



Consortium for Improving Complementary Foods in Southeast Asia (COMMIT)

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

## COMMIT ACTIVITY 3

COMMIT 1 Comprehensive nutrient gap assessment

COMMIT 2 Consumer survey

**COMMIT 3 Legal and policy review**

COMMIT 4 Nutrient profile model

COMMIT Synthesis report

# COMMIT

Consortium for Improving Complementary Foods in Southeast Asia

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# List of acronyms

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

# THE COMMIT INITIATIVE

## Overview

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

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

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



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

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



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

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



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

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



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

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

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

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

# 1 Introduction

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

While Thailand has made dramatic progress in improving nutrition and reducing its rate of malnutrition in recent decades, an unfinished agenda remains. One in eight children is affected by stunting or chronic malnutrition, putting them at risk of impaired physical and cognitive development.<sup>3</sup> The prevalence of overweight in children under 5 years of age is 9.2 per cent in the country, and in Bangkok, one in five children is overweight. Micronutrient deficiencies also remain prevalent, with anaemia affecting one in four children 6 to 59 months of age.<sup>4</sup> Only 14 per cent of all children aged 0–5 months are exclusively breastfed and only 15 per cent of children continue to receive any breastmilk at 2 years of age. However, two out of every three children 6 to 23 months of age benefit from diets sufficient in minimum diversity and frequency as per complementary feeding recommendations.<sup>5</sup>

Strong economic growth has taken place in Thailand over the last two decades. Net household disposable income grew by 7.2 per cent between 2020 and 2021, coupled with a growing appreciation for convenience foods and dining outside the household.<sup>6</sup> Higher disposable incomes, together with nearly universal female labour force participation rates (over 80 per cent for women 25–50 years of age) and a fall in fertility rates (which are currently well below replacement levels) have increased the purchasing power of families, including their ability to purchase commercially produced baby foods. The Government of Thailand introduced a child support grant of US\$3,220 for all households with children under 6 years of age. The child support grant is expected to impact the ability of households to purchase nutritious foods for their older infants and young children, including well formulated commercially produced complementary foods (CPCF) – which are commercially produced, packaged complementary foods marketed as suitable for older infants and young children.<sup>7</sup>

The market for CPCF is focused on urban areas, where over half of the population lives. Breastmilk substitutes (BMS) comprise 93.1 per cent of the overall market of baby foods in the country, with continued projected growth of BMS focused on stage 3 toddler milks, which are not included in Thailand's Code legislation. Baby cereals are the second largest in value for baby foods, accounting for 4.1 per cent of sales in 2022, while soft, wet spoonable ready-to-eat meals accounted for a 3 per cent share of the sector. The market for CPCF is forecasted to grow, with a projected 18 per cent increase in the market value for cereals and a 37 per cent increase in the market value for soft, wet spoonable ready-to-eat meals by 2028. Importantly, the projected increased value share of CPCF will be the result of more frequent purchasing of CPCF by households with young children, rather than an increase in the number of young children (in fact, the birth rate in Thailand is projected to continually decline).<sup>7</sup>

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

## Codex Alimentarius

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

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

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

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

The WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children<sup>8</sup> is a global guidance document (referred to hereafter as WHO Guidance) recommending essential messages to include on the labelling of all CPCF.

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

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

In addition, WHO Guidance recommends that messages should not:

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

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

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

for added sugars and salt – are inadequate, and that application of the Codex Standards alone is insufficient to define whether a particular CPCF is appropriate for promotion to older infants and young children.<sup>8</sup> Indeed, the WHO Guidance emphasizes the need for new or updated Codex Standards and Guidelines that are in full alignment with WHO recommendations.

