



## International Special Dietary Foods Industries

20 May 2010

**New work to revise the Codex Guidelines on Formulated  
Supplementary Foods for Older Infants and Young Children  
(CAC/GL 08-1991)**

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. Within this context, ISDI expresses its interest in participating in the ongoing efforts led by the delegation of Ghana to review the *Codex Guidelines on Formulated Supplementary Foods for Older Infants and Young Children (CAC/GL 8-1991)*.

Following the call for comments by the Electronic Working Group, Chaired by Ghana, regarding the new work to revise the Codex Guidelines on Formulated Supplementary Foods for Older Infants and Young Children (CAC/GL 08-1991), ISDI would like to submit the following comments for the Electronic Working Group consideration.

### **Initial question: Comments requested on the Title:**

#### **a) Please comment on the proposed modification to the title below.**

ISDI considers that "*Specific formulated complementary foods*" would be more appropriate since the term "specific" highlights that these guidelines specifically apply to foods used during complementary feeding for which no specific Codex Standards are yet applicable.

#### **b) The term "Supplementary" will be replaced in the document by the term "Complementary"**

As above mentioned in the case of the title, ISDI more generally considers that the term complementary would be more appropriate since it defines clearly that other foods are being used.

### **Question 1: Comments requested on the Purpose (Section 1):**

#### **Please comment on the proposed modification to the purpose below.**

ISDI considers that products covered by these guidelines are:

- **nutritional products** providing not only the lacking micro/macronutrient but also energy. These foods are used as a complement at the weaning time when breast



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milk alone cannot cover anymore all the requirement (particularly energy) of the babies .

As they have to fulfil the very specific local needs, they have to be specifically formulated.

- **food fortificant** to be added to the home based food. In this case the energy is provided through the home based food when lacking nutrients are provided by the food fortificant.

### Question 2: Comments requested on the Scope (Section 2):

a) Please comment on the proposed modification (highlighted in yellow) to the scope below.

ISDI supports the reference to “*Specific formulated complementary food*” (cf. above rationale)

b) Are there any other changes needed in the scope?

ISDI would suggest adding the following text: “*The existing standards that apply to formulas and foods designed for older infants and young children are out of scope of these guidelines*”.

### Question 3: Comments requested on the Description (Section 3)

a) Please comment on the proposed modifications (highlighted in yellow) suggested for section 3 under description below.

ISDI suggest the following text: “*Specifically formulated food for older infants and young children are:*

- *Foods that are suitable for use during infant’s complementary feeding period and for feeding young children as a complement to breastfeeding, or to breast milk substitute. These foods provide those nutrients which either are lacking or are present in insufficient quantities in local diet*
- *Food fortificant that could be used to enrich home made food either with macro nutrient or with micronutrients which are lacking in the diet.*

*They are not suitable for use by infant under six months of age*”

b) Sub-sections 3.4 and 3.5 have been added. Are there any other additions or modifications needed?



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ISDI considers that paragraph 3.5 should be in line with the above suggestion.

### Question 4: Comments requested on the Suitable Raw Materials and Ingredients (Section 4)

a) Please comment on the proposed modifications (highlighted in yellow) and deletions suggested for section 4 under below.

#### 4.1.2.1:

ISDI suggests in 4.1.2.1. the addition of “soya” as another example. “including” to be replaced by “as” or the word “etc...” at the end of the sentence. Other pulses can be used when they are appropriate.

4.1.2.1 would then read:

*Pulses, **as** chick peas, lentils, peas, cow peas, mungo beans, green gram, kidney beans **and soya** are a source of protein (20-24%).*

#### Phytates:

ISDI would like to get clarification on phytates in the list in 4.1.1.1 and 4.1.2.3.

Do processing methods exist to remove them?

According to Lutter<sup>1</sup> (2003) “*Although methods for phytic acid degradation and removal are available, none has been tested in large-scale production*”.

#### 4.2.1:

ISDI recommends using the terms Milk and Milk products as in the Milk and Milk Products Codex Code of Hygienic Practice (CAC/RCP 57-2004) and adding text to allow for other dairy ingredients at the end of the paragraph. There are much more dairy ingredients that can be added than the three currently mentioned.

The text would then read:

*“**Milk and milk products** are considered beneficial to growth and can be added to complementary food. Dairy products can be added as dried skimmed milk, full fat milk, semi-skimmed milk solids, **or other dairy ingredients**”*

b) Sub-section 4.1.5.3 has been added. Are there any other additions or modifications needed?



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ISDI proposes this additional sentence for section 4.1.5.3 "*partially hydrogenated fats should not be used in specific formulated complementary food*"

### Question 5: Comments requested on the Technologies for and Effects of processing (Section 5)

a) Please comment on the proposed modifications (highlighted in yellow) and deletions suggested for section 5 below.

ISDI agrees with this modification.

