

IBFAN Report on the Codex Committee on Nutrition and Foods for Special Dietary Uses Berlin, Germany 26-30 November, 2001

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IBFAN Report

On the agenda at the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) were the two proposed draft standards that have been the focus of the IBFAN Codex Alimentarius Working Group:

- Proposed Draft Revised Standard for Infant Formula
- Proposed Draft Revised Standard for Processed Cereal-based Foods for Infants and Young Children

A number of key issues of primary interest to IBFAN's work in the protection of breastfeeding were brought to the attention of the representatives of Member States:

- Firstly the outcomes of the WHO's Expert Committee on the Recommended Duration of Exclusive Breastfeeding - for six months - needed to be integrated into the labelling provisions of the two proposed draft standards before the Committee.
- Secondly, IBFAN sought to have important provisions of the World Health Assembly Resolutions 54.2 incorporated into the two proposed draft standards.
- Thirdly, the inclusion of the prohibition on health claims, as are currently proposed in the Guidelines for Nutrition and Health Claims at Step 3 under consideration at the Codex Committee on Food Labelling (CCFL).
- Fourthly, other items proposed on the agenda of concern to IBFAN's mandate for the protection of breastfeeding and optimal infant health. On the agenda was a discussion paper prepared by Germany with the participation of Canada on the topic of infant formulas for special medical purposes. This document proposed 3 options;
 - Option A – revising the Standard for the Labelling of and Claims for Foods for Special Medical Purposes (FSMP) to include provisions for infant formulas for special medical purposes;
 - Option B – to exclude FSMP from the Standard for Infant Formula and

- Option C - one standard for all infant formulas that allows for the speciality formulas.
- IBFAN has consistently been opposed to the development of a separate infant formula standard as all artificially fed infants who need breast-milk substitutes must have the best possible protection against needless and inappropriate use. Any attempt to propose separate standards could be used to circumvent the protective provisions of the International Code of Marketing of Breastmilk Substitutes and subsequent, relevant Resolutions of the World Health Assembly. Also the standard as it is currently proposed has adequate flexibility to accommodate any compositional changes that might be need for special purposes. Any such changes in composition can readily be included in compositional labelling and a statement for the special medical purpose can be added, i.e. Infant Formula for PKU infants.

Additionally IBFAN sees this as an attempt by the industry to develop special formulas for various infant behaviours and feeding needs – e.g. formulas for spitting up, formulas for babies with low blood sugars, formulas for babies with allergies. Our concern is that health claims may be permitted to market these products, as there are attempts to exempt these from the provisions of the International Code.

- Lastly IBFAN also has considerable concerns regarding composition, additives and contaminants, and pesticide residues in standards developed for infant formulas and infant foods. However, to address all these additional concerns would require considerable financial inputs and expertise and is thus beyond the scope of our Codex work. Also it is not within our capacity to attempt to ‘repair’ the problems of artificial feeding but to focus on the protection of breastfeeding and optimal complementary feeding practices.

Proposed Draft Standard for Infant Formulas

- **Scope**
IBFANs position: retain all infant formulas under the scope rather than limiting it to formulas for healthy infants, by the deletion of the word healthy.
Outcome: Considerable debate about the word ‘healthy’ and the introduction of the Document prepared by Germany. The term ‘healthy’ was deleted from the text.
- **IBFANs position:** retain the International Code in the scope of the standard and the inclusion of Resolution 54.2
Outcome: Both the International Code and Resolution 54.2 were retained in the scope of the standard.

- **Product Definition**
IBFANs position: remove the words ‘to satisfy by itself’ the nutritional requirements of infants... from the text.
Outcome: The ‘to satisfy by itself’ was deleted but the EU added another sentence to confuse the definition. The entire definition remains in square brackets, meaning the final text is still to be decided.

- **Labelling**
IBFANs position: considerable improvements in the labelling provisions of this standard were needed:
 - A prohibition on nutrition and health claims.
 - Labelling to be in the appropriate language in the country in which the product is sold.
 - Important Notice: Breastmilk is the best food for your baby. It protects against diarrhea and other illnesses.
 - No pictures of infant or women or any other picture or text which idealizes the use of infant formula.
 - Labelling to avoid confusion between infant formulas and follow-on formulas.

- **Outcome:**
 - Labelling in the appropriate language is not yet in the draft text.
 - A prohibition on health claims is in square brackets in the draft text, meaning the final text is still to be decided.
 - The **Important Notice** followed by "*breastmilk is the best food for your baby. It protects against diarrhea and other illnesses*" remains in square brackets, meaning the final text is still to be decided.
 - A watered down version – Breastfeeding is the best food for your baby is given as an alternative and is in square brackets, meaning the final text is still to be decided.
 - The label shall have no pictures of infant or women or any other picture or text which idealizes the use of infant formula. The label shall have graphics illustrating the method of preparation of the product and methods of feeding. This text is now in the draft standard and represents a step forward in improving the labelling of infant formulas.

Proposed Draft revised Standard for Processed Cereal-based Foods for Infants and Young Children

- **Scope**
IBFANs position: To include the age of introduction of complementary foods to be consistent with the recommendations of the WHO Expert Consultation and Resolution 54.2 for wording that states, "for six

months".

Outcome: There was much discussion about the need for age of introduction in the scope. Two sets of wording are now in the scope, both in square brackets, meaning the final text is still to be decided. Much of the discussion centred on whether all infants should start at 6 months and what would be the exceptions such as formula fed infants, special medical reasons etc. Thus the EU and the producer countries – France, Germany, Switzerland wanted an or in the text to highlight exceptions to the 6 month position.

- **Description**

IBFANs position: As this is a standard for cereal-based food, the level of cereals required is only 25%, IBFAN proposal was to increase the compositional level to 75%.

Outcome: The text now includes "at least" ...one or more cereals should constitute at least 25% of the final mixture on a dry weight basis.

- **Other definitions**

IBFANs position: noted that Codex has a definition for the older infant to be 6 months to 12 months and that this would be the appropriate term to be used for this product.

Outcome: This was rejected and is clearly something we need to continue for the next meeting.

- **Essential Composition**

IBFANs position: Since roots and starchy roots and stems are less nutritious for infants and young children at a critical time of nutritional needs, thus these fillers should be minimized and the primary ingredient should be cereals.

Outcome: There were not any real improvement in increasing cereal content and reducing the content of less nutritious components.

- **Labelling**

IBFANs position: a number of labelling provisions for cereal-based complementary foods need to be in conformity with the *International Code*.

- The label shall have no pictures or text that idealizes the use of the product or suggests an inappropriate age of introduction.
- No health claims shall be made for the dietary properties of the products within the scope of this standard.
- The use of or the addition of genetically modified ingredients shall be clearly indicated on the label.
- The age of introduction to be **at 6 months**.

- And a statement to read:
"Important notice: For best child nutrition and health, breastfeeding should continue along with feeding of complementary foods."
- **Outcome:**
 - The provision: "The label shall have no pictures or text which idealizes the use of the product or suggests an inappropriate age of introduction" was inserted in square brackets, meaning the final text is still to be decided.
 - The remaining segments were mentioned in the report but were not incorporated into the text of the draft standard. The chairman claimed lack of time.

There was considerable resistance to changing the age of introduction to for 6 months.

The chairman cut off the debate before the provision on the age of introduction could be resolved, claiming that there was insufficient time to debate this segment.