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

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

Nutrient profiling is the science of classifying or ranking foods according to their nutritional composition for reasons related to preventing disease and promoting health. Nutrient profiles can be used to generate criteria to classify foods according to nutrient levels. In 2019, the WHO Regional Office for Europe (WHO Europe) published “*Ending inappropriate promotion of commercially available complementary foods for infants and young children between 6 and 36 months in Europe*,” which provided a draft nutrient profile model (NPM) for the assessment of CPCF in Europe.<sup>9</sup>

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

The 2019 WHO Europe NPM for CPCF provided the most extensive set of recommendations on CPCF nutrient composition and labelling practices. This included explicit limits on the addition of sugars and sodium and requirements for other nutrients, as well as extensive requirements for the labelling of CPCFs.<sup>9</sup> It is important to note that the nutrient composition and labelling requirements in the 2019 WHO Europe NPM for CPCF are stricter than those in current Codex Standards and Guidelines and in the WHO Guidance.

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

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

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

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

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

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

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

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

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

### Nutrient composition requirements

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

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

#### *Protection and promotion of breastfeeding*

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

#### *Claims*

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

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

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

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

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

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

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

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

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

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

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

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

## 2 Objectives

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

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

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



# 3 Methods

## 3.1 Identification of the binding legal measures

COMMIT partners 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 Thailand. One respondent from the Thailand Food and Drug Administration and one respondent from the Bureau of Nutrition completed the checklist and identified six relevant documents. As a part of the scope of work, the law firm identified 18 additional legal measures in English and prepared a summary table of laws, standards, and binding legal measures. After review, five binding legal measures were deemed relevant for this analysis.

## 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 five 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 Thailand Country Office, and representatives from the Food and Drug Administration and the Bureau of Nutrition.

# 4 Results

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

The review of relevant binding legal measures in Thailand identified five binding legal measures relevant to CPCF although only four binding legal measure apply for CPCF (**Table 2**).

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

Binding legal measure	Year	Type	Content
1. Notification of the Ministry of Public Health No. 158/1994 Re: Supplementary Food for Infants and Young Children	1994	Mandatory	General rules about CPCF.
2. Notification of the Ministry of Public Health No. 367/2014 Re: Labelling of Pre-packaged Foods	2014	Mandatory	General rules about labelling pre-packaged foods.
3. Notification of the Ministry of Public Health No. 383/2017 Re: Labelling of Pre-packaged Foods (No.2)	2017	Mandatory	General rules about labelling pre-packaged foods.
4. Control of Marketing Promotion of Infant and Young Child Food Act, 2017.	2017	Mandatory	Regulation about controlling the marketing and promotion of CPCF.
5. Notification of the Ministry of Public Health No. 182/1998 Re: Nutrition Labelling	1998	Mandatory	Regulation on the criteria for use of nutrition claims for foods that have nutrition claims (excluding CPCF).

### 4.1.1 Nutrient composition

In Thailand, CPCF are primarily regulated by Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children. This Notification was adopted in 1994 and has not been updated since, despite significant changes in the market for CPCFs. Notification No. 158/1994 is about supplementary food for infants 6–12 months of age and young children 1 to 3 years of age. Supplementary food is defined as food intended to supplement nutritional value and to create familiarization in eating normal food.

Notification No. 158/1994 classifies six categories of CPCF:

1. Flour, where the major ingredient is derived from cereals
2. Vegetable, where the major ingredient is derived from vegetables
3. Legume, where the major ingredient is derived from legume(s)
4. Fruit, where the major ingredient is derived from fruit(s)
5. Meat, where the major ingredient is derived from any kind of meat or egg
6. Mixture, which is a mixture of two types of foods from categories 1–5.

It is notable that Notification No. 158/1994 complies with some components of the Codex “Standard for processed cereal-based foods for infants and young children, CXS 74-1981” and “Standard for canned baby foods, CXS 73-1981” but does not adopt the Codex Standards in full. The scope of Notification No. 158/1994 emphasizes the quality and safety of CPCF for older infants and young children, excluding conventional foods for general populations. The CPCF product categories presented in Notification No. 158/1994 include a range of CPCF products, but exclude dairy products,

such as yogurt, milk and cheese. Product categorization is based on the main ingredient with the largest percentage share in the product.