#### b) Are there any other additions or modifications needed?

In order to secure quality of the end products, ISDI suggests introducing new paragraphs:

#### In section 5.1:

- "5.1.2. Destoning to remove all type of stones or foreign bodies
- "5.1.3 Magnet/metal detection: to remove metal pieces"

#### In 5.5.1.2:

In order to increase palatability and/or acceptance of these products, the extrusion cooking is used also in order to improve taste. As a consequence, a new bullet point to be added:

- "flavour development"

#### In 5.5.2.2:

Pre-digestion is also used to get a better consistency of the product to allow a higher nutrient density.

ISDI proposes to add at the end of the sentence "(higher nutrient density)".

### Question 6: Comments requested on the Formulation (Section 6)

a) Please comment on the proposed modifications (highlighted in yellow) and deletions suggested for section 6 below.

#### **6.1.2:**

The quantity given is only for children fed breast. How about the children not fed breast?

ISDI proposes to add "[... ] is considered a reasonable quantity which an older infant or young child fed breast milk **and milk substitute** [...]".

ISDI would like to get some clarification on the quantity recommended:



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Is it for complementary foods or for food fortificant? Does the quantity depend on the child's age, type of food (complete meals versus incomplete meals, main dish or dessert, and so forth)?

### 6.2.2:

ISDI would suggest the inclusion of a new sentence: "c. enzymatic hydrolysis of flours"

### 6.2.3:

ISDI would like to get clarification behind the high energy of food without any reference (as sold, as consumed?). ISDI considers that this needs further clarification and alignment with FAO/WHO recommendations.

### 6.4.2:

In order to be consistent with 6.4.3 and taking into account that adding all desired fats/oils is not always technically feasible, ISDI proposes the inclusion of: "**When adequate for the product**, the level of linoleic acid (in the form of glycerides) should not be less than 300 mg per 100 kcal or 1.4 g per 100 g of dry product and the ratio between linoleic acid and alpha-linolenic acid should be between 5:1 and 15:1"

### 6.4.3:

ISDI proposes to introduce the following changes:

"Where it is not feasible to include all of the desired fats and/or oils in the formulation of the food, the instructions for use on the label should recommend the addition of a specified quantity of fats and oils with appropriate essential fatty acid ratio (5:1 to 15:1) during the preparation of the feed".

### 6.5.2:

ISDI proposes the addition of the following text at the end of the sentence

"Flatulence sugars such raffinose, verbascose stachyose need to be reduced during processing"

### 6.6.3:

In order to reflect latest updates of Codex Documents, the text should read:

Vitamins and/or minerals should be selected from the Advisory Lists of ~~mineral salts and vitamin compounds~~ Nutrient Compounds for Use in Foods for Infants and Children (CAC/GL 10-1979- Rev 2008)

### 6.6.4:

ISDI suggests that the Nutrient Reference Values for older infants and young children are discussed as part of the "Proposed Draft Additional or Revised Nutrient Reference Values for Labelling Purposes in the Codex Guidelines on Nutrition Labelling" (ALINORM 10/33/26 - Appendix IV), which is currently discussed at CCNFSDU.

## Question 7: Comments requested on the Hygiene (Section 7)



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**a) Please comment on the proposed modifications (highlighted in yellow) and deletions suggested for section 7 below.**

### 7.3

ISDI suggests updating paragraph 7.3 in order to reflect the latest updates of Codex documents.

The paragraph would then read:

“The product shall be prepared, packed and held under sanitary conditions and should comply with the *It is recommended that the products covered by the provisions of this standard be prepared and handled in accordance with the appropriate sections of the Recommended International Code of Practice – General Principle of Hygiene (CAC/RCP 1 1969), and other relevant Codex texts such as Codes of Hygienic Practice and Codes of Practice. The product should comply with any microbiological criteria established in accordance with the Principles for the Establishment and application of microbiological Criteria for Foods (CAC/GL 21-1997)*”.

### Question 8: Comments requested on the Labelling (Section 9)

**a) Please comment on the proposed modifications (highlighted in yellow) and deletions suggested for section 6 under below.**

#### 9.2.3.b

For 9.2.3.b, due to the fact than linoleic and alpha-linoleic are not necessarily added at manufacturing level, labelling is not relevant in this case.

ISDI suggests the following addition *“the amounts of protein, carbohydrates and fat, and the amount of linoleic and alpha-linolenic acid **when relevant**, expressed in grammes”*

#### 9.2.4.5

ISDI supports the addition of a paragraph 9.2.4.5 as follows:

*“A statement that complementary food (except for fortificant) for infants and young children shall not be fed through bottles or any other words of similar meaning.”*

**b) Are there any other additions or modifications needed?**

In order to allow for nutrition (nutrient content) and nutrient function claims (a subset of health claims) so that caregivers can be informed about the nutritional quality of these products that are specifically designed to help meet the needs of a vulnerable population, ISDI would suggest the addition of a paragraph 9.1.1 as follows:

*“Taking into account paragraph 1.4 of the Guidelines for Use of Nutrition and Health*

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*Claims, nutrition and health claims may be permitted under national legislation for the foods that are the subject of the standard provided that they have been demonstrated in rigorous studies with adequate scientific standards.*

### **Question 9: Comments requested on the Annex**

**a) Please comment on the proposed modifications (highlighted in yellow) and deletions suggested for the Annex below.**

ISDI agrees with the proposed modifications.