

1 **DRAFT SCIENTIFIC OPINION**

2 **Draft Scientific Opinion on the essential composition of infant and follow-**
3 **on formulae¹**

4 **EFSA Panel on Dietetic Products, Nutrition and Allergies (NDA)^{2,3}**

5 European Food Safety Authority (EFSA), Parma, Italy

6 **ABSTRACT**

7 Following a request from the European Commission, the EFSA Panel on Dietetic Products, Nutrition and
8 Allergies (NDA) was asked to deliver a Scientific Opinion on the essential composition of infant and follow-on
9 formula. This Opinion reviews the Opinion provided by the Scientific Committee on Food in 2003 on the
10 essential requirements of infant and follow-on formulae in light of more recent evidence and by considering the
11 Panel's Opinion of October 2013 on nutrient requirements and dietary intakes of infants and young children in
12 the European Union. The minimum content of a nutrient in formula proposed in this Opinion is derived from the
13 intake levels the Panel had considered adequate for the majority of infants in the first six months of life in its
14 previous Opinion and an average amount of formula consumed during this period. From a nutritional point of
15 view, the minimum contents proposed by the Panel cover the nutritional needs of virtually all healthy infants
16 born at term and there is no need to exceed these amounts in formulae, as nutrients which are not used or stored
17 have to be excreted and this may put a burden on the infant's metabolism. Therefore, the Panel emphasises that
18 maximum amounts should not be interpreted as target values but rather as upper limits of a range which should
19 not be exceeded.

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21 **KEY WORDS**

22 infant formula, follow-on formula, composition, public consultation

23

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24 **SUMMARY**

25 Following a request from the European Commission, the EFSA Panel on Dietetic Products, Nutrition
26 and Allergies (NDA) was asked to deliver a Scientific Opinion on the essential composition of infant
27 and follow-on formula. This Opinion reviews the Opinion provided by the Scientific Committee on
28 Food (SCF) in 2003 on the essential requirements of infant and follow-on formulae in light of more
29 recent evidence and by considering the Panel's Opinion of October 2013 on nutrient requirements and
30 dietary intakes of infants and young children in the European Union.

31 There is scientific consensus that breast milk is the preferred food for all healthy infants and provides
32 an adequate supply of all nutrients to support healthy growth and development (with the exception of
33 vitamin K during the first weeks of life and of vitamin D).

34 All formulae intended for infants must be safe and suitable in meeting the nutritional requirements and
35 to promote growth and development of infants born at term when used as a sole source of nutrition
36 during the first months of life and when used as the principal liquid element in a progressively
37 diversified diet after the introduction of appropriate complementary feeding. Nutrients and substances
38 should be added to formulae for infants only in amounts that serve a nutritional or other health benefit.
39 The addition in amounts higher than those serving a benefit or the inclusion of unnecessary substances
40 in formulae may put a burden on the infant's metabolism and/or on other physiological functions, as
41 substances which are not used or stored have to be excreted.

42 The minimum content of a nutrient in formula proposed in this Opinion is derived from the intake
43 levels the Panel had considered adequate for the majority of infants in the first half of the first year of
44 life in its previous Opinion and an average amount of daily energy intake from formula during this
45 period (500 kcal/day). These minimum amounts should be understood as target values which cover the
46 nutritional needs of virtually all infants born at term for optimal growth and development, whereas
47 maximum amounts are driven by safety and also taking into account technological considerations and
48 should not be interpreted as target values but rather as upper limits of a range, which should not be
49 exceeded.

50 Specifications for the currently permitted maximum amounts of micronutrients in formulae were
51 generally calculated as three to five times the minimum amounts established at the time and took into
52 account established history of apparent safe use (Codex Stan 72-1981, Codex Stan 156-1987, the
53 Directive 2006/141/EC, and the SCF) and were not based on scientific evidence for adverse effects
54 owing to the lack of such evidence for most nutrients.

55 There are no reports on any adverse effects associated with the use of formulae complying with the
56 current specifications for micronutrients as laid down in Directive 2006/141/EC, although there are no
57 studies available which were designed to investigate the short or long-term health consequences of
58 consumption of formulae containing the currently permitted maximum amounts of micronutrients in
59 infant or follow-on formula. Assuming an energy intake from formula of 500 kcal/day (average of the
60 average requirement for energy of boys and girls aged three to four months), regular consumption of a
61 formula by an infant containing the currently permitted maximum amounts of zinc, iodine, vitamin A
62 and folate (if the whole amount is provided in the form of folic acid) would imply that the Tolerable
63 Upper Intake Levels is exceeded for these nutrients. Assuming an energy intake from formula of
64 700 kcal/day (highest observed mean energy intakes in infants below six months of age), also intakes
65 of selenium would also exceed the Tolerable Upper Intake Level. The Panel acknowledges the
66 Tolerable Upper Intake Levels used in this estimation were those derived for young children and there
67 is uncertainty with respect to the extrapolation to infants.

68 Cow's milk, goat's milk and isolated soy protein are safe and suitable protein sources for use in infant
69 and follow-on formula based on intact protein. The use of other protein sources in infant and follow-
70 on formula and/or the introduction of new technologies need clinical evaluation and their safety and

71 suitability should be established in the target population prior to their general use in infant and follow-
72 on formula.

73 Formulae containing protein hydrolysates are insufficiently characterised by the declared protein
74 content even if they fulfil regulatory criteria concerning amino acid patterns; therefore the safety and
75 suitability of each specific infant and follow-on formula containing protein hydrolysates has to be
76 established by clinical evaluation in the target population.

77 The use of a default conversion factor of 6.25 is proposed to calculate the protein content from the
78 total nitrogen content, irrespective of the protein source.

79 Infant and follow-on formula should provide on an energy basis indispensable and conditionally
80 indispensable amino acids in amounts at least equal to the reference protein (i.e. breast milk),
81 irrespective of the protein source.

82 There is no necessity to add arachidonic acid, eicosapentaenoic acid, non-digestible oligosaccharides,
83 “probiotics” or “synbiotics”, chromium, taurine, nucleotides, to infant and follow-on formula. There is
84 also no necessity to use phospholipids as a source of long-chain polyunsaturated fatty acids instead of
85 triacylglycerols in infant and follow-on formula or to use triacylglycerols with palmitic acid
86 predominantly esterified in the *sn*-2 position in infant and follow-on formula instead of
87 triacylglycerols from other fat sources. For follow-on formula, contrary to infant formula, the addition
88 of L-carnitine, inositol and choline is not necessary.

89 The Panel did not consider it necessary to propose specific compositional criteria for formulae
90 consumed after one year of age, as formulae consumed during the first year of life can continue to be
91 used by young children.

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374 **BACKGROUND AS PROVIDED BY THE EUROPEAN COMMISSION**

375 Directive 2009/39/EC on foodstuffs intended for particular nutritional uses lays down general rules⁴ on
376 the composition of such foods that are specially designed to meet the particular nutritional
377 requirements of the persons to whom they are intended, including infants and young children in good
378 health.

379 One of the measures adopted under that framework legislation is Commission Directive 2006/141/EC
380 on infant formulae and follow-on formulae⁵. That Directive was adopted originally in 1991 and
381 revised globally in 2006.

382 The Directive defines 'infants' as "children under the age of 12 months" and 'young children' as
383 "children aged between one and three years".

384 The Directive also defines 'infant formulae' as "foodstuffs for particular nutritional use by infants
385 during the first months of life and satisfying by themselves the nutritional requirements of such infants
386 until the introduction of appropriate complementary feeding" and 'follow-on formulae' as "foodstuffs
387 intended for particular nutritional use by infants when appropriate complementary feeding is
388 introduced and constituting the principal liquid element in a progressively diversified diet of such
389 infants".