Notification No. 158/1994 provides guidance on production standards, with the following requirements for formulation:

- Sodium should not be more than 200 mg in 100 g of supplementary food, calculated on a prepared/ ready-to-eat basis.
- Dried supplementary food should be soft when prepared according to the instructions for use on the label.
- Food additives should comply with the notification of the Ministry of Public Health regarding Food additives (MOPH Notification No. 391 B.E. 2561 (2018)).
- Dry supplementary food that is ready to eat and does not require cooking, should contain 5 per cent less moisture by weight. For dry supplementary food that requires cooking before eating, the dry contents should contain no more than 9 per cent moisture by weight.
- Supplementary food for infants and young children (including all CPCF) should NOT contain:
  - Artificial sweetener
  - Hormones or antibiotics
  - Preservatives
  - Colouring agents or seasoning substances
  - Flavouring substances (except with the permission of the Food and Drug Administration)

#### 4.1.2 Labelling practices and marketing

Notification No. 158/1994 has only basic requirements for CPCF labelling. Three additional binding legal measures regulate the labelling and promotion of CPCF: 1) Control of Marketing Promotion of Infant and Young Child Food Act, 2017; 2) Notification of the Ministry of Public Health No. 367/2014 Re: Labelling of Pre-packaged Foods; and 3) Notification of the Ministry of Public Health No. 383/2017 Re: Labelling of Pre-packaged Foods (No.2).

Labelling requirements contained in Notification No. 158/1994 include:

- The label shall be in the Thai language, but a foreign language may also be displayed.
- The label must include the following details:
  - name of the food
  - food registration number or symbol of labelling permission
  - name and address of the manufacturer or distributor
  - the country of origin
  - the quantities displayed using the metric system, with dry types of CPCF displaying net weight, liquid CPCF displaying net volume and semi-solid CPCF displaying either net weight or net volume.
  - the composition of major ingredients in terms of percentage in descending order and shall display energy value and quantities of nutrients per 100 g or 100 ml of product and per meal of the CPCF according to the instructions for use. The nutrition declaration should include energy value (Kcal/KJ), protein (g), carbohydrates (g), fat (g), vitamin and minerals if added.
  - a statement when a flavouring substance is used, such as “natural odour added” or “natural flavour added” or “artificial odour added”.
  - the statement “Do not use for feeding an infant under 6 months of age” in red bold letters with text no less than 5 mm in size and written in a rectangular frame with the inside area in white and the frame in a colour that contrasts with the background.

Control of Marketing Promotion of Infant and Young Child Food Act, 2017 addresses the promotion of both BMS and CPCF for children under 3 years of age. CPCF is defined in line with Regulation 158/1994 from 6–36 months of age with the food supplementing nutritional value and creating food consumption familiarity for an older infant or young child. This Act states that:

- Labels of CPCF must be clearly different from labels for BMS.
- Information on CPCF labels must be supported by scientific evidence.
- If CPCF is donated it must not bear any name, seal or symbol that conveys that it is a CPCF.
- CPCF producers, importers, or distributors shall not offer any gift, money, incentive or any other benefit to public health personnel.
- CPCF producers, importers or distributors shall not organize or grant support for academic conferences, trainings or seminar.
- CPCF producers, importers, or distributors shall not carry out or support demonstrations of the use of CPCF in a public health service centre or any other place to support or promote the use of CPCF.
- CPCF producers, importers and distributors cannot conduct marketing promotion towards any person in a medical establishment operated by government or the Thai Red Cross Society. This includes providing coupons or entitlements for a discount or conducting a tie-in sale or exchange for a prize, gift or article, or providing or giving infant food supplements or a sample of infant food supplements.

The Control of Marketing Promotion of Infant and Young Child Food Act, 2017 also:

- Prohibits promotion of infant food supplements to pregnant women or to a woman whose child is under 6 months of age.
- Prohibits the advertisement of infant food supplements.
- Requires the inclusion of detailed information about food allergens, including the words “contains or may contain” and the name of the food allergen.

