EUROPEAN COMMUNITY COMMENTS FOR THE

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON NUTRITION AND FOODS FOR SPECIAL
DIETARY USES
Twenty-fourth Session
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AD HOC WORKING GROUP ON FOOD ADDITIVES IN THE CODEX
PROPOSED DRAFT REVISED STANDARDS FOR INFANT FORMULA AND
FOR PROCESSED CEREAL-BASED FOODS FOR INFANTS AND YOUNG
CHILDREN (CX/NFSDU 02/5-Add.2)

GENERAL CONSIDERATIONS
The ad hoc Working Group noted that alpha- and beta-amylases are included in the list of food additives in the draft Standard for Processed Cereal-based Foods for Infants and Young Children. Rules on processing aids can be set in Commodity Standards, for example, in the Codex Standard on fruit juices processing aids are listed after additives. If rules on processing aids are set then the list should be exhaustive.

The ad hoc Working Group indicates it has taken into account in its proposal the “General Principles for the Use of a Food Additive” as laid down in the Preamble to the General Standard on Food Additives (GSFA). The European Community notes that this is a requirement laid down in the Procedural Manual of the Codex Alimentarius Commission. In the section for food additives and contaminants it is stated that “when establishing provision for food additives, Codex committees should follow the General Principles for the Use of Food Additives and the Preamble of the General Standard for Food Additives. Full explanation should be provided for any departure from the above recommendations”. The Committee may need to consider whether additional criteria should be required for limiting the use of food additives in foods for infants and young children, for example by restricting the number of food additives that may be used.

SECTION II – AD HOC WORKING GROUP’S PROPOSAL FOR FOOD ADDITIVES IN THE PROPOSED DRAFT REVISED STANDARD FOR INFANT FORMULA (CODEX STAN 72-1981)

General considerations
Under the European Union legislation there are additives permitted for use in foods for special medical purposes for infants and young children additional to those for use in foods intended for use by healthy infants and young children. Agreement has not been reached on whether the Draft Standard for Infant Formula only applies to
formula intended for healthy infants or if it also applies to formula intended for infants not in good health. If it is agreed that the infant formula standard also applies to formula intended for infants not in good health then consideration should be given as to whether additional additives should be included in the Standard.

The European Community has some comments on the proposals of the ad hoc Working Group. There are some additives included in the proposals whose use was not considered necessary by many members of the ad hoc Working Group who submitted comments. It is proposed that the technological need for these additives should be considered.

In the Codex General Standard on Food Additives and in the majority of the Codex Commodity Standards that include provisions on food additives the limits on the food additives are expressed as either per litre or per kilogram. To be consistent with other Codex Standards it is proposed that the limits on food additives included in the Proposed Draft Standard for Infant Formula be expressed per litre of formula ready for consumption. It is proposed that the heading of the second column should be changed to: “Maximum level per litre of the formula ready for consumption prepared following manufacturers’ instructions” and the figures should be changed accordingly.

4.1 Thickening Agents

4.1.1 412 Guar gum – The European Community proposes that the use of guar gum should be restricted to use in liquid formulas containing partially hydrolysed protein instead of being permitted for use in all types of infant formula.

4.1.2 410 Carob bean gum (Locust bean gum) - It is proposed that the function and technological need of this additive in infant formula should be considered.

4.1.3 to 4.1.6 1412 Distarch phosphate, 1414 Acetylated distarch phosphate, 1413 phosphated distarch phosphate, 1440 Hydroxypropyl starch – It is proposed that the technological need for these additives should be considered.

4.1.7 407 Carrageenan – The European Community does not support the use of carrageenan in infant formula for infants aged between 0 to 3 months. This is based on the evaluation of the Scientific Committee on Food that concluded the following: “The Committee could not exclude the possibility of absorption of carrageenan by the immature gut or the possibility that the absorbed material might affect the immune system in the infant. The Committee does not therefore consider carrageenan acceptable for use in infant formula.”

4.3 pH-Adjusting Agents

4.3.1 to 4.3.7 524 Sodium hydroxide, 500i Sodium hydrogen carbonate, 500ii Sodium carbonate, 525 Potassium hydroxide, 501i Potassium hydrogen carbonate, 501ii Potassium carbonate, 526 Calcium hydroxide - It is proposed that the technological need for these additives should be considered.

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1 Opinion on certain additives for use in infant formula, follow-on formula and weaning foods, expressed on 11 December 1992 (Reports of the Scientific Committee for Food 32nd series).
4.3.12 to 4.3.14  338 Orthophosphoric acid, 339 (i, ii, iii) Sodium orthophosphates, 340 (i, ii, iii) Potassium orthophosphates – There is an established acceptable daily intake (ADI) for phosphates of 70 mg/kg b.w. expressed as phosphorus. Therefore the Committee should set a numerical maximum level for the use of these additives. In addition, if maximum levels for phosphorus are agreed by the Committee then the note concerning compliance with Section 3.1.2 (c) of the Standard would need to also refer to phosphorus.


As previously noted, in the Codex General Standard on Food Additives and in the majority of the Codex Commodity standards that include provisions on food additives the limits on the food additives are expressed as either per litre or per kilogram on an as consumed basis. It is proposed that the limits on food additives included in the Proposed Draft Standard for Processed Cereal-based Foods for Infants and Young Children should be expressed per kilogram of food ready for consumption and the heading of the second column should be changed to: “Maximum level per kg of the product ready for consumption prepared following manufacturers’ instructions”.

In general in Codex Standards the maximum permitted levels of food additives apply to the products as consumed. The European Community comments to the ad hoc Working Group reflected the position in the European Community legislation which applies to foodstuffs ready for consumption prepared following manufacturers’ instructions. Given that the usual approach on food additives is to establish limits in foods ready for consumption it is possible that the comments of other ad hoc Working Group members were on this basis rather than a dry weight basis.

Based on the assumption that the proposals of the ad hoc Working Group on Food Additives refer to foods ready for consumption, prepared following manufacturers’ instructions the European Community has the following comments.

4.1 Emulsifiers
4.1.1 322 Lecithin - It is proposed that the technological need for this additive at the proposed level should be considered.

4.1.2 471 Mono- and diglycerides - It is proposed that the technological need for these additives at the proposed levels should be considered.

4.2 pH-Adjusting Agents
4.2.4 and 4.2.5 270 L(+)-Lactic acid and 330 Citric acid – Neither of these additives have ADIs nor do the other additives listed in this category that are permitted for use under conditions of GMP. It is proposed that the limits for both L(+) lactic acid and citric acid should be based on GMP.
4.2.14 331ii sodium citrate – In the GSFA the proposed sodium citrates for use in processed cereals-based foods for infants and young children are 331, 331i and 331iii, however, the recommendation of the ad hoc Working Group relates to 331, 331i and 331ii. It should be clarified which forms of sodium citrates are to be permitted.

4.2.22 Tartrates – In the GSFA the proposed tartrates for use in processed cereals-based foods for infants and young children are 334, 335, 336 and 354, however, the recommendation of the ad hoc Working Group relates to 334, 335, 336 and 337. It should be clarified which forms of tartrates are to be permitted.

4.3 Antioxidants
Some of the limits for antioxidants are based on the fat content of the product and some on the product as consumed. This may cause confusion. Therefore, the European Community proposes that all the levels are set on a product as consumed basis and that it is specified that these additives are only for use in fat-containing products.