390 The Directive sets essential requirements for the composition of infant formula and follow-on formula,
391 which are based on a number of opinions of the Scientific Committee on Food, the latest one being the
392 "Report of the Scientific Committee on Food on the Revision of Essential Requirements of Infant
393 Formulae and Follow-on Formulae", adopted on 4 April 2003⁶. In the last ten years, scientific and
394 technological developments on the essential composition of these products have progressed and there
395 are increasing calls for a review of the legislation to reflect such developments.

396 The Commission's proposal for a Regulation of the European Parliament and the Council on foods
397 intended for infants and young children and on food for special medical purposes⁷ aims at revising the
398 legal framework applicable to food for particular nutritional uses and, among others, at repealing
399 Directive 2009/39/EC. Negotiations on the proposal are reaching their conclusion and it is expected
400 that such Regulation will be adopted in the next months.

401 Once the new Regulation is adopted, the Commission will need to adopt delegated acts setting specific
402 rules for the categories of food covered by the Regulation, including infant formulae and follow-on
403 formulae.

404 In the last years, increasing numbers of milk-based drinks and similar products are marketed in
405 different Member States with the denomination of 'growing-up milks' or 'toddlers' milks' or with
406 similar terminology. The composition of these products varies with respect to the protein origin (they
407 can be derived from protein of animal or vegetable origin such as cows' milk, goats' milk, soy or rice)
408 and other ingredients. They are promoted as being particularly suitable for young children and, as
409 such, under the current rules, may be considered as foodstuffs for particular nutritional uses. However,
410 no composition requirements for these products are set in EU legislation.

411 Different views exist in the scientific community and among stakeholders on whether these products
412 are necessary to satisfy the nutritional requirements of young children or have any nutritional benefits
413 when compared to other foods that can constitute the normal diet of young children. In this context,

⁴ Directive 2009/39/EC of the European Parliament and of the Council of 6 May 2009 on foodstuffs intended for particular nutritional uses, OJ L 124, 20.5.2009, p. 21.

⁵ Commission Directive 2006/141/EC of 22 December 2006 on infant formulae and follow-on formulae and amending Directive 1999/21/EC, OJ L 401, 30.12.2006, p. 1.

⁶ Report of the Scientific Committee on Food on the Revision of Essential Requirements of Infant Formulae and Follow-on Formulae, adopted on 4 April 2003, SCF/CS/NUT/IF/65 Final, 18 May 2003.

⁷ COM (2011) 353.

414 some would argue that, given the potential variability of weaning diets that may result in different
415 nutrient intakes for this group of the population, these products are convenient, as a liquid element in
416 the diet of young children, in contributing to meeting their nutritional requirements. Taking all these
417 elements into account, the European Parliament and the Council agreed that these products should be
418 subject of a specific reflection. Therefore, in the abovementioned revision of the legal framework, the
419 Commission will be requested, after consulting the European Food Safety Authority, to draft a report
420 on the necessity, if any, of special provisions for milk-based drinks and similar products intended for
421 young children (hereinafter 'growing-up milks').

422 In the meantime, at international level, the Codex Committee on Nutrition and Food for Special
423 Dietary Uses (CCNFSDU) agreed at its 34th session in December 2012 to revise their existing
424 standard for follow-up formulae⁸, which dates back to 1987 and applies to food intended for use as a
425 liquid part of the weaning diet for the infant from the 6th month on and for young children up to three
426 years of age. Such review will cover all aspects of the existing standard and will include consideration
427 of issues such as technological and scientific developments in follow-up formula production and
428 composition over the past 25 years, the age range of the intended population, product definition and
429 the role of such products in the diet of infants and young children. Furthermore, following comments
430 by WHO and some Codex Member Countries and observers, the review may also consider whether
431 this standard is still necessary at all. The first discussion on this subject has taken place at the session
432 of the CCNFSDU held on 4-8 November 2013.

433 Taking into account the developments described above, it is considered necessary to request the EFSA
434 to provide a scientific opinion on all milk-based drinks and similar products intended for infants and
435 young children.

436 **TERMS OF REFERENCE AS PROVIDED BY THE EUROPEAN COMMISSION**

437 In accordance with Article 29(1) (a) of Regulation (EC) No 178/2002⁹, the European Commission asks
438 EFSA to:

- 439 • Provide advice on the nutritional requirements of infants and young children and, in particular,
440 on those requirements that may be satisfied by breast milk, milk-based drinks and similar
441 products. In this context it will also be important to provide advice to the Commission on how
442 these nutritional requirements evolve during the age period 0-3 years.
- 443 • Provide advice on the essential composition requirements of infant formulae and follow-on
444 formulae by updating the relevant opinions of the SCF on the matter.
- 445 • Provide advice on the importance of the role that 'growing-up milks' may have as a liquid
446 element in the diet of young children, with respect to elements such as the pattern of
447 consumption, the nutritional intake and any other relevant aspect related to exposure to
448 substances that may be present in their diet. In this context it would be useful to take into
449 account that different products are on the market which may have a considerably varied
450 composition.
- 451 • Provide advice on whether 'growing-up milks' are necessary to satisfy the nutritional
452 requirements of young children or have any nutritional benefits when compared to other foods
453 that may be included in the normal diet of young children (such as breast milk, infant
454 formulae, follow-on formulae, cows' milk and other similar products).
- 455 • If considered appropriate, advise the Commission with respect to the appropriate age range
456 and the essential composition of 'growing-up milks'.

⁸ CODEX STAN 156-1987.

⁹ OJ. L 31, 01.02.2002. p. 1.

457 **ASSESSMENT**458 **1. Introduction**

459 The period of infancy is characterised by special needs in nutrition, with respect to requirements for
460 energy and for nutrient amounts per kilogram body mass, which must not only maintain the body but
461 also support a rapid growth rate and the appropriate synthesis and deposition of body tissue. A special
462 feature of young infancy is that, as a rule, one liquid food is the sole source of nutrition and must
463 supply appropriate amounts of energy, water and nutrients.

464 Comparative studies in affluent countries have indicated important health advantages of breast-feeding
465 over formula-feeding for the recipient infants, such as lower incidence rates of gastrointestinal and
466 respiratory tract infections (Ip et al., 2007; Agostoni et al., 2009; Hörnell et al., 2013b), otitis media
467 (Hörnell et al., 2013b) and a lower risk of overweight and obesity (von Kries et al., 1999; Toschke et
468 al., 2002; Owen et al., 2005; Hörnell et al., 2013b).

469 Infant formulae (IF) and follow-on formulae (FOF) have been regulated as foods for particular
470 nutritional uses under Directive 2009/39/EC¹⁰ and its implementing Directive 2006/141/EC¹¹ based
471 upon a series of reports from the Scientific Committee on Food (SCF, 1983, 1989, 1991, 1993b, 1995,
472 2003a) and EFSA (EFSA, 2005e; EFSA NDA Panel, 2012c). No revision of the SCF reports in the
473 light of new available evidence has been undertaken since then, and such review in the context of the
474 revision of the implementation of Regulation (EU) No 609/2013¹² is part of the present Terms of
475 Reference (ToR).

476 Owing to the limited time frame given, the Panel has decided, in agreement with the European
477 Commission, to produce two separate Opinions. Of the five parts of the ToR:

- 478 • nutritional requirements of infants and young children and their coverage by human milk and
479 milk-based products,
- 480 • advice on the necessity of a revision of the essential composition of IF and FOF as laid down
481 in Directive 2006/141/EC,
- 482 • the potential role of milk-based drinks designed, manufactured and advertised to be used in the
483 diets of infants and young children other than IF and FOF,
- 484 • a comparison of the nutritional role of such other milk-based drinks in the diet of young
485 children with other formulae, human milk or cow's milk,
- 486 • eventually advice on the essential composition of such other milk-based drinks and their target
487 groups,

488 the Panel will provide in this second Opinion

- 489 1) advice on the necessity of a revision of the essential composition of IF and FOF as laid down
490 in Directive 2006/141/EC, and

¹⁰ Directive 2009/39/EC of the European Parliament and of the Council of 6 May 2009 on foodstuffs intended for particular nutritional uses, OJ L 124, 20.5.2009, pp. 21–29.

