



Consortium for Improving Complementary Foods in Southeast Asia (COMMIT)

# A review of policies and regulations related to commercially produced complementary foods in Malaysia

## COMMIT ACTIVITY 3

COMMIT 1 Comprehensive nutrient gap assessment

COMMIT 2 Consumer survey

**COMMIT 3 Legal and policy review**

COMMIT 4 Nutrient profile model

COMMIT Synthesis report

# COMMIT

Consortium for Improving Complementary Foods in Southeast Asia

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# List of acronyms

<b>ARCH</b>	Assessment and Research on Child Feeding
<b>ATNI</b>	Access to Nutrition Initiative
<b>BMS</b>	Breastmilk substitutes
<b>COMMIT</b>	The Consortium for Improving Complementary Foods in Southeast Asia
<b>CPCF</b>	Commercially produced complementary foods
<b>GDP</b>	Gross domestic product
<b>NPM</b>	Nutrient profile model
<b>UNICEF</b>	United Nations Children’s Fund
<b>WHA</b>	World Health Assembly
<b>WHO</b>	World Health Organization
<b>WHO Europe</b>	WHO Regional Office for Europe
<b>2019 WHO Europe NPM for CPCF</b>	2019 WHO Europe Nutrient Profile Model for Commercially Produced Complementary Foods

# THE COMMIT INITIATIVE

## Overview

A nutrition transition is underway across Southeast Asia, with convenience, time and aspiration increasingly influencing food choices. This changing food environment is resulting in a shift from traditional diets towards processed foods that are usually higher in salt, sugar and unhealthy fats, and lower in essential nutrients – and children’s diets are no exception.

The availability, affordability and variety of commercially produced, packaged foods marketed as suitable for older infants and young children – also known as commercially produced complementary foods (CPCF) – is increasing. Many CPCF exceed recommended levels of sugar, salt or fat and/or are labelled in ways that may mislead consumers; these products should not be promoted or provided to older infants and young children. For other CPCF, however, targeted improvements to their nutrient composition – such as through fortification – can help improve their nutritional impact. Governments and partners must work together to ensure that the CPCF promoted as suitable for older infants and young children are nutritionally adequate, safe and labelled in a responsible way.

The **Consortium for Improving Complementary Foods in Southeast Asia (COMMIT)**<sup>i</sup> was established to help ensure that the CPCF sold and consumed in the region contribute to healthy diets instead of unhealthy ones. COMMIT recognizes that one of the most effective ways to transform the food system and food environment is by supporting governments to set up regulatory environments that enable access to healthy food, adequately regulate unhealthy products and protect consumers from inappropriate marketing practices. To do this, COMMIT identified micronutrient gaps in the diets of older infants and young children, analysed current consumer CPCF preferences, reviewed national legislation regulating CPCF nutrient composition and labelling practices, and used a nutrient profile model to assess current CPCF nutrient composition, labelling practices and micronutrient content:



### **COMMIT Activity 1: Comprehensive nutrient gap assessment**

A comprehensive nutrient gap assessment to identify limiting micronutrients in diets during the complementary feeding period.



### **COMMIT Activity 2: Consumer survey**

Consumer perspective survey on the provision of CPCF to older infants and young children, motivations for CPCF provision and factors influencing CPCF purchases.



### **COMMIT Activity 3: Legal and policy review**

Assessment of current national binding legal measures related to CPCF nutrient composition and labelling practices and their adherence to global CPCF guidance.



### **COMMIT Activity 4: CPCF nutrient profile model**

Benchmarking of CPCF nutrient composition and labelling practices against an adapted version of the 2019 WHO Europe nutrient profile model designed specifically for CPCF.

**This report details the methods and results for COMMIT Activity 3 in Malaysia.**

<sup>i</sup> COMMIT partners include Access to Nutrition Initiative; Alive & Thrive; Helen Keller International’s Assessment and Research on Child Feeding Project; JB Consultancy; School of Food Science and Nutrition, University of Leeds; UNICEF East Asia and the Pacific Regional Office; and World Food Programme Asia Pacific Regional Bureau.

# 1 Introduction

The right to adequate nutrition is a fundamental right for every child. Children who are fed enough of the right foods, in the right way, at the right time in their development, are more likely to survive, grow, develop and learn. Between the ages of 6 and 23 months – the complementary feeding period – breastfeeding and access to a diverse range of nutritious foods can provide children with the essential nutrients, vitamins and minerals they need to develop to their full physical and cognitive potential, with benefits that endure well into adulthood.<sup>1, 2</sup> The complementary feeding period is also a critical opportunity to prevent all forms of childhood malnutrition, including stunting, wasting, micronutrient deficiencies, overweight, obesity and diet-related non-communicable diseases.

While Malaysia has made dramatic progress in improving nutrition and reducing its rate of malnutrition in recent decades, an unfinished agenda remains. Stunting or chronic malnutrition remains a key concern: one in five Malaysian children is affected by stunting (22 per cent) and the prevalence of stunting has increased in the past 20 years. At the same time, approximately 5 per cent of children under 5 years of age and nearly half of all Malaysian adults (45.5 per cent) are living with overweight.<sup>3</sup> <sup>4</sup> Fewer than half of all children aged less than 6 months are exclusively breastfed (40 per cent). The quality of children's diets between 6 and 23 months of age, however, is encouraging: more than half of children (53 per cent) are benefiting from diets sufficient in diversity and frequency and nearly all young children (90 per cent) are consuming nutrient-rich meat or eggs.<sup>4</sup>

The food environment in Malaysia is dynamic and complex. Two decades of rapid economic growth and development, characterized by increasing incomes, urbanization and female participation in the workforce, have produced a sizeable group of middle-income consumers who are well educated and well informed. Middle-income households, which now account for over 50 per cent of Malaysian households, have adopted many Western food and eating habits.<sup>5</sup> In this changing food environment, there is a growing market for convenience foods

The market for commercially produced baby foods in Malaysia is well established but dominated by breastmilk substitutes (BMS). BMS remains the largest category of baby foods, with growing up milk accounting for 62.5 per cent of the BMS market.<sup>5</sup> According to a recent report by the World Health Organization (WHO), UNICEF and the International Baby Food Action Network, Malaysia is among the 58 countries worldwide that have no binding legal measures to give force to the International Code of Marketing of Breast-milk Substitutes (the Code).<sup>6</sup> All aspects of the Code are included in a voluntary Code of Ethics and in PU(A) 437/85 Food Regulations 1985, which includes nutrient and labelling requirements. However, labelling requirements in both documents do not cover growing up milks marketed to children over 3 years of age. Growing up milks are a major growth area for the baby food sector in Malaysia and globally.

A smaller, but growing portion of the baby food sector is commercially produced, packaged foods marketed as suitable for older infants and young children aged 6 to 36 months – also known as commercially produced complementary foods (CPCF). CPCF represent approximately 6.7 per cent of the total baby food sector (including BMS). Sales of CPCF cereals and dry meals increased by 6.2 per cent between 2014 and 2020, and sales of soft, wet spoonable ready-to-eat CPCF foods increased by 7.4 per cent over the same time period. The market for CPCF in Malaysia is primarily in CPCF cereals and dried meals. Nestle holds 67 per cent of CPCF cereal sales, which are predominantly marketed under the Cerelac brand; most of these products are produced locally in Malaysia, while most other CPCF product types (e.g., soft, wet spoonable, ready-to-eat foods) are imported.<sup>5</sup>

Growing demand and supply of CPCF in Southeast Asia requires robust and enforceable binding legal measures to regulate both the nutrient composition and labelling practices of these practices. Global guidance on the nutrient composition and labelling practices of CPCF has been produced by Codex Alimentarius (Codex) and the World Health Organization (WHO). **An overview of global guidance documents for CPCF is provided below:**

## Codex Alimentarius

Codex has six Standards and Guidelines<sup>ii</sup> directly and indirectly regulating the nutrient composition and labelling practices of CPCF for older infants and young children:

1. Standard for processed cereal-based foods for infants and young children, CXS 74-1981. Revised in 2006. Adopted in 1981. Amended in 2017 and 2019.
2. Standard for canned baby foods, CXS 73-1981. Adopted in 1981. Amended in 1983, 1985, 1987, 1989 and 2017.
3. Guidelines on formulated complementary foods for older infants and young children, CAC/GL 8-1991. Adopted in 1991. Amended in 2017. Revised in 2013.
4. General standard for labelling of pre-packaged foods, CXS 1- 1985. Adopted in 1985. Amended in 1991, 1999, 2001, 2003, 2005, 2008 and 2010. Revised in 2018.
5. Guidelines on nutritional labelling, CXG 2 – 1985. Adopted in 1985. Revised in 1993 and 2011. Amended in 2003, 2006, 2010, 2012, 2013, 2015, 2016, 2017 and 2021. Annex 1 adopted in 2011. Revised in 2013, 2015, 2016 and 2017. Annex 2 adopted in 2021.
6. Guidelines for use of nutrition and health claims, CAC/GL 23. Adopted in 1997.

Codex Standards and Guidelines are intended to guide the development of national legislation. However, it is noteworthy that adherence to Codex is voluntary, and countries may also modify any aspect of the Standard or Guideline.

## WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children

The WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children<sup>7</sup> is a global guidance document (referred to hereafter as WHO Guidance) recommending essential messages to include on the labelling of all CPCF.