The general Notification No. 367/2014 and Notification No. 383/2017 (incorporated under Notification No. 367/2014) provide standards for the labelling of pre-packaged foods, including CPCF. In addition to standards stipulated under Notification 158/1994, Notification 367/2014 requires that pre-packaged food labels display percentage by weight of main ingredients in descending order.

Notification of the Ministry of Public Health No.182/1998 Re: Nutrition Labelling provides criteria for use of nutrition claims on food labelling. However, in this notification, Clause 5 states that the notification does not enforce criteria for the labelling and claims on supplementary for infant and young children.

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

The content of the four identified binding legal measures for CPCF in Thailand were compared against the Codex Standards and Guidelines and the 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 Thailand with Codex Standards and Guidelines and the WHO Guidance**

Global guidance	Binding legal measures in Thailand relating to Codex and WHO Guidance		
	Name of binding legal measure(s)	Content of binding legal measure(s)	Alignment with global guidance <sup>y</sup>
<b>Codex Alimentarius</b>			
1. Standard for processed cereal-based foods for infants and young children, CXS 74-1981	Notification of the Ministry of Public Health No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	
2. Standard for canned baby foods, CXS 73-1981	Notification of the Ministry of Public Health No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	
3. General standard for labelling of pre-packaged foods, CXS 1 – 1985	Notification of the Ministry of Public Health No. 367/2014 Re: Labelling of Pre-packaged Foods	All pre-packed foods (including CPCF)	
	Notification of the Ministry of Public Health No. 383/2017 Re: Labelling of Pre-packaged Foods (No.2)		
4. Guidelines on nutritional labelling, CXG 2 – 1985	Notification of the Ministry of Public Health No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	
	Notification of the Ministry of Public Health No. 182/1998 Re: Nutrition Labelling	All pre-packed foods (excluding CPCF)	
5. Guidelines on formulated complementary foods for older infants and young children, CAC/GL 8-1991	Notification of the Ministry of Public Health No. 158/1994 Re: Supplementary Food for Infants and Young Children	–	
6. Guidelines for use of nutrition and health claims, CAC/GL 23 – 1997	Notification of the Ministry of Public Health No. 182/1998 Re: Nutrition Labelling	All pre-packed foods (excluding CPCF)	
<b>WHO Guidance</b>			
1. WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children	Notification of the Ministry of Public Health No.158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	

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

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

The content of the four identified binding legal measures for CPCF in Thailand were compared against the adapted version of the 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). 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 Thailand with nutrient composition requirements in the adapted WHO Europe NPM for CPCF**

Nutrient composition requirements	Relevant CPCF product categories	Binding legal measures in Thailand relating to the adapted WHO Europe NPM for CPCF nutrient composition requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>vi</sup>
<b>CPCF products that automatically should not be promoted</b>					
Sweet confectionery, sweet spreads, and fruit chews	Category 4.1	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	Not specifically mentioned in Notification No. 158, however would fall under the major food categories.	
Single or mixed fruit juices, vegetable juices or other non-formula drinks	Category 5.1	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	Not specifically mentioned in Notification No. 158, however would fall under the major food categories.	
Cow’s milk and milk alternatives, with added sugar or sweetening agent	Category 5.2	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	Not specifically mentioned in Notification No. 158, however would fall under the major food categories.	
<b>Nutrient composition requirements</b>					
No added sugars or sweeteners	All categories	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	Prohibits the use of the artificial sweeteners, but there is no regulation about the use of sugar.	