¹¹ Commission Directive 2006/141/EC of 22 December 2006 on infant formulae and follow-on formulae and amending Directive 1999/21/EC, OJ L 401, 30.12.2006, pp. 1–33.

¹² Regulation (EU) No 609/2013 of the European Parliament and of the Council of 12 June 2013 on food intended for infants and young children, food for special medical purposes, and total diet replacement for weight control and repealing Council Directive 92/52/EEC, Commission Directives 96/8/EC, 1999/21/EC, 2006/125/EC and 2006/141/EC, Directive 2009/39/EC of the European Parliament and of the Council and Commission Regulations (EC) No 41/2009 and (EC) No 953/2009, OJ L 181, 29.6.2013, pp. 35–56.

491 2) advice on the appropriateness to propose compositional requirements for formulae consumed
492 after one year of life.

493 Advice on the dietary requirements of infants and young children, an evaluation of dietary intakes of
494 infants and young children living in Europe in comparison with requirements, and advice on the
495 potential role of milk-based drinks designed, manufactured and advertised to be used in the diets of
496 infants and young children, including an evaluation whether they have any nutritional benefits when
497 compared with other foods (such as breast milk, IF, FOF and cow's milk) that may be included in the
498 normal diet of infants and young children has been given by the Panel in a previous Opinion (EFSA
499 NDA Panel, 2013a).

500 This Opinion will not address compositional requirements of formulae intended for pre-term infants,
501 for very low or low birth weight infants or for infants with specific nutritional requirements. Also the
502 dietary management of cow's milk allergy in infants is outside the scope of this Opinion.

503 However, the general considerations and the specifications with respect to nutrients or other
504 ingredients proposed in the present Opinion may serve as a basis for defining compositional
505 requirements for foods for special medical purposes for infants, unless the disease conditions for
506 which such foods are to be used necessitate other compositional aspects.

507 2. Definitions

508 For this Opinion the following definitions apply:

509 • Infants means children under the age of 12 months (Article 2(2)(a) of Regulation (EU) No
510 609/2013).

511 • Young children means children aged between one and three years (36 months) (Article 2(2)(b)
512 of Regulation (EU) No 609/2013).

513 • IF means food intended for use by infants during the first months of life and satisfying by
514 itself the nutritional requirements of such infants until the introduction of appropriate
515 complementary feeding (Article 2(2)(c) of Regulation (EU) No 609/2013 and Codex Stan 72-
516 1981¹³).

517 • FOF means food intended use by infants when appropriate complementary feeding is
518 introduced and which constitutes the principal liquid element in a progressively diversified
519 diet of such infants (Article 2(2)(d) of Regulation (EU) No 609/2013).

520 • “Growing-up milk” or “toddlers’ milk” are formulae intended specifically for young children.
521 No compositional criteria have been laid down in EU legislation. They may or may not be
522 based on milk. In the latter case they would have to contain other animal or plant protein. The
523 Panel proposes not to use the term “growing-up milk” because this would imply a particular
524 effect on growth. The Panel will also not use the term “toddlers’ milk” because it considers
525 that a “young child” is better defined by age. Young-child formula is the term proposed by the
526 Panel for formulae intended for young children. This term includes also formulae based on
527 protein sources other than cow's milk.

528 • Complementary feeding, as defined by WHO in 2002, is “the process starting when breast
529 milk alone is no longer sufficient to meet the nutritional requirements of infants” so that
530 “other foods and liquids are needed, along with breast milk” (WHO, 2002). In the Panel's
531 Opinion on the appropriate age for the introduction of complementary food (EFSA NDA
532 Panel, 2009) “complementary feeding” means the period, when complementary foods are

¹³ Codex-Stan 72-1981 (Codex Alimentarius), 2011. Standard for infant formula and formulas for special medical purposes intended for infants. Adopted 1981, amended 1983, 1985, 1987, revised 2007, amended 2011.

533 given together with either human milk or a breast milk substitute. The Panel notes that this
534 definition differs from the definition of “complementary feeding” provided by WHO.

535 • Complementary food in this Opinion comprises, therefore, all liquid, semisolid and solid
536 foods other than breast milk and IF or FOF that are fed to infants. Complementary food can be
537 beverages, spoon-fed foods or finger food (EFSA NDA Panel, 2009). Cereal-based foods and
538 baby foods are regulated in Directive 2006/125/EC.¹⁴

539 3. General aspects of infant feeding

540 There is scientific consensus that breast milk is the preferred food for all healthy infants and provides
541 an adequate supply of all nutrients to support healthy growth and development (with the exception of
542 vitamin K during the first weeks of life and of vitamin D), besides providing protection against
543 infection and immunostimulatory components (EFSA NDA Panel, 2013a). When complementary food
544 is introduced into the infant’s diet, breast milk remains the most appropriate liquid part of a
545 progressively diversified diet (EFSA NDA Panel, 2009, 2013a).

546 4. Methodological considerations

547 All formulae intended for infants must be safe and suitable in meeting the nutritional requirements and
548 to promote growth and development of infants born at term when used as a sole source of nutrition
549 during the first months of life and when used as the principal liquid element in a progressively
550 diversified diet after the introduction of appropriate complementary feeding. The safety and suitability
551 of such formulae should be demonstrated by generally accepted scientific evidence.

552 Even though human milk composition of healthy, well-nourished mothers can provide guidance for
553 the composition of formulae intended for infants, compositional similarity to human milk is not the
554 only appropriate determinant or indicator of safety and nutritional suitability of such formulae. The
555 mere presence of a substance in human milk does not necessarily indicate a specific benefit of this
556 substance for the infant, nor do the concentrations of nutrients in human milk necessarily reflect
557 infants’ dietary requirements owing to the fact that they may mirror maternal intakes rather than
558 infants’ needs or because absorption efficiency of certain nutrients differ between breast milk and
559 formula. A more suitable approach to evaluate the compositional suitability of formulae intended for
560 infants is to relate health outcomes, including physiological parameters (including growth and
561 development) and biochemical parameters, in formula-fed infants to those of healthy term infants who
562 have been exclusively breast-fed for four to six months. The Panel also notes that nutrients and
563 substances should be added to formulae for infants only in amounts that serve a nutritional or other
564 health benefit. The addition in amounts higher than those serving a nutritional or health benefit or the
565 inclusion of unnecessary substances in formulae may put a burden on the infant’s metabolism or on
566 other physiological functions, as substances which are not used or stored have to be excreted.

567 The compositional requirements of IF and FOF as laid down by Directive 2006/141/EC have been set
568 by specifying the minimum and maximum content of nutrients and other substances in formulae as
569 ready for consumption, including the contribution of water used to reconstitute powdered formulae.
570 The Panel notes that, whereas minimum amounts should be understood as target values which cover
571 the nutritional needs of the majority of infants born at term for optimal growth and development,
572 maximum amounts are driven by safety while also taking into account technological considerations
573 and should not be interpreted as target values but rather as upper limits of a range which should not be
574 exceeded.

575 4.1. Minimum content of nutrients and other substances in IF and FOF

576 Minimum amounts of nutrients in formulae should be based on generally accepted scientific evidence
577 which establishes the nutrient requirements of virtually all infants in the target population. The Panel

¹⁴ Commission Directive 2006/125/EC of 5 December 2006 on processed cereal-based foods and baby foods for infants and young children (Codified version). OJ L 339, 6.12.2006, pp. 16–35.

