

30 August 2024

CCNFSDU44: ISDI Positions on Additives

Nutrient Carriers

Background CCFA53 §53 ([link](#)):

53rd Session of the Codex Committee on Food Additives (CCFA53)⁵

7. CCFA53(2023) agreed to request CCNFSDU to consider whether CXS 73-1981 permits the use of the food additives listed in CXG 10-1979 Part D as nutrient carriers; noting that the CCFA EWG could not agree on whether CXS 73-1981 permits the use of the food additives listed in CXG 10-1979 Part D as nutrient carriers or not.

ISDI comments

ISDI is of the opinion that the Standard for Canned Baby Foods ([CXS 73-1981](#)) permits the use of the food additives listed in Part D of the Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses Intended for Infants and Young Children ([CAC/GL 10-1979](#)) in nutrient preparations. In particular, this includes mannitol (INS 421).

The scope of the CAC/GL 10-1979 covers the use of nutrients in foods for special dietary uses intended for infants and young children, which also includes the products covered by the STAN CXS 73-1981. Section D of the advisory lists clearly indicates that for the reasons of stability and safe handling of vitamins and other nutrients, the food additives included in the respective standards and the ones listed in the table in Section D may be used as nutrient carriers.

The request from CCFA53 comes because Section 4 of the Standard on Canned Baby Foods did not specifically refer to CXG 10-1979 prior to alignment, unlike Section 4 of the Standard for Processed Cereal Based Foods for Infants and Young Children ([CXS 74-1981](#)) which did.

Section 4 of CXS 73-1981 prior to alignment:

The following additives are permitted in the preparation of canned baby food with the restrictions stated below [...]

Compared to Section 4 of CXS 74-1981 prior to alignment:

Only the food additives listed in this Section or in the Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Children (CXG10-1979) may be present in the foods described in Section 2.1 of this Standard, as a result of carry-over from a raw material or other ingredient (including food additive) used to produce the food, subject to the following conditions: [...]

ISDI noted at CCFA53 that Section 3.1.2.1 of the Standard for Canned Baby Foods (CXS 73-1981) refers to CAC/GL 10-1979:

3.1.2.1 Vitamins and/or minerals added in accordance with Section 3.1.2 should be selected from the Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Children (CXG 10-1979).

While CCFA53 recognised that Section 3.1.2.1 of CXS 73-1981 did refer to CXG 10-1979, this was not deemed sufficiently clear as to the intent of CCNFSDU. On this basis, CCFA53 recommended that CCFA seek clarity from CCNFSDU as to whether CXS 73-1981 allows food additives listed in CXG 10-1979 Part D as nutrient carriers or not.

To support ISDI's position that mannitol (INS 421), alongside other substances in Part D of CAC/GL 10-1979, are permitted as a nutrient carrier in CXS 73-1981, we note that:

- (1) The scope of the CAC/GL 10-1979 covers the use of nutrient in foods for special dietary uses intended for infants and young children, which also includes the products covered by the STAN CXS 73-1981.
- (2) Part D of CAC/GL 10-1979 allows certain food additives to be used, in addition to those additives listed in the GSFA Food Category 13.2, to **prepare suitable preparations of some vitamins and other nutrients**. The justification is to support the stability and safe handling of these preparations.
- (3) The carriers listed in Part D are included in the GSFA Food Category 13.2 **except Mannitol** (INS421). Part D permits the use of Mannitol being limited to Vit B12 dry rubbing, 0,1% only.

Consequently, ISDI is of the opinion that Part D applies, and the food additives included in Appendix D can be used as additives in nutrient preparations used in products in Food Category 13.2. Therefore, CCNFSDU should confirm that Mannitol (INS 421) should be permitted in the GSFA in Food Category 13.2 through removal of Note XS73, with an appropriate Note to capture the conditions of use included in Part D of CAC/GL 10-1979.

D: ADVISORY LIST OF FOOD ADDITIVES FOR SPECIAL NUTRIENT FORMS

For reasons of stability and safe handling, some vitamins and other nutrients have to be converted into suitable preparations, e.g. gum arabic coated products, dry rubbed preparations. For this purpose, the food additives included in the respective specific Codex standard may be used. In addition, the following food additives may be used as nutrient carriers:

INS n.º	Additive/ Carrier	Maximum Level in Ready-to-use Food for infants and young children (mg/kg)
414	Gum Arabic (gum acacia)	10
551	Silicon dioxide	10
421	Mannitol (for vitamin B ₁₂ dry rubbing, 0,1% only)	10
1450	Starch sodium octenyl succinate	100
301	Sodium L-ascorbate (in coating of nutrient preparations containing polyunsaturated fatty acids)	75

CXS 73-1981

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS

3.1 Composition

3.1.1 Baby foods may be prepared from any suitable nutritive material that is used, recognized or commonly sold as an article or ingredient of food, including spices.

3.1.2 Vitamins and minerals may only be added in accordance with the legislation of the country in which the food is sold.

3.1.2.1 Vitamins and/or minerals added in accordance with Section 3.1.2 should be selected from the *Advisory Lists of Nutrient Compounds for Use in Foods for Special Dietary Uses intended for Infants and Children (CXG 10-1979)*.

3.1.2.2 The amounts of sodium derived from the added vitamins and/or minerals shall be within the limits indicated for sodium in Section 3.1.3.

3.1.3 The total sodium content of the products shall not exceed 200 mg Na/100 g calculated on the ready-to-eat basis in accordance with directions for use. The addition of salt (NaCl) to fruit products and dessert products based on fruit is not permitted.

Batch 2 Additives –

Background CCNFSDU EWG Discussion paper ([link](#))

Conclusions

10. There is no technological need for the use of
guar gum (INS 412),
distarch phosphate (INS 1412),
phosphated distarch phosphate (INS 1413),
acetylated distarch phosphate (INS 1414) and
hydroxypropyl starch (INS 1440) in foods conforming to CXS 72-1981.

ISDI comments

ISDI confirms that currently no ISDI members have reported the use of any of the Batch 2 food additives in the formulation of products within food categories 13.1.1 or 13.1.3. **Therefore, with respect to Batch 2, ISDI supports the conclusion of the eWG.**

ISDI notes that four of these substances fall within a similar class (modified starches), and it is possible that more technologically advanced alternatives exist today. The lack of any use of this group of five additives, which have been authorized since the establishment of the infant formula standard (CXS 72-1981) is a surprising result and is not expected to be typical during the continued review of use of infant formula (FC 13.1.1 and FC 13.1.3) additives.

ISDI fully endorses the widely agreed principle that the use of food additives in infant formula should be restricted and limited to where technologically essential with proven safety considerations in the sensitive consumer using the products. Their use should be guided by specific considerations to ensure the highest level of consumer protection. However, this would not mean that additive use should be completely prohibited in these products. There is a technological need for additives in formulas for infants in order to maintain sufficient quality and food safety standards. Therefore, industry is making every reasonable effort to maintain exposures of additives as low as practically achievable, consistent with the General Principles for Use of Food Additives in the GSFA.