USES

Twenty-fourth Session

Berlin, Germany, 4 - 8 November 2002

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

- Comments at Step 3 of the Procedure

Comments from:

ARGENTINA
AUSTRALIA
BRAZIL
COLOMBIA
CUBA
CZECH REPUBLIC
HUNGARY
NEW ZEALAND
NIGERIA
SLOVAK REPUBLIC
SOUTH AFRICA

AAC - ASSOCIATION DES AMIDONNERIES DE CÉRÉALES DE L'UE
EUROPEAN COMMUNITY
ENCA - EUROPEAN NETWORK OF CHILDBIRTH ASSOCIATIONS
ISDI - INTERNATIONAL SPECIAL DIETARY FOODS INDUSTRIES
WHO - WORLD HEALTH ORGANIZATION

ARGENTINA

SCOPE

We strongly support the first proposed wording, i. e.:

“This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of 6 months onwards, or when upon the advice of an independent health worker, it is required to satisfy their individual nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).”

In 2001 the WHO Expert Consultation recommended “exclusive breastfeeding for 6 months, with introduction of complementary foods and continued breastfeeding thereafter.”

The Expert Consultation also recognised that some infants might require supplementary feeding due to insufficient growth or an iron deficiency before six months of age.

We think that the above wording is in keeping with the recommendation of the WHO Expert Consultation, as it offers some flexibility for introducing cereal-based food at an earlier age, if and when deemed necessary by a doctor or health worker.

DESCRIPTION

We propose to delete the word “primarily” so that the text reads as follows:

“Processed cereal-based foods are prepared from one or more milled cereals which constitute at least 25% of the final mixture on a dry weight basis.”

We agree to the requirement for at least 25% content of one or more milled cereals. However, some cereal products contain other ingredients, such as milk, or high-protein seeds, at levels greater than 25%, and these products are therefore not primarily cereals as stipulated by the currently proposed wording. These products would, however, conform to the current definition of the Codex Standard (CODEX STAN 74-1991).

We therefore suggest to delete the word “**primarily**”.

2.1 PRODUCT DEFINITIONS

Section 2.1.1 reads as follows:

“Products consisting only of cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids;”

This category also covers cereal products where fruits, oils, sugars, vitamins, minerals or other ingredients might be added. We therefore suggest to replace “only” by “**primarily**” so that the statement reads as follows:

“Products consisting *primarily* of cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids;”

3.1 ESSENTIAL COMPOSITION

Section 3.1.1 reads as follows:

“Dry cereal, rusk, biscuits and pasta are prepared primarily from one or more milled cereal products, such as wheat, rice, barley, oats, rye, maize, millet, sorghum and buckwheat. It may also contain legumes (pulses), starchy roots (such as arrow root, yam or cassava) or starchy stems or oil seeds in smaller proportions.”

Here there is the same problem as encountered in Section 2. Description, concerning the word ‘primarily’. Some products, specifically those containing milk, legumes (pulses) or high-protein seeds, may not conform to this composition. They have the advantage that they can be made from locally produced crops of excellent nutritional quality, so that there is no reason to exclude them from this standard.

We therefore recommend to change the wording as follows:

“Dry cereal, rusk, biscuits and pasta are prepared from one or more milled cereal products such as wheat, rice, barley, oats, rye, maize, millet, sorghum, buckwheat, legumes (pulses) and oil seeds. Starchy roots (such as arrow root, yam or cassava) or starchy stems may also be used in smaller proportions.”

3.2 ENERGY DENSITY

The energy density should not be less than 0.8 kcal/g instead of 0.8 kcal/100 g (as specified incorrectly in the Spanish and English versions, translator's note). This is possibly the result of a typing error.

3.3 PROTEIN

3.3.1 - This section refers to a reference protein, which has, however, not been defined. We support the use of casein as a reference and consider that it is useful to retain the possibility of using 70% of the Protein Efficiency Ratio (PER) as a quality standard.

3.4 CARBOHYDRATES

3.4.1 – We support the use of honey in infant cereals because honey is safe if treated as outlined in 3.8.2.

3.4.2 There is a mistake in the calculation of the carbohydrate content. This point had been discussed in 1999 (ALINORM 99/26, paragraph 63) and as a result, the carbohydrate level has been modified and raised from 1.2 g to 2 g/100 kJ. This level was mistranscribed in the draft Standard and the value of 2 g is given for 100 kcal instead of 100 kJ and then divided by 4.18 to obtain the value per kJ ($2 / 4.18 = 0.48$). The sentence should therefore read:

**“The amount of added carbohydrates shall not exceed 2.0 g/100 kJ or 8.4 g/100 kcal.
The amount of added fructose shall not exceed 1.2 g/100 kJ (5 g/100 kcal).”**

3.5 LIPIDS

We suggest introducing the following sentence: **“No hydrogenated fats should be used”**.

3.6 MINERALS

3.6.1 We support a maximum level of sodium of 100 mg/100 kcal in ready-to-eat products for infants under 1 year of age and a maximum level of 200 mg/100 kcal in products for older children. These levels are safe, so all square brackets should be deleted.

3.7 OPTIONAL INGREDIENTS

The age should be aligned with the age given in Section 1. Scope.

We do not support the proposal that the age at which cocoa can be introduced should be increased to above 9 months because of the risk of an allergic reaction. Many ingredients can cause allergies, and some of the most common allergens are found in milk and soy. If an infant is allergic to cocoa, another flavour of cereal should be chosen.

FOOD ADDITIVES

We are going to present our views on this issue in a forthcoming communication. Meanwhile, we feel that this section should be retained, as some food additives in clearly evaluated amounts are necessary for the production of these foods.

LABELLING

First of all, the numbering of this section is incorrect.

“The label shall have no pictures of infants or young children or text, which idealizes the use or suggests an inappropriate age of introduction of these products.”

We strongly reject this proposal, as it is completely unfounded. There is no evidence to suggest that drawings or photos of children on products for older infants result in a reduction of breastfeeding. Pictures of children serve to identify the products and to illustrate the age group for which they are intended. The suggestion of an inappropriate age for the introduction of such products is forbidden under the Codex General Standard for the Labelling of Pre-packaged Foods (Codex STAN 1-1985 Rev 1-1991 Section 3.1.) which stipulates that “Pre-packaged 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”.

DECLARATION OF NUTRITIVE VALUE

We suggest to change the title as follows: **“Declaración de la información nutricional” (Declaration of Nutritional Information).**

8.4(a) The word *“kilo”* is missing before „calorías/calories“. (Correction applies to Spanish and English versions, translator’s note).

8.5(b) (correct number: **8.4(b)**, translator’s note) The proposed sentence reads as follows: “...the total quantity...of each vitamin and mineral added ... per 100 g as well as according to the serving size of the food suggested for consumption.”

The declaration per serving size should not be mandatory as this serving size varies with the age of infants. The words “as well as” should be replaced by **“and may be given”**, so that the sentence reads as follows:

“... the total quantity...of each vitamin and mineral added... shall be declared per 100g and may be given according to the serving size of the food suggested for consumption.”

We also recommend to add the following (new) paragraph:

“8.4.2 Nutrition and health claims are permitted insofar as they are supported by relevant scientific data.”

8.6 INFORMATION FOR UTILIZATION

8.6.4 In our opinion the sentence “The label shall clearly state that the product is not recommended for use below 4 to 6 months.” is unnecessary and should therefore be deleted. The previous sentence already requires the label to indicate the age at which the product should be used. Furthermore, the Section “Scope” clearly states the minimum age at which supplemental food can be introduced. Therefore this sentence is redundant and unnecessary.

The square brackets should be deleted and the whole paragraph should thus read:

“The label shall indicate clearly from which age the product is intended for use. In addition, the label shall include a statement indicating that the decision when precisely to begin complementary feeding 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.”