578 considers that the minimum content of a nutrient in formula can be derived from the intake levels the
579 Panel had considered adequate for the majority of infants in the first half of the first year of life (EFSA
580 NDA Panel, 2013a) and an average amount of formula consumed during this period. The average
581 amount of formula consumed in the first six months of life is taken to be equivalent to 500 kcal/day by
582 averaging the Average Requirements (ARs) for energy of boys and girls aged three to less than four
583 months (i.e. 479 kcal/day) (EFSA NDA Panel, 2013a) and rounding up. The Panel notes that observed
584 mean energy intakes at this age are generally above the AR. Therefore, the Panel considers observed
585 mean energy intakes not to be a suitable basis for deriving the minimum content of nutrients in
586 formulae. Bearing in mind that the levels the Panel had considered adequate for the majority of infants
587 in the first half of the first year of life take into account inter-individual variability in nutrient
588 requirements and are designed to cover the dietary requirements of at least 97.5 % of infants and that
589 observed formula intakes are generally above the intakes assumed by the Panel, the minimum content
590 derived on that basis can be assumed to be adequate for virtually all infants below six months of age
591 and there is no necessity to provide nutrients in amounts higher than the amounts proposed by the
592 Panel.

593 The Panel notes that while for a food which is the sole source of energy and nutrients, such as IF,
594 compositional requirements can be based on energy and nutrient needs of the respective population,
595 the evidence for proposing compositional requirements for foods which are not the sole source of
596 energy and nutrients, such as FOF, is less strong, as other foods contribute to nutrient and energy
597 intakes in variable amounts. For the present Opinion, the Panel assumes that energy and nutrient
598 intakes from complementary foods will compensate for higher requirements of infants and for
599 potentially lower feeding volume of formulae in infants receiving complementary foods, unless
600 otherwise specified in the respective Section.

601 **4.2. Maximum content of nutrients in IF and FOF**

602 As the different protein and fat sources used in the manufacture of formula and the water used to
603 reconstitute powdered formula contribute to the total nutrient content of a formula in varying amounts,
604 maximum contents of nutrients have been established in order to ensure the safe use of formula while
605 limiting technological alternations of the initial nutrient contents of food constituents used in the
606 production of formulae.

607 The Panel notes that specifications for the currently permitted maximum amounts of micronutrients in
608 formulae were generally calculated as three to five times the minimum amounts established at the time
609 and took into account established history of apparent safe use (Codex Stan 72-1981, Codex Stan 156-
610 1987, the Directive 2006/141/EC, and the SCF (2003a)) and were not based on scientific evidence for
611 adverse effects owing to the lack of such evidence for most nutrients.

612 The Panel acknowledges that the scientific data available to derive Upper Tolerable Intake Levels
613 (UL) for infants remain scarce for most micronutrients and there are no reports on any adverse effects
614 associated with the use of formulae complying with the current specifications as laid down in
615 Directive 2006/141/EC. However, there is a lack of studies designed to investigate the short or long-
616 term health consequences of consumption of formulae containing the currently permitted maximum
617 amounts of nutrients in IF or FOF. Whenever a UL has been established for a specific nutrient for
618 infants or young children, the Panel will note if the continuous consumption of formulae containing
619 the currently permitted maximum amount of that micronutrient could lead to intakes exceeding the
620 UL.

621 **5. Minimum and maximum content of energy and macronutrients in IF and FOF**

622 **5.1. Energy**

623 **5.1.1. Current compositional requirements of IF and FOF**

624 Based on the Opinion of SCF (2003a), Directive 2006/141/EC lays down a minimum energy content
 625 of 60 kcal/100 mL and a maximum energy content of 70 kcal/100 mL. These minimum and maximum
 626 values apply both to IF and to FOF and were based on the energy content of breast milk.

627 **5.1.2. Energy density of human milk**

628 The average energy density of human milk has been shown by Butte et al. (2001) to be about
 629 65 kcal/100 mL.

630 Since then, this value has been confirmed by several recent studies on donor breast milk or own
 631 mother's milk (mean \pm standard deviation (SD)): 65 \pm 11 kcal/100 mL for donor breast milk (Wojcik
 632 et al., 2009); 67.3 \pm 6.5 kcal/100 mL for own mother's milk, 64.1 \pm 5.9 kcal/100 mL for single-donor
 633 pooled breast milk, 63.6 \pm 4.5 kcal/100 mL for multiple-donor pooled breast milk (de Halleux and
 634 Rigo, 2013); 62 \pm 9.6 kcal/100 mL to 65 \pm 9.1 kcal/100 mL for own mother's milk (Nielsen et al.,
 635 2011) and 66 \pm 12 kcal/100 mL for donor breast milk (Cooper et al., 2013).

636 **5.1.3. Energy requirements of infants**

637 The energy content of human milk can provide some guidance for the composition of IF and FOF.
 638 However, the energy content of human milk changes within one feed. Because the lipid content
 639 increases markedly with emptying of the breast, hindmilk has a significantly higher energy content
 640 than foremilk (Stam et al., 2013), while formula is of stable composition. Therefore, the knowledge of
 641 energy requirements of infants is a key factor to determine the optimal composition of IF and FOF.
 642 Energy requirement is the amount of food energy needed to balance energy expenditure in order to
 643 maintain body mass, body composition, and a level of physical activity consistent with long-term good
 644 health. This requirement includes the energy needed for growth and development. Dietary reference
 645 values (DRVs) for energy are provided as ARs (EFSA NDA Panel, 2013b). Table 1 summarises the
 646 energy intakes considered adequate for infants in the Panel's previous Opinion on nutrient
 647 requirements and dietary intakes of infants and young children in the European Union (EFSA NDA
 648 Panel, 2013a).

649 **Table 1:** Intakes of energy considered adequate for infants (EFSA NDA Panel, 2013a).

Age (months)	AR		AR	
	(MJ (kcal)/day)		(MJ (kcal)/kg body weight per day)	
	Boys	Girls	Boys	Girls
0 to < 1	1.5 (359)	1.4 (329)	0.45 (109)	0.43 (103)
1 to < 2	2.1 (505)	1.9 (449)	0.47 (112)	0.45 (107)
2 to < 3	2.2 (531)	2.0 (472)	0.40 (95)	0.39 (92)
3 to < 4	2.1 (499)	1.9 (459)	0.33 (78)	0.33 (79)
4 to < 5	2.3 (546)	2.1 (503)	0.33 (78)	0.33 (79)
5 to < 6	2.4 (583)	2.3 (538)	0.33 (78)	0.33 (78)
6 to < 7	2.5 (599)	2.3 (546)	0.32 (76)	0.31 (75)
7 to < 8	2.7 (634)	2.4 (572)	0.32 (76)	0.32 (76)
8 to < 9	2.8 (661)	2.5 (597)	0.32 (77)	0.32 (76)
9 to < 10	2.9 (698)	2.6 (628)	0.32 (77)	0.32 (76)
10 to < 11	3.0 (724)	2.7 (655)	0.33 (79)	0.32 (77)
11 to < 12	3.1 (742)	2.8 (674)	0.33 (79)	0.32 (77)

650

651 These ARs are generally lower than the ones used by the SCF (2003a), with the exception of male
652 infants at the age of one month (+1.9 %) and two months (+4.7 %), and of female infants at the age of
653 two months (+4.7 %). From three months of age onwards, the differences range between -6.2 % and
654 -3.2 %. This is a result of more refined equations used to calculate total energy expenditure, different
655 assumptions made with respect to energy needs for growth and the use of updated reference body
656 weights.

