



Consortium for Improving Complementary Foods in Southeast Asia (COMMIT)

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

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

ARCH	Assessment and Research on Child Feeding
ATNI	Access to Nutrition Initiative
BMS	Breastmilk substitutes
BPOM	Indonesian Food and Drug Authority
COMMIT	The Consortium for Improving Complementary Foods in Southeast Asia
CPCF	Commercially produced complementary foods
NPM	Nutrient profile model
SME	Small- and medium-sized enterprises
UNICEF	United Nations Children’s Fund
WHA	World Health Assembly
WHO	World Health Organization
WHO Europe	WHO Regional Office for Europe
2019 WHO Europe NPM for CPCF	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)ⁱ** 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 Indonesia.

ⁱ 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.^{1, 2} 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 Indonesia has made dramatic progress in improving nutrition and reducing the prevalence of malnutrition in recent decades, an unfinished agenda remains. Indonesia is among 34 countries globally facing the highest burden of stunting, or chronic malnutrition; the 7.5 million children under 5 years of age who suffer from the condition and are at risk of impaired physical and cognitive development.³ Micronutrient deficiencies also remain prevalent, with anaemia affecting 38.5 per cent of children under 5 years of age.³ At the same time, the prevalence of overweight is steadily increasing, with an estimated 10.6 per cent of Indonesian children under 5 affected by overweight as of 2022.⁴

Breastfeeding practices in Indonesia are among the best in the Southeast Asia region: a little over half of all children aged less than 6 months are exclusively breastfed (52 per cent) and 54.6 per cent continue receiving breastmilk at 2 years of age.^{5, 6} However, the prevalence of exclusive breastfeeding has been declining in the past few years and more progress is needed to achieve the 2030 World Health Assembly target of 70 per cent exclusive breastfeeding. The quality of young children's diets also requires improvement, with only 40.3 per cent of children 6 to 23 months of age benefiting from diets sufficient in minimum diversity and frequency as per complementary feeding recommendations.⁵

The food environment in Indonesia is both dynamic and complex. Rapid economic development, steep increases in income and urbanization are leading to significant changes in lifestyles and diets. Indonesia's middle class now accounts for 20 per cent of the population (52 million people) and has more disposable income than ever before, accounting for nearly half (43 per cent) of all household expenditure in Indonesia.⁷ This growing middle class is expected to demand and access food in new ways, with increased emphasis on quality, convenience and higher living standards.⁸

Indonesia has the largest market for commercially baby foods in Southeast Asia, with a baby food sector valued at US\$ 2.4 billion in 2022, which has grown by 26 per cent since 2015.⁷ Breastmilk substitutes (BMS) comprise 92 per cent of the baby food sector in Indonesia; however, sales have largely stagnated since 2016 due in large part to effective breastfeeding advocacy and a declining birth rate. Category growth for BMS is concentrated on the growing up milk sector, currently accounting for more than two-thirds of the BMS market value. In the absence of national regulations covering BMS products for children over 12 months of age, the advertising or promotion of growing up milks is allowed in Indonesia, and BMS manufacturers market these products aggressively.⁹

Though the market for CPCF is classified as extremely underdeveloped, it still represents 8 per cent of the total baby food sector and is valued at US\$189 million.¹⁰ The majority share of the market for CPCF in Indonesia is in the cereals and dried meals category, representing 97 per cent of the CPCF market, with a 33 per cent growth in sales between 2016 and 2022. The soft, wet spoonable ready-to-eat food market and snack food market is small in Indonesia, representing less than 0.5 per cent of the total baby food sector. However, there has been robust growth for snack foods (51 per cent) in sales during the period from 2016 to 2022, with a projected increase to US\$9.8 million by 2028. In

Indonesia, the majority (65 per cent) of CPCF are produced locally and marketed under three main brands.

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 Guidelinesⁱⁱ 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 Children¹¹ 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)

ⁱⁱ 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.

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 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.¹¹ 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.¹²

The ‘Draft WHO Europe Commercially Available Complementary Foods Nutrient Profile Model’ (hereafter referred to as the 2019 WHO Europe NPM for CPCF)ⁱⁱⁱ 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.¹² 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

ⁱⁱⁱ 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.

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.

Table 1: Commercially produced complementary food product categories

Category 1: Dry, powdered and instant cereal/starchy food	
Category 1.1	Dry or instant cereals/starch
Category 2: Soft–wet spoonable, ready-to-eat foods; typically smooth or semi-puréed packaged in jars or pouches and can be spoon-fed	
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
Category 3: Meals with chunky pieces, often sold in trays or pots for infants and young children	
Category 3.1	Meat, fish or cheese-based meal with chunky pieces
Category 3.2	Vegetable-based meal with chunky pieces
Category 4: Dry finger foods and snacks	
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
Category 5: Juices and other drinks	
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 Indonesia 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^{iv}

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[†]
14. Percentage of protein stated in ingredient list[‡]

Messages on products with a spout

15. Product with spout states not to suck from the container[§]
16. Product with spout warns that cap is a choking hazard[§]

Age restriction on blended/puréed products

17. Maximum recommended age of use of 12 months^{§§}

^{iv} *All products excluding category 2.3 products assessed against this requirement; All products excluding category 1 and category 4 products assessed against this requirement. [†] Only categories 2.6, 2.7 and category 3 products assessed against this requirement; [§] Only category 2 products with spouts assessed against this requirement; ^{§§} 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.