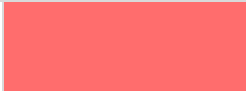
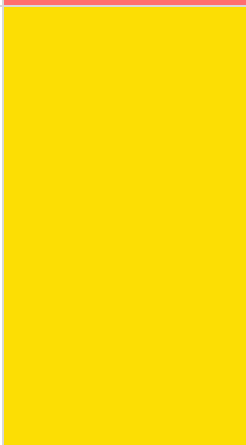
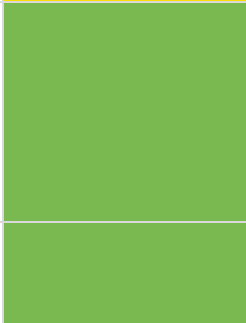
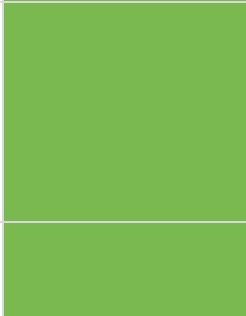
<sup>vi</sup> No binding legal measure means that the binding legal measures identified for analysis made no reference to any of the recommended CPCF nutrient composition or labelling practice. Partial alignment means that binding legal measures include some component of the recommended CPCF nutrient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


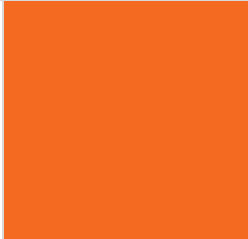
Food category-specific sodium limits	All categories	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	Sodium shall not be more than 200 mg in 100 g of the supplementary food for infants and young children calculated in term of ready-to-eat. In line with Codex for canned baby foods, however, double the NPM threshold.	
Food category-specific total fat limit	All categories	No legal measures	--	--	
Food category-specific limit on percentage of fruit content	Categories 1.1, 2.1, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, and 3.2	No legal measures	--	--	
Food category-specific total sugar limit	Category 4.3	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	Prohibits the use of the artificial sweeteners, but there is no regulation about the use of sugar.	
Food category-specific protein threshold	Categories 1.1, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2	No legal measures	--	--	
Food category-specific minimum for energy density	Categories 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7	No legal measures	--	--	
<b>Thresholds that are not included as a measured component of the adapted 2019 WHO Europe NPM for CPCF</b>					
Front-of-pack high sugar warning: Required if the percentage of energy from total sugar content exceeds category-specific thresholds	All categories except 4.2 and 4.3	No legal measures	--	--	
Standards for micronutrient content of CPCF	All categories	No legal measures	--	--	

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

Labelling practice requirements	Relevant CPCF product categories	Binding legal measures in Thailand relating to the adapted WHO Europe NPM for CPCF labelling practice requirements			
		Relevant binding legal measure(s)	Scope of binding legal measure(s)	Relevant text/content	Alignment with adapted NPM <sup>vii</sup>
<b>Claims requirement:</b> No claims	All categories	No legal measures	–	–	
<b>Appropriate age restriction requirements:</b> <ul style="list-style-type: none"> <li>All CPCF categories have a minimum recommended age of use of 6 months</li> <li>All category 2 CPCF have a maximum age of 12 months</li> </ul>	All categories must have a minimum recommended age of use, and category 2 products have a maximum age	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	<ul style="list-style-type: none"> <li>A statement “Do not use for feeding infants aged under 6 months” in red bold letters with its height of not less than 5 mm filled in a rectangular frame with the inside area white and colour of the frame contrasted to the background.</li> <li>No maximum age restriction for category 2 CPCF.</li> </ul>	
<b>Not marketed as suitable for children aged &lt;6 months requirement:</b>  No image/text that suggests suitability for infants <6 months	All categories	Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children	All CPCF for children 6–36 months of age	<ul style="list-style-type: none"> <li>A statement “Do not use for feeding infants aged under 6 months” in red bold letters with its height of not less than 5 mm filled in a rectangular frame with the inside area white and colour of the frame contrasted to the background.</li> <li>The notification does not make a statement regarding restriction of images suggesting suitability for infants under 6 months for CPCF.</li> </ul>	
<b>Message on importance of breastfeeding for up to 2 years and beyond requirement</b>	All categories	No legal measures	–	–	
<b>Does not suggest equivalence or superiority to breastmilk requirement</b>	All categories	No legal measures	–	–	