657 **5.1.4. Energy intakes of infants**

658 Data on energy intakes were available from four surveys for mostly formula-fed infants aged from
659 zero to below six months (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008;
660 Lennox et al., 2013) in which mean/median energy intakes of about 550-700 kcal/day were reported.
661 In exclusively breast-fed infants mean energy intakes at 15 and 25 weeks of age were reported to be
662 590 kcal/day and 620 kcal/day, respectively (Nielsen et al., 2011). For infants in the second half of the
663 first year of life mean/median energy intakes in the range of 650-980 kcal/day were observed
664 (Lagström et al., 1997; Noble and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008;
665 Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

666 Only one study from a representative sample of French infants (Fantino and Gourmet, 2008) reported
667 on the contribution of formula to energy intakes in formula-fed infants over the first year of life.
668 Energy from formula intakes represented the following percentages of the total energy intakes (E%):
669 95.5 E% at one to three months; 91.0 E% at four months; 77.8 E% at five months; 63.8 E% at six
670 months; 58.6 E% at seven months; 54 E% at eight to nine months; and 36.7 E% at 10-12 months of
671 age.

672 **5.1.5. Health consequences**

673 Several studies have observed slight differences in growth patterns of formula-fed infants as compared
674 to breast-fed infants, with formula-fed infants growing at a faster rate over the first year of life
675 (Koletzko et al., 2009a; Hörnell et al., 2013a). A role for the higher energy and protein content of IF as
676 compared to breast-milk has been suggested to explain these differences. A number of studies have
677 found associations between a high growth velocity during the first months of life and an increased risk
678 of non-communicable diseases later in life. Systematic reviews showed that upward percentile
679 crossing for weight and length in infancy was associated with a higher risk of later obesity (Baird et
680 al., 2005; Monteiro and Victora, 2005).

681 The Panel notes that the composition of IF has evolved over the last decade and energy and protein
682 contents of current IF resemble more closely that of human milk. It should, however, also be noted
683 that whereas composition of IF remains stable over time, breast-milk composition changes
684 continuously and therefore IF cannot imitate breast-milk with respect to its energy and protein content.

685 **5.1.6. Recommendations**

686 IF and FOF should ensure that growth and development of infants fed IF are similar to that of infants
687 who are exclusively breast-fed during the first four to six months of life and that growth and
688 development of infants fed FOF in association with appropriate complementary feeding are similar to
689 those of infants who continue to be breast-fed while complementary food is introduced into their diet.
690 Since IF and FOF can be used instead of breast milk, there is no reason to set different minimum and
691 maximum energy contents for IF and FOF.

692 There is no scientific evidence suggesting that the mean energy content of breast milk nor the energy
693 requirements of infants up to the age of one year are markedly different from the values used by the
694 SCF (2003a) to determine the minimum and maximum energy content of IF and FOF. An energy
695 density of IF and FOF considerably higher than that of human milk may increase total energy intakes
696 beyond the energy intakes considered adequate for infants and may play a role in the development of a
697 higher than desirable weight gain.

698 The Panel therefore proposes a minimum energy content of IF and FOF of 60 kcal (250 kJ)/100 mL
 699 and a maximum energy content of 70 kcal (293 kJ)/100 mL. However, the Panel considers it desirable
 700 if IF and FOF are designed in a way that their energy content tends towards the lower bound of the
 701 range provided that infants are fed *ad libitum*.

702 5.2. Protein

703 5.2.1. Current compositional requirements of IF and FOF

704 Permitted sources of protein in IF and FOF as laid down in Directive 2006/141/EC include cow's milk
 705 protein, goat's milk protein, isolated soy protein (ISP) and protein hydrolysates of unspecified origin
 706 and unspecified degree of hydrolysis. Currently permitted minimum and maximum amounts of protein
 707 in IF and FOF as laid down in Directive 2006/141/EC and as compared to the recommendations by the
 708 SCF (2003a) are depicted in Table 2.

709 **Table 2:** Currently permitted minimum and maximum amounts of protein in IF and FOF from
 710 different sources as laid down by Directive 2006/141/EC in comparison to the
 711 recommendations by the SCF (2003a) and by the EFSA NDA Panel (2012c)

Formula with g per 100 kcal	IF				FOF			
	Directive 2006/141/EC		SCF (2003a)		Directive 2006/141/EC		SCF (2003a)	
	min	max	min	max	min	max	min	max
Cow's milk protein	1.80 ^(a)	3.00	1.80	3.00	1.80	3.50	1.80	3.00
Goat's milk protein	1.80 ^(a)	3.00	1.80	3.00	1.80	3.50	1.80	3.00
Protein hydrolysates	1.80 ^(b)	3.00	2.25	3.00	1.80 ^(b)	3.50	2.25	3.00
ISP	2.25	3.00	2.25	3.00	2.25	3.50	2.25	3.00

712 ^(a) Formulae with a protein content between 1.80 and 2.00 g per 100 kcal currently require that their safety and suitability is
 713 demonstrated by clinical evaluation.

714 ^(b) Formulae with a protein content between 1.80 and 2.25 g per 100 kcal currently require that their safety and suitability is
 715 demonstrated by clinical evaluation. To date only one specific formulation of whey protein hydrolysates that provides
 716 1.86 g protein per 100 kcal is authorised for use in IF and FOF following an evaluation by the Panel (EFSA, 2005e).

717 5.2.2. Protein content of human milk

718 Protein concentrations in human milk change during the first days of life. In a meta-analysis of
 719 21 studies reporting on energy and macronutrient composition of breast milk from mothers of healthy
 720 singleton infants born at term and who were exclusively breast-fed at the time of breast milk sampling
 721 (Hester et al., 2012), crude protein content expressed as mean (range) was reported for colostrum
 722 (1-5 days): 2.5 (1.4-6.5) g/100 mL (3.8 (2.2-10.0) g/100 kcal, n = 433), for transitional milk
 723 (6-14 days): 1.7 (1.3-2.5) g/100 mL (2.6 (2.0-3.8) g/100 kcal, n = 308) and for mature human milk
 724 (> 14 days): 1.3 (0.8-2.1) g/100 mL (2.0 (1.2-3.2) g/100 kcal, n = 415). Protein accounts for around
 725 17 E% in colostrum and 7 E% in mature human milk (Räihä, 1994). The concentrations of different
 726 proteins also change with duration of lactation. Casein is low or absent in early lactation, then
 727 increases rapidly and subsequently decreases. The concentration of whey proteins decreases from
 728 early lactation and continues to fall. These changes result in a whey protein:casein ratio of about 90:10
 729 in the first three to four days *post-partum*, 55:45 in mature milk and 50:50 in late lactation (at around
 730 six months) (Kunz and Lönnerdal, 1992).

731 5.2.3. Protein requirements of infants

732 Estimating true protein intakes from breast milk is difficult because of the non-protein nitrogen (NPN)
 733 fraction that represents about 25 % of total nitrogen, made up of urea (up to 50 % of NPN), free amino
 734 acids and other nitrogenous compounds. How and how much of NPN is utilised by the body is not
 735 entirely understood (WHO/FAO/UNU, 2007). Moreover, the composition of the protein fraction of
 736 breast milk changes with time and no data are available on the true digestibility of the different
 737 fractions. Therefore, in previous Opinions (EFSA NDA Panel, 2012d, 2013a) the Panel decided to
 738 derive an AR and subsequently a Population Reference Intake (PRI) for protein for infants based on a

739 factorial approach as the sum of the requirement for maintenance and the requirement for growth
 740 adjusted for efficiency of dietary protein utilisation.

741 Table 3 summarises the protein intakes considered adequate for the majority of infants in the Panel’s
 742 previous Opinion on nutrient requirements and dietary intakes in infants and young children in the
 743 European Union (EFSA NDA Panel, 2013a).

744 **Table 3:** Intakes of protein considered adequate for the majority of infants (EFSA NDA Panel,
 745 2013a).