8.7 ADDITIONAL REQUIREMENTS

We recommend to delete the square brackets around [not], so that the sentence reads as follows:

“The products covered by this standard are not breast-milk substitutes and shall not be presented as such.”

AUSTRALIA

1. SCOPE

Australia supports the second option, being a modified version of that proposed by the World Health Organization (WHO), with an addition as follows:

This standard covers processed cereal-based foods intended for complementary feeding of infants generally from the age of 6 months onwards, or for feeding young children as part of their progressively diversified diet in accordance with the World Health Assembly resolution WHA54.2 (2001).

We believe that this option reflects the recommendations of the WHA resolution but also with the inclusion of ‘generally’ allows for individual variation in the nutritional requirements of infants. This also removes the need to include ‘or when upon the advice of an independent health worker it is required to satisfy their individual nutritional requirements’, which is more appropriately prescribed in labelling requirements. (See section 8.6.4).

2. DESCRIPTION

2.1.1 Australia is aware that products in this category may not only consist of cereals but also other ingredients like fruit, oil and sugar. Therefore we propose the following changed (bolded) text. This is also consistent with the wording used in section 2.

*2.1.1 Products consisting ~~only~~**primarily** of cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids.*

2.1.2 For consistency of language and approach with sections 2.1.1 and 2.1.3, we recommend amending this section to include the following **bolded text**:

*2.1.2 Cereals with an added high protein food which are or have to be reconstituted with water or other **appropriate** protein-free liquid.*

2.1.4 The numbering is incorrect as it reads 2.1.5.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

Australia is awaiting the outcomes of the Compositional Working Group (chaired by Malaysia). The review of sections 3.6 (minerals) and 3.7 (vitamins) should be undertaken in accordance with a risk-based approach also having regard to the Codex General Principles for the Addition of Essential Nutrients to Foods (CAC/GL 09-1987). Australia's recent review of the regulation of infant foods permitted restoration of vitamins and minerals found naturally in cereals but mandated the addition of iron to reduce risk of anaemia in second (and subsequent) years of life.

3.1 ESSENTIAL COMPOSITION

3.1.1 Australia does not believe the second sentence is necessary. The listed ingredients 'may' be included and are therefore not 'essential'. If however this sentence remains, we suggest also including milk powder as a non-cereal ingredient to accommodate products defined under section 2.1.2.

3.2 ENERGY DENSITY

There is a mistake as the energy density should not be less than **0.8 kcal/g (3.3 kJ/g)** instead of 0.8 kcal/100g (3.3 kJ/100g).

3.3 PROTEIN

3.3.1 This section refers to a reference protein, but does not define what the reference is. It is assumed that the Compositional Working Group will consider a suitable reference protein for inclusion in this section.

3.4 CARBOHYDRATES

3.4.2 There is a mistake in the calculation of the carbohydrate content in the first dash point. This point was discussed in 1999 (ALINORM 99/26, paragraph 63) and the carbohydrate level increased from 1.2 g to 2 g/100kJ. Although, this agreed level has been included in the draft standard with the value of 2 g given for 100kcal instead of 100kJ. This has then been divided by 4.18 to obtain the value per kJ (2/4.18 = 0.48). Thus the sentence should read:

*The amount of added carbohydrates shall not exceed **2.0 g/100kJ or 8.4 g/100kcal.***

- *the amount of added fructose shall not exceed **1.2 g/100kJ (5 g/100kcal).***

3.6 MINERALS

3.6.1 Australia supports the maximum levels for sodium as indicated and therefore supports deletion of the square brackets.

3.8 OPTIONAL INGREDIENTS

3.8.1 We support the deletion of 'four to six months' as this is unnecessary when assessed in the context of proposed scope of the standard, that is, any ingredient must suitable for infants aged over six months.

3.8.1 In addition to the ingredients listed under 3.1, other ingredients suitable for infants and young children can be used.

3.10 CONSISTENCY AND PARTICLE SIZE

- 3.10.1 Australia supports the removal of ‘spoon’ as it is not relevant to all foods regulated by the standard, eg. rusks.

8. LABELLING

Standard 2.9.2 - Foods for Infants from the *Australia New Zealand Food Standards Code* contains a number of labelling requirements which we believe could be included in the Codex Standard. These are:

- the labelling of honey as ‘sterilised’ to reflect section 3.8.2, which allows use of honey following processing to destroy *Clostridium botulinum*. For example, *where honey is used as an ingredient, the word ‘sterilised’ must be used in association with the word ‘honey’* ;
- the labelling of a food as ‘sweetened’ if the food has more than a certain level of added sugar. In Australia and New Zealand this level is 4g/100g. For example, *where the added sugars content of a food exceeds 4g/100g, the word ‘sweetened’ be included on the label*; and
- prohibiting labels from recommending that a food can be added to bottle feeds of infant or follow-up formula.

8.4 DECLARATION OF NUTRITIVE VALUE

- 8.4(a) The word ‘kilo’ is missing before ‘calories’

8.4 (a) For consistency of language, Australia suggests using the same reference to ‘food as consumed’ in all 3 sub-sections. For example, subsection 8.4 (a) expresses this as ‘**per specified quantity** of the food as suggested for consumption’ whereas 8.4 (b) says ‘as **according to the serving size** of the food as suggested for consumption.

8.4 (b) The reference to section 3.2.2 in section 8.4 (b) is incorrect as there is no section 3.2.2 in the standard. From the current standard (CODEX STAN 74-1981), section 3.2.2 refers to the general permission for the addition of vitamins, minerals and iodised salt in accordance with local legislation, which is obsolete in the proposed draft standard. This section should be revised following the outcome of the review of sections 3.6 and 3.7.

8.4 (c) It is unclear why the average quantity of only vitamins and minerals is required per 100g or 100ml of the product. Should this not apply to all subsections?

8.6 INFORMATION FOR UTILIZATION

8.6.3 Australia supports deleting this section as the general principles of the Codex General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1 –1985) requires cereals containing gluten to be declared and also the proposed scope of the standard is for infants over six months, which if adopted makes this requirement obsolete.

8.6.4 Australia supports inclusion of the bracketed text with an amendment to the recommended minimum age to reflect the WHA 54.2 resolution.

*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 to precisely to begin complementary feeding 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.*

8.7 ADDITIONAL REQUIREMENTS

Delete the square brackets around ‘not’ in this section.

BRAZIL

1. SCOPE

~~{This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of 6 months onwards, or when upon the advice of an independent health worker it is required to satisfy their individual nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).}~~

~~or:~~

{ This standard covers processed cereal-based foods intended for complementary feeding of infants from the age of 6 months onwards, or for feeding young children as part of their progressively diversified diet in accordance with the World Health Assembly resolution WHA54.2 (2001). }

- *To maintain the second option of the Scope.*

2.1. PRODUCT DEFINITIONS

Four categories are distinguished:

2.1.1 (...)

2.1.2 (...)

2.1.3 (...)

2.1.4 Rusks and biscuits which are to be used either directly or, after pulverization, with the addition of water, milk or other suitable liquids.

- *To renumber the item 2.1.5 to 2.1.4.*

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.2 ENERGY DENSITY

The energy density of cereal-based foods should not be less than 0.8 kcal/100g (3.3/kJ/100g).