WHO Guidance recommends three essential messages to include on CPCF labels, and states that these messages should be easily understood/visible and legible:

- The importance of continued breastfeeding for up to 2 years or beyond
- The importance of not introducing complementary foods before 6 months of age
- The importance of providing an appropriate age of introduction for the food (i.e., an age of 6 months or older)

In addition, WHO Guidance recommends that messages should not:

- Include images or text that might imply the product is appropriate for children <6 months of age (including milestones/stages)
- Undermine or discourage breastfeeding
- Make a comparison to breastmilk
- Suggest equivalence or superiority to breastmilk
- Recommend or promote bottle-feeding
- Convey endorsement, unless specifically approved by regulatory authorities

The WHO Guidance, which informed the subsequent World Health Assembly (WHA) Resolution 69.9, recognizes that the current Codex Standards on nutrient values – particularly

<sup>ii</sup> Two additional standards are relevant for this age group, but not relevant for the review of binding legal measures for CPCF. These include: (1) Standard for infant formula and formulas for special medical purposes intended for infants, CXS 72-1981, adopted in 1981. Amendment: 1983, 1985, 1987, 2011, 2015 and 2016. Revision: 2007, and (2) Standard for Follow up Formula, CXS 156-1987. Adopted in 1987. Amended in 1989, 2011, 2017 and currently under review.

for added sugars and salt – are inadequate, and that application of the Codex Standards alone is insufficient to define whether a particular CPCF is appropriate for promotion to older infants and young children.<sup>7</sup> Indeed, the WHO Guidance emphasizes the need for new or updated Codex Standards and Guidelines that are in full alignment with WHO recommendations.

Recommendation 3 of the WHO Guidance further encourages that “Nutrient profile models should be developed and utilized to guide decisions on which foods are inappropriate for promotion.”

## 2019 Draft WHO Europe Nutrient Profile Model for Commercially Produced Complementary Foods

Nutrient profiling is the science of classifying or ranking foods according to their nutritional composition for reasons related to preventing disease and promoting health. Nutrient profiles can be used to generate criteria to classify foods according to nutrient levels. In 2019, the WHO Regional Office for Europe (WHO Europe) published “*Ending inappropriate promotion of commercially available complementary foods for infants and young children between 6 and 36 months in Europe*,” which provided a draft nutrient profile model (NPM) for the assessment of CPCF in Europe.<sup>8</sup>

The ‘Draft WHO Europe Commercially Available Complementary Foods Nutrient Profile Model’ (hereafter referred to as the 2019 WHO Europe NPM for CPCF)<sup>iii</sup> was developed in response to resolution WHA 69.9, which calls on WHO to provide technical support to Member States to develop nutrient profiling tools to guide decisions on which foods are inappropriate for promotion for older infants and young children (aged 6–36 months). This was a first step in developing a NPM for CPCF promoted for older infants and young children in the European region. The draft was released in 2019 and a final model was published in 2022.

The 2019 WHO Europe NPM for CPCF provided the most extensive set of recommendations on CPCF nutrient composition and labelling practices. This included explicit limits on the addition of sugars and sodium and requirements for other nutrients, as well as extensive requirements for the labelling of CPCFs.<sup>8</sup> It is important to note that the nutrient composition and labelling requirements in the 2019 WHO Europe NPM for CPCF are stricter than those in current Codex Standards and Guidelines and in the WHO Guidance.

The 2019 WHO Europe NPM for CPCF categorizes CPCF products into 16 subcategories (**Table 1**) and identifies products that may be considered inappropriate for promotion for older infants and young children based on whether they meet nutrient composition and labelling practice requirements. The nutrient composition requirements in the 2019 WHO Europe NPM for CPCF establish limits or thresholds for the fruit content, energy density and use of sugar/sweetening agent, sodium, total fat and protein content of CPCF. These nutrient composition limits and thresholds were established based on European Commission Directives, WHO Guidance and Codex. The labelling practices component of the 2019 WHO Europe NPM for CPCF contains general and food category-specific labelling practice requirements pertaining to the protection and promotion of breastfeeding, use of claims, product name and ingredient list clarity, messages on products with a spout and age restrictions on puréed products. CPCF must meet all applicable nutrient composition and labelling practice requirements to ‘pass’ the 2019 WHO Europe NPM for CPCF and be considered suitable for promotion.

<sup>iii</sup> Note that while the 2019 WHO Europe document refers to CPCFs as commercially available complementary foods (CACF), these two terms describe the same types of products. CPCF is used to reference these products throughout this report.

**Table 1: Commercially produced complementary food product categories**

<b>Category 1: Dry, powdered and instant cereal/starchy food</b>	
Category 1.1	Dry or instant cereals/starch
<b>Category 2: Soft-wet spoonable, ready-to-eat foods; typically smooth or semi-puréed packaged in jars or pouches and can be spoon-fed</b>	
Category 2.1	Dairy-based desserts and cereal products
Category 2.2	Fruit purée with or without addition of vegetables, cereals or milk
Category 2.3	Vegetable-only purée
Category 2.4	Puréed vegetables and cereals
Category 2.5	Puréed meal with cheese (but not meat or fish) mentioned in the name
Category 2.6	Puréed meal with meat or fish mentioned as first food in product name
Category 2.7	Puréed meals with meat or fish (but not named first in product name)
Category 2.8	Purées with only meat, fish or cheese in the name
<b>Category 3: Meals with chunky pieces, often sold in trays or pots for infants and young children</b>	
Category 3.1	Meat, fish or cheese-based meal with chunky pieces
Category 3.2	Vegetable-based meal with chunky pieces
<b>Category 4: Dry finger foods and snacks</b>	
Category 4.1*	Confectionery, sweet spreads and fruit chews
Category 4.2	Fruit (fresh or dry whole fruit or pieces)
Category 4.3	Other snacks and finger foods
<b>Category 5: Juices and other drinks</b>	
Category 5.1*	Single or mixed fruit juices, vegetable juices or other non-formula drinks
Category 5.2*	Cow's milk and milk alternatives with added sugar or sweetening agent

\* Should not be marketed as suitable for older infants and young children <36 months of age.

## COMMIT adaptation of the 2019 WHO Europe NPM for CPCF

In 2021, COMMIT adapted the 2019 WHO Europe NPM for CPCF by incorporating updates to nutrient composition and labelling requirements made by the University of Leeds and WHO Europe. The model was also adapted to gather more detailed data on the types of claims made on CPCF labels (e.g., non-permitted compositional claims, nutrient content claims, nutrient function claims, disease risk reduction claims, 'other' claims) and to capture information on the micronutrient content of CPCFs. This adapted version of the 2019 WHO Europe NPM for CPCF was then used by COMMIT to benchmark the CPCF sold in Southeast Asia against nutrient composition and labelling practice requirements. For a CPCF to pass the model, it must meet *all* nutrient composition and labelling practice requirements in the adapted version of the 2019 WHO Europe NPM for CPCF (hereafter referred to as the adapted WHO Europe NPM for CPCF). The nutrient composition and labelling requirements stipulated in the adapted WHO Europe NPM for CPCF are shown in **Box 1** (details on all NPM requirements are provided in **Annex 1**).

The analysis presented in this report describes the alignment between national binding legal measures (i.e., policies and regulations) in Malaysia relevant to CPCF and the recommendations for CPCF outlined in Codex, the WHO Guidance and the adapted WHO Europe NPM for CPCF.

## Box 1: Nutrient composition and labelling practice requirements in the adapted WHO Europe NPM for CPCF

### Nutrient composition requirements

1. No added sugar/sweetener in the product ingredient list
2. Must not exceed food category-specific fruit content limit
3. Must not exceed food category-specific total sugar limit
4. Must not exceed food category-specific sodium limit
5. Must meet food category-specific minimum for energy density
6. Must meet food category-specific threshold for protein
7. Must not exceed food category-specific total fat limit

### Labelling practice requirements<sup>iv</sup>

#### *Protection and promotion of breastfeeding*

1. Has a minimum recommended age of introduction of at least 6 months
2. Not marketed as suitable for children <6 months of age
3. Message on importance of breastfeeding to age 2 years or longer
4. Does not suggest superiority or equivalence to breastmilk
5. Does not recommend or promote bottle-feeding

#### *Claims*

6. No non-permitted compositional claims
7. No nutrient content claims
8. No nutrient function claims
9. No disease risk reduction claims
10. No other claims

#### *Product name and ingredient list clarity*

11. Product name reflects ingredients in descending order as per ingredient list
12. Percentage of fruit stated in ingredient list\*
13. Percentage of added water stated in ingredient list<sup>†</sup>
14. Percentage of protein stated in ingredient list<sup>‡</sup>

#### *Messages on products with a spout*

15. Product with spout states not to suck from the container<sup>§</sup>
16. Product with spout warns that cap is a choking hazard<sup>§</sup>

#### *Age restriction on blended/puréed products*

17. Maximum recommended age of use of 12 months<sup>§§</sup>

<sup>iv</sup> \* All products excluding category 2.3 products assessed against this requirement; All products excluding category 1 and category 4 products assessed against this requirement. <sup>†</sup> Only categories 2.6, 2.7 and category 3 products assessed against this requirement; <sup>§</sup> Only category 2 products with spouts assessed against this requirement; <sup>§§</sup> Only category 2 products assessed against this requirement.

**Box 2: Comparison of global guidance for CPCF standards and recommendations with the adapted WHO Europe NPM for CPCF product categories and requirements**

There are a wide variety of CPCF product types on the market, including infant cereals, purées, meals, finger foods and more. The 2019 WHO Europe NPM for CPCF provides the most extensive categorization of CPCF product types to date, with 16 CPCF product categories (**Table 1**). This same list of 16 product categories was included in the adapted version of the NPM used by COMMIT. Global guidance on the nutrient composition and labelling practices of CPCF, however, does not universally apply to all types of CPCF products.

**Annex 2** presents the CPCF food categories covered by the relevant Codex Standards and Guidelines and the WHO Guidance. This analysis shows that the two Codex Standards and one Guideline that provide recommendations on CPCF nutrient composition apply only to specific CPCF product categories. The remaining Codex Standards and Guidelines and WHO Guidance with recommendations on labelling practices, however, pertain to all the CPCF product categories.

