

18 October 2019

# Discussion paper on General guidelines to establish nutrient profiles<sup>1</sup>

## CCNFSDU41: ISDI (CRD) comments on Agenda Item 12

ISDI thanks Costa Rica, the United States of America and Paraguay for the extensive work in preparation of the Discussion paper on General guidelines to establish nutrient profiles for food labelling.

**ISDI supports the general recommendation** of the discussion paper to “*Develop harmonised general guidelines for the establishment of nutritional profiles for use in packaging front labelling systems, in line with the current provisions of Codex and other scientific documents as needed.*”

However, in order to facilitate future discussion and ensure a relevant scope for this work, **ISDI would recommend clarifying a key exclusion criteria for this future work.**

Considering the introductory elements from the Discussion paper<sup>2</sup>, it is clear that nutrient profiles are established for pre-packaged general food, and that Foods for Special Dietary Uses<sup>3</sup> (FSDU) should be excluded, as they have to follow specific nutritional limits or references values.

FSDU are defined in the General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses (CODEX STAN 146-1985) in section 2.1 on Description. In that section, the footnote 1 also clearly identifies that FSDU include foods for infants and young children.

This would mean exclusion of the target population of 6-36 months, of Foods for Special Medical Purpose (FSMP) and any FSDU specially processed or formulated to satisfy particular dietary requirements where the specific nutrient profiles developed by a country would not be applicable to such products or to specific target populations.

For example, as other FSDU, the standardised products falling under Formula Foods for Use in Weight Control Diets (CODEX STAN 181-1991) should be excluded from the nutrient profiles. Potentially, products falling under the Codex Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CODEX STAN 118-1979) may not need to be excluded.

This would also be in line with the discussions and agreement at CCFL45 in the context of FOPNL.

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<sup>1</sup> For the background information, please refer to CX/NFSDU 19/41/12.

<sup>2</sup> See paragraph “The main uses of nutritional profiles are to: provide guidelines to establish nutritional and healthy declarations in pre-packaged foods, advise on raw materials and the choice of recipes by restaurants and food services, be a tool for the elaboration of the legislation of the school and institutional canteens, regulate food advertisements in different media, help the development of healthy eating guidelines, provide the basis for the preparation of the frontal nutritional labelling of pre-packaged foods (FOPNL), be input for reformulation of food in the industrial food sector, regulate the prepackaged food available in food vending machines, be the basis for the choice of food in social programs with food support, among many others” and footnote 3 of the Discussion paper.

<sup>3</sup> Codex Standard on General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses (CODEX STAN 146-1985), defines in section 2.1, Foods for Special Dietary Uses as those foods which are specially processed or formulated to satisfy particular dietary requirements which exist because of a particular physical or physiological condition and/or specific diseases and disorders and which are presented as such. The composition of these foodstuffs must differ significantly from the composition of ordinary foods of comparable nature, if such ordinary foods exist. This includes foods for infants and young children.