



DG SANCO CONSULTATION ON A PROPOSAL TO RECAST COMMISSION DIRECTIVE 91/321 ON INFANT FORMULAE AND FOLLOW-ON FORMULAE

EDA comments on the conversion factor for the calculation of the protein content

The protein content of foodstuffs is commonly done by analysis of total nitrogen according to reference method of Kjeldahl. Total nitrogen is the sum of that derived from amino acids, which generally represent the vast majority, and that from non-protein nitrogen (NPN) sources, generally minor in quantity, existing in the foodstuff. Total nitrogen derived from the analysis is converted into protein by multiplying by a factor that takes into account the nitrogen content of a known or average amino acid composition. In the case of milk and milk products, a conversion factor of 6.38, based on a total nitrogen content of 15.67%, is being applied and has been widely accepted and used in national and EU regulations for decades, mainly in relation to mandatory compositional criteria for milk protein content, in relation to milk payment to farmers or in the price-setting of dairy products traded at the national and international market. As milk contains minor sources of NPN, the true protein content of milk is actually given by the following calculation: total nitrogen minus NPN, multiplied by factor 6.38.

However, further to the recommendation of the EU Scientific Committee for Foodstuffs (May 2003) to apply, for simplification reasons, a universal conversion factor of 6.25 x nitrogen as determined by the Kjeldahl method for the calculation of all proteins as essential requirements of infant formulae and follow-on formulae, your services are currently considering to propose to change the established 6.38 conversion factor for milk within the framework of the revision of the Directive 91/321/EC on infant foods and follow-on formulae.

EDA, representing the entire European dairy industry, would herewith like to express its deep concern about such possible development:

Adopting a universal factor of 6.25 would obviously result in a serious underestimation of the actual protein content of milk, and a serious overestimation of the protein content of proteins from vegetable sources. It would thus not reflect the accurate composition of products and their actual nutrient content. It indeed would fail to recognize the nutritional quality of cow's milk over other proteins and will require manufacturers of infant foods to add additional 2 up to 3% protein to their formulae as to comply with the required minimum protein content.

EDA supports the retention of the difference between the two categories of proteins and their respective conversion factors of 6.38 for milk protein and 6.25 for vegetable protein.