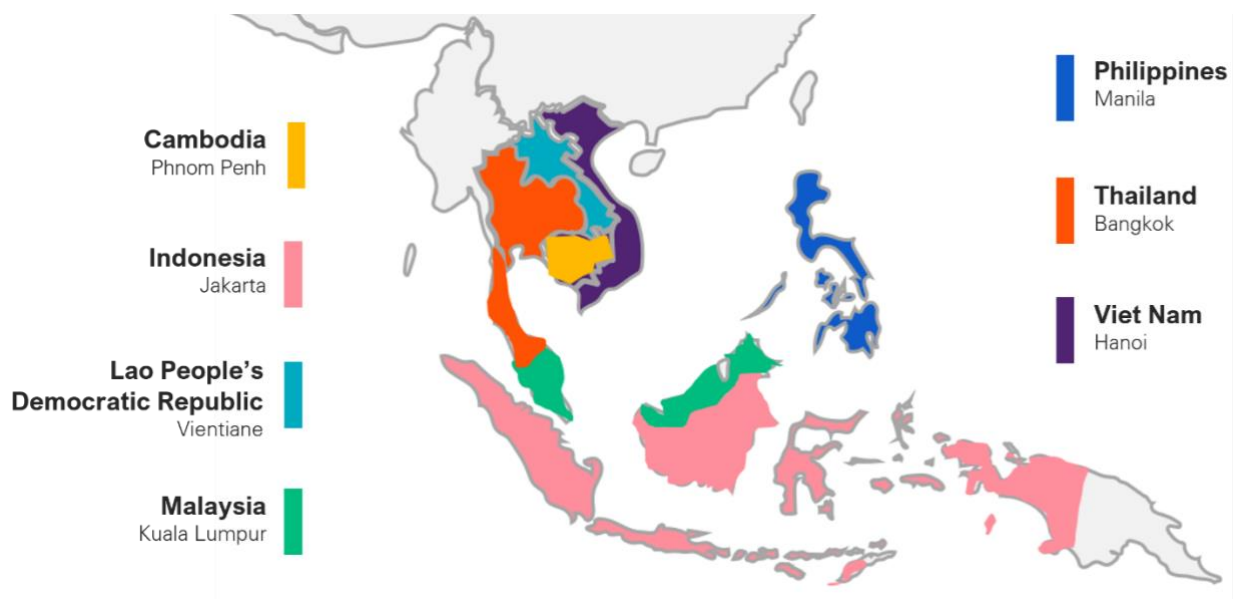
**Annex 3** maps the alignment between the nutrient composition and labelling practice requirements in the adapted WHO Europe NPM for CPCF (**Box 1**) and the relevant Codex Standards and Guidelines and the WHO Guidance. Alignment for both nutrient composition and labelling is mapped by CPCF product category.

## 2 Objectives

A desk review of active national binding legal measures (national policies, standards and legislation) relevant to CPCF was conducted to provide insight into the regulatory environment guiding the formulation and promotion of CPCF in seven Southeast Asian countries (Cambodia, Indonesia, the Lao People's Democratic Republic, Malaysia, the Philippines, Thailand and Viet Nam). The analysis then assessed the alignment of identified national binding legal measures with global guidance on CPCF nutrient composition and labelling practices. Specific objectives included:

1. To compare the content of active national binding legal measures to relevant Codex Standards and Guidelines.
2. To compare the content of active national binding legal measures to the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children.
3. To compare the content of active national binding legal measures to the nutrient composition and labelling practice requirements in the adapted version of the 2019 WHO Europe NPM for CPCF.

**Figure 1: Map of the seven COMMIT Initiative countries**



# 3 Methods

## 3.1 Identification of the binding legal measures

COMMIT partners contracted a regional law firm (DFDL) to collect and summarize relevant legislation related to CPCF in Malaysia. The firm prepared a summary table of binding legal measures (e.g., laws, standards, policies) and provided English translations of two relevant legal instruments, both of which were deemed relevant and included in the analysis. A voluntary measure on the Code of Ethics for the Marketing of Infant Foods and Related Products was also identified. All documents can be found on the Malaysian Ministry of Health website in Bahasa Malaysia: [Bahagian Keselamatan dan Kualiti Makanan \(moh.gov.my\)](http://BahagianKeselamatandanKualitiMakanan(moh.gov.my)). The voluntary Code of Ethics is referred to in this report but was not included in the analysis against global guidance because as it is voluntary and thus not legally binding.

## 3.2 Development of the data extraction form

To extract information from each of the documents selected for analysis, COMMIT partners created a Binding Legal Measures Analysis Framework. The framework incorporates all content from the six selected Codex Standards and Guidelines relevant to CPCF, the WHO Guidance and the adapted WHO Europe NPM for CPCF pertaining to nutrient composition and labelling practices. The Binding Legal Measures Analysis Framework was applied to compare the content of the collected binding legal measures relevant to CPCF nutrient composition and labelling practices against the six Codex Standards and Guidelines, WHO Guidance and the adapted WHO Europe NPM for CPCF requirements.

## 3.3 Extraction of information from binding legal measures and presentation of findings

Two legal experts reviewed the documents selected for analysis and applied the Binding Legal Measures Analysis Framework to compare their content to the six Codex Standards and Guidelines, WHO Guidance and the adapted WHO Europe NPM for CPCF nutrient composition and labelling practice requirements. Each legal expert reviewed the selected documents independently. Responses were then jointly reviewed to finalize Tables 3, 4 and 5 of this report.

For each component of the Binding Legal Measures Analysis Framework, a broad three-category classification was applied to assess the availability of national binding legal measures and their alignment with the CPCF nutrient composition and labelling practice recommendations in Codex, the WHO Guidance, and the adapted WHO Europe NPM for CPCF. The three categories for classification included: no binding legal measures; partial - some alignment; and full alignment.

No binding legal measure means that the binding legal measures identified for analysis made no reference to any of the recommended CPCF nutrient composition and labelling practices. Partial alignment means that binding legal measures include some component of the recommended CPCF nutrient composition and labelling practice, but not all. Full alignment means that the active binding legal measure includes all components of the recommended CPCF nutrient composition and labelling practice.

Final responses were validated by the UNICEF East Asia and the Pacific Regional Office, the UNICEF Malaysia Country Office, and the Malaysia Ministry of Health, Department of Nutrition.

# 4 Results

## 4.1 Overview of active binding legal measures for CPCF in Malaysia

The review of relevant binding legal measures in Malaysia identified two mandatory measures relevant to CPCF (Table 2).

**Table 2: Active binding legal measures for CPCF in Malaysia**

Binding legal measure	Year	Type of legislation	Scope	Content
1. Food Act (Laws of Malaysia Act 281)	1983  Republished after amendments made by Act A1117 (2001) and Act A1266 (2006)	Mandatory	All foods	<ul style="list-style-type: none"> <li>A general regulation about the protection of the public against health hazards and fraud in the preparation, sale and use of food.</li> <li>Ministry of Health is responsible for the implementation and enforcement of the Food Act in Malaysia.</li> </ul>
2. Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations	1985	Mandatory	All foods under Regulation with Regulations 390 and 391 specific to canned CPCF and cereal-based CPCF	<ul style="list-style-type: none"> <li>Food regulation consisting of 10 Parts and 27 Schedules applying to the composition, labelling and claims of food in general.</li> </ul>

### 4.1.1 Nutrient composition

In Malaysia, the composition of CPCFs is primarily regulated by the Food Act of 1983<sup>v</sup> and its subsidiary legislation, the Food Regulations of 1985.<sup>vi</sup>

Numerous amendments have been introduced to Food Regulations 1985, including a regulation on 'Special purpose food' in Regulations 388 to 393.<sup>vii</sup> This regulation includes foods such as CPCFs, infant formula and follow-up formula. Regulations 390 and 391 from the regulation on 'Special purpose food' regulate canned foods and cereal-based foods for infants and children. Canned foods have been regulated since 1988, while cereal-based foods were added in 2012.

These two regulations adopt the majority of the provisions of the two Codex Standards: "Standard for processed cereal-based foods for infants and young children, CXS 74-1981" and "Standard for canned baby foods, CXS 73-1981".

<sup>v</sup> Food Act 1983 - Act 281, published on 10 March 1983.

<sup>vi</sup> Laws of Malaysia PU (A) 437/1985 - Food Regulation 1985.

<sup>vii</sup> Laws of Malaysia PU (A) 437/1985 - Food Regulation 1985, Part VIII – Standards and Particular Labelling Requirements for Food, Chapter: Special Purpose Food art.388-393A.

Regulation 390 and regulation 391 together with the annexes called First Schedule,<sup>viii</sup> Fifth Schedule,<sup>ix</sup> the Fifth A Schedule,<sup>x</sup> Fourteenth Schedule,<sup>xi</sup> Fifteenth Schedule,<sup>xii</sup> the Twenty-Second Schedule<sup>xiii</sup> and the Twenty-Third Schedule<sup>xiv</sup> contain the most important regulations regarding CPCF. A summary of the regulations as they pertain to the nutrient composition and labelling practices of canned and cereal-based CPCF for older infants and young children is presented below.<sup>xv</sup>

- **Regulation 388: For all special purpose food (including canned and cereal-based foods for infants and children):**
  - All CPCF categories fall under the general regulation 388 for all special purpose food defined as a food named or described as particularly suitable for consumption by persons requiring special nutritional needs and includes the food for which a standard is prescribed in regulations 389 to 393. All CPCF categories marked as suitable for older infants and young children 6–36 months of age fall under Regulation 388.
  - Regulation 388 covers the age range of 0–36 months.
  - If the special purpose food contains any carbohydrates,<sup>xvi</sup> the label for the product shall not contain the words ‘sugarless’, ‘sugar free’ or any other word of similar meaning. Carbohydrate includes alcohol, glycerol, sorbitol or sugar alcohol and any carbohydrate substance that is capable of being metabolized.
  - All particulars required to appear on the label of the package of special purpose foods shall be written in Bahasa Malaysia and may include translation in any other language.
  - No label of any food shall claim that a food is a special purpose food unless adequate information to support special suitability or nutritional qualities is stated on the label.
- **Regulation 390: Canned food for infants and children**
  - Canned food is defined as a wholesome food or a mixture of wholesome food suitable for feeding infants (aged 0–11 months) or young children (aged 12–26 months) and does not contain cereal.
  - It can be classified in two categories:
    - Ready-to-eat
    - Dry or concentrated form.
  - Canned food shall contain micro- and macronutrients, defined in Twenty-Second Schedule – Table I. This table defines a minimum threshold for 15 macro- and micronutrients and a maximum value for vitamins A and D.
  - The threshold of sodium shall not exceed 1 g /kg calculated on the ready-to-eat basis.
  - The addition of salt to fruit products and dessert products based on fruit shall be prohibited.
  - If the canned food contains any carbohydrates,<sup>xvii</sup> the label for the product shall not contain the words ‘sugarless’, ‘sugar free’ or words of a similar meaning.
  - Canned food for infants and children may contain the food additives specified in Table II to the Twenty-second Schedule.