Age (months)	PRI (g/kg body weight per day)	Body weight (kg) ^(a)		PRI (g/day)	
		Boys	Girls	Boys	Girls
		1 to < 2	1.77	4.5	4.2
2 to < 3	1.50	5.6	5.1	8	8
3 to < 4	1.36	6.4	5.8	9	8
4 to < 5	1.27	7.0	6.4	9	8
5 to < 6	1.21	7.5	6.9	9	8
6 to < 7	1.15	7.9	7.3	9	8
7 to < 8	1.27	8.3	7.6	11	10
8 to < 9	1.23	8.6	7.9	11	10
9 to < 10	1.19	8.9	8.2	11	10
10 to < 11	1.16	9.2	8.5	11	10
11 to < 12	1.14	9.4	8.7	11	10

746 (a): 50th percentile of WHO Growth Standards.

747 No PRI has been proposed by the Panel for the age group zero to less than one month owing to the
 748 lack of data for the first month of life. However, the Panel considers it safe to assume that
 749 requirements for protein intakes in the first month of life do not differ significantly from those of the
 750 second month of life.

751 **5.2.4. Protein intakes of infants**

752 Protein intakes in mostly formula-fed infants in Europe were reported to be around 9-10 E% in infants
 753 less than six months of age (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008;
 754 Lennox et al., 2013) and around 10-15 E% in infants in the second half of the first year of life
 755 (Lagström et al., 1997; Noble and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008;
 756 Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

757 **5.2.5. Health consequences**

758 5.2.5.1. Protein intakes to ensure adequate growth and development

759 Several studies which investigated the safety and suitability of IF based on intact cow’s milk protein
 760 with protein contents of 1.8-1.9 g/100 kcal have been reviewed by the Panel previously (EFSA,
 761 2005e). These studies have generally shown that protein concentrations in formula of
 762 1.8-1.9 g/100 kcal when derived from intact milk protein are adequate to promote normal growth
 763 when these formulae are fed *ad libitum*. In a study on infants (Koletzko et al., 2009b) consuming a low
 764 protein IF with 1.77 g protein per 100 kcal and subsequently FOF providing 2.2 g protein per 100 kcal
 765 for the first year of life and who were followed-up until 24 months of age, no statistically significant
 766 differences between the group consuming low protein formula and the breast-fed reference group with
 767 respect to weight-for-length and BMI was found at 24 months of follow up. Another study (Trabulsi et
 768 al., 2011) investigated the effect on infant growth of an IF with a protein content of 1.9 g/100 kcal as
 769 compared to an IF formula with a protein content of 2.2 g/100 kcal which was consumed for four
 770 months. There were no statistically significant differences between the two formula groups with
 771 respect to weight gain, length gain and head circumference at the end of the study at four months of
 772 age.

773 No studies which evaluated the safety and suitability of lower than currently permitted (i.e.
774 2.25 g/100 kcal) protein contents in formulae containing ISP were published after the report by the
775 SCF (2003a). Also, no evidence is available to suggest that this protein content would be inadequate to
776 ensure adequate growth and development.

777 The Panel considers that based on the available evidence a minimum protein intake of 1.8 g/100 kcal
778 from IF and FOF based on intact milk protein and 2.25 g/100 kcal from formula containing ISP are
779 sufficient to ensure adequate growth and development. Adequate minimum protein intakes from IF
780 and FOF containing protein hydrolysates need to be established for each specific IF or FOF containing
781 hydrolysed proteins following clinical evaluation, as outlined in Section 5.2.5.4.

782 5.2.5.2. High protein intakes

783 In infants, a very high protein intake (around 20 E%) can impair the water balance, particularly when
784 no other liquids are consumed and/or extrarenal water losses are increased (EFSA NDA Panel, 2012d).
785 It has been suggested that high protein intakes contribute to higher insulin secretion, and to a higher
786 release of insulin-like growth factor (IGF)-1 and IGF-binding protein (IGFBP)-1 (Axelsson, 2006). It
787 has also been suggested to be associated with increased growth (Koletzko et al., 2009b; EFSA NDA
788 Panel, 2012d; Hörnell et al., 2013a) and a higher body mass index (BMI) in childhood (Hörnell et al.,
789 2013a; Thorisdottir et al., 2013; Weber et al., 2014). Whether protein plays a role in the observed
790 increased growth rate and higher BMI in childhood is still matter of debate and requires more
791 research.

792 5.2.5.3. Plant proteins as protein sources for IF and FOF

793 Some plant proteins are deficient in certain indispensable amino acids and the digestibility of plant
794 proteins can be less than that of milk proteins. Therefore, a higher minimum protein content is usually
795 recommended for formulae with intact proteins other than milk proteins. Also, when setting minimum
796 amounts for the contents of certain minerals in IF and FOF based on plant proteins, the increased
797 phytic acid content of plant proteins that can reduce the availability of minerals has to be taken into
798 account (SCF, 2003a).

799 Currently, for formulae containing intact proteins the only permitted source of plant proteins is ISP.
800 ISP is low in sulphur containing amino acids. It contains around 1-2 % phytate and is rich in
801 nucleotides and isoflavones (SCF, 2003a). Soy protein also contains trypsin inhibitors and lectins
802 (Bhatia et al., 2008). Reducing phytic acid content in formulae by around half from around 600 mg/kg
803 to around 270 mg/kg or completely as compared to around 250-400 mg/kg ready-to-feed formula has
804 been shown to improve zinc absorption and to a lesser extent also iron absorption (Lönnerdal et al.,
805 1984; Davidsson et al., 1994; Davidsson et al., 2004). Concerns have been raised with respect to
806 potential negative effects of soy isoflavones on sexual, reproductive and neurobehavioural
807 development, immune function and thyroid function. The American Academy of Pediatrics (AAP)
808 Committee on Nutrition concluded in its review that the evidence for adverse effects of dietary soy
809 isoflavones on human development, reproduction or endocrine function is not conclusive (Bhatia et
810 al., 2008). The European Society for Paediatric Gastroenterology Hepatology and Nutrition
811 (ESPGHAN) Committee on Nutrition acknowledged the lack of evidence from human studies, but
812 recommended the reduction of soy isoflavones in soy-based formulae as precautionary approach
813 (ESPGHAN Committee on Nutrition et al., 2006). Trypsin inhibitors and lectins may interfere with
814 protein digestion and nutrient absorption. Enzyme inhibitors and lectins are inactivated under heat
815 treatment, although some residual activity can be found when proper heating is not achieved (Lajolo
816 and Genovese, 2002). It is technologically possible to remove isoflavones, trypsin inhibitors, lectins
817 and phytic acid from formula.

818 The Panel considers that concentrations of isoflavones, trypsin inhibitors, lectins and phytic acid in IF
819 and FOF should be kept as low as is feasible.

820 The Panel notes that the main indications for the use of formulae exclusively based on ISP in place of
821 milk-based formula are congenital lactase deficiency and galactosaemia, provided the formula is
822 lactose-free according to the criteria laid down in Directive 2006/141/EC (i.e. 0.01 g/100 kcal) (EFSA
823 NDA Panel, 2010b), and infants for whom caregivers chose a vegetarian diet.

824 5.2.5.4. Protein hydrolysates as protein sources for IF and FOF

825 According to Directive 2006/141/EC, formulae containing hydrolysed protein may be produced from
826 any suitable protein source and by different enzymatic or chemical means provided that the
827 compositional criteria laid down by the Directive are met. In its Opinion, the SCF (2003a) concluded
828 that there is a need for clinical evaluation of formulae containing protein hydrolysates with respect to
829 their safety and suitability.

830 The Panel emphasises that the safety and suitability of each specific formula containing protein
831 hydrolysates has to be established by clinical studies. Information on protein sources and the
832 technological processes applied should also be provided. In this context, the Panel notes that one
833 particular formula containing partially hydrolysed whey protein has been evaluated for its safety and
834 suitability by the Panel (EFSA, 2005e) and has been authorised for use by Directive 2006/141/EC.