- *To modify 100g to 1.0g*

3.3 PROTEIN

3.3.2 For products mentioned in points 2.1.2 and 2.1.4, the protein content shall not exceed 1.3 g/100 kJ (5.5 g/100 kcal){}

- *To remove the square brackets*

3.7 VITAMINS

3.7.1 The amount of vitamin B1 (thiamin) shall not be less than { 15µg/100 kJ } / { (60µg/100 kcal) }.

- *To delete the square brackets of the item.*

3.7.2 For products mentioned in 2.1.2, the amount of vitamin A and vitamin D expressed in µg/100 kcal shall be within the following limits:

Vitamin A (µg retinol equivalents) 60	180
Vitamin D 1	3

- *To add in the Table the equivalent values for KJ*

3.8 OPTIONAL INGREDIENTS

3.8.1 In addition to the ingredients listed under 3.1, other ingredients suitable for infants who are more than [four to six months of age] and for young children can be used.

- *To Include after than : “six months of age”, and to eliminate square brackets.*

3.8.2 Products containing honey or maple syrup should be processed in such a way as to destroy spores of *Clostridium botulinum*, if present.

- *To write in italic Clostridium botulinum.*

3.10 CONSISTENCY AND PARTICLE SIZE

3.10.1 When prepared according to the label directions for use, processed cereal-based foods should have a texture appropriate for the [spoon feeding] of infants or young children of the age for which the product is intended.

- To delete square brackets of " spoon feeding".

3.11 SPECIFIC PROHIBITION

The product and its components shall not have been treated by ionizing radiation.

- We suggest the inclusion of the specific item: "The product and theirs components must not contain GMOs".

Justification: The British Royal Society, in the report "Genetically modified plants for use and human health-an update", February 2002, points out special recomendations in the introduction of genetically modified foods on diet of specific and vulnerables groups such as infants, children, pregnant and lacting women. We quote as reference the Italian Government Law n.º 128/99 , which prohibits the presence of GMO in food directed to infant feeding.

8. LABELLING

8.2 Any indication required in the labelling should be made in the appropriate languages of the country in which the product is sold. †

- To delete and replace "language" by "languages". To eliminate square brackets and to maintain the item.

8.3 † The label shall have no pictures of infants or young children or text, which idealizes the use or suggests an inappropriate age of introduction of these products. †

- To delete the square brackets and to maintain the item 8.3.

8.6 INFORMATION FOR UTILIZATION

8.6.3 The presence or absence of gluten should be indicated on the label, if the intended age of use is below [six months] according to the national legislation.

- To eliminate "if the intended age of use is below [six months]", and to add after "label" the phrase "according to the national legislation"

[8.6.4 The label shall indicate clearly from which age the product is intended for use. The label shall not clearly state that the product is not recommended for use below 4 to 6 months. In addition, the label shall include a statement indicating that the decision when precisely to begin complementary feeding 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.]

- To substitute the second phrase of the first line for "The label shall not state that the product is recommended for use below 6 months".

- To delete the hole phrase "“ In addition (...) is sold”".

COLOMBIA

Scope

1. We support the second proposal. Young children should not be called "niño de corta edad". Instead the term "niño pequeño", which is defined in the text, is to be used throughout the translation. (This correction applies to the Spanish version only. Translator's note)

Description

1. We suggest to change the phrase "...que constituyen ,por lo menos' el 25%" by replacing the words "por lo menos" by the word "mínimo", which allows to limit the amount. (This correction applies to the Spanish version. Translator's note)
2. We also suggest to delete the word "primarily" so that the phrase now reads "from one or more ... cereals" and the scope is limited to cereal-based foods.
3. We think a proportion of 25 % is somewhat too low and suggest to express this percentage also in relation to the final product.

Essential composition

1. Section 3.4 Carbohydrates: The indicated amounts should be checked again, as they are too low, considering that these products are made from grain, which has a high carbohydrate content.
2. In the interest of a uniform and coherent presentation of composition Section 3.8 Optional ingredients should follow Section 3.1.
3. The square bracket in Section 3.8.1 should be deleted so that this part reads: "for infants of six months of age and for young children". This is in accordance with World Health Assembly Resolution 54.2.
4. We accept the wording including the expression in brackets. We therefore propose to delete the square brackets and keep the wording "for the spoon feeding of infants".

Labelling

1. Regarding Section 8.3 we propose to go further than specify that "The label shall have no pictures of infants or young children...", but refer to the observance of the International Code of Marketing of Breast-Milk Substitutes and the related resolutions adopted subsequently by the World Health Assembly, which cover this type of product.
2. In Section 8.2 The name of the food "... for infants" should be followed by "OF MORE THAN SIX MONTHS OF AGE" to avoid confusion, as the term "infants" per definition describes children aged up to 12 months and it is recommended that these products be consumed after six months of age.
3. Section 8.3 List of ingredients should include a reference to the use of genetically modified constituents.
4. In Section 8.4 Declaration of nutritive value, letter a), the words "as sold" are to be deleted as irrelevant. In addition, the calorific value should be stated per portion, as the consumer will find this easier to understand.
5. In letter c) of the same section the words "as sold" should be deleted as well.
6. In Section 8.5.1 the words "best before" must be clearly defined, i.e. the decision must not be left to the consumer, but it is up to the manufacturer to specify certain conditions. We therefore propose the following wording: "consume not later than ...date X" (specify date). Also, for greater clarification for the consumer the month must be given in letters; this aspect of labelling must not be optional.
7. As for Section 8.6.1, any direction for preparation or use must be given on the label. The statement "or on the accompanying leaflet" should be deleted. There is a possibility that potential consumers might not receive the leaflet, and the information is too important not to be listed.
8. It is important to disallow directions that can currently be found on the labels of many products stating that the product may be diluted as required by the consumer. Instead the manufacturer must provide clear specifications in accordance with the standards he sets for the dilution of his product.
9. Section 8.6.3 must become Section 8.3.3, as it reads: "The presence or absence of gluten should be indicated on the label". The second half of this sentence should be deleted, as it is recommended that the products in question be used as breast-milk substitutes from the age of six months.
10. In Section 8.6.4 the reference to 4 months of age is to be deleted and the label should now indicate that the product is not recommended for use below 6 months. This section should also state that the age for the use of this product is to be given on the main label.

11. As for Section 8.7, in accordance with the International Code of Marketing of Breast-Milk Substitutes processed cereal-based food for infants and young children are classified as breast-milk substitutes. Consequently, the word “not” in square brackets is superfluous.
12. It would be important to add an explanation of the term “breast-milk substitutes” to the definitions.

CUBA

4. FOOD ADDITIVES

Referring to additives we maintain the same expressed criteria as for foods for infants and young children, where we consider that additives in such type of foods should be kept at the minimal necessary level. The use of colouring additives should not be permitted in these foods.

CZECH REPUBLIC

1. SCOPE

In 2001 the WHO Expert Consulting Committee recommended "exclusive breastfeeding for 6 months, with introduction of complementary foods and continued breastfeeding thereafter."

The Expert Consulting Committee also recognised that some individual children might suffer from growth faltering or iron deficiency before 6 months and these children would need other foods.

We fully support this WHO position.

In the text of the Standard, there are two proposed wordings:

[This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of 6 months onwards, or when upon the advice of an independent health worker, it is required to satisfy their individual nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).]

or

[This standard covers processed cereal-based foods intended for complementary feeding of infants from the age of 6 months onwards, or for feeding young children as part of their progressively diversified diet in accordance with the World Health Assembly resolution WHA54.2 (2001).]

We strongly support the first proposal. This proposal respects the recommendation of the WHO Expert Consultation and protects the health of the infants, while leaving room for some flexibility for introducing a cereal at an earlier age, if and when deemed necessary by the health worker.

2. DESCRIPTION

The description presently reads:

“Processed cereal-based foods are prepared primarily from one or more milled cereals which constitute at least 25% of the final mixture on a dry weight basis.”