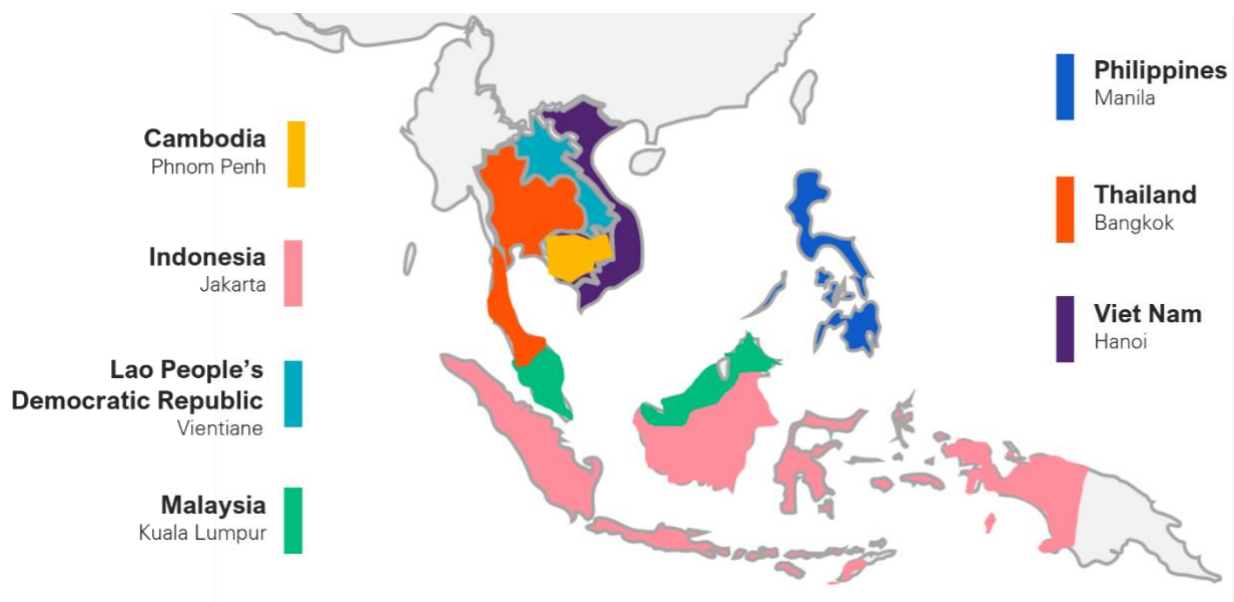
Annex 3 maps the alignment between the nutrient composition and labelling practice requirements in the adapted WHO Europe NPM for CPCF (**Box 1**) and the relevant Codex Standards and Guidelines and the WHO Guidance. Alignment for both nutrient composition and labelling is mapped by CPCF product category.

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 1) identified key stakeholders and requested their assistance in collecting legal measures related to CPCF; and 2) contracted a regional law firm (DFDL) to collect and summarize relevant legislation related to CPCF in Indonesia. A CPCF policy checklist was shared with key stakeholders in Indonesia during August 2021. Two respondents from the Indonesian Food and Drug Authority (BPOM) completed the checklist, identifying eight relevant documents.

As a part of the scope of work, the law firm identified 17 legal measures in Bahasa and prepared a summary table of laws, standards and binding legal measures. Eight of these legal measures (regulations and amendments) were deemed relevant for this analysis and translated into English by Google Translate with translation confirmed by COMMIT partners.

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 eight 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 used 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 Pacific Regional Office, the UNICEF Indonesia Country Office, and Indonesia's Food and Drug Authority.

4 Results

4.1 Overview of active binding legal measures for CPCF in Indonesia

The review of relevant binding legal measures in Indonesia identified seven mandatory regulations and one supporting implementation guideline relevant to CPCF (Table 2).

Table 2: Active binding legal measures for CPCF in Indonesia

Names	Year	Types of Legislation	Scope	Content
1. BPOM Regulation 24/2020 on Supervision of Processed Foods for Special Nutritional Needs	2020	Mandatory	All CPCF for children 6–24 months of age	The regulation provides guidance on requirements for food safety, quality, nutrition and labelling for CPCF (termed MP-ASI [†]) and for snacks for children 1–3 years of age, that are not MP-ASI.
2. BPOM Regulation Number 13/2016 on Control of Claims on Processed Food Labels and Advertising	2016	Mandatory	All processed foods, including CPCF for children 6–36 months of age	Provides labelling guidance for permitted claims, with no claims allowed for CPCF marketed for children under 12 months of age. Guidance is provided on the types of nutrient content, nutrient function and nutrient comparison claims allowed for all processed foods marketed for children 1–3 years of age. No other claims are allowed for processed foods marketed for children 1–3 years of age.
3. BPOM Regulation No. 11/2019	2019	Mandatory	All processed foods, including CPCF for children 6–36 months of age	Provides guidance on the regulation of food additives, including artificial sweeteners.
4. BPOM Regulation No. 9/2016	2016	Mandatory	All processed foods, including CPCF for children 6–36 months of age	Provides labelling guidance for nutrition label reference (ALG) for macronutrients and micronutrients with separate ALG for children aged 0–6 months, 7–11 months and 1–3 years.
5. Government Regulation 69/1999	1999	Mandatory	All processed foods, including CPCF for children 6–36 months of age	Provides labelling and advertising guidance for all process food. This is the overarching guidance under which BPOM regulations fall.
6. BPOM Reg 20/2021 on Processed Food Labels	2021	Mandatory	All processed foods, including CPCF for children 6–36 months of age	General guidance on labelling of processed foods.

[†] MP-ASI stands for Makanan Pendamping Air Susu Ibu in Bahasa Indonesia. CPCF (MP-ASI) are defined as any nutritious food that is given to infants and children 6 to 24 months of age in addition to breastmilk. Main CPCF are intended to be given at mealtimes at least twice a day while CPCF snacks are to be given between two meals to infants 6–24 months of age.

Names	Year	Types of Legislation	Scope	Content
7. BPOM Regulation 31/2018 on Processed Food Label	2018	Mandatory	All processed foods, including CPCF for children 6–36 months of age	General guidance on labelling of processed foods and inclusive of language of labelling in Article 7.
8. Guidelines for the Implementation of Regulation of Complementary Foods for Breastfeeding (MP-ASI) for Micro, Small and Medium Enterprises	2021	Supporting document for BPOM Regulation Number 24/2021	All CPCF for children 6–24 months of age	Implementation guideline on MP-ASI for small- and medium-sized enterprises (SMEs) to implement BPOM Regulation Number 24/2021.

4.1.1 Nutrient composition

The nutrient composition of CPCF is generally regulated under Indonesia's Drug and Food Supervisory Board (*Badan Pengawas Obat dan Makanan* or "**BPOM**") by two mandatory regulations: Regulation No. 11 of 2019 and BPOM Regulation No. 24 of 2020 ("**BPOM Reg 24/2020**").

According to BPOM Reg 24/2020, complementary foods for children aged 6–36 months are categorized as special dietary processed foods, along with baby formula, advanced formula and growth formula. For complementary foods, there are three defined categories regulated under BPOM 24/2020: 1) main complementary foods (MP-ASI Meals) provided to an older infant or young child 6–24 months of age during mealtime; 2) snack complementary foods (MP-ASI Snack) provided to an older infant or young child 6–24 months of age between two mealtimes; and 3) snacks for children that are provided between the ages of 1 and 3 years in-between meals and are not MP-ASI. The regulation provides guidance on requirements for food safety, quality, nutrition and labelling all three categories.