835 Directive 2006/141/EC specifies criteria for formulae containing protein hydrolysates to be allowed to
836 be marketed as reducing the risk of developing allergy to milk proteins. Attempts have been made to
837 classify formulae containing hydrolysed protein into partially and extensively hydrolysed protein
838 formulae according to the degree of protein fragmentation, but there is no agreement on the criteria on
839 which to base this classification (Greer et al., 2008) and no regulatory definition exists as to what
840 would constitute a partially or extensively hydrolysed protein formula. Formulae containing
841 hydrolysed protein have been studied with respect to their potential to reduce the risk of developing
842 allergic manifestations in at-risk-infants who are not breast-fed (Osborn and Sinn, 2006; Szajewska
843 and Horvath, 2010; von Berg et al., 2013; de Silva et al., 2014). These studies indicate that the
844 characterisation of a formula by molecular weight of protein cannot predict their potential to reduce
845 the risk of developing allergic manifestations in genetically predisposed infants in the general
846 population.

847 The Panel considers that the criteria given in Directive 2006/141/EC alone are not sufficient to predict
848 the potential of a formula to reduce the risk of developing allergy to milk proteins. Clinical studies are
849 necessary to demonstrate if and to what extent a particular formula reduces the risk of developing
850 short and long-term clinical manifestations of allergy in at-risk-infants who are not breast-fed.

851 5.2.5.5. Protein quality

852 Amino acid reference patterns can be used in the assessment of protein quality by comparing the
853 amino acid composition of a food to an amino acid reference pattern. Given that intakes of breast milk
854 from a healthy well nourished mother are considered to satisfy the amino acid requirements for the
855 first six months of life, the Panel considers the amino acid pattern of breast milk to be the best
856 reference pattern for a product substituting for breast milk in infants.

857 The SCF (2003a) determined the amount of indispensable and conditionally indispensable amino acids
858 per energy value in IF and FOF based on six studies of the amino acid content of human milk (Bindels
859 and Harzer, 1985; Lönnerdal and Forsum, 1985; Janas et al., 1987; Darragh and Moughan, 1998;
860 Villalpando et al., 1998; Råihä et al., 2002). A recent meta-analysis of 26 studies (Zhang et al., 2013)
861 which investigated the total amino acid profile in human milk closely corroborated the amounts of
862 indispensable and conditionally indispensable amino acids in human milk determined by the SCF
863 (2003a) and which are also in line with the values proposed by the Codex Alimentarius in Codex Stan
864 72-1981 and by an ESPGHAN coordinated international expert group (Koletzko et al., 2005). The
865 Panel, therefore, considers that the available evidence supports the amino acid pattern of human milk
866 proposed by the SCF (2003a).

867 Based upon results indicating a lower formation of cysteine from cystathionine in the transsulfuration
868 pathway, it has been considered that L-cysteine is a conditionally indispensable amino acid for
869 neonates and that methionine cannot substitute for cysteine completely (White et al., 1994; Vina et al.,
870 1995). These results were not confirmed in recent studies in parenterally fed infants (Courtney-Martin
871 et al., 2008; Thomas et al., 2008; Courtney-Martin et al., 2010). However, as there is marked
872 individual variability in the rate of transsulfuration, the Panel considers that it is appropriate to provide
873 both cysteine and methionine in IF and FOF and the ratio of methionine to cysteine in IF shall not
874 exceed two unless the safety and suitability of the formula has been demonstrated by clinical
875 evaluation.

876 Tyrosine is synthesised by the hydroxylation of phenylalanine, via phenylalanine hydroxylase in the
877 liver. Studies in human neonates have reported a substantial ability to hydroxylate phenylalanine (the
878 first step in phenylalanine oxidation) (van Toledo-Eppinga et al., 1996; House et al., 1998). However,
879 the extent to which neonates can accommodate high phenylalanine and low tyrosine intakes via
880 phenylalanine hydroxylation remains unknown. Infants may require a pre-formed dietary source of
881 tyrosine because the activity of phenylalanine hydroxylase in some neonates can be low, and
882 hyperphenylalaninaemia tends to occur, whereas tyrosine tends to be deficient in these infants.
883 Therefore, the Panel considers that it is appropriate to provide both tyrosine and phenylalanine in IF
884 and FOF and the ratio of tyrosine and phenylalanine in IF shall not exceed two unless the safety and
885 suitability of the formula has been demonstrated by clinical evaluation.

886 5.2.5.6. Effects of processing on nutritional value of protein

887 The nutritional value of protein is influenced by its amino acid composition, by protein hydrolysis but
888 also by heat-treatment, especially in the presence of iron, vitamin C and lactose in these products. Heat
889 processing is essential for the preservation of IF and FOF but induces a number of degradation
890 reactions in milk, including Maillard reactions between lactose and protein and advanced glycation
891 end products, as well as other direct modification reactions, which reduce the nutritional value of
892 protein and could produce potentially active derivatives (Pischetsrieder and Henle, 2012). Among the
893 Maillard reaction products the most important is lactulosyllysine, the reaction product of lactose and
894 lysine side chains of the milk proteins (Fritsch and Klostermeyer, 1981; Langhendries et al., 1992;
895 Henle et al., 1993). The presence of lactose is also an important prerequisite for extensive protein
896 oxidation during the thermal treatment of milk (Meltretter et al., 2007) as the oxidation of other amino
897 acid side chains can be promoted by reactive oxygen species, which are formed in the course of the
898 Maillard reaction (Mossine et al., 1999). As a consequence of their specific formulation and
899 processing, IF and FOF can show higher content of glycation markers than regular milk products.
900 Liquid formulae contain around double the amount of advanced Maillard reaction products compared
901 with formulae in powdered form (SCF, 2003a).

902 The Panel considers that the contents of Maillard reaction products and protein degradation products
903 in IF and FOF should be kept as low as technologically possible owing to their potentially untoward
904 effects on the nutritional value of protein.

905 **5.2.6. Recommendations**

906 5.2.6.1. Calculation of protein content

907 The SCF (2003a) proposed to use a default conversion factor of 6.25 to calculate the protein content
908 from the total nitrogen content, irrespective of the protein source. The Panel is aware of the
909 discussions with respect to the use of different conversion factors for different protein sources in order
910 to reflect variations in the nitrogen content of different proteins (EFSA NDA Panel, 2012d). The
911 Panel, however, proposes to retain the conversion factor of 6.25 mainly for practical considerations.

912 5.2.6.2. Protein sources

913 The Panel considers that cow's milk, goat's milk and ISP are safe and suitable protein sources for use
914 in IF and FOF based on intact protein. The use of other protein sources in IF and FOF and/or the

915 introduction of new technologies need clinical evaluation and their safety and suitability should be
 916 established in the target population prior to their general use in IF and FOF.

917 With respect to formulae containing protein hydrolysates, the Panel reiterates the conclusions of the
 918 SCF (2003a) that those formulae are insufficiently characterised by the declared protein content even
 919 if they fulfil regulatory criteria concerning amino acid patterns and contents and that the safety and
 920 suitability of each specific IF or FOF containing protein hydrolysates has to be established by clinical
 921 evaluation.

922 The Panel notes that the characterisation of protein hydrolysates by molecular weight of the protein
 923 cannot predict their potential to reduce the risk of developing allergic manifestations in genetically
 924 predisposed infants. Therefore, the Panel considers that the criteria given in Directive 2006/141/EC
 925 are not sufficient to predict the potential of a formula to reduce the risk of developing allergy to milk
 926 proteins.

927 5.2.6.3. Minimum and maximum protein content of IF and FOF

928 Human milk is a food of changing composition during the lactational period, during 24 hours and
 929 during one feed, whereas an IF is a product of constant composition and, therefore, must be a
 930 compromise on the safe side, both as to the amount and as to the quality of the protein.