<sup>viii</sup> Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments – First Schedule Regulation 3: Food Requiring Written Warranty.

<sup>ix</sup> Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments – Fifth Schedule Regulation 14: Food Requiring Date Marking.

<sup>x</sup> Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments – Fifth A Schedule Regulation 18C, 18D, 18E, 18F and 26: Tables I-V: Conditions for Claims.

<sup>xi</sup> Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments- Fourteenth Schedule Regulation 38: Maximum permitted proportion of metal contaminant in specific food (arsenic, lead, tin, mercury, cadmium).

<sup>xii</sup> Fifteenth Schedule Regulation 39: Mycological contaminant for cereal-based food for infants and children (aflatoxin M1, Ochratoxin A).

<sup>xiii</sup> Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments – Twenty-Second Schedule (Regulation 390(7)) Table I Subregulation 390(6) and Subregulation 391 (6) Table I-II. Nutrient levels for canned and cereal-based food (minimum/maximum) and permitted food additive in canned food.

<sup>xiv</sup> Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments – Twenty-Third Schedule (Regulation 391(7)) Permitted food additive in processed cereal-based food and food additives.

<sup>xv</sup> Original text from binding legal measures has been amended here for consistency and ease-of-reading.

<sup>xvi</sup>The term "carbohydrate" includes alcohol, glycerol, sorbitol or sugar alcohol, and any carbohydrate substance that is capable of being metabolized.

<sup>xvii</sup>The term "carbohydrate" includes alcohol, glycerol, sorbitol or sugar alcohol, and any carbohydrate substance that is capable of being metabolized.

- **Regulation 391: Cereal-based foods for infants and children**
  - Cereal-based foods are intended for feeding older infants and young children as a complementary food from 6 months of age and are intended to be prepared primarily from one or more milled cereals, such as wheat, rice, barley, oats, rye, maize, millet, sorghum and buckwheat. These grains shall constitute at least 25 per cent of the final mixture on a dry weight basis. They may also contain legumes or pulses, starchy roots, such as arrowroot, yam, cassava, starchy stems, or oil seeds in smaller proportions.
  - Following the provisions of Codex "Standard for processed cereal-based foods for infants and young children, CXS 74-1981", Regulation 391 classifies cereal-based foods in four categories, as follows:
    - Products containing cereals served with milk or other appropriate liquid nutritional products
    - Cereals with fortified protein foods, served with water or other appropriate liquid nutritional products containing protein
    - Pasta, served after being cooked
    - Rusk and biscuit eaten directly or served with water, milk or other suitable liquid product.
  - Nutrient content for cereal-based foods is specified for energy density, protein, carbohydrate, lipids, sodium, calcium, vitamin B<sub>1</sub>, vitamin A, vitamin D and 15 micronutrient levels in the Twenty-Second Schedule.
  - The sodium content for the processed cereal-based foods for infants and young children shall not exceed 100 mg per 100 kcal or 24 mg per 100 kJ for ready-to-eat products.
  - The addition of salt to fruit products and dessert products based on fruit shall be prohibited.
  - If the canned food or cereal-based food contains any carbohydrates,<sup>xviii</sup> the label shall not contain the words 'sugarless', 'sugar free' or any other word of similar meaning.
  - Cereal-based food may contain the food additives deemed allowable in the Twenty-third Schedule.
  - The processed cereal-based foods for infants and children shall be free from residues of hormones, antibiotics, and pesticides, and shall comply with requirement of metal contaminant specified in Table I, IA, IB, IC, ID and IE to the Fourteenth Schedule.
  - Cereal-based foods shall comply with the requirement of mycological contaminant for aflatoxin and Ochratoxin as per the Fifteenth Schedule Regulation 39.

#### 4.1.2 Labelling practices

The same Regulations provide regulations related to the labelling of canned foods and cereal-based foods, in the following way:

- **For both canned and cereal-based foods:**
  - CPCF labelling should appear in Bahasa Malaysia and may include translation in any other language.
  - It is mandatory to write the words, "NOT TO BE GIVEN TO INFANTS UNDER SIX (6) MONTHS OF AGE UNLESS ADVISED BY A HEALTH PROFESSIONAL" on the label of the canned food or cereal-based food in not less than 10-point lettering.
  - For both canned and cereal-based foods, it is mandatory to write the following on the label in not less than 4-point lettering:
    - The amount of energy, expressed in kilocalorie (kcal), or kilojoule (kJ) or both, and the amount of protein, carbohydrate, fat, vitamin and mineral content per 100 grams of the food as sold and as per specified quantity of the food as suggested for consumption
    - The direction for the preparation and use of the food and instruction on its storage before and after the package has been opened; and (may be written in an accompanying leaflet)

<sup>xviii</sup>The term "carbohydrate" includes alcohol, glycerol, sorbitol or sugar alcohol, and any carbohydrate substance that is capable of being metabolized.

- A statement that canned food for infants and children shall not be fed through a bottle or any other word of similar meaning
- For cereal-based foods: For products that need to be prepared with milk: directions on the label shall state, "only milk shall be used for dilution or mixing", or an equivalent statement.
- Date marking and written warranty.
- The Food Regulations permits claims for both types of food categories if some conditions are fulfilled. The claims and the conditions are defined in Food Regulation - Fifth A Schedule Table I-V.
- The following type of claims are permitted:
  - Nutrition claims
  - Function claims
  - Other function claims
  - Claims related to added nutrients.
- **Regulation 390: Canned food for infants and children**
  - For canned foods for older infants and children, it is mandatory to write on the label in not less than 10-point lettering the word "STRAINED" or "NON - STRAINED", as the case may be, immediately followed by the name of the food. No other word or words shall appear on the same line.
- **Regulation 391: Cereal-based foods for infants and children**
  - For cereal-based foods, it is mandatory to write on the label in not less than 10-point lettering:
    - The form/type of processed cereal-based foods for infants and young children such as "dry cereal for infants (and/or young children)", "rusks for infants (and/or young children)" or "biscuits or milk biscuits for infants (and/or young children)" or "pasta for infants (and/or young children)".
    - The words "FOR OPTIMAL INFANT HEALTH, BREASTFEEDING SHOULD CONTINUE UP TO TWO (2) YEARS OF AGE ALONG WITH COMPLEMENTARY FEEDING".
  - No labels of processed cereal-based foods for infants and young children shall display any picture, graphic or text that idealizes the use of the product.
  - No picture and graphics of infants less than 6 months of age shall be displayed on any label of processed cereal-based foods for infants and young children.

## 4.2 Alignment of Malaysia binding legal measures for CPCF to Codex Standards and Guidelines and WHO Guidance

The content of the two identified binding legal measures for CPCF in Malaysia were compared against the Codex Standards and Guidelines and WHO Guidance to determine their degree of alignment (**Table 3**) (red: no binding legal measures; yellow: partial alignment; green: full alignment).

**Table 3: Alignment of Malaysia binding legal measures with Codex Standards and Guidelines and the WHO Guidance**

Global guidance	Binding legal measures in Malaysia relating to Codex and WHO Guidance		
	Name of binding legal measure(s)	Content of binding legal measure(s)	Alignment with global guidance <sup>xix</sup>
<b>Codex Alimentarius</b>			
1. Standard for processed cereal-based foods for infants and young children, CXS 74-1981	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations	Regulation about the composition, labelling and claims of food in general.	Green
2. Standard for canned baby foods, CXS 73-1981	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations	Regulation about the composition, labelling and claims of food in general.	Green
3. General standard for labelling of pre-packaged foods, CXS 1- 1985	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations	Regulation about the composition, labelling and claims of food in general.	Yellow
4. Guidelines on nutritional labelling, CXG 2 – 1985	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations	Regulation about the composition, labelling and claims of food in general.	Yellow
5. Guidelines on formulated complementary foods for older infants and young children, CAC/GL 8-1991	No legal measures	–	Red
6. Guidelines for use of nutrition and health claims, CAC/GL 23 – 1997	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations	Regulation about the composition, labelling and claims of food in general.	Green
<b>WHO Guidance</b>			
1. WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations	Regulation about the composition, labelling and claims of food in general.	Yellow

<sup>xix</sup> No binding legal measure means that the binding legal measures identified for analysis made no reference to any of the recommended CPCF nutrient composition or labelling practices. Partial alignment means that binding legal measures include some component of the recommended CPCF nutrient composition or labelling practices, but not all. Full alignment means that the active legal binding measure includes all components of the recommended CPCF nutrient composition or labelling practices.

### 4.3 Alignment of binding legal measures in Malaysia for CPCF with the adapted version of the 2019 WHO Europe NPM for CPCF nutrient composition and labelling practice requirements

The content of the two identified binding legal measures for CPCF in Malaysia were compared against the adapted version of the 2019 WHO Europe NPM for CPCF nutrient composition (Table 4) and labelling practice requirements (Table 5) to determine their degree of alignment (red: no binding legal measures; yellow: partial alignment; green: full alignment). In some instances, the degree of alignment is noted for specific CPCF food categories. See Annex 1 for more detail on the food category-specific nutrient composition and labelling practice requirements.