We agree to the requirement for 25% content of one or more milled cereals. However, some cereal products have other ingredients, such as milk, or protein-rich pulses, at greater levels than 25% and thus these products are not ‘*primarily*’ cereals. These cereals conform to the current Codex Standard (CODEX STAN 74-1991), but will not conform to this one. We strongly recommend the removal of the word ‘primarily’ from this description, so that the sentence reads:

“Processed cereal-based foods are prepared ~~primarily~~ from one or more milled cereals which constitute at least 25% of the final mixture on a dry weight basis.”

2.1 PRODUCT DEFINITIONS

2.1.1 “Products consisting only of cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids.”

This category also covers cereal products where fruits, oils, sugars, vitamins, minerals or other ingredients might be added. Thus we suggest the following wording:

2.1.1 “Products consisting ~~only~~ mainly of cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids.”

3.1 ESSENTIAL COMPOSITION

3.1.1 "Dry cereal, rusks, biscuits and pasta are prepared primarily from one or more milled cereal products such as wheat, rice, barley, oats, rye, maize, millet, sorghum, and buckwheat. It may also contain legumes (pulses), starchy roots (such as arrow root, yam or cassava) or starchy stems or oil seeds in smaller proportions.”

Here there is the same problem as is encountered in Section 2. DESCRIPTION, concerning the word ‘primarily’. Some products, specifically those containing milk or protein rich pulses and beans, may not conform to this composition. These products take advantage of locally produced crops, their nutritional quality is excellent and there is no reason to exclude them from this standard.

The following wording is suggested:

"Dry cereal, rusks, biscuits and pasta are prepared ~~primarily~~ from one or more milled cereal products such as wheat, rice, barley, oats, rye, maize, millet, sorghum, ~~and~~ buckwheat. ~~It may also contain~~ legumes (pulses), oil seeds. Starchy roots (such as arrow root, yam or cassava) or starchy stems *may also be used* in smaller proportions."

3.2 ENERGY DENSITY

The energy density should not be less than 0.8 kcal/g instead of 0.8 kcal/100g (editorial error).

3.3 PROTEIN

3.3.1 This section refers to a reference protein, but the reference is not defined. We support the use of casein as a reference and consider that it is useful to retain the possibility of using 70% of PER as a quality standard.

3.4 CARBOHYDRATES

3.4.1 We support the use of honey in infant cereals because honey is safe if treated as outlined in 3.8.2.

3.4.2 There is a mistake in the calculation of the carbohydrate content (first bullet). This point had been discussed in 1999 (ALINORM 99/26, paragraph 63) and as a result, the carbohydrate level has been modified and raised from 1.2 g to 2 g/100kJ. This level was mistranscribed in the draft Standard and the value of 2g is given for 100kcal instead of 100kJ and then divided by 4.18 to obtain the value per kJ (2 / 4.18 = 0.48).

Consequently the sentence should read:

"The amount of added carbohydrates shall not exceed 2.0 g/100 kJ or 8.4 g/100kcal.
-the amount of added fructose shall not exceed 1.2g/100kJ (5 g/100kcal)"

3.5 LIPIDS

We suggest introducing a sentence "No hydrogenated fats should be used". This is in accordance with our policy and all our formulations.

3.6 MINERALS

3.6.1 We support the levels of maximum 100 mg/100 kcal for sodium in ready-to-eat products for infants under 1 year of age. We support levels of 200 mg/100 kcal in products for older children. These levels are perfectly safe, so all square brackets should be deleted.

3.8 Optional Ingredients

3.8.1 Age to be aligned with Section 1. Scope.

3.8.3 We do not support any proposal that the age of introduction of cocoa be increased to greater than 9 months because of risk of allergy. Many ingredients can cause allergies, and some of the most serious and common allergens are found in milk and soy. If an infant has an allergy to cocoa, another flavour of cereal should be chosen.

4. FOOD ADDITIVES

The request for deletion of this entire Section, which would also mean that no flavours would be permitted, should be rejected. Some additives are necessary in the formulation of cereals. These additives have been widely used in such foods in many countries over a long period of time. Their risk evaluation has been extensive and there is no scientific or health reason to exclude reasonable use. All the proposed flavours have been evaluated for safety. The argument of allergic reactions is not to the point, because almost all ingredients can give, theoretically, allergic reactions. For children who are allergic to vanilla, for example, other varieties without vanilla are available.

8. LABELLING

The numbering of this section is incorrect.

8.3 “[*The label shall have no pictures of infants or young children or text, which idealises the use or suggests an inappropriate age of introduction of these products.*]

We strongly insist on deletion of this sentence. We are strongly against this wording. There is no basis for such provision and there is no evidence to suggest that photos/ cartoons or pictures of children on products for the older infant results in the reduction of breastfeeding. Pictures of children serve to identify the product and to illustrate the age group for which they are intended. The suggestion of an inappropriate age of introduction is forbidden under the Codex General Standard for the Labelling of Pre-packaged Foods (Codex STAN 1-1985 Rev 1-1991 Section 3.1.) which reads: "Pre-packaged 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".

8.4 DECLARATION OF NUTRITIVE VALUE

We recommend that the title reads "*Declaration of ~~nutritive~~ nutrition information*".

We recommend that the first sentence then reads:

"8.4.1 *The declaration of ~~nutrition information~~ nutritive value shall contain the following information in the following order*".

8.4 (a) The word "*kilo*" is missing is before "calories"

8.4 (b) The sentence presently reads "the total quantity...of each vitamin and mineral added...shall be declared per 100 g as well as according to the serving size of the food suggested for consumption".

The declaration per serving size should not be mandatory as this serving size varies from country to country and with the infant age. The words "*as well as*" should be replaced by "*and may be given*", so that the sentence should read as follows:

"the total quantity...of vitamin and mineral added...shall be declared per 100g *and may be given* according to the serving size of the food suggested for consumption".

We recommend to add the following new paragraph:

"**8.4.2** *Nutrition and health claims are permitted insofar as they are supported by relevant scientific data*".

8.6 INFORMATION FOR UTILISATION

8.6.4 is a critical paragraph and the whole of it is in square brackets. The second sentence of this paragraph "*The label shall clearly state that the product is not recommended for use below 4 to 6 months.*" is not necessary and should be removed. The previous sentence already requires labelling of the age at which the product should be used. In the Scope, as discussed above, the age of introduction is clearly stated. Therefore this sentence is redundant, and unnecessary.

The square brackets should be deleted and the whole paragraph should thus read:

"The label shall indicate clearly from which age the product is intended for use. In addition, the label shall include a statement indicating that the decision when precisely to begin complementary feeding 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."

8.7 The square brackets around [not] must obviously be deleted.

HUNGARY

ad 1. Scope

We support the first one of the alternatives.

ad 3.4.2.

We agree with the proposal of Germany written in CX/NFSDU 1/06 September 2001 page 24.

ad 3.5.

We agree with the proposal of Thailand concerning the limits for lauric and myristic acids. As concerns the ratio of linolenic acid to linoleic acid the addition of the following sentence is proposed: *"the amount of linolenic acid should be between 4 and 15 % of that of linoleic acid"*

ad 3.6.

We support the proposals of several countries to add a sentence: *"The sodium content of products should be as low as possible"*

ad 3.7.2.

The addition of vitamin A and vitamin D shall not be mandatory. We agree with the proposals of Norway and Canada and we support the addition of a sentence as follows:

"The addition of vitamins and minerals is not mandatory but if added the addition shall be in conformity with the legislation of the country in which the product is sold."

When this proposal is accepted the point 3.7.3. can be deleted.

ad 3.8.1.

Remove square brackets and reword to "six months".

ad 8.2. The name of food (8.1. in CX/NFSDU 01/06 page. 47)

We agree with the Canadian proposal and thus we support the addition of the following text:
„provided the food contains no less than 60 % cereal by weight as sold."

ad 8.4. Declaration of nutritive value (8.3.1. in CX/NFSDU 01/06 page. 48)

We consider the points written by representatives of European Community are acceptable.

ad 8.6.3.

