

Brussels, 13 October 2021

Proposed draft principles for the establishment of NRVs for persons aged 6 – 36 months

ISDI response to CL 2021/56/OCS-NFSDU

ISDI welcomes the opportunity to comment on the Circular Letter and would like to thank Ireland, Costa Rica and the USA for leading the work in the eWG 2020 and preparing a comprehensive summary of discussions in the eWG.

Recommendations from eWG

Recommendation 1 – Approaches to derive DIRVs from WHO/FAO and 6 RASBs

The Chairs recommend that a three category ranking is used in the General Principles and that NRVs should be based on DIRVs derived using the most rigorous scientific methods. These methods, ranked in order of overall scientific rigor, are as follows:

1. Using physiological evidence for the target age group
2. Extrapolating up or down from DIRVs of other age groups
3. Estimates of nutrient intake of the target group; or interpolation

ISDI position

ISDI supports the recommendation of the eWG chairs regarding the approach to derive DIRVs from WHO/FAO and 6 RASBs.

Recommendation 2 – Establishing General Principles as a separate Annex

A separate Annex has been drafted by the eWG Chairs for consideration by the Committee (see Appendix II). The Chairs recommend that the Committee considers this draft text on General Principles for NRVs-R for persons aged 6 to 36 months and that it also considers whether the information contained should be integrated into Annex 1 or remain as a separate text.

ISDI position

ISDI recommends the principles relating to the establishment of NRVs-R for persons aged 6-36 months should not be integrated into Annex 1 but rather be included as Annex 2 in CXG 2-1985.

ISDI would like to seek clarification about some of the recommendations made by the eWG chairs as further explained in ISDI's answers to recommendations provided below.

Recommendation 3 – The application of different sets of NRVs for persons aged 6 to 36 months

The Chairs recommend that the application of different sets of NRVs for persons aged 6 to 36 months on a label needs to be referred to CCFL for their input as follows:

Having only one set of NRVs on a label is preferable to avoid confusion. This raises the following questions where the input of CCFL is required:

1. what criteria should be used to choose the most appropriate set of NRVs for a food
2. where in the main text of CXG 2-1985 should such criteria be placed.

ISDI position

ISDI is of the view that CCNFSDU should lead this discussion as products targeting this population are foods for

special dietary uses (FSDU) per Codex definition. Therefore, CCNFSDU would be the most appropriate Committee for this discussion, while CCFL could be consulted without delaying the progress of the work (noting that CCFL47 takes place in 2023, the text would then not be addressed until CCNFSDU44 in November 2023).

ISDI believes it is essential to establish science based NRVs separately for older infants and younger children. This would then consider their specific needs in the context of their different growth velocities.

ISDI also considers that the target population of a product should drive which set of NRVs is on the label:

- For products targeting OI, the OI set of NRVs;
- For products targeting YC, the YC set of NRVs;
- For products targeting both OI and YC (e.g. canned baby foods), there should be the flexibility of labelling with the most relevant set(s) of NRVs.

ISDI notes that there is a possibility for a third set of NRVs for the 6-36 months' age group (in particular for the same values in both sets of NRVs, these could be declared as one) but this will not be decided upon until the sets of NRVs for OI and YC are scientifically established and finalised.

ISDI also considers that these specific labelling considerations should be left to each appropriate Standard covering specific infant and young children categories. The principles currently established by Codex for labelling and nutrition labelling may be sufficient and competent authorities can ensure that products are labelled properly in line with the requirements and principles established by Codex.

Recommendation 4 – Purpose of NRVs-R for persons aged 6 to 36 months

The Chairs recommend that the NRVs-R established for labelling should also apply as reference criteria for vitamin and mineral composition, but not protein, in the Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991).

ISDI position

ISDI supports the approach proposed by the eWG chairs for vitamins and minerals as outlined in recommendation 4.

ISDI also seeks clarification regarding the exclusion of protein.

Recommendation 5 – Issues relevant to General Principles but outside current TORs

The Chairs recommend that the Committee consider issues relevant to the General Principles but that are outside the current ToRs:

1. Inclusion of sodium
2. the type of NRV (NRV-NCD or an NRV-R) for sodium and potassium
3. NRVs-R should be limited to labelling purposes in FSDU texts other than the Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991).

ISDI position

1. Inclusion of sodium

ISDI considers that NRVs for sodium for both older infants and young children should be established. Such reference values are important for all parts of the population and in particular for this specific and sensitive target population.

2. The type of NRV (NRV-NCD or an NRV-R) for sodium and potassium

ISDI questions if the discussions on NRVs NCDs are part of the TOR of the eWG and in the mandate and scope of

original work as agreed by the Codex Alimentarius Commission.

ISDI believes that for both Sodium and Potassium NRVs-R are appropriate as it is essential to ensure sufficient intake of these nutrients.

3. NRVs-R should be limited to labelling purposes in FSDU texts other than the Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991).

ISDI does not support the approach proposed by the eWG chairs, as it would overly restrict the usefulness of the NRVs-R once established and national authorities should be allowed to use these NRVs-R where relevant.