**Table 4: Alignment of Malaysian binding legal measures with nutrient composition requirements in the adapted 2019 WHO Europe NPM for CPCF**

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Malaysia relating to the adapted WHO Europe NPM for CPCF nutrient composition requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>xx</sup>
<b>CPCF products that automatically should not be promoted</b>					
Sweet confectionery, sweet spreads and fruit chews	Category 4.1	No legal measures	--	--	
Single or mixed fruit juices, vegetable juices or other non-formula drinks	Category 5.1	No legal measures	--	--	
Cow's milk and milk alternatives, with added sugar or sweetening agent	Category 5.2	No legal measures	--	--	
<b>Nutrient composition requirements</b>					
No added sugars or sweeteners	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, Regulation 391 (8), letters a-b	Cereal-based CPCF	<ul style="list-style-type: none"> <li>• Maximum amounts of sucrose, fructose, glucose, glucose syrup or honey are specified for cereal-based foods but not prohibited.</li> <li>• No mention of non-sugar sweeteners in circular.</li> <li>• Does not include all CPCF food categories.</li> </ul>	For product categories 1 and 4
					For product categories 2 and 3

<sup>xx</sup> No binding legal measure means that the binding legal measures identified for analysis made no reference to any of the recommended CPCF nutrient composition or labelling practice. Partial alignment means that binding legal measures include some component of the recommended CPCF nutrient composition or labelling practice, but not all. Full alignment means that the active legal binding measure includes all components of the recommended CPCF nutrient composition or labelling practice.

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Malaysia relating to the adapted WHO Europe NPM for CPCF nutrient composition requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>xx</sup>
Food category-specific sodium limits	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments	Cereal-based CPCF and canned CPCF	<ul style="list-style-type: none"> <li>For cereal-based foods: the sodium threshold shall not exceed 100 mg /100 kcal for ready-to-eat products.</li> <li>For canned foods: the sodium threshold shall not exceed 1 g/1 kg calculated on the ready-to-eat basis in accordance with the direction for use.</li> <li>Does not include CPCF product categories 4.3.</li> </ul>	
Food category-specific total fat limit	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, Regulation 391 (9), letters a-c	Cereal-based CPCF	<ul style="list-style-type: none"> <li>For products without milk in the ingredient list and for other snack and finger foods, total fat should be <math>\leq 3.3</math> g /100 kcal.</li> </ul>	For product categories 1 and 4
				<ul style="list-style-type: none"> <li>For dry or instant cereals/starch with milk in the ingredients list, total fat should be <math>\leq 4.5</math> g /100 kcal.</li> </ul>	For product categories 2 and 3
Food category-specific limit on percentage of fruit content	Categories 1.1, 2.1, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, and 3.2	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, Regulation 391 (8), letters a-b	Cereal-based CPCF	<ul style="list-style-type: none"> <li>Fruit content is not specified</li> <li>Category 1.1 (dry or instant cereals) has a maximum total sugar content including fructose.                             <ul style="list-style-type: none"> <li>For cereals without milk added, the maximum fructose is 3.75 g/100 kcal (15 per cent), which is 50 per cent higher than the adapted NPM requirement.</li> <li>For cereals with milk added, the maximum is 2.5 g/100 kcal (10 per cent), which is in line with the adapted NPM requirement.</li> </ul> </li> <li>Does not include all CPCF food categories 2 and 3.</li> </ul>	For product category 1
					For product categories 2 and 3

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Malaysia relating to the adapted WHO Europe NPM for CPCF nutrient composition requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>xx</sup>
Food category-specific total sugar limit	Category 4.3	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, Regulation 391 (8)	Cereal-based CPCF	<ul style="list-style-type: none"> <li>Rusks and biscuits should contain less than 30 per cent energy from total sugars and 7.5 g/100 kcal of additional carbohydrates from sucrose, fructose, glucose syrup, or honey, which is double the adapted NPM limit.</li> <li>Additional fructose should be less than (15 per cent) 3.75 g/100 kcal.</li> </ul>	
Food category-specific protein threshold	Categories 1.1, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments	Cereal-based CPCF	For dry or instant cereals/starch with milk added, minimum protein should be 2 g/100 kcal and a maximum of 5.5 g/100 kcal.	For product category 1
					For product category 2 and 3
Food category-specific minimum for energy density	Categories 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7	No legal measures	--	--	
<b>Thresholds that are not included as a measured component of the adapted WHO Europe NPM for CPCF</b>					
Front-of-pack high sugar warning: Required if the percentage of energy from total sugar content exceeds category-specific thresholds <sup>xxi</sup>	All categories except 4.2 and 4.3	Laws of Malaysia PU(A) 437/1985 Food Regulations	Cereal-based CPCF	<ul style="list-style-type: none"> <li>Cereals not containing milk should contain less than 30 per cent energy from total sugars and 7.5 g/100 kcal.</li> </ul>	For product category 1

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Malaysia relating to the adapted WHO Europe NPM for CPCF nutrient composition requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>xx</sup>
		with Amendments, Regulation 391 (8)		<ul style="list-style-type: none"> <li>• Cereals containing milk should contain less than 20 per cent energy from total sugar from sucrose, fructose, glucose syrup or honey.</li> <li>• CPCF containing more than this amount should not be sold.</li> </ul>	For product categories 2 and 3
Standards for micronutrient content of CPCF	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments: <ul style="list-style-type: none"> <li>• Twenty-Second Schedule (Regulation 390 (6)) Table I -II</li> <li>• Twenty-Third Schedule (Regulation 391 (7)) Table I-I</li> <li>• Regulation 390 (3)-(4)</li> <li>• Regulation 391 (10)</li> <li>• Regulation 391 (11)</li> <li>• Regulation 391 (12)</li> </ul>	Cereal-based CPCF and canned CPCF	<ul style="list-style-type: none"> <li>• The tables in the twenty-second schedule regulate the major micronutrients in cereal-based foods and canned foods (Annex 4).</li> <li>• The Twenty-Second Schedule supersedes the separate regulations in 390 and 391 for calcium, vitamin B<sub>1</sub>, vitamin A and vitamin D.</li> </ul>	

**Table 5: Alignment of Malaysian binding legal measures with labelling practice requirements in the adapted WHO Europe NPM for CPCF**

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Malaysia relating to the adapted WHO Europe NPM for CPCF labelling practice requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>xxii</sup>
<b>Claims requirement:</b> No claims	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments: <ul style="list-style-type: none"> <li>Fifth A Schedule (Regulation 18C, 18D, 18E, 18F and 26) Table I-V</li> </ul>	All CPCF	<ul style="list-style-type: none"> <li>The Food Regulations are in line with Codex for the use of nutrient function and nutrient content if required conditions are fulfilled. In addition to claims in line with Codex, other claims are included in the Food Regulations:                             <ul style="list-style-type: none"> <li>“Other claims” includes some health claims for Beta glucan, Bifidobacterium lactis (specific to CPCF), oligosaccharide mixture, resistant dextrin or resistant maltodextrin, inulin, isomaltose, high amylose maize resistance starch, oligofructose/fructooligosaccharide, polydextrose, soy protein, plant sterol and slowly digestible starch.</li> </ul> </li> </ul>	
<b>Appropriate age restriction requirements:</b> <ul style="list-style-type: none"> <li>All CPCF categories have a minimum recommended age of use of 6 months</li> <li>All category 2 CPCF have a maximum age of 12 months</li> </ul>	All categories must have a minimum recommended age of use, and category 2 products have a maximum age	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments	For cereal-based CPCF and canned CPCF	<ul style="list-style-type: none"> <li>For canned and cereal-based food: the label shall include the following statement: “NOT BE GIVEN TO INFANTS UNDER SIX MONTHS OF AGE UNLESS ADVISED BY A HEALTH PROFESSIONAL”.</li> <li>No maximum age for category 2 CPCF.</li> </ul>	
<b>Not marketed as suitable for children aged &lt;6 months requirement:</b>	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with	For cereal-based CPCF	Regulation 391 (20) states that no picture and graphics of an infant less than 6 months shall be displayed on any label of processed	For product categories 1 and 4

<sup>xxii</sup> No binding legal measure means that the binding legal measures identified for analysis made no reference to any of the recommended CPCF nutrient composition or labelling practices. Partial alignment means that binding legal measures include some component of the recommended CPCF nutrient composition or labelling practices, but not all. Full alignment means that the active legal binding measure includes all components of the recommended CPCF nutrient composition or labelling practices.

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Malaysia relating to the adapted WHO Europe NPM for CPCF labelling practice requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>xxii</sup>
No image/text that suggests suitability for infants aged <6 months		Amendments: Regulation 391 (20) - <u>just for cereal-based foods</u>		cereal-based foods for infants and young children.	For product categories 2 and 3
<b>Message on importance of breastfeeding for up to 2 years and beyond requirement</b>	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments: Regulation 391 (20) - <u>just for cereal-based foods</u>	For cereal-based CPCF	<ul style="list-style-type: none"> <li>Regulation 391 (17) states that the following words shall be written on the label of a package containing processed cereal-based foods for infants and young children in not less than 10-point lettering: "FOR OPTIMAL INFANT HEALTH, BREASTFEEDING SHOULD CONTINUE UP TO TWO (2) YEARS OF AGE ALONG WITH COMPLEMENTARY FEEDING."</li> </ul>	For product categories 1 and 4 For product categories 2 and 3
<b>Does not suggest equivalence or superiority to breastmilk requirement</b>	All categories	No legal measures	--	--	
<b>Does not recommend or promote bottle-feeding requirement</b>	All categories	<ul style="list-style-type: none"> <li>Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments</li> <li>Regulation 391 (17) b/iii for cereal-based foods, Regulation 390 (10) d (canned foods)</li> </ul>	For cereal-based CPCF and canned CPCF	<ul style="list-style-type: none"> <li>Mandates a statement that cereal-based/canned CPCF shall not be fed through bottle or any other words of similar meaning.</li> <li>No inclusion of use of images.</li> </ul>	
<b>Product name reflects ingredients in descending order as per ingredient list requirement</b>	All categories	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, article 11/ 1 letter a	All CPCF	The appropriate designation of the food or a description of the food containing the common name of its principal ingredients or if there is no common name of its principal ingredients, an appropriate descriptive term of the food that is not misleading.	