The Hungarian Working Committee for CX/NFSDU repeatedly proposes the following sentences: *"The products intended for use below six months of age shall not contain gluten. The presence or absence of gluten should be indicated in the label all foods prepared for infants"*

NEW ZEALAND

1 SCOPE

New Zealand supports the second text in brackets, with one addition, that reads

*This standard covers processed cereal-based foods intended for complementary feeding of infants **generally** from the age of 6 months onwards, or for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).*

This text picks up on the issue that in certain circumstances it may be necessary to introduce infant foods at an earlier stage than 6 months but that this should be on the recommendations of an independent health worker. The information about the appropriate advice would be on the label as part of the labelling requirements.

2 DESCRIPTION

For consistency it is recommended that the word "suitable " is included so that the clause reads:

*Cereals with an added high protein food which are or have to be reconstituted with water or other **appropriate** protein-free liquid.*

2.1.5 Number should read 2.1.4.

3 ESSENTIAL COMPOSITION

3.2 Energy Density

The energy density should read not less than 0.8kcal/g not per 100g.

3.4 Carbohydrates

3.4.2 Should read *-the amount of added carbohydrate from these sources shall not exceed 2g/100 kJ (8.4 g/100 kcal).*

This appears to be a mistake in the calculation of the carbohydrate content.

In reviewing sections 3.6 and 3.7 New Zealand recommends taking a risk-based approach to establishing any minimum and maximum levels.

3.7 Vitamins

3.7.2 The limits for vitamin A and D should be expressed in kilo joules as well as kilo calories.

3.8 Optional Ingredients

3.8.1 Replace the wording in the square bracket with the following so that the text reads:

In addition to the ingredients listed under 3.1, other ingredients suitable for infants and for young children can be used.

No reference is needed to age as this is covered in the scope of the standard.

3.9 Quality Factors

3.9.1 Delete "including optional ingredients" as this will be covered under "all ingredients".

3.10 Consistency and Particle Size

3.10.1 New Zealand recommends removing the words "spoon feeding".

8 LABELLING

Standard 2.9.2 - Foods for Infants from the *Australia New Zealand Food Standards Code* contains a number of labelling requirements which we believe could be included in the Codex Standard. These are:

- the labelling of honey as 'sterilised' to reflect section 3.8.2, which allows use of honey following processing to destroy *Clostridium botulinum*. For example, *where honey is used as an ingredient, the word 'sterilised' must be used in association with the word 'honey'* ;

- the labelling of a food as 'sweetened' if the food has more than a certain level of added sugar. In Australia and New Zealand this level is 4g/100g. For example, *where the added sugars content of a food exceeds 4g/100g, the word 'sweetened' be included on the label*; and
- prohibiting labels from recommending that a food can be added to bottle feeds of infant or follow-up formula.

8.4

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 unless on the specific advice from an independent health care worker. In addition, the label shall include a statement indicating that the decision when precisely to begin complementary feeding 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.

8.6.4

New Zealand recommends deletion of this clause as the declaration of presence or absence of gluten is too problematic and the appropriate cereals will be listed in the ingredient list.

NIGERIA

Optional Ingredients

Section 3.8.1 We propose removal of bracket and sentence should read: "In addition to ingredients listed under section 3.1, other ingredients suitable for infants who are more than six(6) months of age and for young children can be used."

8. Labelling:

Section 8.3 The sentence should be modified to read: "Pictures of infants, young children or text when used on labels shall conform with the appropriate age of introduction of these products."

8.2 The name of the Food

The standard should not suggest names as is being currently reflected in the proposed draft. The sentence should read: "The name of the food shall be any appropriate designation indicating the true nature of the food in accordance with National legislation."

8.4 Declaration of Nutritional Value:

(a) 'calories (kcal)' should be corrected to kilocalories(kcal)

8.5 Date marketing and Storage Instructions:

The 'Date of manufacture' and 'Batch No' In addition should be added as these are required by some National Legislation including Nigeria.

8.6 Information for Utilization

8.6.4 '... not recommended for use below 4 to 6 months' to read '... not recommended for use below 6 months' because exclusive breastfeeding is required up to 6 months.

SLOVAK REPUBLIC

1. SCOPE

In 2001 the WHO Expert Consulting Committee recommended "exclusive breastfeeding for 6 months, with introduction of complementary foods and continued breastfeeding thereafter."

The Expert consulting Committee also recognised that some individual children might suffer from growth faltering or iron deficiency before 6 months and these children would need other foods.

We fully support this WHO position.

In the text of the Standard, there are two proposed wordings:

[This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of 6 months onwards, or when upon the advice of an independent health worker, it is required to satisfy their individual nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).]

or

[This standard covers processed cereal-based foods intended for complementary feeding of infants from the age of 6 months onwards, or for feeding young children as part of their progressively diversified diet in accordance with the World Health Assembly resolution WHA54.2 (2001).]

We strongly support the first proposal. This proposal respects the recommendation of the WHO Expert Consultation and protects the health of the infants, while leaving room for some flexibility for introducing a cereal at an earlier age, if and when deemed necessary by the health worker.

2. DESCRIPTION

The description presently reads:

"Processed cereal-based foods are prepared primarily from one or more milled cereals which constitute at least 25% of the final mixture on a dry weight basis".

We agree to the requirement for 25% content of one or more milled cereals. However, some cereal products have other ingredients, such as milk, or protein-rich pulses, at greater levels than 25% and thus these products are not '*primarily*' cereals. These cereals conform to the current Codex Standard (CODEX STAN 74-1991), but will not conform to this one. We strongly recommend the removal of the word 'primarily' from this description, so that the sentence reads :

"Processed cereal-based foods are prepared ~~primarily~~ from one or more milled cereals which constitute at least 25% of the final mixture on a dry weight basis".

2.1 PRODUCT DEFINITIONS

2.1.1 "Products consisting only of cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids".

This category also covers cereal products where fruits, oils, sugars, vitamins, minerals or other ingredients might be added. Thus we suggest the following wording:

2.1.1 "Products consisting ~~only~~ mainly of cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids".

3.1 ESSENTIAL COMPOSITION

3.1.1 "Dry cereal, rusks, biscuits and pasta are prepared primarily from one or more milled cereal products such as wheat, rice, barley, oats, rye, maize, millet, sorghum, and buckwheat. It may also contain legumes (pulses), starchy roots (such as arrow root, yam or cassava) or starchy stems or oil seeds in smaller proportions".

Here there is the same problem as is encountered in Section 2. DESCRIPTION, concerning the word '*primarily*'. Some products, specifically those containing milk or protein rich pulses and beans, may not conform to this composition. These products take advantage of locally produced crops, their nutritional quality is excellent and there is no reason to exclude them from this standard.

The following wording is suggested:

"Dry cereal, rusks, biscuits and pasta are prepared ~~primarily~~ from one or more milled cereal products such as wheat, rice, barley, oats, rye, maize, millet, sorghum, and buckwheat. ~~It may contain~~ legumes (pulses), oil seeds. Starchy roots (such as arrow root, yam or cassava) or starchy stems *may also be used* in smaller proportions".

3.2 ENERGY DENSITY

the energy density should not be less than 0,8 kcal/g instead of 0,8 kcal/100 g (editorial error).

3.3 PROTEIN

3.3.1 This section refers to a reference protein, but the reference is not defined. We support the use of casein as a reference and consider that it is useful to retain the possibility of using 70% of PER as a quality standard.