Main meal CPCF (MP-ASI Meal) products can be:

- A powder that is prepared for consumption with milk, water, or other suitable liquid (infant cereal)
- Pasta to be cooked in boiling water or other suitable liquid
- Biscuits and rusks used directly or after mashing with added water, milk or other suitable liquid

Snack CPCF (MP-ASI Snack) products can be ready-to-eat products, such as biscuits, pudding, yogurt and instant products adapted to the oro-motor abilities of infants and children. Products packaged in pouches, jars and cans also fall under the snack CPCF category.

Both main meal and snack CPCF products (MP-ASI Meals and Snacks) should be made from the following ingredients or their derivatives: cereals (e.g., rice, corn, wheat, sorghum, barley, oats, rye, millet, buckwheat); tubers (e.g., sweet potatoes, cassava, arrowroot, potatoes, yam); starchy ingredients (e.g., sago, palm starch, pumpkin machetes); nuts (e.g., green beans, kidney beans, cowpeas, chickpeas); seeds containing oil (e.g., soybean, peanut, sesame); milk, fish, meat, poultry, fruit and/or other suitable food ingredients. In addition, other ingredients such as oil, fat, sugar, sugar syrup, salt, vegetables, fruit and spices can be added to both meal and snack CPCF.

BPOM Regulation No. 24/2020 provides nutrient composition thresholds for both MP-ASI Meals and MP-ASI Snacks, including water content, energy, protein, fat, total sugar, fibre. It also provides minimum thresholds for 20 vitamins and minerals and maximum thresholds for sodium. In addition, BPOM Reg 24/2020 limits the addition of cocoa for products intended for infants over 9 months of age, with a maximum usage of 1.5 g per 100 g of ready-to-eat product and prohibits the use of honey in products for infants under 12 months of age.

In addition to MP-ASI Meals and MP-ASI Snacks, BPOM Regulation No. 24/2020 regulates the ingredients, quality, safety and labelling of snack products given to children 1–3 years of age that are not categorized as MP-ASI. Nutrient composition thresholds are provided for energy, fat, and carbohydrates with not more than 100 per cent of the ALG provided per day. Of note, a maximum energy content of 100 kcal/100 g and not more than 200kcal/day of product is provided in the regulation.

The use of artificial sweetener in CPCF is forbidden in BPOM Regulation Number 11/2019, Article 13, which states: “Food additive- Artificial Sweetener cannot be used on the product special food for infants, children aged under 3 years of age, pregnant women and/or breastfeeding mothers.”

4.1.2 Labelling practices

The Indonesian legal system has six mandatory regulations for labelling of CPCF and one voluntary implementation guide that is intended to help SMEs implement both the nutrition composition and labelling practice requirements for CPCF.

Specific labelling practice requirements for all CPCF for older infants and young children 6–24 months of age are included in **BPOM Regulation No. 24/2020**. All labels of both MP-ASI Meals and Snacks must contain the following:

- Age recommendation, namely from 6–12 months, 12–24 months, or other age group appropriate for oro-motor abilities.
- Information on the nutritional value of MP-ASI Meals must be expressed per serving with a serving size of 20–50 g. For ready-to-eat products, the serving size is 75–125 g. Information on the nutrition value of MP-ASI Snacks should be expressed per serving, with a serving size of 10–30 g.
- The recommended daily consumption must be stated in order to meet the nutritional adequacy of infants and children aged 6–24 months.
- The label should contain an explanation of the signs that indicate that an MP-ASI Meal or Snack has spoiled and should therefore not be provided to children.
- For MP-ASI Meal or Snack that is not consumed in one go, the label must contain instructions for storing after the container is opened.
- Usage instructions for both MP-ASI Meals or Snacks must contain the following:
 - How to prepare, including illustrations on how to feed
 - Handling methods, including storage and disposal after being prepared
 - Method of use
 - Warning about health hazards when the method of preparation, storage and use are not correct
- On the labels of both MP-ASI Meals or Snacks that are commonly consumed directly, the label must state “for direct consumption”.
- The label of an MP-ASI Meals or Snacks must contain a statement that the MP-ASI Meal or Snack should not be given to infants under the age of six months unless medically indicated.
- The label of an MP-ASI Meal or Snack must state the recommended feeding frequency for infants aged 6–12 months and children aged 12–24 months each day.

BPOM Regulation No. 24/2020 provides specific labelling practice requirements for snacks for children 1–3 years of age that are not categorized as MP-ASI. All labels of snacks for children 1–3 years of age that are not MP-ASI must contain:

- The name ‘snacks for children’ and the recommended age (i.e., children aged 1–3 years).
- Information on nutritional value per serving.
- The recommended daily intake should be stated, and the energy intake should not exceed 200 kcal/day.
- Storage instructions, including special storage conditions in the form of storage instructions and listed next to the expiration date if the shelf life of the product is greatly affected by special storage conditions.

- An explanation of the signs that indicate snacks for children have spoiled and cannot be given.
- Usage guidelines for snacks for children must contain the following:
 - How to prepare, handle and use.
 - Snacks for children in powder form must include instructions for reconstitution.
 - Method of preparation and use of the product, including the method of storage and how long it may be stored after preparation.
 - An illustration of the preparation method.
 - Guidelines for preparing and serving snacks for children should be stated on the label.
- “Not including MP-ASI” must be included on the label.^{vi}

BPOM Regulation 9/2016 provides guidance on the ALG in Indonesia, with age-specific recommended dietary allowances provided for age categories of the Indonesian population. Nutrient content in processed food should not be more than 100 per cent of the ALG per day, with the ALG provided for infants 0–6 months of age, 7–11 months of age and children 1–3 years of age.

ALG is available for energy value in kcal or kj, protein, total carbohydrate, fat, Linoleic acid, alpha linolenic acid, fiber and the following vitamins and minerals: iron, zinc, copper, selenium, magnesium, iodine, calcium, sodium, potassium, selenium, chromium, fluoride, vitamin A, vitamin B₁, vitamin B₂, vitamin B₃, vitamin B₆, vitamin B₁₂, folic acid, vitamin C, vitamin D, and vitamin E.