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

<p><b>Does not recommend or promote bottle-feeding requirement</b></p>	<p>All categories</p>	<p>No legal measures</p>	<p>--</p>	<p>--</p>	
<p><b>Product name reflects ingredients in descending order as per ingredient list requirement</b></p>	<p>All categories</p>	<p>Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children</p>	<p>All CPCF for children 6–36 months of age</p>	<ul style="list-style-type: none"> <li>• Composition of major ingredients in terms of percentage in descending order and shall display energy value and quantities of nutrients per 100 g/100 ml of product and per one meal of the CPCF according to the instructions for use.</li> <li>• Nutrition declaration should include energy value (Kcal/KJ), protein (g), carbohydrates (g), fat (g), vitamin and minerals if added.</li> <li>• No requirement on the relationship between product name and major ingredients.</li> </ul>	
<p><b>Percentage of fruit stated in ingredient list requirement:</b></p> <p>If the product contains fruit, the ingredient list should include fruit (fresh or powdered/processed) by percentage weight</p>	<p>Categories 1.1, 2.1, 2.2, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2, 4.3</p>	<p>Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children</p>	<p>All CPCF for children 6–36 months of age</p>	<p>Composition of major ingredients in terms of percentage in descending order shall be displayed along with energy value and quantities of nutrients per 100 g or 100 ml of product and per meal of the CPCF according to the instructions for use.</p>	
<p><b>Percentage of added water stated in ingredient list:</b></p> <p>If the product contains added water, the ingredient list should include water by percentage weight</p>	<p>Categories 2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8, 3.1, 3.2</p>	<p>Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children.</p>	<p>All CPCF for children 6–36 months of age</p>	<p>Composition of major ingredients in terms of percentage in descending order shall be displayed along with energy value and quantities of nutrients per 100 g or 100 ml of product and per meal of the CPCF according to the instruction for use.</p>	
		<p>Notification No. 383/2017</p>	<p>All CPCF for children 6–36 months of age</p>	<p>Percentage by weight of main ingredients should be displayed in descending order.</p>	
		<p>Notification No. 383/2017</p>	<p>All CPCF for children 6–36 months of age</p>	<p>Percentage by weight of main ingredients should be displayed in descending order.</p>	

<p><b>Percentage of protein stated in ingredient list requirement:</b></p> <p>If the product is a main meal, the ingredient list should include protein by percentage weight</p>	<p>Categories 2.6, 2.7, 2.8, 3.1</p>	<p>Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children.</p>	<p>All CPCF for children 6–36 months of age</p>	<p>Composition of major ingredients in terms of percentage in descending order shall be displayed along with energy value and quantities of nutrients per 100 g or 100 ml of product and per meal of the CPCF according to the instruction for use.</p>	
		<p>Notification No. 383/2017</p>	<p>All CPCF for children 6–36 months of age</p>	<p>Percentage by weight of main ingredients should be displayed in descending order.</p>	
<p><b>Messages on products with a spout requirements:</b></p> <ul style="list-style-type: none"> <li>• Statement informing that infants and young children must not be allowed to suck from the container</li> <li>• Statement that warns against choking hazard</li> </ul>	<p>Category 2 products with a spout</p>	<p>No legal measures</p>	<p>--</p>	<p>--</p>	

# Conclusion

In this review of binding legal measures on CPCF in Thailand, four mandatory binding 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 WHO Europe NPM for CPCF used by COMMIT in Southeast Asia.

With regard to nutrient composition, Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children includes both a threshold for sodium content and prohibits the use of artificial sweeteners in CPCF.

With regards to labelling practices, four pieces of legislation (Notification of the Ministry of Public Health No. 158/1994, Control of Marketing Promotion of Infant and Young Child Food Act, 2017, Notification of the Ministry of Public Health No. 367/2014, and Notification No. 383/2017) partially address some labelling practices recommended in the adapted WHO Europe NPM for CPCF and outlined in Codex Standards and Guidelines.

The main conclusions from the review are summarized below.