3.4 CARBOHYDRATES

3.4.1 We support the use of honey in infant cereals because honey is safe if treated as outlined in 3.8.2

3.4.2 There is a mistake in the calculation of the carbohydrate content (first bullet). This point had been discussed in 1999 (ALINORM 99/26, paragraph 63) and as a result, the carbohydrate level has been modified and raised from 1.2 g to 2 g/100kJ. This level was mistranscribed in the draft Standard and the value of 2 g is given for 100 kcal instead of 100 kJ and then divided by 4.18 to obtain the value per kJ ($2 / 4.18 = 0.48$).

Consequently the sentence should read:

"The amount of added carbohydrates shall not exceed 2.0 g/100 kJ or 8.4 g/100 kcal.
the amount of added fructose shall not exceed 1.2 g/100 kJ (5 g/100 kcal)"

3.5 LIPIDS

We suggest introducing a sentence "No hydrogenated fats should be used". This is in accordance with our policy and all our formulations.

3.6 MINERALS

3.6.1 We support the levels of maximum 100 mg/100 kcal for sodium in ready-to-eat products for infants under 1 year of age. We support levels of 200 mg/100 kcal in products for older children. These levels are perfectly safe, so all square brackets should be deleted.

3.8 Optional Ingredients

3.8.1 Age to be aligned with Section 1. Scope.

3.8.3 We do not support any proposal that the age of introduction of cocoa be increased to greater than 9 months because of risk of allergy. Many ingredients can cause allergies, and some of the most serious and common allergens are found in milk and soy. If an infant has an allergy to cocoa, another flavour of cereal should be chosen.

4. FOOD ADDITIVES

The request for deletion of this entire Section, which would also mean that no flavours would be permitted, should be rejected. Some additives are necessary in the formulation of cereals. These additives have been widely used in such foods in many countries over a long period of time. Their risk evaluation has been extensive and there is no scientific or health reason to exclude reasonable use. All the proposed flavours have been evaluated for safety. The argument of allergic reactions is not to the point, because almost all ingredients can give, theoretically, allergic reactions. For children who are allergic to vanilla, for example, other varieties without vanilla are available.

8. LABELLING

The numbering of this section is incorrect.

8.3 "[The label shall have no pictures of infants or young children or text, which idealises the use or suggests an inappropriate age introduction of these products.]

We strongly insist on deletion of this sentence. We are strongly against this wording. There is no basis for such provision and there is no evidence to suggest that photos/cartoons or pictures of children on products for the older infant results in the reduction of breastfeeding. Pictures of children serve to identify the product and to illustrate the age group for which they are intended.

The suggestion of an inappropriate age of introduction is forbidden under the Codex General Standard for the Labelling of Pre-packaged Foods (Codex STAN 1-1985 Rev 1-1991 Section 3.1.) which reads: "Pre-packaged 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".

8.4 DECLARATION OF NUTRITIVE VALUE

We recommend that the title reads "Declaration of ~~nutritive~~ nutrition information".

We recommend that the first sentence then reads:

"8.4.1 The declaration of ~~nutrition information~~ nutritive value shall contain the following information in the following order".

8.4 (a) The word "*kilo*" is missing before "calories"

8.4 (b) The sentence presently reads "the total quantity ... of each vitamin and mineral added ... shall be declared per 100 g as well as according to the serving size of the food suggested for consumption".

The declaration per serving size should not be mandatory as this serving size varies from country to country and with the infant age. The words "*as well as*" should be replaced by "*and may be given*", so that the sentence should read as follows:

"the total quantity ... of vitamin and mineral added ... shall be declared per 100 g *and may be given* according to the serving size of the food suggested for consumption".

We recommend to add the following new paragraph:

"8.4.2 Nutrition and health claims are permitted insofar as they are supported by relevant scientific data".

8.6 INFORMATION FOR UTILISATION

8.6.4 is a critical paragraph and the whole of it is in square brackets. The second sentence of this paragraph "*The label shall clearly state that the product is not recommended for use below 4 to 6 month.*" is not necessary and should be removed. The previous sentence already requires labelling of the age at which the product should be used. In the Scope, as discussed above, the age of introduction is clearly stated. Therefore this sentence is redundant, and unnecessary.

The square brackets should be deleted and the whole paragraph should thus read:

"The label shall indicate clearly from which age the products is intended for use. In addition, the label shall include a statement indicating that the decision when precisely to begin complementary feeding 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."

8.7 The square brackets around [not] must obviously be deleted.

SOUTH AFRICA

Scope

South Africa prefers option 2 that reads as follows:

"This standard covers processed cereal-based foods intended for complimentary feeding of infants from the age of 6 months onwards, or for feeding young children as part of their progressively diversified diet."

Essential composition

South Africa proposes that dietary fibre be limited to maximum 5g dietary fibre per 100g food.

AAC - ASSOCIATION DES AMIDONNERIES DE CÉRÉALES DE L'UE

The European Cereal Starch Industry (AAC) would like to draw your attention on a problem of translation in the English version versus the French version in the above-mentioned Draft revised Standard (Alinorm 03/26, p.55 and following) and to the corresponding current standard (Codex Stan 74-1981 amended in 1985, 1987, 1989, 1991).

The Section 4 actually reads in English:

- 4.5 Enzymes
- 4.5.1 Malt **carbohydrates** GMP

But in French:

- 4.5 Enzymes
- 4.5.1: **Carbohydrases** de malt BPF

The word "carbohydrates" in the English version is erroneous as it should have been "carbohydrases" as is the case in the French version and the Spanish version (that also correctly reads "carbohydrasas").

EUROPEAN COMMUNITY

1. SCOPE

The European Community supports the first proposed wording for the Scope of the standard, namely:

“This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of 6 months onwards, or when upon the advice of an independent health worker it is required to satisfy their individual nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).”

2.1 PRODUCT DEFINITIONS

There is a mistake in the numbering of the four categories. The final category should be 2.1.4 not 2.1.5.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

No comments are made at this stage as the section is under consideration by electronic Working Group coordinated by Malaysia.

4. FOOD ADDITIVES

No comments are made at this stage as the section is under consideration by the electronic Working Group coordinated by Switzerland.

8. LABELLING

During the 23rd session of the Committee there was insufficient time to discuss the whole of Section 8 concerning labelling. Therefore it was not possible to consider the comments previously made on this section so relevant comments are repeated.

8.4 DECLARATION OF NUTRITIVE VALUE

8.4.1

Paragraph 77 of the report of the 21st session states that section on the declaration of nutritive value (previously section 8.3 now section 8.4) was amended as proposed by the observer from the EC. The revised wording did not appear in the proposed draft revised standard appearing in Alinorm 99/26, Annex IV. The proposal, which was read and agreed by the Committee, was based on the EC comments (CX/NFSDU 98/6 – Add 2, page 6) and took into account the comments of other participants, in particular the text suggested by Canada. It also took into account the fact that customarily for solid food 100 g is a reference amount for nutrient declaration whilst for liquid food 100 ml is a reference amount.

The proposed text which has been accepted by the Committee should read as follows:

“8.4 DECLARATION OF NUTRITIVE VALUE

8.4.1 The declaration of nutrition information shall contain the following information in the following order:

- (a) the energy value, expressed in calories (kcal) or kilojoules (kJ), and the amount of protein, carbohydrate and fat expressed in grammes (g) per 100 g or 100 ml of the food as sold, and where appropriate, as per specified quantity of the food as suggested for consumption;
- (b) the average amount of each vitamin and mineral for which specific levels are defined in section 3.6 and 3.7 expressed in numerical form per 100 g or 100 ml of the food as sold and, where appropriate, as per specified quantity of the food as suggested for consumption;
- c) any other nutritional information required by national legislation.

8.4.2 The labelling may bear the average amount of the vitamins and minerals when their declaration is not covered by the provisions of section 8.3.1.(b) expressed in numerical form per 100 g or 100 ml of the product as sold and, where appropriate, per specified quantity of the food as suggested for consumption.”