The use of claims on all processed food labels is regulated under **BPOM Regulation Number 13/2016** on Control of Claims on Processed Food Labels and Advertising. The regulation prohibits the use of:

- Any claim on CPCF for infants under the age of 12 months
- Other function claims, disease risk reduction claims and claims without sugar addition for processed food, including MP-ASI/CPCF intended for children aged 1–3 years of age
- Claims for all processed foods cannot:
 - Contain a statement that the consumption of the processed food can meet all nutrient requirements.
 - Utilize consumer concerns.
 - Encourage consumption of a MP-ASI incorrectly.
 - Illustrate that a food component can prevent, treat or cure disease.
 - State that MP-ASI can increase intelligence.

BPOM Regulation 13/2016 does not consider the following to be claims:

- Inclusion of food ingredients and/or components in the ingredients list.
- Inclusion of mandatory nutrition as part of labelling; and/or
- Quantitative or qualitative statement on nutrition or certain ingredient on the label as necessary in accordance with the applicable laws and regulations.

Allowed claims for MP-ASI/CPCF marketed for children 12+ months of age include nutrient function claims, if the nutrient is listed in the nutrition information table with ALG percentage included.

Allowed claims include:

- Nutritional claims
 - Nutrient content claims
 - Nutrient comparison claims
- Health claims
 - Nutrient function claims

^{vi} Specification is not provided but to be interpreted as: labels for snack foods for children 1–3 years should say “not an MP-ASI or suitable complementary food for children 6–24 months”

Nutrient content claims are permitted as listed in Annex 1 of BPOM Regulation 13/2016. Annex 1 provides thresholds to qualify for “low” or “free of” energy, fat, saturated fat, trans fat, cholesterol, sugar, sodium. It also provides thresholds for claims that a product is a “source of” or “high/rich in” protein, vitamins and minerals and fibre. Claims of “low” or “free of” can only be used on processed foods that have undergone a particular process so that the contents of the food components are low or free of that nutrient. Processed foods that naturally do not contain certain components are prohibited from claiming that they are “free of” that component unless stipulated in other provisions.

Nutrient comparison claims are permitted as listed in Annex II of BPOM Regulation 13/2016. Comparison of nutrient claims can only be used for processed food that meets the following requirements:

- Processed foods being compared are similar processed foods.
- Similar Processed Food as referred to in letter a is a variant of Processed similar food from the same producer and has been circulating.
- The difference in content is expressed as a percentage, fraction or in absolute numbers.
- The relative difference in the nutrient content compared to at least 10 per cent ALG (higher or lower) for micronutrients, except for sodium, while for energy and other nutrients (including sodium) at least 25 per cent (higher or lower); and the absolute difference must at least meet the “low” or “source” requirements as specified in the nutrition claim.

Nutrient function claims are permitted as per Annex III. Processed food that includes a claim of substance function requires the nutrition to meet the requirements of “source” as defined in Annex I. Specific allowed nutrient function claims are defined for protein, fibre, vitamin A, vitamin D, vitamin B₁, vitamin B₂, vitamin B₃, folic acid, vitamin B₆, vitamin B₁₂, vitamin C, calcium, iron, iodine and magnesium.

General guidance on content of mandatory labelling requirements for all processed foods is provided in **BPOM Reg 20/2021 on Processed Food Labels** with overarching law provided in **Government Regulation 69/1999**. These regulations set standards for the inclusion of the following on all processed food labels, including all MP-ASI/CPCF:

- Product name
- List of ingredients
- Net weight or net contents
- Name and address of the producer or importer
- Halal (as relevant and required)
- Product date and code
- Expiry date
- Distribution permit number
- Origin of certain food ingredients

The font size must be equal to Arial 6 point or larger, with the product name and all warnings on the label in Arial typeface with a size of 2 mm.

BPOM Regulation 31/2018 Article 7 mandates that labelling of all MP-ASI/CPCF and all processed foods must be in Bahasa Indonesia, except where there is no Indonesian language equivalent. These foreign terms can be words, sentences, numbers or letters other than Indonesian.

4.1.3 Supporting documents to binding legal measures

The Guidelines for the Implementation of Regulation of Complementary Foods for Breastfeeding (MP-ASI) for Micro, Small and Medium Enterprises were published in 2021 as a tool to help SMEs interpret the BPOM Regulations for MP-ASI/CPCFs. The guidelines interpret how the different BPOM regulations come together to regulate the nutrient composition and labelling practices of MP-ASI/CPCF. Of note, the guidelines provide a step-by-step calculation of minimum micronutrient content and include examples of nutrition information table reporting.

4.2 Alignment of binding legal measures in Indonesia for CPCF with Codex Standards and Guidelines and the WHO Guidance

The content of the eight identified legal measures for CPCF in Indonesia 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 Binding Legal Measures in Indonesia with Codex Standards and Guidelines and the WHO Guidance

Global guidance	Binding legal measures in Indonesia relating to Codex and WHO Guidance		
	Name of binding legal measure	Scope of binding legal measure	Alignment with global guidance ^{vii}
Codex Alimentarius			
1. Standard for processed cereal-based foods for infants and young children, CXS 74-1981	<ul style="list-style-type: none"> • BPOM Regulation 24/2020 • BPOM Regulation Number 11/2019, Article 13 	CPCF promoted for children aged 6–24 months	Yellow
2. Standard for canned baby foods, adopted in 1981, CXS 73-1981	<ul style="list-style-type: none"> • BPOM Regulation 24/2020 • BPOM Regulation Number 11/2019, Article 13 	CPCF promoted for children aged 6–24 months	Yellow
3. Standard for canned baby foods, CXS 73-1981	<ul style="list-style-type: none"> • BPOM Reg 20/2021 • Government Regulation 69/1999 	All pre-packaged foods, including CPCF	Green
4. General standard for labelling of pre-packaged foods, CXS 1- 1985	<ul style="list-style-type: none"> • BPOM Regulation No. 9/2016 • BPOM Regulation 24/2020 	All pre-packaged foods, including CPCF	Green
5. Guidelines on formulated complementary foods for older infants and young children, adopted in 1991, CAC/GL 8-1991	<ul style="list-style-type: none"> • BPOM Regulation 24/2020 • BPOM Regulation Number 11/2019, Article 13 	CPCF promoted for children aged 6–24 months	Yellow
6. Guidelines on nutritional labelling, CXG 2 – 1985	BPOM Regulation Number 13/2016	All pre-packaged foods, including CPCF	Green
WHO Guidance			
1. WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children	BPOM Regulation 24/2020	CPCF promoted for children aged 6–24 months	Yellow

^{vii} 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 for CPCF in Indonesia with the adapted WHO Europe NPM for CPCF nutrient composition and labelling practice requirements

The contents of the seven identified binding legal measures and one guideline for CPCF in Indonesia 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). It is noted that the voluntary “Guidelines for the Implementation of Regulation of Complementary Foods for Breastfeeding (MP-ASI) for Micro, Small and Medium Enterprises” is included in this comparison as it is intended as a resource guide for SMEs to interpret binding legal measures for CPCF in Indonesia. See Annex 1 for more detail on the food category-specific nutrient composition and labelling practice requirements.

