

# Definition of different types of formula products and foods

Legislative Proposal Relating to  
Formula Products and Foods Intended for  
Infants and Young Children under the Age of 36 Months  
in Hong Kong

3rd Technical Meeting with Trade  
10 July 2013

# Background

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- In order to better protect the health of infants and young children, the Administration proposed to enhance the local legislative control on formula products and foods intended for infants and young children under the age of 36 months.
- It is proposed to establish different requirements on nutritional composition and nutrition labelling for different types of formula products and foods with reference to Codex principles, taking into account the international practices.

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# Definition for formula products

# Codex definitions

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- “Infant formula” :  
a breast-milk substitute specially manufactured to satisfy, by itself, the nutritional requirements of infants during the first months of life up to the introduction of appropriate complementary feeding
- “Follow-up formula” :  
a food intended for use as a liquid part of the weaning diet for the infant from the 6th month on and for young children

# Different types of formula products

Product	Intended age group	Sole source of nutrition for infants $\leq 6$ months?	Product type
Product A	0-6 months	Yes	?
Product B	3-6 months	Yes	?
Product C	0-9 months	Yes	?
Product D	4-8 months	Yes	?
Product E	Over 6 months	No	?
Product F	4-12 months	No	?
Product G	1-5 years	No	?

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# Definition for formula for special medical purposes for infants and young children

# Codex definition

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- “Formula for special medical purposes intended for infants” means-
  - a substitute for human milk or infant formula that complies with Section 2, Description, of the Codex Standard for the Labelling of and Claims for Foods for Special Medical Purposes (Codex Stan 180-1991)\* and
  - is specially manufactured to satisfy, by itself, the special nutritional requirements of infants with specific disorders, disease or medical conditions during the first months of life up to the introduction of appropriate complementary feeding.

# Codex definition

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\* Section 2, Description, of the Codex Standard for the Labelling of and Claims for Foods for Special Medical Purposes (Codex Stan 180-1991)

□ “Food for special medical purposes” are a category of foods for special dietary uses which-

- are specially processed or formulated and presented for the dietary management of patients,
- may be used only under medical supervision,
- are intended for exclusive or partial feeding of patients
  - with limited or impaired capacity to take, digest, absorb or metabolize ordinary foodstuff or certain nutrients contained therein,
  - or who have other special medically-determined nutrient requirements, whose dietary management cannot be achieved only by modification of normal diet and/or other food for special dietary uses, or by a combination of the two



# Product classification (1)

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- Products for infants and young children with metabolic diseases (e.g. maple syrup urine disease or PKU):
  - Usually clearly marked with the specific medical purpose (e.g., "**for the dietary management of xxx disease**") and statements such as "**use under medical supervision**".
  - Normally consumed under medical supervision and many them are not available from retail stores.
  - Whether to classify these products as formula for special medical purposes for infants and young children?

# Product classification (2)

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- Products that are for specific groups of infants such as premature infants, babies with diarrhoea or lactose intolerance:
  - They may not claim to be "formula for special medical purposes", or "for use under medical supervision"
  - Whether to classify them as formula for special medical purposes for infants and young children?

# General labelling requirement (1)

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- To facilitate the consumer to distinguish foods for special medical purposes ordinary foods from ordinary foods, Codex has established general labelling requirements for these products

# General labelling requirement (2)

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- The name of the product shall be "**Food for Special Medical Purposes**";
- A prominent statement "**USE UNDER MEDICAL SUPERVISION**" shall appear on the label in bold letters in an area separated from other written, printed, or graphic information;
- The statement "**For the dietary management of .....**" with the blank to be filled in with the specific disease(s), disorder(s) or medical condition(s) for which the product is intended, and for which it has been shown to be effective; and
- An additional prominent **warning statement** consisting of an explanatory statement shall appear on the label in bold letters in an area separated from other written, printed or graphic information if the food for special medical purpose poses a **health hazard** when consumed by individuals who do not have the disease(s), disorder(s) or medical condition(s) for which the food is intended.

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# Definition for foods intended for infants and young children

# Codex definitions (1)

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- Codex has established standards for:
  - Processed cereal-based food for infants and young children (Codex Stan 74-1981); and
  - Canned baby foods (Codex Stan 73-1981)

# Codex definitions (2)

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- ❑ *Codex Standard for Processed Cereal-based Food for Infants and Young Children* covers processed cereal-based foods intended for feeding infants as a complementary food generally from the age of 6 months onwards, taking into account infant's individual nutritional requirements, and for feeding young children as part of a progressively diversified diet
- ❑ Process cereal-based foods are prepared primarily from one or more milled cereals, which constitute at least 25% of the final mixture on a dry weight basis
- ❑ Included 4 categories of products

# Categories of processed cereal-based food

Sub-category		Products
(i) Cereal to be prepared with milk or other appropriate nutritious liquids	=?	<ul style="list-style-type: none"><li>● Baby rice cereal</li><li>● Infant multi-grain cereal</li></ul>
(ii) Cereal with an added high protein food to be prepared for consumption with water or other appropriate protein-free liquid		<ul style="list-style-type: none"><li>● Rice-based milk cereal</li></ul>
(iii) Pasta to be used after cooking in boiling water or other appropriate liquid		<ul style="list-style-type: none"><li>● Baby macaroni (dry)</li></ul>
(iv) Rusks and biscuits		<ul style="list-style-type: none"><li>● Teething rusk</li><li>● Baby cookies</li><li>● Puffs for infants</li><li>● Rice crackers for young children</li></ul>

# Codex definitions (2)

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- For “canned baby foods”-
  - Codex has established the *Codex Standard for Canned Baby Foods* (Codex Stan 73-1981)
  - Definition for “Canned baby foods” has not been provided in the standard
- Baby foods are now available in various packing
- Jurisdictions such as Australia, New Zealand and EU have not adopted the concept of “canned baby foods”, but classified products as “cereal-based food” or “non-cereal-based foods” with separated requirements established
- → How to define and regulate “canned baby foods” or “non-cereal-based foods”?

# Food for different ages

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- According to Codex standard, processed cereal-based food for infant and young children are for feeding infants as complementary food generally from 6 months onwards
- WHO recommended that complementary feeding should generally be introduced to infants at 6 months
- Some products claimed to be suitable for infants under the age of 6 months and are, at the same time, recommended for infants and young children from 6 months (e.g., “for 4-12 months”, “from 4 months on”)
  - How to regulate these products?
  - Should they be treated in similar way as their counterparts which are only targeted for individuals aged 6 months onwards?

# Way forward

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- We suggest to include definitions of different products in the proposed regulation, and to establish different requirements on nutritional composition and/or nutrition labelling for different types of formula products and foods
- If considered necessary, supplementary information regarding the classification of different products and relevant examples may be provided in form of trade guidelines or FAQ in the future
- Representatives from the trade are invited to provide information and comments on the definition of different formula products and foods for infants and young children

# For comments and discussion