8.6 INFORMATION FOR UTILIZATION

8.6.2

Section 2.1.1 defines a category of products as “... cereals which are or have to be reconstituted with milk or other appropriate nutritious liquids”. Section 8.6.1 states that “For products covered by 2.1.1, directions on the label shall state “Milk or formula but no water shall be used for dilution or mixing” or an equivalent statement.”. However “other appropriate nutritious liquids” might include liquids other than milk or formula. It is proposed that the wording of the section should be changed to:

“8.6.2 For products covered by 2.1.1, directions on the label shall state “Milk, formula or other nutritious liquids but no water should be used for dilution or mixing” or an equivalent statement.”.

8.6.3

The European Community agrees with the wording in square brackets. The square brackets should be deleted.

8.6.4

The EC proposes that the 2nd and 3rd sentences of the section read as follows (new wording is indicated by italics):

“The label shall clearly state that the product *is recommended for use from about 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.”

However, the use of the term “health worker” may require further consideration. For the Committee’s information the European Community legislation refers to “independent persons having qualifications in medicine, nutrition or pharmacy, or other professionals responsible for maternal and child care”.

8.7 ADDITIONAL REQUIREMENTS

The text as it stands is acceptable. The square brackets should be deleted. However, this section can hardly be justified by the content. It is suggested that this sentence should be moved to the Scope section.

Finally an editing comment, the numbering of the paragraphs of the draft standard is not consistent, in particular in relation to sections 6 to 8, the secretariat may wish to consider this when revising the draft.

ENCA - EUROPEAN NETWORK OF CHILDBIRTH ASSOCIATIONS

1. SCOPE

Remove the brackets on the second paragraph and delete first text.

The scope now reads:

"This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of six months onwards, or for feeding young children as part of their progressively diversified diet in accordance with the World Health Assembly resolution WHA 54.2 (2001).

This reflects the intent of the WHA Resolution 54.2 as a population recommendation and the recommendations adopted at the recent World Health Assembly meeting, (May 2002) where both the Global Strategy for infant and young child feeding and the WHA Resolution 55.25 were unanimously adopted.

The **Global Strategy for infant and young child feeding** says:

*Ensuring that all Codex Alimentarius standards and related texts dealing with foods for infants and young children are consistent with WHO policy concerning appropriate marketing and distribution, **recommended age of use**, and safe preparation and feeding, including as reflected in the International Code of Marketing of Breast-milk Substitutes and subsequent relevant Health Assembly resolutions*

The **WHA Resolution 55.25** says:

*REQUESTS the Codex Alimentarius Commission to continue to give full consideration, within the framework of its operational mandate, to action it might take to improve the quality standards of processed foods for infants and young children and to promote their safe and proper use **at an appropriate age**, including through adequate labelling, consistent with the policy of WHO, in particular the International Code of Marketing of Breast-milk Substitutes, resolution 54.2 and other relevant resolutions of the Health Assembly.*

A standard reflects policy recommendations.

Individual situations different from the recommended policy should be medically assessed and decided between the parents and the health care worker.

2. DESCRIPTION

Change "25 %" to a higher percentage.

- *A complementary food named "cereal-based" should have more than 25% cereal content.*
- *Such a low content would be misleading to parents.*
- *The degree of milling should be specified in the product description. Because nutritional benefits of cereal grains are lost when only the starchy endosperm and not the germ part of the cereal grain is included in the product.*

2.1.5 Rusk... should be renumbered 2.1.4

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Essential composition

Same comment as for 2.Description

3.2 Energy density

Add" of the ready to eat" product

WE DON'T UNDERSTAND THE GIVEN KCAL. IS THERE ANY TYPING MISTAKE??.

WE COMPARED TO MATURE HUMAN MILK WHERE 100 ML HAVE 70 KCAL. THE ENERGY DENSITY SHOULD NOT BE LESS THAN IN HUMAN MILK.

3.4 Carbohydrates

The sugar content should be lower.

ADDING THE PROPOSED AMOUNT TO THE ALREADY EXISTENT NATURAL SUGARS IN CEREALS CAN LEAD TO A SWEET TOOTH

3.5 Lipids

Add: "no hydrogenated fats containing trans fatty acids should be added to the products defined as cereal-based foods intended for infants and young children."

Trans fatty acids are unhealthy ingredients for infants and young children.

3.6 Minerals

3.6.1 The sodium content of complementary foods should be lower.

3.8 Optional ingredients

3.8.1 Delete "four to" and the brackets.

The proportion of other ingredients like vegetables, meat or fruit should be clearly labelled in order to avoid misleading the care-givers.

3.8.2 delete "if present"

Add the sentence:

Honey and maple syrup should only be used in products to be consumed after the age of 12 months

3.8.3 Change: "...after 9 months..." to "...after 12 months..."

Cocoa should only be introduced into the young child's diet as late as possible, at the very least after 12 months of age. (we are concerned by the theobromine content and the allergy potential)

1.5% m/m ??? typing mistake?? TO BE CORRECTED

3.10 Consistency and particle size

3.10.1 Delete brackets to include "spoon feeding". *Finger-feeding would be adequate too (2.1.3 and 2.1.4)*

Bottle feeding complementary foods is a harmful practice which undermines breastfeeding and should be discouraged.

Introduction of cereal based foods means a diversification of the diet and consist of a development milestone by introducing new eating methods and prepares for the transition to family foods

4. FOOD ADDITIVES

4.4 Delete reference to flavours.

These substances can cause allergic reactions

5. CONTAMINANTS

- 5.1 Reword to read: "are reduced to a maximum level of 0,01 mg/kg each in the ready to eat product.
- Last sentence: the published sentence does not exactly give the agreed sentence during the 23rd session Alinorm 03/26 para 114 change to read."These limits....

6. HYGIENE

6.1 Reword to read:

"The product covered by the provisions of this standard **shall** be prepared and handled in accordance with the appropriate sections of the Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1 1969, Rev.3, 1997), and other relevant Codex texts such as Codes of Hygienic Practice and Codes of Practice.

8. LABELLING

8.2 CHANGE LANGUAGE TO PLURAL TO REFLECT THE MULTILANGUAGE SITUATION IN MANY COUNTRIES

Remove the [] from 8.3 to read:

"The label shall have no pictures of infants or young children or text which idealizes the use or suggests an inappropriate age of introduction of these products."

Add the following text:

"No nutrition or health claims shall be made regarding the dietary properties of the products covered by the provisions of this standard."

This provision is in accordance with the *Proposed Draft Guidelines for Use of Nutrition and Health Claims, Scope 1.4*

Health claims are used to idealize the health and nutritional aspects of processed infant foods. Such claims are promotional and have a high potential for misleading consumers. Claims should not be permitted, in order to protect consumers from making infant feeding choices based on promotional claims.

Add the following text:

"The use of or the addition of genetically modified ingredients shall be clearly indicated on the label."

It is preferable that they not be permitted. If they are permitted then the above statement is needed.

8.3.1 add "outside" before label

8.6 Information for utilization

8.6.2 add breastmilk to the liquids to be mixed with 2.1.1

8.6.3 fullstop after " on the label" delete "if the intended age is below six months

8.6.4

- Remove square brackets. DELETE: "before 4 to 6 months" and change to read:" that the product is recommended for use after six months".
- Add the word "independent" before "health worker" to read: "in consultation with an independent health worker,"

8.6.5

Add 8.6.5

labels shall contain the following statement:"Important notice-for best child nutrition and health, breastfeeding should continue along with feeding complementary foods."

Parents should be warned that the introduction of complementary foods does not signal a need to stop breastfeeding. Breastmilk continues to be the most important source of nutrition. WHO and UNICEF policy encourage mothers to breastfeed for 2 years and beyond.