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

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Indonesia related 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 ^{viii}
CPCF products which automatically should not be promoted					
Sweet confectionery, sweet spreads, and fruit chews	Category 4.1	BPOM Regulation 24/2020	For all CPCF promoted for children 6-24 months of age	<ul style="list-style-type: none"> Promotion is allowed following the thresholds set for all CPCF for children 6–24 months of age. This food category is not prohibited or specially mentioned in types of CPCF. 	
Single or mixed fruit juices, vegetable juices or other non-formula drinks	Category 5.1	BPOM Regulation 24/2020	For all CPCF promoted for children 6-24 months of age	<ul style="list-style-type: none"> Promotion is allowed following the thresholds set for all CPCF for children 6–24 months of age. This food category is not prohibited or specially mentioned in types of CPCF. 	
Cow’s milk and milk alternatives, with added sugar or sweetening agent	Category 5.2	BPOM Regulation 24/2020	For all CPCF promoted for children 6-24 months of age	<ul style="list-style-type: none"> Promotion is allowed following the thresholds set for all CPCF for children 6–24 months of age. This food category is not prohibited or specially mentioned in types of CPCF. 	

^{viii} 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 Indonesia related 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 ^{viii}
Nutrient composition requirements					
No added sugars or sweeteners	All categories	BPOM Regulation 24/2020	For all CPCF promoted for children 6–24 months of age	<ul style="list-style-type: none"> • Maximum of 5 g/100 kcal (20 per cent) added from sucrose, fructose, glucose, glucose syrup or honey. • Maximum fructose of 2.5/100 kcal (10 per cent). • Flavouring food additives in the form of artificial sweetener shall not be used in food products specifically made for babies and children under 3 years of age. 	
		BPOM No. 11/2019	For all CPCF promoted for children 6–24 months of age	Article 13: Food additive- Artificial sweetener cannot be used on the product special food for infants, children aged under 3 years of age, pregnant women and/or breastfeeding mothers.	
Food category-specific sodium limits	All categories	BPOM Regulation 24/2020	For all CPCF promoted for children 6–24 months of age	<ul style="list-style-type: none"> • Maximum of 100 mg/100 kcal for all CPCF. • Double the recommended threshold for CPCF not containing cheese in the front-of-pack name in the adapted NPM for CPCF. 	
Food category-specific total fat limit	All categories	BPOM Regulation 24/2020	For all CPCF promoted for children 6–24 months of age	<ul style="list-style-type: none"> • Maximum of 4.5 g/100 kcal with elimination of partially hydrogenated oils and fats. • Minimum of 50 mg/100 kcal linolenic acid. • Trans fatty acids should not be added but if present from inherent raw materials there should be a maximum of 3 per cent of the total fatty acid content. 	CPCF categories 2,3,4
				<ul style="list-style-type: none"> • In line with adapted NPM for dry cereals with milk, snack foods and puréed meals, but higher than the threshold for dry cereals without milk in the ingredient list. 	CPCF category 1
Food category-specific limit on percentage of fruit content	Categories 1.1, 2.1, 2.3,		For all CPCF promoted for	<ul style="list-style-type: none"> • Maximum fructose of 2.5 /100 kcal (10 per cent). 	CPCF category 1

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Indonesia related 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 ^{viii}
	2.4, 2.5, 2.6, 2.7, 2.8, 3.1, and 3.2	BPOM Regulation 24/2020	children 6–24 months of age	<ul style="list-style-type: none"> In line with adapted NPM for categories 1.1, but higher for category 2 and 3 CPCF. 	CPCF categories 2,3
Food category-specific total sugar limit	Category 4.3	BPOM Regulation 24/2020	For all CPCF promoted for children 6–24 months of age	<ul style="list-style-type: none"> Maximum of 5 g/100 kcal (20 per cent). Maximum fructose of 2.5/100 kcal (10 per cent). Maximum sugar of 20 per cent is higher than the 15 per cent threshold recommended in the adapted NPM. 	
Food category-specific protein threshold	Categories 1.1, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2	BPOM Regulation 24/2020	For all CPCF promoted for children 6–24 months of age	<ul style="list-style-type: none"> There are protein minimum and maximums for two age groups, and these pertain to all food categories: <ul style="list-style-type: none"> Children 6–11 months: minimum 1.9 g/100 kcal and maximum of 5.5 g/100 kcal. Children 12–24 months of age minimum of 0.8 g/100 kcal and maximum of 5.5 g/100 kcal. Minimum thresholds are higher for puréed meals (category 2 and 3). 	CPCF category 1
					CPCF categories 2,3
Food category-specific minimum for energy density	Categories 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7	BPOM Regulation 24/2020	For all CPCF promoted for children 6–24 months of age	<ul style="list-style-type: none"> Guidance is split by two age groups: <ol style="list-style-type: none"> For children 6–12 months there is a minimum of 60 kcal/day. For children 12–24 months there is a minimum of 160 kcal/day. There is an energy density requirement of at least 0.8 kcal/g. While there are water thresholds for dry products, there is no specific threshold for vegetable-only purées. 	

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Indonesia related 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 ^{viii}
Thresholds that are not included as a measured component of the adapted WHO Europe NPM for CPCF					
Front-of-pack high sugar warning: Required if the percentage of energy from total sugar content exceeds category-specific thresholds	All categories except 4.2 and 4.3	No legal measures	For all CPCF promoted for children 6-24 months of age	Sugar thresholds are set for CPCF, but no high sugar warning is mandated.	
Standards for micronutrient content of CPCF	All categories	BPOM Regulation 24/2020	For all CPCF promoted for children 6–24 months of age	<ul style="list-style-type: none"> • Minimum requirements for 12 vitamins and minerals with separate thresholds for children 6–12 months and 12–24 months of age. • Micronutrient minimum requirements apply only to CPCF for 6–24 months and are not extended to CPCF for children up to 36 months of age. 	

