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**CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL
DIETARY USES
42nd Session**

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European Union Comments on

Agenda item 6

**GENERAL PRINCIPLES FOR THE ESTABLISHMENT AND USE OF NRVS-R FOR
PERSONS AGED 6–36 MONTHS (CX/NFSDU 21/42/7)**

*European Union Competence
European Union Vote*

This document provides specific comments from the European Union (EU) on each recommendation made by the eWG Chairs in document CX/NFSDU 121/42/7 and in addition to the questions in CL 2021/56/OCS-NFSDU.

1. Comments in reply to CX/NFSDU 21/42/7

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

The EU notes that the Draft Report Review of derivation methods for dietary intake reference values for older infants and young children, a dense 44 pages report, on which the proposed principles are based has been published only recently. The EU considers that the outcome of the report and the inclusion in the proposed Draft General Principles for Establishing Nutrient Reference Values for Persons aged 6 to 36 Months deserves more detailed discussions in an eWG. The EU considers that such changes in approach deserve a more detailed discussion and time for Codex Members and Codex Member Organizations to prepare for such discussions.

The EU is not convinced that there is a need to include a ranking method, as proposed, in the General Principles.

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.

The EU considers that Annex 1 to the Guidelines on Nutrition Labelling (CXG 2-1985) has been carefully discussed and agreed and such agreed text should be retained also for a possible draft Annex 2 and adaptations should be only proposed where needed to accommodate principles for persons aged 6 to 36 months. The EU has carefully checked Appendix II of CX/NFSDU 21/42/7 and found numerous changes to the text agreed in Annex 1 to the Guidelines on Nutrition Labelling (CXG 2-1985) that are not explained by adapting the agreed text to accommodate principles for details specific to persons aged 6 to 36 months. The EU does not support such unneeded and therefore unjustified proposed modifications. Furthermore, the EU considers that the agreed content of the new work comprises to work on NRVs-R for persons aged 6 to 36 months following the work program and that modifying the Annex: General principles for establishing nutrient reference values for the general population to the Guidelines on Nutrition Labelling (CXG 2-1985) is not part of this new work. The agreed Terms of Reference (ToR) for the work is to develop general principles to guide the establishment of NRVs-R for persons aged 6 to 36 months and not to work on modifying the Annex: General principles for establishing nutrient reference values for the general population to the Guidelines on Nutrition Labelling (CXG 2-1985).

The EU is of the view that the modifications, text deletions, changes and additions, which in some cases introduce new concepts need to be investigated in the frame of an eWG.

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

The EU considers that labelling options for foods for persons aged 6 to 36 months should be aligned with relevant regulatory frameworks, Codex Guidelines and Standards and support the labelling of products for this age group while no new product categories should be introduced. The EU does not see the need for developing criteria and therefore the need to refer questions to CCFL. Drink/product for young children with added nutrients or drink for young children targets young children and the NRVs-R for young children apply (12 to 36 months). Follow-up Formula for older infants targets older infants and can be consumed thereafter, the NRVs-R for older infants and young children apply (6 to 36 months). Processed Cereal-Based Foods for Infants and Young Children, Canned Baby Foods and Formulated Complementary Foods for Older Infants and Young Children target older infants and young

children and the NRVs-R combined for older infants and young children apply (6 months to 36 months). Each of the 3 sets of NRVs-R should include in the title and in an explanatory text the Codex texts to which they refer to. The EU does not consider it necessary to consult CCFL.

The EU is of the view that a single NRV-R for persons aged 6 to 36 months needs to be established, as detailed in para 115 and 116 of REP19/NFSDU: “The Committee also noted the view that it was important to have a single set of NRVs-R (6 – 36 months) in case the product was intended for both the age groups in order to avoid confusing consumers (by having two sets of values on a label).” And “The Committee agreed to decide on whether or not to combine the two sets of NRVs-R depending on the actual values of nutrient requirements and in the meantime add Recommendation 1c on a separate set of NRVs-R for older infants and young children combined” (underlining added). The Committee agreed that NRVs-R would be developed for three age groups as follows:

- From 6 months to not more than 12 months (from the day after 6 months to the day of first birthday)
- From 12 months to 36 months (from 1 day after first birthday to the day of the third birthday)
- From 6 months to 36 months (from the day after 6 months to the day of the third birthday).

These age groups will be included in the General Principles under the section ‘Defining the population groups’.

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).

The EU does not support to use NRVs-R for infants and young children as reference criteria for vitamin and mineral composition without proper review of the consequences of such modifications. In case the reference criteria for vitamin and mineral composition are modified, such work should be done by reflecting on the impacts that the modification of the Annex of the Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991) may have. The EU considers that revision of compositional criteria for the Guidelines on Formulated Complementary Foods for Older Infants and Young Children (CXG 8-1991) would therefore best be carried out as a separate project.

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)

The EU considers that the scope of the work has been discussed and agreed: to establish General principles for the establishment and use of NRVs-R for persons aged 6–36 months. Nutrients for which NRVs-R should be established were agreed. Sodium was not among the nutrients and should thus not be included in the list of nutrients. Furthermore, it was agreed to establish NRVs-R and not NRVs-NCD for persons aged 6–36 months.

As stated before, the EU supports the establishment of a list of NRV-Rs for persons aged 6–36 months for voluntary micronutrient declaration for the following Codex Standards and Guidelines:

- Processed Cereal-Based Foods for Infants and Young Children
- Canned Baby Foods
- Formulated Complementary Foods for Older Infants and Young Children
- Follow-up Formula (under review)

The EU considers that this issue is covered by the TORs (part B).