## 1 Binding legal measures cover the appropriate age range and nearly all categories of CPCF products.

Notification No. 158/1994 pertains to all supplementary food for older infants 6–12 months of age and young children 1–3 years of age. Supplementary food is defined as food intended to supplement nutritional value and to create familiarity in eating normal food. The majority of CPCF product categories defined in the adapted WHO Europe NPM for CPCF are included under Notification No. 158/1994, although they are reclassified into six categories: cereal flour, vegetable, legume, fruit, meat and mixture of two or more of any of the other categories. It is notable that dairy products including yogurt, milk and cheese are excluded in the defined CPCF product categories. Both Notification No. 158/1994 and the Control of Marketing Promotion of Infant and Young Child Food Act, 2017 define the age range for CPCF as 6–36 months of age, in line with the adapted NPM.

## 2 Use of the Thai language is required for CPCF product labels, with foreign languages also allowed.

Notification No. 158/1994 and the Control of Marketing Promotion of Infant and Young Child Food Act, 2017 provide labelling requirements for CPCF, including the use of the Thai language on the label, with foreign languages also allowed in addition to Thai. Notification No. 158/1994 specifies the use of Thai for the ingredients list, nutrition information table, manufacturer information and a statement to not use for feeding infants whose age is under 6 months on all CPCF products.

## 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.

Notification No. 158/1994 pertains to the labelling and advertisement of BMS and CPCF, but does not identify specific categories of CPCF products or thresholds or situations in which CPCF should be or should not be promoted. Notification No. 158/1994 does not include dairy-based products as a category of CPCF; therefore, its specified requirements and regulations do not pertain to these products if marketed to children 6–36 months of age.

**4 Binding legal measures provide some thresholds for the nutrient composition of CPCF, but are not in line with either the Codex Standards or the adapted WHO Europe NPM for CPCF**

Notification No.158/1994 provides a nutrient threshold for sodium and prohibits the addition of artificial sweeteners in CPCF. Notably, this measure does not incorporate the existing nutrient composition thresholds from Codex Standards with no mention of sugar, fat, energy, protein, or fruit content for CPCFs.

**5 There are no binding legal measures for the use of claims on CPCF products**

Binding legal measures guiding the use of claims are in place for pre-packaged foods in Thailand, but CPCF are excluded from these measures. Notification of the Ministry of Public Health No.367/2014 includes specific requirements for the inclusion of information on food allergens but there is no statement on the use of claims for CPCF.

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

Notification No. 158/1994 aligns with some of the global guidance requirements to protect, promote and support breastfeeding. Notably, it requires the following statement on all CPCF: “do not use for feeding infants aged under 6 months” in red bold letters. However, there is no maximum age restriction for jarred, pouched or canned CPCF and no restriction of images suggesting suitability for infants under 6 months of age. Further, there are no binding legal measures for inclusion of a message on the importance of breastfeeding for up to 2 years and beyond; no binding legal measures prohibiting messages implying that a product is equivalent or superior to breastmilk; and no measures prohibiting the promotion of bottle-feeding.

Thailand has some active legal binding measures in place to meet several of the adapted WHO Europe NPM for CPCF labelling practice requirements. Binding legal measures cover the appropriate age range of children, and cover nearly all CPCF product categories. However, active binding legal measures only include a threshold for sodium that does not meet the adapted NPM threshold; they do not include any nutrient thresholds for sugar, protein, fat, calorie density, and fruit content. Further, the active binding legal measure includes a classification of CPCF products that does not cover dairy products and does not distinguish nutrient-poor CPCF categories, such as confectionery and all non-BMS drinks, that should never be promoted. Additionally, the measures provide no standards or regulations on the use of claims and fail to specify a minimum age of 6 months for the introduction of CPCF products.