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

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Indonesia 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 ^{ix}
Claims requirement: No claims	All categories	BPOM Regulation Number 13/2016	All CPCF 6–36 months of age	<ul style="list-style-type: none"> • Article 28: Prohibits to state any claim on food products label for babies less than 12 months. • Prohibits other function claims, impairment claims, disease risk claims and claims about no added sugar for processed food intended for children 1–3 years old. • The following are not considered to be nutrient content claims and are allowed for CPCF: <ul style="list-style-type: none"> ○ Inclusion of food ingredients and/or components in the ingredients list. ○ Inclusion of mandatory nutrition as part of labelling; and/or ○ Quantitative or qualitative statement on nutrition or certain ingredient on the label as necessary in accordance with the applicable laws and regulations. • The following types of claims are allowed if they meet all requirements (only for CPCF promoted for children 12+ months): <ul style="list-style-type: none"> ○ Nutrient content claims (appendix I) ○ Nutrient comparison claims (appendix II) ○ Nutrient function claims (appendix III) 	

^{ix} 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.

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Indonesia 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 ^{ix}
		Guidelines for the Implementation of Regulation of Complementary Foods for Breastfeeding (MP-ASI) for Micro, Small and Medium Enterprises	<ul style="list-style-type: none"> For all CPCF promoted for children 6–24 months of age For snacks for children promoted for children 1–3 years of age 	<ul style="list-style-type: none"> Section F: Inclusion of Nutrition and Health Claims makes the following conclusions from Regulation 13/2016: Nutrition content, nutritional comparison and nutritional function claims are allowed. Examples of these claims are provided in Annex 1–3 of the Regulation. Types of claims that are prohibited for MP-ASI include: <ul style="list-style-type: none"> Claims that the consumption of CPCF (MP-ASI) can meet all the nutrition requirements; 2) claims that take advantage of consumer concerns; 3) claims that encourage consumers to consume MP-ASI incorrectly; 4) claims that describe that a food component can prevent, treat, or cure disease; 5) statements that MP-ASI can increase intelligence. 	
		B POM Regulation No. 6/2021		Everyone is prohibited from advertising processed food by containing statements that appear to be the statements of health workers, religious leaders or public officials.	
<p>Appropriate age restriction requirements:</p> <ul style="list-style-type: none"> All CPCF categories have a minimum recommended age of use of 6 months All category 2 CPCF have a maximum age of 12 months 	All categories must have a minimum recommended age of use, and category 2 products have a maximum age	B POM Regulation 24/2020	All CPCF for children 6–24 months of age	<ul style="list-style-type: none"> A statement must include the message that basic complementary foods and snacks should not be given to infants under the age of 6 months, unless medically indicated. Labelling must include the age allocation, namely the age of 6 to 12 months, age 12 to 24 months, or other age group with the appropriate oro-motor abilities. No maximum age for category 2 CPCF. 	

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Indonesia 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 ^{ix}
Not marketed as suitable for children <6 months of age requirement: No image/text that suggests suitability for infants <6 months	All categories	No legal measures	---	---	
Message on importance of breastfeeding for up to 2 years and beyond requirement	All categories	No legal measures	---	---	
Does not suggest equivalence or superiority to breastmilk requirement	All categories	No legal measures		This statement is included in Regulation 24/2020 for infant formula, FUF and GUM: the label must not contain all pictures of babies and women or anything that favours the use of infant formula, either in the form of pictures or sentences. The label must not state that infant formula is of the same quality as breast milk.	
Does not recommend or promote bottle-feeding requirement	All categories	No legal measures	---	---	
Product name reflects ingredients in descending order as per ingredient list requirement	All categories	BPOM Reg 20/2021 Government Regulation 69/1999	All CPCF 6–36 months of age	<ul style="list-style-type: none"> Ingredients shall be listed in descending order of proportion using a common complete name (not abbreviated). This may be exempted for vitamins, minerals and/or food additives. Does not include the adapted NPM recommendation to have product name reflect ingredients in descending order. 	
Percentage of fruit stated in ingredient list requirement: If the product contains fruit, the ingredient list should include fruit (fresh or powdered/processed) by percentage weight	Categories 1.1, 2.1, 2.2, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2, 4.3	BPOM Reg 20/2021	All CPCF 6–36 months of age	<ul style="list-style-type: none"> Percentage of raw material content must be stated for processed food that uses: <ul style="list-style-type: none"> Raw materials that give identity to processed foods. Raw materials that are emphasized in labelling, either in the form of words or pictures; or 	

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Indonesia 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 ^{ix}
		Government Regulation 60/1999		<ul style="list-style-type: none"> ○ Raw materials that constitute the name of the food type or are referred to in the name of the food type, except for types of ingredients that intersect with nutrients. ● The percentage of raw material content must be stated on the ingredient list. ● The percentage of raw material content can also be listed next to the type name. ● The emphasis in the form of words, including the percentage content of raw materials for processed food may be in the form of: <ul style="list-style-type: none"> ○ The words "from (followed by the name of the material)" ○ The words "with (followed by the name of the material)" ○ The use of different sizes, colours and/or fonts on labels. ● The added water must be included in the list of ingredients used, unless the water is part of the ingredients used. 	
<p>Percentage of added water stated in ingredient list:</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	BPOM Reg 20/2021 Government Regulation 60/1999	All CPCF 6–36 months of age	<ul style="list-style-type: none"> ● Percentage of raw material content must be stated for processed food that uses: <ul style="list-style-type: none"> ○ Raw materials that give identity to processed foods ○ Raw materials that are emphasized in labelling, either in the form of words or pictures ○ Raw material that constitutes the name of the food type or that is referred to in the name of the food type, except for types of ingredients that intersect with nutrients. 	

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Indonesia 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 ^{ix}
				<ul style="list-style-type: none"> • The percentage of raw material content must be stated on the ingredient list. • The percentage of raw material content can also be listed next to the type name. • The emphasis in the form of words, including the percentage content of raw materials for processed food may be in the form of: <ul style="list-style-type: none"> ○ The words "from (followed by the name of the material)" ○ The words "with (followed by the name of the material)" ○ The use of different sizes, colours and/or fonts on labels. • The added water must be included in the list of ingredients used, unless the water is part of the ingredients used. 	
<p>Percentage of protein stated in ingredient list requirement:</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	<p>B POM Reg 20/2021</p> <p>Government Regulation 60/1999</p>	All CPCF 6–36 months of age	<ul style="list-style-type: none"> • Percentage of raw material content must be stated for processed food that uses: <ul style="list-style-type: none"> ○ Raw materials that give identity to processed foods ○ Raw materials that are emphasized in labelling, either in the form of words or pictures ○ Raw material that constitutes the name of the food type or that is referred to in the name of the food type, except for types of ingredients that intersect with nutrients. • The percentage of raw material content must be stated on the ingredient list. • The percentage of raw material content can also be listed next to the type name. 	

