

International Baby Food Action Network (IBFAN)

Comment on the Proposed Draft Revised Standard for Processed Cereal-Based Foods for Infants and Young Children

Comment at step 3 of the procedure

1. SCOPE

Remove the brackets on the text below.

["This standard covers processed cereal-based foods intended for feeding infants as a complementary food from the age of six months onwards, or for feeding young children as part of their progressively diversified diet in accordance with the World Health Assembly resolution WHA 54.2 (2001)."]

The text as cited above adequately reflects the intent of the WHA Resolution 54.2 as a population recommendation. Individual situations cannot and need not be reflected in a standard. Any deviation from recommended policy is a medically indicated decision between the parent and the health care worker based on individual assessment.

The proposed draft standard should also be in conformity with the recommendations from the recent World Health Assembly meeting, May 2002 where both the Global Strategy for infant and young child feeding and the WHA Resolution 55.25 were unanimously adopted.

The **Global Strategy for infant and young child feeding A55.15** notes:

Ensuring that all Codex Alimentarius standards and related texts dealing with foods for infants and young children are consistent with WHO policy concerning appropriate marketing and distribution, recommended age of use, and safe preparation and feeding, including as reflected in the International Code of Marketing of Breast-milk Substitutes and subsequent relevant Health Assembly resolutions.

The **WHA Resolution 55.25** calls for:

REQUESTS the Codex Alimentarius Commission to continue to give full consideration, within the framework of its operational mandate, to action it might take to improve the quality standards of processed foods for infants and young children and to promote their safe and proper use at an appropriate age,

including through adequate labelling, consistent with the policy of WHO, in particular the International Code of Marketing of Breast-milk Substitutes, resolution 54.2 and other relevant resolutions of the Health Assembly.

2. DESCRIPTION

Change "25 %" to read "75%".

If a complementary food is named "cereal-based" it should have more than 25% cereal content. This would bring the description in agreement with the essential composition as defined in 3.1.1 which states pulses and starchy roots or oil seeds can be present in "smaller amounts". The amounts of the other ingredients can only be smaller if the amount of cereal required is higher.

Also if a product is labelled as a cereal food it would be misleading to parents to have only 25% of the product as cereal.

The degree of milling should be specified in the product description. A large part of the nutritional benefits of cereal grains are lost when only the starchy endosperm and not the germ part of the cereal grain is included in the product.

2.1 Product definitions

2.1.5

Change to 2.1.4

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Essential composition

3.1.1

Change to read:

Dry cereal, rusk, biscuit and pasta is prepared from one or more milled cereal grain such as wheat, rice, barley, oats, rye, maize, millet, sorghum and buckwheat to contain a minimum of 75% on a dry weight basis. It may also contain legumes (pulses), starchy roots (such as arrowroot, yam or cassava) or starchy stems or oil seeds in smaller proportions.

3.2 energy density

Change to read:

The energy density of cereal-based foods should not be less than the energy content of breastmilk (75kcal/100ml or 300kJ/100ml), which is being replaced when cereal foods are introduced. It should be a minimum of 300kcal/100g or 1200kJ/100g of dry weight of the product.

The energy density given in the standard is clearly an error.

3.3 Protein

3.3.1

Add: "The minimum content of the product protein shall be no less than 10% on a dry weight basis."

One has to assume that in many situations where animal milks are not available or not part of the local diet that cereal-based foods will be mixed with water.

The refinement of the cereal-based foods should be limited to retain the maximum protein content. This also ensures that other micronutrients are retained and not lost in the milling.

The inclusion of rusks, biscuits and pasta to the product description of this standard permits the cereal-based foods (pap) to be reduced to the nutritional minimum of these foods.

3.4 Carbohydrates

3.4.1 and 3.4.2

Delete: "honey"

The sugar content should be lower. It would be preferable to lower the maximum amount permitted.

3.4.2

Change to read:

- the amount of added carbohydrates from these sources shall not exceed 0.48gm/100 kJ(2.0 gm/100kcal)
- the amount of added fructose shall not exceed 0.24g/100kJ (1.25g/100kcal).

Fructose is more than twice as sweet as glucose and therefore the amount permitted should be less.

3.5 Lipids

Add: "no hydrogenated fats containing trans fatty acids should be added to the products defined as cereal-based foods intended for infants and young children."

Trans fatty acids are undesirable ingredients for infants and young children, which have been implicated in impairing the metabolic conversions of linolenic and linoleic acids to DHA and AA. These long chain essential fatty acids are critical in the cognitive, visual and neural development of infants and young children.

3.6 Minerals

3.6.1

Retain brackets.

The sodium content of complementary foods should be as low as possible. Research has shown that infants and young children may acquire a preferred taste for salty foods when fed salty foods during infancy and early childhood.

3.8 Optional ingredients

The “optional ingredients” permitted must be specified, meet Codex standards; have safe permissible minimum or maximum amounts and must be appropriately labelled.

A standard for infant and young child foods should not allow unspecified optional ingredients.