Updating or amending the three existing standards – Notification No. 158/1994 Re: Supplementary Food for Infants and Young Children, Notification of the Ministry of Public Health No.367/2014 Re: Labelling of Pre-packaged Foods and Control of Marketing Promotion of Infant and Young Child Food Act, 2017 – 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
<b>No added sugar/sweetener threshold:</b> No added sugar/sweetener in product ingredient list	Requirement for <b>all</b> subcategories	
<b>Low/no added fruit threshold:</b> Product did not exceed category-specific fruit content limit	1.1 Dry or instant cereals/starch	≤10%
	2.1 Dairy-based desserts and cereal products	≤5%
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	N/A
	2.3 Vegetable-only purée	0% (none allowed)
	2.4 Puréed vegetables and cereals	0% (none allowed)
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	≤5%
	2.6 Puréed meal with meat or fish mentioned as first food in product name	≤5%
	2.7 Puréed meals with meat or fish (but not named first in product name)	≤5%
	2.8 Purées with only meat, fish or cheese in name	≤5%
	3.1 Meat, fish or cheese-based meal with chunky pieces	≤5%
	3.2 Vegetable-based meal with chunky pieces	≤5%
	4.2 Fruit (fresh or dry whole fruit or pieces)	N/A
	4.3 Other snacks and finger foods	N/A
<b>Total sugar threshold:</b> Product did not exceed category-specific total sugar limit	1.1 Dry or instant cereals/starch	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)
<b>Sodium threshold:</b> Product did not exceed category-specific sodium limit	1.1 Dry or instant cereals/starch	<50 mg/100 kcal
	2.1 Dairy-based desserts and cereal products	<50 mg/100 kcal and <50 mg/100 g
	2.2 Fruit purée with or without addition of vegetables, cereals or milk	<50 mg/100 kcal and <50 mg/100 g
	2.3 Vegetable-only purée	<50 mg/100 kcal and <50 mg/100 g
	2.4 Puréed vegetables and cereals	<50 mg/100 kcal and <50 mg/100 g
	2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	<100 mg/100 kcal and 100 mg/100 g
	2.6 Puréed meal with meat or fish mentioned as first food in product name	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/100 kcal and <100 mg/100 g if cheese is listed in front-of-pack name)
	2.7 Puréed meals with meat or fish (but not named first in product name)	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/100 kcal and <100 mg/100 g if cheese is listed in front-of-pack name)
	2.8 Purées with only meat, fish or cheese in name	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/100 kcal and <100 mg/100 g if cheese is listed in front-of-pack name)
	3.1 Meat, fish or cheese-based meal with chunky pieces	<50 mg/100 kcal and <50 mg/100 g (or <100 mg/10kcal and <10 mg/10 g if

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

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

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

**Table A2: Labelling practice requirements**

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

# Annex 2

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

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

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

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

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

# Annex 3

## Nutrient composition

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

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

CPCF product category	Adapted WHO Europe NPM for CPCF nutrient composition requirements						
	No added sugar/sweetener requirement	Low/no added fruit requirement	Total sugar requirement	Sodium requirement	Energy density requirement	Protein requirement	Total fat requirement
1.1 Dry or instant cereals/starch	Partially aligned with Codex <sup>1</sup>	Partially aligned with Codex <sup>1</sup>	NA	Partially aligned with Codex <sup>1</sup>	NA	Fully aligned with Codex <sup>1</sup>	Fully aligned with Codex <sup>1</sup>
2.1 Dairy-based desserts and cereal products	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	NA	Not aligned with Codex
2.2 Fruit purée with or without addition of vegetables, cereals or milk	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	N Not aligned with Codex	NA	Not aligned with Codex
2.3 Vegetable-only purée	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	NA	Not aligned with Codex
2.4 Puréed vegetables and cereals	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	NA	Not aligned with Codex
2.5 Puréed meal with cheese (but not meat or fish) mentioned in the name	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex
2.6 Puréed meal with meat or fish mentioned as first food in product name	Not aligned with Codex	Not aligned with Codex	NA	Partially aligned with Codex <sup>2</sup>	Not aligned with Codex	Not aligned with Codex	Not aligned with Codex

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

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

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

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

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

## Labelling practices

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

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

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

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

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

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

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

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

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

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

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