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Indonesia 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 ^{ix}
				<ul style="list-style-type: none"> The emphasis in the form of words, including the percentage content of raw materials for processed food, may be in the form of: <ul style="list-style-type: none"> The words "from (followed by the name of the material)" The words "with (followed by the name of the material)" The use of different sizes, colours and/or fonts on labels The added water must be included in the list of ingredients used, unless the water is part of the ingredients used. 	
<p>Messages on products with a spout requirements:</p> <ul style="list-style-type: none"> Statement informing that infants and young children must not be allowed to suck from the container Statement that warns against choking hazard 	Category 2 products with a spout	No legal measures	---	---	

Conclusion

In this review of binding legal measures on CPCF in Indonesia, eight legal measures were reviewed and compared with 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, there are two mandatory regulations: BPOM Regulation 24/2020 and BPOM Regulation 11/2019. BPOM Regulation 24/2020 divides CPCF into three groups: 1) main complementary foods (MP-ASI Meals) to be provided to children 6–24 months of age; 2) snack complementary food (MP-ASI Snack) provided to children 6–24 months of age between two main mealtimes; and 3) snacks for children 1–3 years of age to be provided in-between meals and which are not MP-ASI. Nutrition composition thresholds are provided for energy, fat, and carbohydrates for snacks provided to children 1–3 years of age, and for water content, energy, protein, fat, total sugar, fibre. For CPCF marked to children 6–24 months of age, minimum thresholds are provided for 20 vitamins and minerals and maximum thresholds are provided for sodium.

With regards to labelling practices, six legal measures (BPOM Reg 24/2020, BPOM Reg 9/2016, BPOM Reg 13/2016, BPOM Reg 20/2021, BPOM Reg 31/2018 and Government Regulation 69/1999) partially address the labelling practices recommended in the adapted WHO Europe NPM for CPCF and outlined in Codex Standards and Guidelines.

The main conclusions from this review are summarized below.

- 1 Binding legal measures include the appropriate age range and all categories of CPCF.**

BPOM Regulation 24/2020 covers two age ranges of children consuming CPCF. Older infants and young children 6–24 months of age are included in the regulation for both meal and snack CPCF, while children 1–3 years of age are covered under a separate article for snack foods that are not CPCF. While the regulation covers children 6–36 months of age, not all components of the regulation apply for both children 6–24 months and 1–3 years of age. BPOM Regulation 24/2020 covers all categories of CPCF provided in the adapted WHO Europe NPM for CPCF, although they are categorized as ‘main meals’ and ‘snacks’ instead of by the CPCF product categories in the adapted NPM.
- 2 Use of the Bahasa Indonesia language is required on both domestically produced and imported CPCF product labels.**

BPOM Regulation 31/2018 stipulates in Article 7 that all CPCF labels should be in Bahasa Indonesia, except where there is no equivalent in the Indonesian language. These foreign terms can be words, sentences, numbers or letters other than Indonesian. This is inclusive of both domestically produced and imported CPCF. While there is no specification on what is covered under CPCF labelling, it is assumed that this would include labelling of the ingredients list, nutrition information table and all claims.
- 3 Binding legal measures do not prohibit the promotion of CPCF categorized as sweet confectionery and all non-BMS drinks, such as fruit and vegetable juices, teas and sweetened milk drinks.**

The eight legal measures in Indonesia do not specify categories of CPCF that are prohibited from promotion in the adapted WHO Europe NPM for CPCF (sweet confectionery or all non-BMS drinks, such as fruit and vegetable juices, teas, and sweetened milk drinks).

- 4** Binding legal measures provide thresholds for the nutrient composition of CPCF promoted for children 6–24 months of age and snacks intended for children 1–3 years of age that are in line with Codex Standards and Guidelines but not with the adapted WHO Europe NPM for CPCF.

B POM Regulation 24/2020 divides CPCF into three groups: 1) main complementary foods (MP-ASI meals) to be provided to children 6–24 months of age; 2) snack complementary food (MP-ASI snack) provided to children 6–24 months of age between two main mealtimes; and 3) snacks for children 1–3 years of age to be provided in-between meals and which are not MP-ASI. Nutrition composition thresholds are provided for energy, fat, and carbohydrates for snacks provided to children 1–3 years of age and for water content, energy, protein, fat, total sugar, fibre. For all CPCF marketed to children 6–24 months of age, minimum thresholds are provided for 20 vitamins and minerals and maximum thresholds are provided for sodium. These thresholds are in line with Codex but not with the adapted NPM. Namely, current measures do not restrict the addition of any added sugars or sweeteners and the threshold for sodium is double that recommended in the adapted NPM.

- 5** Binding legal measures for the use of claims on CPCF products are in alignment with the Codex Guidelines; however, they fall short of the adapted WHO Europe NPM for CPCF requirement.

B POM Regulation 13/2016 is in line with Codex Guidelines for use of nutrition and health claims, CAC/GL 23 – 1997, meaning that nutrient content claims, nutrient function claims, and nutrient comparative claims are permitted if they meet the conditions set by the regulation. Indonesia further prohibits the use of any claim on foods products promoted for older infants 6–12 months of age. It is notable that Codex Guidelines are incorporated into the national legislation with additional restrictions on the use of all claims for older infants 6–12 months of age; however, the regulation does not prohibit the use of any claims as required by the adapted NPM.

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

B POM Regulation 24/2020 includes some of the adapted NPM mandatory messages and labelling requirements to protect, promote and support breastfeeding. It is notable that B POM Regulation 24/2020 includes mandatory messaging prohibiting images and text that suggest suitability for infants under 6 months of age. It also requires labelling with the age allocation and a minimum age of 6 months; however, these messages only pertain to CPCF marketed for children 6–23 months of age and do not cover products marketed to children 24–36 months of age. Further, explicit statements on “breastmilk is the best food for the health and growth of the infant”, “continue breastfeeding for up to 2 years and beyond” and ensuring CPCF labelling does not promote bottle-feeding or suggest equivalence or superiority to breastmilk are not included in B POM Regulation 24/2020.