3.8.2

Change to read:

Honey and maple syrup should be processed in such a way as to destroy spores of *Clostridium botulinum*. (delete “if present”)

Add the sentences:

Honey and maple syrup should only be used in products to be consumed after the age of 12 months and at a maximum level of 1.5% in the dry product. Products containing maple syrup and honey must be labelled according to age of introduction.

3.8.3

Change to read:

"...after 9 months..." to "...after 12 months..."

Add the sentence:

Products containing cocoa must be labelled according to age of introduction.

Cocoa can cause allergic reactions and should be introduced into the young child's diet as late as possible, at the very least after 12 months of age.

3.9 Quality Factors

3.9.1

Change to read:

All **permissible** ingredients shall be clean, safe, suitable and of good quality.

3.10 Consistency and particle size

3.10.1

Delete brackets to include the phrase “spoon feeding”.

Bottle feeding complementary foods is a harmful practice which undermines breastfeeding and should be discouraged. Additionally, the introduction of cereal based foods and the progress to spoon feeding is a developmental milestone in the increasingly diversified diet of an infant.

4. FOOD ADDITIVES

4.4

Delete reference to flavours.

These substances can cause allergic reactions in children less than 12 months of age.

5. CONTAMINANTS

5.1

Reword to read:

"The product shall be prepared with special care under the good manufacturing practices, so that residues of those pesticides which may be required in the production, storage or processing of the raw materials or the finished food ingredient do not remain, or if technically unavoidable, do not exceed a maximum level of 0.01mg/kg for each substance in the product as sold."

This standard should have a stated maximum level for pesticides and not vague phrases such as the present text, "pesticides...are reduced to the maximum extent possible". There are 200 known pesticides found in baby foods. By stating the maximum allowable levels for each pesticide the cumulative pesticide load is unclear and may present a health hazard to babies and young children.

6. HYGIENE

6.1 Reword to read:

"The product covered by the provisions of this standard shall be prepared and handled in accordance with the appropriate sections of the Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1 1969, Rev.3, 1997), and other relevant Codex texts such as Codes of Hygienic Practice and Codes of Practice."

Stating that the product shall be manufactured in accordance with these Codes of practice is stronger than a recommendation that the product be made in accordance with them.

8. LABELLING

8.1

Change the numbering to: 8.1.1, 8.1.2, 8.1.3

8.2

Remove the end]

Pluralize the word "language".

*This residual end] is clearly an error.
Many countries have more than one language.*

8.3

Remove the [] from 8.3 to read:

"The label shall have no pictures of infants or young children or text which idealizes the use or suggests an inappropriate age of introduction of these products."

Add the following text as 8.4:

"No nutrition or health claims shall be made regarding the dietary properties of the products covered by the provisions of this standard."

*This provision is in accordance with the **Proposed Draft Guidelines for Use of Nutrition and Health Claims**, Scope 1.4*

Health claims are used to idealize the health and nutritional aspects of processed infant foods. Such claims are promotional and have a high potential for misleading consumers. Claims should not be permitted, in order to protect consumers from making infant feeding choices based on promotional claims.

Add the following text as 8.5:

"The use of or the addition of genetically modified ingredients shall be clearly indicated on the label."

It is preferable that they not be permitted. If they are permitted then the above statement is needed.

8.3 List of ingredients

8.3.1

Insert the words "outside panel".

A complete list of ingredients shall be declared on the outside panel of the label....

All vital information must be available to parents at point of purchase. They should not have to purchase a product in order to read the ingredients list.

8.6 Information for utilization

8.6.2

Delete: milk

Insert: Breastmilk

To read: ...the label shall state, Breastmilk or formula but no water shall be used for the dilution or mixing”.

8.6.3

Delete: “if the intended age of use is below [six months].”

To read: The presence or absence of gluten should be indicated on the label.

8.6.4

Remove square brackets.

The first sentence - change to read: The label shall indicate clearly that the age for use is after six months.

The second sentence - delete: "before 4 to 6 months", and insert: “not before six months”.

The third sentence - add the word “independent” before “health worker” to read: “in consultation with **an independent** health worker”.

8.6.5

Add 8.6.5

"labels shall contain the following statement: 'Important notice-for best child nutrition and health, breastfeeding should continue along with feeding complementary foods.'"

Parents should be warned that the introduction of complementary foods does not signal a need to stop breastfeeding. Breastmilk continues to be the most important source of nutrition. WHO and UNICEF policy encourage mothers to breastfeed for 2 years and beyond.

8.7 Additional requirements

Delete [] and change to read:

The products covered by this standard are not breastmilk substitutes and shall not be represented as such when introduced after six months and breastfeeding is continued.

When introduced prior to the age of six months, these products replace breastmilk as the recommended method of feeding for the first six months of life. When introduced prior to six months extra precautions are needed to safeguard infant health, growth and development and

must conform to the marketing requirements of the International Code of Marketing of Breast-milk Substitutes.

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