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Malaysia relating to the adapted WHO Europe NPM for CPCF labelling practice requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>xxii</sup>
<p><b>Percentage of fruit stated in ingredient list requirement:</b></p> <p>If the product contains fruit, the ingredient list should include fruit (fresh or powdered/processed) by percentage weight</p>	Categories 1.1, 2.1, 2.2, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2, 4.3	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, article 11/ 1 letter e	All CPCF	Where the food consists of two or more ingredients other than water, food additives and added nutrients, the appropriate designation of each of those ingredients in descending order of proportion by weight and, wherever required by these Regulations, a declaration of the proportion of such ingredient.	
<p><b>Percentage of added water stated in ingredient list:</b></p> <p>If the product contains added water, the ingredient list should include water by percentage weight</p>	Categories 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, article 11/ 1 letter e	All CPCF	Where the food consists of two or more ingredients other than water, food additives and added nutrients, the appropriate designation of each of those ingredients in descending order of proportion by weight and, wherever required by these Regulations, a declaration of the proportion of such ingredient.	
<p><b>Percentage of protein stated in ingredient list requirement:</b></p> <p>If the product is a main meal, the ingredient list should include protein by percentage weight</p>	Categories 2.6, 2.7, 2.8, 3.1	Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments, article 11/ 1 letter e	All CPCF	Where the food consists of two or more ingredients other than water, food additives and added nutrients, the appropriate designation of each of those ingredients in descending order of proportion by weight and, wherever required by these Regulations, a declaration of the proportion of such ingredient.	
<p><b>Messages on products with a spout requirements:</b></p> <ul style="list-style-type: none"> <li>Statement informing that infants and young children must not be allowed to suck from the container</li> <li>Statement that warns against choking hazard</li> </ul>	Category 2 products with a spout	No legal measures	--	--	

# Conclusion

In this review of binding legal measures pertaining to CPCF in Malaysia, two active binding legal measures were reviewed and compared to the six relevant Codex Standards and Guidelines, the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children and the nutrient composition and labelling practice requirements defined in the adapted version of the 2019 WHO Europe NPM for CPCF used by COMMIT in Southeast Asia.

With regard to nutrient composition, the Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations, namely Regulations 390 and 391 adopt the majority of provisions of two Codex Standards: "Standard for canned baby foods, CXS 73-1981" and "Standard for processed cereal-based foods for infants and young children, CXS 74-1981". In Malaysia there are no active binding legal measures pertaining to other CPCF product categories.

With regards to labelling practices, the Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations, namely Regulations 390 and 391, partially address some labelling practices recommended in the adapted WHO Europe NPM for CPCF and outlined in Codex Standards and Guidelines and WHO Guidance.

The main conclusions from the review are summarized below:

## 1 Binding legal measures cover the appropriate age range and the majority of CPCF product categories.

The Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations, namely Regulations 390 and 391, have an age range of 0 to 36 months for CPCF in line with the adapted WHO Europe NPM for CPCF. Regulation 390 (canned baby foods) pertains to 10 of the NPM product categories, while Regulation 391 (cereal-based foods) pertains to two additional NPM product categories. While Regulation 388 is inclusive of all CPCF categories, there are no nutrient composition standards included for four of the adapted 2019 WHO Europe NPM for CPCF product categories, including confectionery, sweetened milks, other drinks and fresh or dried fruit.

## 2 Use of the Bahasa Malaysia language is required on CPCF product labels.

The Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations, namely Regulations 390 and 391, state that CPCF labelling should appear in Bahasa Malaysia and may additionally include translation in any other language. While there is no specification on what is covered under CPCF labelling, in line with Codex Standards, it is assumed that this includes the ingredients list, nutrition information declaration and all claims.

## 3 Binding legal measures do not prohibit the promotion of CPCF that are categorized as sweet confectionery and all non-BMS drinks, such as fruit and vegetable juices, teas and sweetened milk drinks.

The two binding legal measures do not identify specific categories of CPCF or thresholds whereby CPCF should be or should not be promoted. Additionally, the three categories of CPCF that are prohibited from promotion in the adapted 2019 WHO Europe NPM for CPCF (sweet confectionery and all non-BMS drinks such as fruit and vegetable juices, teas, and sweetened milk drinks) are not included in either Regulation 390 or Regulation 391.

**4 Binding legal measures provide thresholds for the nutrient composition of cereal-based and canned CPCF that are in line with Codex but are not aligned with the adapted WHO Europe NPM for CPCF.**

The Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations, namely Regulations 390 and 391, provide nutrient composition thresholds for cereal-based and canned baby foods that are in line with Codex but are not aligned with the adapted 2019 WHO Europe NPM for CPCF. Current measures do not restrict the addition of added sugars or sweeteners and the threshold for sodium is double that recommended in the NPM. It is noted that the Laws of Malaysia PU(A) 437/1985 provide minimum thresholds for 15 micronutrients and maximum thresholds for vitamin D and A that pertain to all cereal-based and canned CPCF. This is inclusive of 12 of the 13 permitted CPCF product categories identified in the NPM, with only fresh or dry whole fruit or pieces excluded from this legislation.

**5 The binding legal measures for the use of claims on CPCF products are aligned with the Codex Guidelines, but fall short of the adapted WHO Europe NPM for CPCF requirement.**

The Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments for Special Purpose Food were amended in 2020 to be fully in line with Codex to allow nutrient content claims, nutrient function claims, nutrient comparative claims and claims for enrichment and fortification, provided that they meet the conditions set by Codex and the Laws of Malaysia PU(A) 437/1985. It is noted that all measures of the Codex Guidelines for use of nutrition and health claims, CAC/GL 23 – 1997, are incorporated into the national legislation; however, the measure does not prohibit the use of any claims as required by the adapted 2019 WHO Europe NPM for CPCF.

**6 Binding legal measures are in partial alignment with the WHO Guidance and the adapted WHO Europe NPM for CPCF for the inclusion of mandatory messages and labelling requirements to protect, promote and support breastfeeding.**

The Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations, namely Regulation 391, include some of the NPM mandatory messages and labelling requirements to protect, promote and support breastfeeding. Regulation 391 contains additional requirements compared to Regulation 390, including a specific message on the importance of breastfeeding for up to 2 years and beyond, and a message that pictures or graphics representing an infant under 6 months of age are not to be used. These specific requirements for cereal-based CPCF are not required for canned CPCF.

Malaysia has some binding legal measures in place to meet several of the adapted 2019 WHO Europe NPM for CPCF labelling practice requirements with the appropriate age range of children covered and nearly all CPCF product categories included in the measures. The current measures are in line with Codex Standards for cereal-based and canned baby foods, which incorporate 12 of the 13 NPM product categories allowed for promotion. The existing binding legal measures in Malaysia do not meet the adapted 2019 WHO Europe NPM for CPCF thresholds for no added sugar or sweeteners and instead allow for double the recommended sodium thresholds. Further, the measures do not distinguish nutrient-poor CPCF product categories (such as confectionery and all non-BMS drinks that should never be promoted) from other product categories. However, it is noted that the binding legal measures for the use of claims are in line with the relevant Codex Standards and Guidelines and include minimum and maximum thresholds for micronutrients in CPCF. Required messaging for the protection, promotion and support of breastfeeding is also in place for cereal-based foods, with partial messaging for canned baby foods.

Updating or amending the Laws of Malaysia PU(A) 437/1985 Food Regulations with Amendments - Food Regulations, namely Regulations 388, 390 and 391, would address the current gaps and ensure that regulations and policies protect optimal infant and young child diets.

# Annex 1

## Final Commercially Produced Complementary Food Nutrient Profile and Labelling Model utilized by the COMMIT Initiative in Southeast Asia

Products that automatically fail the adapted WHO Europe NPM for CPCF and are thus not suitable for promotion:

4.1 - Sweet confectionery, sweet spreads, and fruit chews (including category 4.3 if total sugar >15 per cent total energy)

5.1 - Single or mixed fruit juices, vegetable juices or other non-formula drinks

5.2 - Cow's milk and milk alternatives, with added sugar or sweetening agent

**Table A1: Nutrient composition requirements**

Requirement	Subcategory	Relevant threshold
<b>No added sugar/sweetener threshold:</b> No added sugar/sweetener in product ingredient list	Requirement for <b>all</b> subcategories	
<b>Low/no added fruit threshold:</b> Product did not exceed category-specific fruit content limit	1.1 Dry or instant cereals/starch	≤10%
	2.1 Dairy-based desserts and cereal products	≤5%
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	N/A
	2.3 Vegetable-only purée	0% (none allowed)
	2.4 Puréed vegetables and cereals	0% (none allowed)
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	≤5%
	2.6 Puréed meal with meat or fish mentioned as first food in product name	≤5%
	2.7 Puréed meals with meat or fish (but not named first in product name)	≤5%
	2.8 Purées with only meat, fish or cheese in name	≤5%
	3.1 Meat, fish or cheese-based meal with chunky pieces	≤5%
	3.2 Vegetable-based meal with chunky pieces	≤5%
	4.2 Fruit (fresh or dry whole fruit or pieces)	N/A
	4.3 Other snacks and finger foods	N/A
	<b>Total sugar threshold:</b> Product did not exceed category-specific total sugar limit	1.1 Dry or instant cereals/starch
2.1 Dairy-based desserts and cereal products		N/A
2.2 Fruit purée with or without addition of vegetables, cereals or milk		N/A
2.3 Vegetable-only purée		N/A