Indonesia has some active binding legal measures in place that meet several of the adapted WHO Europe NPM for CPCF labelling practice requirements, with the appropriate age range of children covered and nearly all CPCF categories included in the measures. The current measures are in line with nutrient composition recommendations in the Codex Standards for cereal-based and canned baby foods. The existing binding legal measures in Indonesia notably do not meet the adapted NPM requirements for no added sugar or sweeteners and have double the thresholds for sodium in adapted NPM. Further, the measures do not differentiate between nutrient-poor CPCF product categories, such as confectionery and non-BMS drinks (that should never be promoted), and other CPCF product categories. It is notable that the binding legal measures on the use of nutrition and health claims are in line with Codex however the majority of messaging for the protection, promotion and support of breastfeeding is not included in national regulation.

Amendment of B POM Regulation 24/2020 would address the current gaps to ensure that regulations and policies protect 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
No added sugar/sweetener threshold: No added sugar/sweetener in product ingredient list	Requirement for all subcategories	
Low/no added fruit threshold: 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
Total sugar threshold: Product did not exceed category-specific total sugar limit	1.1 Dry or instant cereals/starch	N/A
	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)
Sodium threshold: 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
Energy density threshold: 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
	Protein threshold: 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 ≥ 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 ≥ 7 g/100 kcal
	3.1 Meat, fish or cheese-based meal with chunky pieces	total protein ≥ 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 ≥ 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
Total fat threshold: Product did not exceed category-specific total fat limit	1.1 Dry or instant cereals/starch	≤ 4.5 g total fat/ 100 kcals for products with milk in ingredient list; ≤ 3.3 g total fat/ 100 kcals for products without milk in ingredient list
	2.1 Dairy-based desserts and cereal products	≤ 4.5 g/ 100 kcals total fats
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	≤ 4.5 g/ 100 kcals total fats
	2.3 Vegetable-only purée	≤ 4.5 g/ 100 kcals total fats
	2.4 Puréed vegetables and cereals	≤ 4.5 g/ 100 kcals total fats
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	≤ 6 g/100 kcal total fat
	2.6 Puréed meal with meat or fish mentioned as first food in product name	≤ 6 g/100 kcal total fat
	2.7 Puréed meals with meat or fish (but not named first in product name)	≤ 4.5 g/ 100 kcals total fats
	2.8 Purées with only meat, fish or cheese in name	≤ 6 g/100 kcal total fat
	3.1 Meat, fish or cheese-based meal with chunky pieces	≤ 6 g/ 100 kcals total fats
	3.2 Vegetable-based meal with chunky pieces	≤ 4.5 g/ 100 kcals total fats
	4.2 Fruit (fresh or dry whole fruit or pieces)	≤ 4.5 g/ 100 kcals total fats
	4.3 Other snacks and finger foods	≤ 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 all 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 all 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 all 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*

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 ¹	Partially aligned with Codex ¹	NA	Partially aligned with Codex ¹	NA	Fully aligned with Codex ¹	Fully aligned with Codex ¹
2.1 Dairy-based desserts and cereal products	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex ²	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 ²	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 ²	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 ²	Not aligned with Codex	NA	Not aligned with Codex
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 ²	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 ²	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 ²	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex

* 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
2.8 Purées with only meat, fish or cheese in name of product	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex ²	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 ²	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 ²	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 ¹	NA	Partially aligned with Codex ¹	Partially aligned with Codex ¹	NA	NA	Fully aligned in Codex ¹
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^{xi}

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
Protection and promotion of breastfeeding				
Has a minimum recommended age of introduction of at least 6 months	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵
Not marketed as suitable for children aged <6 months	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵
Message on importance of breastfeeding until age 2 years or longer	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵
Does not suggest superiority or equivalence to breastmilk	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵
Does not recommend or promote bottle-feeding	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵	Fully aligned with WHO ⁵
Claims				
No non-permitted compositional claims	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴
No nutrient content claims	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴
No nutrient function claims	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴

^{xi} 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 ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴
No other claims	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴	Partially aligned with Codex ⁴
Product name and ingredient list				
Product name reflects ingredients in descending order as per ingredient list	Partially aligned with Codex ¹	Partially aligned with Codex ²	Partially aligned with Codex ²	Partially aligned with Codex ¹
Percentage of fruit stated in ingredient list	Partially aligned with Codex ³	Partially aligned with Codex ³	Partially aligned with Codex ³	Partially aligned with Codex ³
Percentage of added water stated in ingredient list	Partially aligned with Codex ³	Partially aligned with Codex ³	Partially aligned with Codex ³	Partially aligned with Codex ³
Percentage of protein stated in ingredient list	Partially aligned with Codex ³	Partially aligned with Codex _{2,3}	Partially aligned with Codex ³	Partially aligned with Codex ³
Messages on products with a spout				
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
Age restriction on blended/puréed products				
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

Indonesia fortification guidelines

Indonesia required vitamins and minerals to be added to CACF			
Micronutrient	Measurement	Thresholds	
		Infants 6-11 months	Young Children 12-24 months
Vitamin A	Mcg RE/100 kcal	60-180	60-80
Thiamin	Mg/100kcal	Minimum 0.05	Minimum 0.05
Vitamin B12	Mcg/100 kcal	Minimum 0.05	Minimum 0.075
Vitamin D	Mcg/100kcal	1-3	1-3
Iron	Mg/100kcal	Minimum 3.56	Minimum 0.86
Seng	Mg/100kcal	Minimum 0.86	Minimum 0.45
Calcium	Mg/100kcal	Minimum 80	Minimum 80
Phosphorus	Mg/100kcal	Minimum 67.5	Minimum 48
Sodium	Mg/100kcal	Maximum 100	Maximum 100
Potassium	Mg/100kcal	Minimum 140	Minimum 266
Iodine	Mcg/100 kcal	Minimum 1.2	Minimum 4.5
Magnesium	Mg/100kcal	Minimum 13.9	Minimum 6.1
Vitamins and minerals that may be added to CACF			
Riboflavin	Mg/100kcal	Minimum 0.07	Minimum 0.06
Niacin	Mg/100kcal	Minimum 1.12	Minimum 0.68
Pantothenic Acid	Mg/100kcal	Minimum 0.18	Minimum 0.18
Vitamin B6	Mg/100kcal	Minimum 0.09	Minimum 0.06
Folate	Mcg/100 kcal	–	Minimum 4.8
Vitamin C	Mg/100kcal	Minimum 2.7	Minimum 2
Vitamin E	Mg/100kcal	Minimum 0.5	Minimum 0.5
Vitamin K	Mcg/100 kcal	Minimum 2.5	Minimum 2.5

Note that CACF here refers to CPCF

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COMMIT ACTIVITY 3
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