8.7 Additional Requirements

Delete brackets and add to read :...when introduced after six months and when breastfeeding is continued. Therefore we insist on having 8.6.5 added to the labels.

ISDI - INTERNATIONAL SPECIAL DIETARY FOODS INDUSTRIES

1. SCOPE

ISDI considers that Codex Standards should take into account nutritional requirements of worldwide countries which include health status and feeding recommendations and practices in developing **and** developed countries. Therefore ISDI believes the first proposal for the wording of the scope is the most appropriate to cover every individual's physiological and feeding differences in the world. This is in line with the full findings of the WHO Expert Consultation, as referenced in the WHA resolution 54.2.

ISDI also underlines that each country has the right to regulate the age of introduction of complementary feeding in a way that complies with its own legal and social framework as well as local nutritional and cultural patterns.

ISDI strongly supports the first option:

[This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of 6 months onwards, or when upon the advice of an independent health worker it is required to satisfy their individual nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with the World Health Assembly Resolution 54.2 (2001).]

2. DESCRIPTION

The word “primarily” should be removed since there are other very nutritive ingredients such as milk or pulses that can be used in these products.

The paragraph should then read:

“Processed cereal-based foods are prepared from one or more milled cereals, which should constitute at least 25% of the final mixture on a dry weight basis”

2.1. PRODUCT DEFINITIONS

2.1.1 In order to cover products consisting of mixtures of cereals with fruits or vegetables, the word “only” should be deleted. Moreover, the reconstitution of a product is only done with water, in order to be consistent with the remaining of the sentence, the word “reconstituted” should be replaced by “made-up”. This section should then read:

*“Products consisting ~~only~~ of cereals which are **to be consumed as such**, or have to be ~~reconstituted~~ **made up** with milk or other appropriate nutritious liquids;”*

2.1.2 ISDI proposes the following wording:

*“Cereals with an added high protein food which are **to be consumed as such**, or have to be reconstituted with water or other protein-free liquid;”*

2.1.5 should read **2.1.4**

4. FOOD ADDITIVES

ISDI is part of the ad hoc working group chaired by Switzerland in charged of reviewing additives provisions in cereal-based foods intended for infants and young children and has provided its comments on this matter to the Swiss delegation (ISDI Reference 02/081).

5. CONTAMINANTS**5.1. PESTICIDES RESIDUES**

ISDI agrees with the introduction of the last paragraph:

“The limit shall take into account the specific nature of the products concerned and the specific population group for which they are intended.

Last year the committee decided to retain a paragraph from the previous Draft revised Standard:

“The products covered by the provisions of this standard shall comply with those maximum residue levels established by the Codex Alimentarius Commission”

For some reason this paragraph was left out of the 2001 revision. ISDI believes that this was an error and that the paragraph adds value to the section 5.1. ISDI thus suggests to re-include it.

8. LABELLING

(current) 8.1 Because all labelling provisions in this Standard have to be endorsed by CCFL, CCNFSDU should formulate the labelling section as carefully as possible in order to avoid any refusal from the CCFL. ISDI therefore proposes to refer to CODEX STAN 146-1985 instead of CODEX STAN 1-1985.

Consequently, **ISDI proposes to change the first sentence as follows:**

“In addition to the requirements of the Codex General Standard for the Labelling and Claims for Prepackaged foods for special dietary uses (CODEX STAN. ~~1-1985~~ 146-1985) the following specific provisions apply: “

Rational: It is insufficient to refer to the General Standard for Labelling of Prepackaged Foods (CODEX STAN 1-1985) because Codex STAN 146-1985 contains a number of specific provisions, which apply to processed cereal-based foods. In addition, CODEX STAN 146-1985 refers back to the General Standard for Labelling (CODEX STAN 1-1985) where appropriate. Therefore, reference should be made to CODEX STAN 146-1985.

(current) 8.2 Should be deleted since this is adequately covered in section 8 of CODEX 146-1985 and in section 8.2 of the General Standard (CODEX STAN 1-1985).

(current) 8.3 Should be deleted. Efforts to introduce language into labelling standards that would ban the use of pictures of young children on processed cereal foods are unfounded. A picture of a young child on the label of processed cereal-based foods that are not being sold or marketed as a breast-milk substitute, cannot be seen as an impediment to breastfeeding. Rather, it visually communicates the intended age of the consumer of this product.

Moreover, marketing policy decisions are legitimately a matter of national sovereignty.

Finally, for a question of consistency in the numbering system of this sections and in accordance with comments above, ISDI suggest the following changes:

8. LABELLING

8.1 General Provisions

“In addition to the requirements...

8.2 The name of the food

8.4. DECLARATION OF NUTRITIVE VALUE

8.4 (a). The word "*kilo*" is missing before "calories"

8.4 (b). ISDI proposes to replace the wording "*as well as*" by "*and may be given*". The declaration per serving size should not be mandatory as this serving size varies with the infant's age and from country to country.

Moreover, *Section 3.2.2* should read *Section 3.7*

8.5 DATE MARKING AND STORAGE INSTRUCTIONS

8.5.3. 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. For simplification purpose, ISDI suggests deleting this Section

8.6 INFORMATION FOR UTILIZATION

8.6.2. Water is used in the reconstitution of infant formula, which is one of the nutritious liquids recommended for the cereals dilution, therefore ISDI requests the addition of the word "*alone*" after "*water*" and to reword the end of the section as follows:

*“ For products covered by 2.1.1, directions on the label shall state “Milk or formula but no water **alone** shall be used for the dilution or mixing” or **a similar appropriate statement**”*

8.6.3. Remove square brackets to read:

“The presence or absence of gluten should be indicated on the label if the intended age of use is below 6 months.”

8.6.4. ISDI believes that 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 reworded to ensure that the individual needs of all infants and young children are met. ISDI therefore proposes the following wording:

“[The label shall indicate clearly from which age the product is intended for use. In addition the label shall include a statement indicating that the decision when precisely to begin complementary feeding 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].”

WHO - WORLD HEALTH ORGANIZATION

1. SCOPE

It is recommended that the square brackets be removed from the first of the two possible paragraphs and that the first paragraph be slightly recast as follows:

This standard covers processed cereal-based foods intended for complementary feeding of infants from the age of 6 months onwards, or when, upon the advice of an independent health worker, complementary food is required to satisfy infants' nutritional requirements, and for feeding young children as part of a progressively diversified diet, in accordance with World Health Assembly resolution WHA54.2 (2001).

3.8 Optional ingredients

It is suggested that **paragraph 3.8.1** read: “In addition to the ingredients listed under 3.1, other ingredients suitable for infants who are more than **six months** of age and for young children can be used.

8. LABELLING

Concerning **paragraph 8.2**, since it is not unusual for there to be more than one “appropriate language” in a given environment, it is suggested that the text read “appropriate language(s)”.

Paragraph 8.3 is both ungrammatical and ambiguous in its present form. Assuming no substantive change in the wording and depending on the desired meaning, it could read one of two ways:

8.3 The label shall have no pictures of infants or young children, or text that idealizes the use of, or suggests an inappropriate age for the introduction of, these products.

8.3 The label shall have no pictures of infants or young children; nor any text that idealizes the use of, or suggests an inappropriate age for the introduction of, these products.

WHO prefers the second wording.

Concerning **paragraph 8.6.2**, in the interest of precision, it is suggested that the text read “Milk or **infant** formula ...”.

Concerning **paragraph 8.6.4**, it is suggested that the text read as follows:

The label shall state clearly that the product is not recommended for use below six months of age. The label shall also include a statement indicating that the decision when precisely to begin complementary feeding should be made in consultation with an independent health worker, based on the individual infant's 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.

Concerning **paragraph 8.7**, the square brackets around “not” should be removed.