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

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European Union Comments on

Agenda item 6 - CL 2021/56/OCS-NFSDU

**PROPOSED DRAFT GENERAL PRINCIPLES FOR ESTABLISHING NUTRIENT
REFERENCE VALUES FOR PERSONS AGED 6 TO 36 MONTHS**

Comments are requested on:

- a) Whether the principles should be integrated into Annex I of The Guidelines on Nutrition Labelling (CXG 2 –1985) or remain as a separate text (Recommendation 2 in Appendix I of CX/NFSDU 21/42/7);
- b) Whether sodium should be included in the list of nutrients for the establishment of labelling NRVs and the type of NRV for sodium and potassium (i.e. NRV-R or NRV-NCD; Recommendation 5 in Appendix I of CX/NFSDU 21/42/7).

a) The EU considers that the agreed Codex text should not be modified but remain as it is. Therefore, the EU considers that a separate Annex should be created.

b) 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 or nutrients. Furthermore, it was agreed to establish NRVs-R and not NRVs-NCD for persons aged 6–36 months.

On the draft text, the EU has the following specific comments:

1. Preamble

The EU notes that the agreed, original text in the Annex of the Guidelines in Nutrition Labelling CAC/GL 2-19 should be retained where there is no need to accommodate the changed population group, persons aged 6 to 36 months. The EU proposes therefore a number of modifications:

“These Principles apply to the establishment of Codex Nutrient Reference Values (NRVs) for persons aged 6 to 36 months. These values ~~are~~ may be used for helping caregivers of persons aged 6 to 36 months ~~nutrient declaration in labelling according to Codex Guidelines CXG 2-1985 for pre-packaged foods. This labelling information may be helpful to caregivers of these individuals to:~~

- 1) estimate the relative contribution of individual products to overall healthful dietary intake of nutrients, and
- 2) as one way to compare the nutrient content between products.
- 3) ~~These values may also be useful for setting nutrient levels for Codex Standards/Guidelines.~~

The EU is of the view that the following paragraph needs to be retained in the proposed draft General Principles, modified to accommodate the age group 6 to 36 months:

~~“For example, at the national level, population weighted values for the general population may be established by weighting science-based reference values for daily intakes for age-sex groups using census data for a country and proportions of each age-sex group. In addition, governments may establish reference values for food labelling that take into account country or region specific factors that affect nutrient absorption, utilization, or requirements. Governments may also consider whether to establish separate food label reference values for specific segments of the age group 6 to 36 months general population.”~~

2. Definitions

In the section of definitions, the EU considers that the terms “older infant” and “young child” have been already defined at Codex level in different texts and should not be repeated. Furthermore, the EU proposes the following modifications:

Adequate Intake (AI) is *“A dietary recommendation used when there is not enough data to calculate an average requirement. An adequate intake is the average nutrient level consumed daily by a typical healthy population that is assumed to be adequate for the population's needs.”*

3. General Principles for Establishing NRVS

The proposed draft text under section 3. (“These principles are aligned with section 3 Annex: General Principles for Establishing NRVs for the General Population of these Guidelines, except that sections 3.1 – 3.4 have been modified to reflect the evidence base for nutrient needs of persons aged 6 to 36 months.”) needs to be discussed once section 3.1 to 4.4 have been agreed.

3.1 Selection of suitable data sources to establish NRVs

The EU notes that the agreed, original text in the Annex of the Guidelines in Nutrition Labelling CAC/GL 2-19 should be retained where there is no need to accommodate for the changed population group, persons aged 6 to 36 months. The EU proposes therefore a number of modifications. The EU is particularly worried that the proposed changes to the original text abolishes an agreed principle without clarifying or highlighting this change and the motivation leading to this change in an accompanying and explanatory text in order to enable an informed discussion: that the values provided by FAO/WHO are the primary source. Furthermore, the text defines FAO/WHO as one of the RASBs, while the EU understands that in the original text, FAO/WHO are considered as the primary sources of values, and only in case no recent values are available from FAO/WHO, data from RASBs could also be considered. The proposed new text places values provided by RASBs on an equal footing

with values provided by FAO/WHO, to which the EU disagrees. The EU proposed therefore the following modification to retain the agreed, original principle:

“Relevant ~~and recent~~ daily ~~nutrient~~ intake reference values provided by FAO/WHO that are based on a recent review of the science should be taken into consideration as ~~one of the~~ primary sources in establishing NRVs.

Relevant ~~and recent~~ daily intake reference values (~~DIRVs~~) that reflect recent independent review of the science, from recognized authoritative scientific bodies (~~RASBs~~) ~~other than FAO/WHO~~ could also be taken into consideration. Higher priority should be given to values in which the evidence has been evaluated through a systematic review.

The daily intake reference values (~~DIRVs~~) should reflect intake recommendations for persons aged 6 to 36 months older infants and/or young children.’ “

3.2 Appropriate Basis for Establishing NRVs

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. However, aligned with the agreed, original text in the Annex of the Guidelines in Nutrition Labelling CAC/GL 2-19, in case there are no and recent daily nutrient intake reference values provided by FAO/WHO, values that have been recently established by recognized authoritative scientific bodies could be reviewed on a case-by-case basis. The EU considers that including aspects of scientific rigor into the General Principles as well could be helpful, as well as quality of the underlying evidence and overall strength of the evidence, but is not convinced that the proposed table is the most helpful tool, while also noting that the time available to scrutinise the approach was too limited to come to a final judgement.

The EU considers that a combined set of NRVs-R for both older infants and young children combined needs to be established and the relevant text in the General Principles should be adapted accordingly throughout the text.

3.2.2 Selection and Priority of Derivation Methods for Establishing NRVs-NCD

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. It was agreed to establish NRVs-R and not NRVs-NCD for persons aged 6–36 months. Therefore, the EU considers section 3.2.2 to be obsolete and does not provide detailed comments.

3.3 Consideration of Upper Levels of Intake

With regard to the draft section 3.3, the EU notes that the agreed, original text agreed in the Annex of the Guidelines in Nutrition Labelling CAC/GL 2-19 should be retained where there is no need to accommodate for the changed population group, persons aged 6 to 36 months and proposes the following text changes:

“3.3 Consideration of Daily Intake Reference Values for Upper Levels of Intake

The establishment of NRVs for persons aged 6 to 36 months should also take into account daily intake reference values for upper levels ~~of intake (UL)~~ established by FAO/WHO or ~~other recognized authoritative scientific bodies (RASBs)~~ where applicable (e.g. Upper Level of Intake, Acceptable Macronutrient Distribution Range).“