

**CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL  
DIETARY USES**

**Forty fourth Session – Dresden, Germany  
2-6 October 2024**

**European Union comments on**

**Agenda item 4.1**

**NRVs-R FOR PERSONS AGED 6 – 36 MONTHS:  
DRAFT GENERAL PRINCIPLES FOR ESTABLISHING  
NUTRIENT REFERENCE VALUES (NRVs-R) FOR  
PERSONS AGED 6 TO 36 MONTHS)  
(CX/NFSU 24/44/4, Part A)**

*European Union Competence  
European Union Vote*

The European Union (EU) would like to thank Ireland, USA and Costa Rica for their work on document CX/NFSU 24/44/4, Part A.

The EU supports recommendation i.. The EU supports the definition of Adequate Intake derived from the FAO/WHO expert group updating the nutrient intake values for infants and young children for calcium, vitamin D, and zinc to be included in the revised General Principles, as described in Appendix I.

The EU does not support recommendation ii.. The EU prefers option 1, as for example, in the EU such a combined NRV-R value likely would be used for labelling of Processed Cereal Based Foods and Baby Foods. The majority of consumption of such products lies at the beginning of the age range and not at the end. Therefore, a value derived from option 1 would be more appropriate for this situation. Furthermore, in jurisdictions where labelling is provided per fixed quantities, e.g. per 100 g or ml, and not per portion, even if a lower quantity of a nutrient is contained per 100 g, after selecting either option 1 or 2, young children would consume higher amounts of this food, bigger portion sizes, due to higher energy requirements, and would therefore consume in absolute amounts also higher amounts of the nutrients as compared to older infants.

The EU does not support recommendation iii.. The EU considers that no clarification is needed on how these combined NRVs-R for persons aged 6–36 months should be used as the preamble of the *Draft general principles for establishing nutrient reference values for persons aged 6 to 36 months* already provide the needed explanations (emphasis added):

*[...] These values may be used in the labelling of pre-packaged foods for special dietary uses (FSDU) intended for persons aged 6–36 months to help consumers 1) estimate the relative contribution of individual products to overall healthful dietary intake, and 2) as one way to compare the nutrient content between products.*

*Governments are encouraged to use the NRVs-R, or alternatively, consider the suitability of the general principles below including the level of evidence required, and additional factors specific to a country or region in establishing their own NRVs-R. [...].”*

The EU considers that this text clarifies that governments can choose the appropriate NRV value for their national situation and legislative context, to “*help consumers 1) estimate the relative contribution of individual products to overall healthful dietary intake, and 2) as one way to compare the nutrient content between products.*” As the case may be, this could be the value for 6-12 months, for 12-36 months, or for 6-36 months. The EU supports, as highlighted in the contributions to previous EWG consultations, that text is added to CXG 2-1985 that clarifies that the use of NRVs-R for persons aged 6–36 (6-12 months, 12-36 months, 6-36 months) is limited to labelling of foods covered by

- the Standard for Processed Cereal-Based Foods for Infants and Young Children CXS 74-1981,
- the Standard for Canned Baby Foods CXS 73-1981\*,
- the Guidelines on Formulated Complementary Foods for Older Infants and Young Children CAC/GL 8-1991,
- the Standard for Follow-up Formula CXS 156-1987.