Requirement	Subcategory	Relevant threshold
	2.4 Puréed vegetables and cereals	N/A
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	N/A
	2.6 Puréed meal with meat or fish mentioned as first food in product name	N/A
	2.7 Puréed meals with meat or fish (but not named first in product name)	N/A
	2.8 Purées with only meat, fish or cheese in name	N/A
	3.1 Meat, fish or cheese-based meal with chunky pieces	N/A
	3.2 Vegetable-based meal with chunky pieces	N/A
	4.2 Fruit (fresh or dry whole fruit or pieces)	N/A
	4.3 Other snacks and finger foods	Total sugar <3.75 g/100 kcal (15% total energy)
<b>Sodium threshold:</b> Product did not exceed category-specific sodium limit	1.1 Dry or instant cereals/starch	<50 mg/100 kcal
	2.1 Dairy-based desserts and cereal products	<50 mg/100 kcal and <50 mg/100 g
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	<50 mg/100 kcal and <50 mg/100 g
	2.3 Vegetable-only purée	<50 mg/100 kcal and <50 mg/100 g
	2.4 Puréed vegetables and cereals	<50 mg/100 kcal and <50 mg/100 g
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	<100 mg/100 kcal and 100 mg/100 g
	2.6 Puréed meal with meat or fish mentioned as first food in product name	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/100 kcal and <100 mg/100 g if cheese is listed in front-of-pack name)
	2.7 Puréed meals with meat or fish (but not named first in product name)	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/100 kcal and <100 mg/100 g if cheese is listed in front-of-pack name)
	2.8 Purées with only meat, fish or cheese in name	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/100 kcal and <100 mg/100 g if cheese is listed in front-of-pack name)
	3.1 Meat, fish or cheese-based meal with chunky pieces	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/10kcal and <10 mg/10 g if

Requirement	Subcategory	Relevant threshold
		cheese is listed in front-of-pack name)
	3.2 Vegetable-based meal with chunky pieces	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/100 kcal and <100 mg/100 g if cheese is listed in front-of-pack name)
	4.2 Fruit (fresh or dry whole fruit or pieces)	<50 mg/100 kcal and <50 mg/100 g
	4.3 Other snacks and finger foods	<50 mg/100 kcal and <50 mg/100 g
<b>Energy density threshold:</b> Product met category-specific minimum for energy density	1.1 Dry or instant cereals/starch	N/A
	2.1 Dairy-based desserts and cereal products	≥60 kcal/100 g
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	≥60 kcal/100 g
	2.3 Vegetable-only purée	added water <25% by weight
	2.4 Puréed vegetables and cereals	≥60 kcal/100 g
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	≥60 kcal/100 g
	2.6 Puréed meal with meat or fish mentioned as first food in product name	≥60 kcal/100 g
	2.7 Puréed meals with meat or fish (but not named first in product name)	≥60 kcal/100 g
	2.8 Purées with only meat, fish or cheese in name	N/A
	3.1 Meat, fish or cheese-based meal with chunky pieces	N/A
	3.2 Vegetable-based meal with chunky pieces	N/A
	4.2 Fruit (fresh or dry whole fruit or pieces)	N/A
	4.3 Other snacks and finger foods	N/A
	<b>Protein threshold:</b> Product met category-specific threshold for protein	1.1 Dry or instant cereals/starch
2.1 Dairy-based desserts and cereal products		<u>Only products with added milk in ingredients:</u> total protein <5.5 g/100 kcal
2.2 Fruit purée with or without addition of vegetables, cereals or milk		N/A
2.3 Vegetable-only purée		N/A
2.4 Puréed vegetables and cereals		N/A
2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name		total protein ≥3 g/100 kcal
2.6 Puréed meal with meat or fish mentioned as first food in product name		total protein ≥4 g/100 kcal and protein named first in product

Requirement	Subcategory	Relevant threshold
		name must be $\geq 10\%$ weight
	2.7 Puréed meals with meat or fish (but not named first in product name)	total protein $\geq 3$ g/100 kcal and protein(s) in product name must be $\geq 8\%$ weight
	2.8 Purées with only meat, fish or cheese in name	total protein $\geq 7$ g/100 kcal
	3.1 Meat, fish or cheese-based meal with chunky pieces	total protein $\geq 4$ g/100 kcal and protein(s) in product name must be $\geq 10\%$ weight
	3.2 Vegetable-based meal with chunky pieces	total protein $\geq 3$ g/100 kcal
	4.2 Fruit (fresh or dry whole fruit or pieces)	N/A
	4.3 Other snacks and finger foods	N/A
<b>Total fat threshold:</b> Product did not exceed category-specific total fat limit	1.1 Dry or instant cereals/starch	$\leq 4.5$ g total fat/ 100 kcals for products with milk in ingredient list; $\leq 3.3$ g total fat/ 100 kcals for products without milk in ingredient list
	2.1 Dairy-based desserts and cereal products	$\leq 4.5$ g/ 100 kcals total fats
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	$\leq 4.5$ g/ 100 kcals total fats
	2.3 Vegetable-only purée	$\leq 4.5$ g/ 100 kcals total fats
	2.4 Puréed vegetables and cereals	$\leq 4.5$ g/ 100 kcals total fats
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	$\leq 6$ g/100 kcal total fat
	2.6 Puréed meal with meat or fish mentioned as first food in product name	$\leq 6$ g/100 kcal total fat
	2.7 Puréed meals with meat or fish (but not named first in product name)	$\leq 4.5$ g/ 100 kcals total fats
	2.8 Purées with only meat, fish or cheese in name	$\leq 6$ g/100 kcal total fat
	3.1 Meat, fish or cheese-based meal with chunky pieces	$\leq 6$ g/ 100 kcals total fats
	3.2 Vegetable-based meal with chunky pieces	$\leq 4.5$ g/ 100 kcals total fats
	4.2 Fruit (fresh or dry whole fruit or pieces)	$\leq 4.5$ g/ 100 kcals total fats
	4.3 Other snacks and finger foods	$\leq 4.5$ g/ 100 kcals total fats

Requirement	Subcategory	Relevant threshold
Front-of-pack for high sugar warning	1.1 Dry or instant cereals/starch	total sugar $\geq$ 10 g/100 kcal (30% total energy)
	2.1 Dairy-based desserts and cereal products	total sugar $\geq$ 7.5 g/100 kcal (30% total energy)
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	total sugar $\geq$ 7.5 g/100 kcal (30% total energy)
	2.3 Vegetable-only purée	total sugar $\geq$ 7.5 g/100 kcal (30% total energy)
	2.4 Puréed vegetables and cereals	total sugar $\geq$ 5 g/100 kcal (20% total energy)
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	total sugar $\geq$ 3.75 g/100 kcal (15% total energy)
	2.6 Puréed meal with meat or fish mentioned as first food in product name	total sugar $\geq$ 3.75 g/100 kcal (15% total energy)
	2.7 Puréed meals with meat or fish (but not named first in product name)	total sugar $\geq$ 3.75 g/100 kcal (15% total energy)
	2.8 Purées with only meat, fish or cheese in name	total sugar $\geq$ 3.75 g/100 kcal (15% total energy)
	3.1 Meat, fish or cheese-based meal with chunky pieces	total sugar $\geq$ 3.75 g/100 kcal (15% total energy)
	3.2 Vegetable-based meal with chunky pieces	total sugar $\geq$ 3.75 g/100 kcal (15% total energy)
	4.2 Fruit (fresh or dry whole fruit or pieces)	N/A
	4.3 Other snacks and finger foods	N/A

**Table A2: Labelling practice requirements**

Requirement category	Labelling requirement	Relevant categories
Protection and promotion of breastfeeding	Has a minimum recommended age of introduction of at least 6 months	Requirement for <b>all</b> subcategories
	Not marketed as suitable for children <6 months of age	
	Message on importance of breastfeeding until age 2 or longer	
	Does not suggest superiority or equivalence to breastmilk	
	Does not recommend or promote bottle-feeding	
Claims	No non-permitted compositional claims	Requirement for <b>all</b> subcategories
	No nutrient content claims	
	No nutrient function claims	
	No disease risk reduction claims	
	No other claims	
Product name and ingredient list clarity	Product name reflects ingredients in descending order as per ingredient list	Requirement for <b>all</b> subcategories
	Percentage of fruit stated in ingredient list	If product contains fruit, for subcategories: 1.1, 2.1, 2.2, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2, and 4.3
	Percentage of added water stated in ingredient list	If product contains added water, for subcategories: 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, and 3.2
	Percentage of protein stated in ingredient list	If product is a main meal, for subcategories: 2.6, 2.7, 2.8, and 3.1
Messages on products with a spout	Product with spout states not to suck from the container	Category 2 products with a spout
	Product with spout warns that cap is a choking hazard	Category 2 products with a spout
Age restriction on blended/puréed products	Maximum recommended age of use of 12 months?	Category 2 products

# Annex 2

## CPCF product categories defined by the adapted WHO Europe NPM for CPCF, mapped to relevant Codex Standards and Guidelines and WHO Guidance

Table A3 presents the specific Codex Standards and Guidelines that provide recommendations for each of the 16 CPCF product categories defined in the adapted WHO Europe NPM for CPCF, and the CPCF product categories that are covered by the WHO Guidance.

