

Brussels, 20 August 2021

Review of the Standard for Follow-up Formula: draft product definition and nitrogen to protein conversion factors

ISDI response to CL 2021/54/OCS-NFSDU

ISDI welcomes the opportunity to comment on the Circular Letter and would like to thank New Zealand, France and Indonesia for leading the work in the eWG 2020 and preparing a comprehensive summary of discussions in the eWG and pulling together the outcome of CL 2021/03/OCS-NFSDU.

Recommendations from eWG

Recommendation 1
<p>OPTION 1: (accept text in the square brackets):</p> <p>Drink/product for young children with added nutrients or Drink for young children means a product manufactured for use as a liquid part of the diversified diet of young children [which may contribute to the nutritional needs of young children]¹</p> <p>¹ In some countries these products are regulated as breast-milk substitutes.</p> <p>or</p> <p>OPTION 2: (delete text in the square brackets):</p> <p>Drink/product for young children with added nutrients or Drink for young children means a product manufactured for use as a liquid part of the diversified diet of young children [which may contribute to the nutritional needs of young children]¹</p> <p>¹ In some countries these products are regulated as breast-milk substitutes.</p>

Note: That CCNFSDU will be invited agree to consider the EWG comments on the definition in addition to the responses to the CL and take a decision on whether the text in the square brackets within the definition be accepted (Option 1) or deleted (Option 2), and that the Committee should not consider additional options for modifying the text within the definition or an alternative definition.

ISDI position

ISDI is of the opinion that option 1 should be accepted. ISDI considers it is crucial CCNFSDU⁴² retains the sentence [which may contribute to the nutritional needs of young children] in the Product definition, section 2.1.1, concerning the role of the product. ISDI considers the product can help contribute or play a role in addressing young children's nutritional requirements when transitioning to a family-based diet.

A clear 'stand-alone' definition will allow:

- to clarify the meaning of the Standard and fulfill the requirements established in the Codex Procedural Manual concerning the purpose of the definition;
- to properly categorize the products for regulators and food business operators to ensure the correct application of the Standard; and
- to differentiate it from other beverages.

ISDI does not support option 2 as option 2 does not sufficiently define the product category or differentiate it from other beverages. The Standard is a technical document and the requirements relating to the definition set out in the Codex Procedural Manual must be fulfilled.

Recommendation 2

That the NCF of 6.25 is retained in the standard(s) for Follow-up Formula for older infants and 'Drink/Product for young children with added nutrients' and 'Drink for young children'.

ISDI position

ISDI agrees with recommendation 2 put forward by the eWG Chairs. The NCF of 6.25 should be retained in the Standard(s) for Follow-up Formula for older infants and 'Drink/Product for young children with added nutrients' and 'Drink for young children'.