

COMMENTS ON CL 2022/57/OCS-NFSDU
DRAFT GUIDELINES FOR RUTF. STEP 8

BRAZIL. September 2022

Brazil appreciates the excellent work made by South Africa, Senegal and Uganda and the efforts made by CCNFSDU to reach a consensus and forward the Guidelines for Ready-to-Use Therapeutic Foods to CAC45 for adoption at Step 8.

Brazil has no objection to the text agreed by CCNFSDU at its last session (42a session: 19 – 25 November 2021) and in the spirit compromise agrees with it. Nevertheless, Brazil would like to highlight some important issues to be considered by the Committee in the future.

Preamble

Brazil acknowledges the consensus reached by CCNFSDU on the revised and simplified text to clearly take into account concepts such as: the promotion of continuation of breastfeeding, transition to nutritious family food; psycho-social support for recovery; the use of locally based foods; RUTF is not for general retail sale.

We understand that the text covers the main issues of concern raised by members. Nevertheless, we would like to emphasize that an appropriately designed programme should support continuation of breastfeeding, training re-lactation and appropriate transition to nutritious family food and psycho-social support for recovery. Furthermore, the use of RUTF should not preclude other more culturally appropriate dietary options including the use of nutrient dense, family-based local foods.

Section 5.2.1 - Carbohydrates

Brazil would like to recall the discussion that took place at the 39^a session of CCNFSDU (2017) when the Representative of WHO mentioned that there were clear recommendations to reduce the consumption of sugars and understanding that it may be possible to further reduce the content of sugars with future technological advances, clearer relevant language could be included in the guideline to address this issue. At the same session, the Representative of UNICEF explained that sugar was normally added to RUTF to enhance palatability of the product, and for technological reasons to act as a filler and a binder and extend the shelf-life. It was currently only possible to reduce sugar by 5%, but in future, with technological advances, sugar might be further reduced (para. 117 – 118 REP18/NFSDU).

Brazil is aware of the issues raised by UNICEF regarding the challenges to limit the addition of free sugars to less than 20% of the energy in the product. On the other hand, reducing the quantity of free sugars used in RUTF at the minimum level possible shall be a goal to be achieved. Considering that further efforts were being made by the suppliers of RUTF to explore the possibilities of lowering the contents of free sugars, Brazil is of the opinion that free sugars should be limited and should not exceed **10%** of total energy.