

## ENCA comment

### STANDARD FOR FOLLOW-UP FORMULA FOR OLDER INFANTS AND PRODUCT FOR YOUNG CHILDREN\* (For adoption at Step 5/8 and 8)

ENCA is of the opinion that the Standard is not ready for adoption at Step 5/8 and 8. ENCA's recommended text and comment is in red;

#### Name of the product for young children

**ENCA proposes to retain the two names: Product for Young Children or Drink for Young Children and to delete the subsidiary names through the text of the standard.**

**Rationale:** Allowing secondary, subsidiary names is unnecessary and will confuse legislators, especially when the names include the claim '*with added nutrients*'. This is a misleading and highly promotional claim that will imply that the product contains nutrients in addition to the mandatory ingredients. Such a claim should not be allowed in any Codex Standard.

#### PREAMBLE

ENCA Proposes the following inclusions to strengthen the preamble.

This Standard is divided into two sections. Section A refers to Follow-up Formula for Older Infants, and Section B deals with Drink for Young Children. **DELETE: -with Added Nutrients,-or Product for Young Children-DELETE-with Added Nutrient.**

The application of this Standard **should be consistent** with national/regional health and nutrition policies and relevant national/regional legislation **and be in conformity with** the International Code of Marketing of Breast-milk Substitutes as per the national/regional context **and** World Health Organization (WHO) guidelines and policies **and** World Health Assembly (WHA) resolutions, **that** were considered in the development of this Standard and ~~may~~ provide further guidance to countries.

**These products are not considered nutritionally necessary in the diets of older infants and young children and their marketing should not undermine breastfeeding.**

**Rationale:** The test will ensure consistency with relevant WHA Resolutions and WHA 39.28 that in Para 3.2 "*requested the Director General to specifically direct the attention of Member States and other interested parties to the following (b) the practice being introduced in some countries of providing infants with specially formulated milks (so-called "follow-up milks") is not necessary*".

#### SECTION B SCOPE – **Product for young children**

To ensure consistency with the Standard for Infant Formula and SMPs ENCA proposes **ADDING** the following text as a new para 1.4 to both sections A and B.

1.4 The application of this section of the Standard shall conform to the recommendations made in the International Code of Marketing of Breast-milk Substitutes (1981), and subsequent relevant World Health Assembly (WHA) resolutions.

#### 4. Food Additives Section B

ENCA proposes the deletion of the following text relating to Flavourings.

#### 4.6 Flavourings <sup>15)</sup>

~~Natural Fruit Extracts: GMP~~

~~Vanilla extract: GMP~~

~~Ethyl vanillin (JECFA no. 893): 5 mg/100 ml~~

~~Vanillin (JECFA no. 889): 5 mg/ 100 ml~~

~~The flavourings used in products covered by this Standard should comply with the Guidelines for the Use of Flavourings (CXG 66-2008).~~

<sup>15)</sup> National and/or regional authorities may restrict or prohibit the use of ~~the listed~~ flavourings

**Rationale:** Flavourings, fruit extracts, vanilla extracts etc. should NOT be permitted for this product, Flavourings will promote the needless use of these products and develop taste preferences at an early age for flavoured, sweetened products – especially if the labels are idealized with images of fresh fruits. Such images will act as a health claim.

#### 8.5 Information for Use (SECTIONS A and B)

8.5.1 *Ready to use products in liquid form should be used directly. Concentrated liquid products and powdered products must be prepared with potable water that is safe or has been rendered safe by previous boiling before feeding, according to directions for use. Adequate directions for the appropriate preparation and handling should be in accordance with Good Hygienic Practice.*

**ENCA PROPOSES TO ADD to both A and B the following text which aligns with WHO/FAO recommendations for the reconstitution of powdered infant formula products.**

**Preparation instructions for powdered products must state clearly that the product is not sterile and must be reconstituted with safe water at 70 degrees centigrade,**

ADD the following references as a footnote:

*WHO/FAO (2007) guidelines, "Safe preparation, storage and handling of powdered infant formula. ([http://apps.who.int/iris/bitstream/handle/10665/43659/9789241595414\\_eng.pdf?sequence=1](http://apps.who.int/iris/bitstream/handle/10665/43659/9789241595414_eng.pdf?sequence=1))*

*WHA resolutions WHA 58.32 (2005) and 61.20 (2008)*

*Codex Alimentarius 'Code of hygienic practice for powdered formulae for infants and young children (2008),*

## Additional Labelling Requirements

### ENCA proposes the following changes in Sections A and B

8.6.2 Labels should not ~~discourage~~ **UNDERMINE** breastfeeding. Each container label shall have a clear, conspicuous and easily readable message which includes the following points:

8.6.4 Follow-up formula for older infants shall be distinctly labelled in such a way as to avoid any risk of confusion with Infant formula, Drink for young children ~~with added nutrients or~~ Product for young children ~~with added nutrients or Drink for young children or Product for young children, and~~ or Formula for Special Medical Purposes intended for infants, in particular as to the text, images and colours used, to enable consumers to make a clear distinction between them. **Cross promotion between product categories is not permitted.**

8.6.5 The labelling of follow-up formula for older infants shall not **RESEMBLE** ~~refer to~~ Infant formula, Drink for young children ~~with added nutrients or~~ Product for young children ~~with added nutrients or Drink for young children or Product for young children,~~ or Formula for special medical purposes intended for infants, including numbers, text, statements, or images of these products.

**Rationale:** Cross-promotion is a misleading and pervasive marketing practice that promotes needless use and undermines healthy feeding practices for infants and young children.

#### Additional Safeguards:

**ENCA strongly recommends the inclusion of a text prohibiting the use of genetically modified ingredients in these products.**

**ENCA recommends that the Standard is not adopted at step5/8 until CCMAS determines the outstanding issue of the measurement of sweetness of these products.**