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Request for publication as Codex Room Document

Item 12 of the CAC39 Agenda “Matters Referred to the COMMISSION by other Codex Committees”, B MATTERS FOR ACTION: Protein Conversion Factors

The European Natural Soy and Plant-based food Manufacturers Association (ENSA) and the European Vegetable Protein Association (EUVEPRO), as key stakeholders in soyfoods and in soy protein products, support the recommendation from CCMAS37 “... *that it might be timely for FAO and WHO to convene an expert panel to review available literature to assess the scientific basis for protein conversion factors and to possibly update the report of the joint FAO/WHO/UNU expert consultation, Protein and Amino Acid Requirements in Human Nutrition (2002).*”, and hereby ask for its endorsement by CAC39.

CAC38 and the Codex Committee on Nutrition and Foods for Special Dietary Uses CCNFSDU37 requested the Codex Committee on Methods of Analysis and Sampling CCMAS to

- assess the appropriateness of the use of the conversion factor of 5.71 to determine protein content in soybean products in general
- assess the accuracy and appropriateness of 5.71 as the nitrogen factor for soy protein isolates used in formula for infants and young children and to take into account the amino acid profile of the isolate

The CCMAS addressed the above questions regarding the Nitrogen Conversion Factor applicable to Soy protein during its last session in February 2016, and the discussions resulted in the following outcome:

Protein conversion factors

12. *The Committee agreed that it was not in a position to reply to the questions posed by CAC38 and CCNFSDU37 as the determination of conversion factors was in the remit of other Codex committees. The Committee agreed to inform the CAC and CCNFSDU accordingly.*

13. *The Committee agreed that conversion factors are scientifically based and that these factors should be harmonized between different Codex standards. The Committee noted that it might be timely for FAO and WHO to convene an expert panel to review available literature to assess the scientific basis for protein conversion factors and to possibly update the report of the joint FAO/WHO/UNU expert consultation, Protein and Amino Acid Requirements in Human Nutrition (2002).*

The physical Working Group preceding the CCMAS37 session discussed the issue in more detail and, in addition to the conclusions here above, acknowledged that “... *there was no consensus on the nitrogen factors*“, and at the same time recognized that “*the conversion factors have severe economic aspects*”.

A nitrogen conversion factor of 6.25 for soy products is consistent with current Codex Standards, the guidelines of globally recognised scientific organisations and agencies, national regulations, European Union legislation:

- Codex Alimentarius STAN 175-1989 Codex general standard for soy protein products
- Codex Alimentarius CAC/GL 2-1985 Guidelines on nutrition labelling
- Codex Alimentarius STAN 234-1999 Recommended Methods of Analysis and Sampling
- European Union Regulation 1169/2011 on the provision of food information to consumers Annex I
- European Commission delegated Regulation (EU)2016/127 supplementing Regulation 609/2013 regarding compositional requirements of infant formula and follow-on formula Annex 2 ('protein content = nitrogen content x 6.25')
- European Food Safety Agency EFSA Scientific Opinion on the essential composition of infant and follow-on formulae [EFSA Journal 2014;12(7):3760]
- European Food Safety Agency EFSA Scientific Opinion on Dietary Reference Values for protein [EFSA Journal 2012;10(2):2557]
- recommendations from the Analytical Sciences Associations (AOAC),
- many national and regional governmental nutrition and labelling regulations

If the value of 5.71 as NCF for soy protein were to replace the widely accepted 6.25, soy would inappropriately be challenged as a high quality protein source, resulting in confusion among consumers and health professionals. This would adversely impact public health programs that rely on soy protein as a staple commodity.

Applying different factors in different Codex standards would be inconsistent, have an impact on international trade, and would bring additional costs to food business operators, some of which are small and medium sized enterprises. Applying a conversion factor of 5.71 instead of 6.25 would result in an almost 10% reduction in the calculated protein content without any change to the composition of the products. This would mean that products would no longer be able to meet certain product requirements, which would entail changes to ingredients lists and food labels.

As stated by CCMAS in its report, protein conversion factors should be harmonised across the different Codex standards.

For the above reasons, we call upon CAC39 to endorse the recommendation of the CCMAS37 and to request FAO and WHO to convene an expert panel to review available literature to assess the scientific basis for protein conversion factors, and to possibly update the report of the joint FAO/WHO/UNU expert consultation, Protein and Amino Acid Requirements in Human Nutrition (2002).

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