**Table A3: CPCF product categories covered in relevant Codex Standards and Guidelines and the WHO Guidance**

CPCF product category	Relevant Codex Alimentarius Standards and Guidelines						WHO Guidance
	Standard for processed cereal-based foods for infants and young children	Standard for canned baby foods	Guidelines on formulated complementary foods for older infants and young children	General standard for labelling of pre-packaged foods	Guidelines on nutritional labelling	Guidelines for use of nutrition and health claims	WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children
1.1 Dry or instant cereals/starch	X			X	X	X	X
2.1 Dairy-based desserts and cereal products		X		X	X	X	X
2.2 Fruit purée with or without addition of vegetables, cereals or milk		X		X	X	X	X
2.3 Vegetable-only purée		X		X	X	X	X
2.4 Puréed vegetables and cereals		X		X	X	X	X
2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name		X		X	X	X	X
2.6 Puréed meal with meat or fish mentioned as first food in product name		X		X	X	X	X

CPCF product category	Relevant Codex Alimentarius Standards and Guidelines						WHO Guidance
	Standard for processed cereal-based foods for infants and young children	Standard for canned baby foods	Guidelines on formulated complementary foods for older infants and young children	General standard for labelling of pre-packaged foods	Guidelines on nutritional labelling	Guidelines for use of nutrition and health claims	WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children
2.7 Puréed meals with meat or fish (but not named as the first food in product name)		X		X	X	X	X
2.8 Purées with only meat, fish or cheese in name of product		X		X	X	X	X
3.1 Meat, fish or cheese-based meal with chunky pieces		X		X	X	X	X
3.2 Vegetable-based meal with chunky pieces		X		X	X	X	X
4.1 Confectionery, sweet spreads and fruit chews			X	X	X	X	X
4.2 Fruit (fresh or dry whole fruit or pieces)			X	X	X	X	X
4.3 Other snacks and finger foods	X			X	X	X	X
5.1 Single or mixed fruit juices, vegetable juices or other non-formula drinks			X	X	X	X	X
5.2 Cow's milk and milk alternatives with added sugar or sweetening agent			X	X	X	X	X

# Annex 3

## Nutrient composition

Specific guidance regarding the nutrient composition of CPCF is provided in two Codex Standards and one Codex Guideline. The adapted WHO Europe NPM for CPCF includes seven nutrient composition requirements that a CPCF product must meet. **Table A4** maps the alignment of the Codex Standards and Guideline to the nutrient composition requirements in the adapted WHO Europe NPM for CPCF. Results are presented by the product categories defined in the NPM, with Codex alignment with each product category nutrient composition requirement noted in table cells. The table notes where Codex documents are not in alignment, are partially aligned or are fully aligned with the adapted WHO Europe NPM for CPCF nutrient composition requirements. Where Codex is noted as *not aligned* with a CPCF product category requirement, it means that Codex recommendations are not in place for the specific CPCF product category.

**Table A4: Comparison of nutrient composition recommendations provided through Codex to the adapted WHO Europe NPM for CPCF nutrient composition requirements, by CPCF product category<sup>xxiii</sup>**

CPCF product category	Adapted WHO Europe NPM for CPCF nutrient composition requirements						
	No added sugar/sweetener requirement	Low/no added fruit requirement	Total sugar requirement	Sodium requirement	Energy density requirement	Protein requirement	Total fat requirement
1.1 Dry or instant cereals/starch	Partially aligned with Codex <sup>1</sup>	Partially aligned with Codex <sup>1</sup>	NA	Partially aligned with Codex <sup>1</sup>	NA	Fully aligned with Codex <sup>1</sup>	Fully aligned with Codex <sup>1</sup>
2.1 Dairy-based desserts and cereal products	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	NA	Not aligned with Codex
2.2 Fruit purée with or without addition of vegetables, cereals or milk	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	N Not aligned with Codex	NA	Not aligned with Codex
2.3 Vegetable-only purée	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	NA	Not aligned with Codex
2.4 Puréed vegetables and cereals	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	NA	Not aligned with Codex

<sup>xxiii</sup> In alignment with the standard includes all components of the global guidance. Partially in alignment with the standard includes some or partial components of the global guidance but may have different thresholds or not include all components. Not in alignment with the standard means the binding legal measure includes no reference to the global guidance components.

CPCF product category	Adapted WHO Europe NPM for CPCF nutrient composition requirements						
	No added sugar/ sweetener requirement	Low/no added fruit requirement	Total sugar requirement	Sodium requirement	Energy density requirement	Protein requirement	Total fat requirement
2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex
2.6 Puréed meal with meat or fish mentioned as first food in product name	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex
2.7 Puréed meals with meat or fish (but not named as the first food in product name)	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex
2.8 Purées with only meat, fish or cheese in name of product	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex
3.1 Meat, fish or cheese-based meal with chunky pieces	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex
3.2 Vegetable-based meal with chunky pieces	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	NA	Not aligned with Codex
4.1 Confectionery, sweet spreads and fruit chews	Not aligned with Codex						
4.2 Fruit (fresh or dry whole fruit or pieces)	Not aligned with Codex	NA	NA	NA	NA	NA	Not aligned with Codex
4.3 Other snacks and finger foods	Partially aligned with Codex <sup>1</sup>	NA	Partially aligned with Codex <sup>1</sup>	Partially aligned with Codex <sup>1</sup>	NA	NA	Fully aligned in Codex <sup>1</sup>
5.1 Single or mixed fruit juices, vegetable juices or other non-formula drinks	Not aligned with Codex						
5.2 Cow's milk and milk alternatives with added sugar or sweetening agent	Not aligned with Codex						

1. Standard for processed cereal-based foods for infants and young children, CXS 74-1981. Adopted in 1981. Revised in 2006. Amended in 2017, 2019.

2. Standard for canned baby foods, CXS 73-1981. Adopted in 1981. Amended in 1983, 1985, 1987, 1989, 2017.

\* NA stands for not applicable as no thresholds or recommendations exist in the NPM for CPCF

## Labelling practices

Specific guidance regarding the labelling practices of CPCF is provided in three Codex Standards, one Codex Guideline and the WHO Guidance. The adapted WHO Europe NPM for CPCF includes 17 labelling practice requirements that a CPCF product must meet. **Table A5** maps the alignment of the relevant Codex Standards and Guideline and WHO Guidance to the labelling practice requirements in the NPM. Results are presented by the CPCF product categories defined in the NPM, with Codex and WHO alignment with each product category labelling practice requirement noted in table cells. The table notes where Codex and WHO are not in alignment, partially aligned or fully aligned with the adapted WHO Europe NPM for CPCF labelling practice requirements. Where Codex is noted as *not aligned* with a NPM requirements, it means Codex and/or WHO recommendations are not in place for the specific CPCF product category.

**Table A5: Comparison of labelling practice recommendations provided through Codex and WHO Guidance to the adapted WHO Europe NPM for CPCF labelling practice requirements, by CPCF product category<sup>xxiv</sup>**

Labelling requirements	CPCF product category			
	1. Dry or instant cereals/ starch	2. Soft-wet spoonable, ready-to-eat foods	3. Meals with chunky pieces	4. Dry finger foods and snacks
<b>Protection and promotion of breastfeeding</b>				
Has a minimum recommended age of introduction of at least 6 months	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>
Not marketed as suitable for children aged <6 months	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>
Message on importance of breastfeeding until age 2 years or longer	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>
Does not suggest superiority or equivalence to breastmilk	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>
Does not recommend or promote bottle-feeding	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>	Fully aligned with WHO <sup>5</sup>
<b>Claims</b>				
No non-permitted compositional claims	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>
No nutrient content claims	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>
No nutrient function claims	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>

<sup>xxiv</sup> In alignment with the standard includes all components of the global guidance. Partially in alignment with the standard includes some or partial components of the global guidance but may have different thresholds or not include all components. Not in alignment with the standard means the binding legal measure includes no reference to the global guidance components.

Labelling requirements	CPCF product category			
	1. Dry or instant cereals/ starch	2. Soft-wet spoonable, ready-to-eat foods	3. Meals with chunky pieces	4. Dry finger foods and snacks
No disease risk reduction claims	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>
No other claims	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>	Partially aligned with Codex <sup>4</sup>
<b>Product name and ingredient list</b>				
Product name reflects ingredients in descending order as per ingredient list	Partially aligned with Codex <sup>1</sup>	Partially aligned with Codex <sup>2</sup>	Partially aligned with Codex <sup>2</sup>	Partially aligned with Codex <sup>1</sup>
Percentage of fruit stated in ingredient list	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sup>3</sup>
Percentage of added water stated in ingredient list	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sup>3</sup>
Percentage of protein stated in ingredient list	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sub>2,3</sub>	Partially aligned with Codex <sup>3</sup>	Partially aligned with Codex <sup>3</sup>
<b>Messages on products with a spout</b>				
Product with spout states not to suck from the container	Not aligned	Not aligned	Not aligned	Not aligned
Product with spout warns that cap is a choking hazard	Not aligned	Not aligned	Not aligned	Not aligned
<b>Age restriction on blended/puréed products</b>				
Maximum recommended age of use of 12 months	Not aligned	Not aligned	Not aligned	Not aligned

1. Standard for processed cereal-based foods for infants and young children, CXS 74-1981. Adopted in 1981. Revised in 2006. Amended in 2017, 2019.

2. Standard for canned baby foods, CXS 73-1981. Adopted in 1981. Amended in 1983, 1985, 1987, 1989, 2017.

3. General standard for labelling of pre-packaged foods, CXS 1-1985. Adopted in 1985. Amended in 1991, 1999, 2001, 2003, 2005, 2008 and 2010. Revised in 2018.

4. Guidelines for use of nutrition and health claims, CAC/GL 23-1997.

5. WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children.

# Annex 4

## National guidelines for fortification of CPCF in Malaysia

### NUTRIENT LEVELS FOR CANNED FOOD FOR INFANTS AND CHILDREN AND CEREAL BASED FOOD FOR INFANTS AND CHILDREN

**205**

(1) <i>Nutrient</i>	NUTRIENT LEVEL (per 100 kcal)	
	(2) <i>Minimum Amount</i>	(3) <i>Maximum Amount</i>
Vitamin A (expressed as retinol)	255 I.U.	500 I.U.
Vitamin D	40 I.U.	80 I.U.
Ascorbic acid (Vit. C)	8 mg	not prescribed
Thiamine (Vit. B1)	25 mg	not prescribed
Riboflavin (Vit. B2)	60 mg	not prescribed
Nicotinamide	0.8 mg	not prescribed
Vitamin B6	35 mg	not prescribed
Follic acid	4 mg	not prescribed
Panthenic acid	300 mg	not prescribed
Vitamin B12	0.15 mg	not prescribed
Vitamin E	0.3 I.U.	not prescribed
Calcium (Ca)	50 mg	not prescribed
Phosphorus (P)	25 mg	not prescribed
Iron (Fe)	1 mg	not prescribed
Iodine	5 mg	not prescribed

*Notes:*

1. Where the maximum amount of the nutrient is not prescribed, the total daily intake of the nutrient arising from its uses in accordance with good manufacturing practice, does not present a hazard to health.
2. The Ca:P ratio shall not be less than 1.2 and not more than 2.0.
3. The level of Vitamin C shall not apply to biscuits, rusks and other similar product.

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COMMIT ACTIVITY 3  
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