

**26 September 2011**

**PROPOSED DRAFT STANDARD FOR  
PROCESSED CEREAL-BASED FOODS  
FOR INFANTS AND YOUNG CHILDREN  
CODEX STAN 074-1981, Rev-I 2006,**

**PART B FOR UNDERWEIGHT INFANTS AND YOUNG CHILDREN**

**ELECTRONIC WORKING GROUP, CONVENED BY INDIA**

**ISDI COMMENTS**

The International Special Dietary Foods Industries (ISDI) represents at Codex Alimentarius the manufacturers of special dietary foods and has been actively involved in the development of relevant Codex standards and guidelines. ISDI is especially interested in contributing to work that is related to nutrition products for infants and young children.

ISDI wishes to thank India for chairing the electronic working group and preparing the draft document on the "Proposed Draft Standard for Processed Cereal-Based Foods for Infants and Young Children (CODEX STAN 74-1981) - Part B for Underweight Infants and Young Children", and for the opportunity to share some of our comments.

**GENERAL COMMENTS**

ISDI recognises the initiative of India, and the work made by the delegation in addressing the issue of underweight and malnourished children.

However ISDI still questions how this new work will be complementary and not redundant with the current Standard for Processed Cereal Based Foods for Infants and Young Children?

In addition, the following elements raise concerns among ISDI members:





- The term underweight is currently not defined at Codex level. It is however an essential element of this work and has to be defined.
- ISDI agrees with India's argument that the children malnutrition is caused by multiple factors, including the delayed and inadequate complementary feeding. Complete intervention programs including educational interventions on the optimal feeding practices with products currently available on the markets and a close medical care and surveillance, in order to identify the best balance between palliative and preventive measures are necessary to solution this vast and multi-factorial malnutrition crisis.
- Underweight infants and young children have special dietary needs significantly different from normal, healthy infants and young children. This has been recognized in recommendations resulting from the Technical meetings that have taken place at the initiative of WHO (2008 and thereafter) on the management of moderate malnutrition, namely the Proposed recommended nutrient densities for moderately malnourished children (Food and Nutrition Bulletin, 2009). The "essential composition" part of section B should be based on these recommendations.

ISDI has noted, in respect with table 1 in this document, that Vitamins and Minerals are necessary and increased, whereas the protein recommendation is in line with section A.

ISDI will be happy to participate to the discussions around this topic and provide Codex with any relevant information and the expertise of our members.