



31 March 2008

**ISDI COMMENTS ON  
PROPOSED DRAFT CODE OF HYGIENIC PRACTICE FOR  
POWDERED FORMULAE FOR INFANTS AND YOUNG CHILDREN**  
Alinorm 08/31/13, Appendix II  
(At step 5/8 of the Procedure)

*Answer to Circular letter CL 2007/41-FH*

The Proposed Draft Code of Hygienic Practice for Powdered Formulae for Infants and Young Children has been moved forward to Step 8 by CCFH at its latest session and hence is now sent to the Codex Commission for final adoption.

ISDI has had the opportunity during the various CCFH sessions to actively contribute to updating this Code of Hygienic Practice that exists since 1969 with the current industry practices and **therefore fully supports its final adoption by the CAC in July 2008.**

Indeed, ISDI notes that in the current Draft Code of Hygienic Practice for Powdered Formulae,

- The Title as proposed better reflects the scope of the Standard,
- The Scope clearly indicates the products covered by this Code of Hygienic Practice:
  - Powdered Infant formula,
  - Powdered Follow-up formula,
  - Formula for special medical purposes intended for infants (sole source of nutrition),
  - Formula for special medical purposes for infants and young children (not sole source of nutrition),
  - Human milk fortifier,
- The Design and Facilities section, the Control of Operation section as well as the Maintenance and Sanitation section give clear guidance on the recommended hygienic measures to apply to produce safe powdered formulae for infants and young children,
- The Product information and Consumer Awareness section as well as the Training section are important additions to the Code which provide guidance on appropriate preparation, handling and use of powdered formulae for infants and young children:

- Through clear labelling of powdered formulae for infants and young children,
- Through a good education of caregivers,

This new guidance notably in the Education section (9.4) on preparation, handling and use will also help to minimize risk of contamination from environmental sources which present the potential for significant public health concern.

- The Annex I specifies Microbiological criteria for powdered infant formula, formula for special medical purposes and human milk fortifiers:
  - *E. sakazakii* and *Salmonella*,
  - Mesophilic Aerobic Bacteria and Enterobacteriaceae as process hygienic indicators,

**As a conclusion, ISDI fully supports the final adoption of the Proposed Draft Code of Hygienic Practice for Powdered Formulae for Infants and Young Children by the CAC in July 2008.**