931 Based on the studies which investigated the adequacy of IF containing around 1.8 g protein per
 932 100 kcal, the Panel considers that a minimum protein content in IF and FOF of 1.8 g/100 kcal
 933 (0.43 g/100 kJ) for cow’s and goat’s milk-based formula is suitable to satisfy the nutritional
 934 requirements of infants. For IF and FOF containing ISP, the Panel proposes a minimum protein
 935 content of 2.25 g/100 kcal (0.54 g/100 kJ). A minimum protein content for IF and FOF containing
 936 protein hydrolysates cannot be proposed and the adequacy of protein content of a specific IF or FOF
 937 containing hydrolysed proteins needs to be established based on clinical evaluation.

938 There is no evidence of a physiological need for protein intakes at amounts of 3.0 g/100 kcal in
 939 infancy, which is the currently permitted maximum content of protein in IF. In addition, protein
 940 intakes of infants are generally well above the requirements, so the protein content of IF and FOF
 941 could be decreased. Therefore, the Panel proposes to reduce the currently permitted maximum protein
 942 content to 2.5 g/100 kcal (0.60 g/100 kJ) for IF and FOF based on cow’s milk and goat’s milk protein
 943 and to 2.8 g/100 kcal (0.67 g/100 kJ) for IF and FOF containing ISP and IF and FOF containing
 944 protein hydrolysates. The Panel, however, acknowledges that there are no scientific data available
 945 which allow the establishment of precise cut-off values for the maximum protein content in IF and
 946 FOF and the proposed values are based on expert judgement of what would constitute an upper bound
 947 of the adequate range of intake. Table 4 gives an overview of the proposed minimum and maximum
 948 amounts of protein in IF and FOF.

949 **Table 4:** Proposed minimum and maximum content of protein in IF and FOF.

Formulae with	Minimum content		Maximum content	
	g/100 kcal	g/100 kJ	g per 100 kcal	g/100 kJ
Cow’s milk protein	1.80	0.43	2.50	0.60
Goat’s milk protein	1.80	0.43	2.50	0.60
ISP	2.25	0.54	2.80	0.67
Protein hydrolysates ^(a)	---	---	2.80	0.67

950 ^(a) The safety and suitability of formulae containing protein hydrolysates, including their minimum protein content, should
 951 be established based on clinical evaluation.

952 5.2.6.4. Amino acid reference pattern

953 As IF is considered as breast milk substitute and FOF can be used as the principal liquid element of a
 954 progressively diversified diet of infants in place of breast milk, the Panel considers that IF and FOF

955 should provide indispensable and conditionally indispensable amino acids in amounts on an energy
 956 basis at least equal to the reference protein (i.e. breast milk), irrespective of the protein source.

957 Given that a recent meta-analysis (Zhang et al., 2013) closely corroborated the findings of the SCF
 958 (2003a) with respect to the total amino acid content of human milk, the Panel proposes to base the
 959 amino acid reference pattern for IF and FOF on the analysis of indispensable and conditionally
 960 indispensable amino acids in human milk by the SCF (2003a). The proposed reference pattern is
 961 depicted in Table 5.

962 **Table 5:** Proposed amino acid reference pattern for human milk protein using a conversion factor
 963 of 6.25.

Amino acid	mg/100 g protein	mg/100 kcal	mg/100 kJ
Cysteine	2.1	38	9
Histidine	2.2	40	10
Isoleucine	5.0	90	22
Leucine	9.2	166	40
Lysine	6.3	113	27
Methionine	1.3	23	5
Phenylalanine	4.6	83	20
Threonine	4.3	77	18
Tryptophan	1.8	32	8
Tyrosine	4.2	76	18
Valine	4.9	88	21

964

965 The sum of methionine and cysteine and the sum of tyrosine and phenylalanine in IF may be used for
 966 calculation purposes. If the ratio between methionine to cysteine and/or the ratio between tyrosine and
 967 phenylalanine, respectively, exceeds two, this must be justified by clinical evaluation. For FOF the
 968 Panel considers that no restrictions with respect to amino acid ratios need to apply, owing to the fact
 969 that complementary foods will contribute to amino acid intakes and the metabolism of older infants is
 970 more mature with respect to the capacity to convert methionine to cysteine and phenylalanine to
 971 tyrosine.

972 **5.3. Fat**

973 **5.3.1. Current compositional requirements of IF and FOF**

974 Current compositional requirements of IF and FOF with respect to total fat, fatty acids and
 975 phospholipids as laid down by Directive 2006/141/EC are depicted in Table 6. These compositional
 976 requirements differ from the Opinion of the SCF (2003a) with respect to the minimum content of
 977 alpha-linolenic acid (ALA, 18:3n-3) and the maximum content of phospholipids (PL) in IF and FOF.
 978 These differences are highlighted in the Table as footnotes.

979 **Table 6:** Current compositional requirements of IF and FOF with respect to total fat, fatty acids and
 980 PL as laid down by Directive 2006/141/EC.

	IF				FOF			
	g per 100 kcal		FA%		g per 100 kcal		FA%	
	min	max	min	max	min	max	min	max
Compulsory composition								
Total fat	4.40 ^(a)	6.00 ^(b)			4.00 ^(c)	6.00 ^(b)		
<i>Trans</i> FA				3.0				3.0
Lauric acid + myristic acid				20.0				20.0
Erucic acid				1.0				1.0
LA (18:2, n-6) ^(d)	0.30	1.20			0.30	1.20		
ALA (18:3, n-3) ^(d)	0.05 ^(e)	0.24 ^(f)			0.05 ^(e)	0.24 ^(f)		
Voluntary addition								
Total n-3 LCPUFA				1.0				1.0
Total n-6 LCPUFA				2.0				2.0
ARA (20:4, n-6)				1.0				1.0
DHA (22:6, n-3)	shall not exceed total n-6 LCPUFA				shall not exceed total n-6 LCPUFA			
EPA (20:5, n-3)	shall not exceed DHA				shall not exceed DHA			
Phospholipids	2 g/L ^(h)				2 g/L ^(h)			

981 ^(a) 40 E%, ^(b) 55 E%, ^(c) 35 E%.

982 ^(d) with a ratio of LA to ALA of ≥ 5 and ≤ 15 .

983 ^(e) the SCF (2003) proposed a minimum content of 0.05 mg/100 kcal for formulae supplemented with ARA and DHA and
 984 0.10 mg/100 kcal for formulae not supplemented with ARA and DHA.

985 ^(f) calculated from the lowest permitted LA:ALA ratio of 5 and the highest permitted LA concentration.

986 ^(h) the SCF (2003) proposed a maximum content of 1 g/L.

987 Abbreviations: LA: linoleic acid, ALA: alpha-linolenic acid, ARA: arachidonic acid, DHA: docosahexaenoic acid, EPA:
 988 eicosapentaenoic acid, FA%: percent of total fatty acids, LCPUFA: long-chain polyunsaturated fatty acids.

989 Conjugated-linoleic acid (CLA) is currently not permitted to be added to formulae in addition to the
 990 CLA naturally present in the fat ingredients, as it is considered to be a novel food ingredient in this
 991 context. Also, the use of sesame oil and cotton-seed oil is not permitted in IF and FOF.

992 5.3.2. Fat composition of human milk

993 Breast milk has an average total fat content of 24-59 g/L (3.7-9.1 g/100 kcal, around 50 E%), but the
 994 fat content varies markedly with pregnancy weight gain and during the feed as the fat content
 995 increases as the breast is emptied (Michaelsen et al., 1994). Most of the fat in breast-milk is
 996 triacylglycerol (TAG, > 98 %), but it also contains some cholesterol (around 0.25 g/L) and PL (around
 997 0.24 g/L), predominantly sphingomyelin, phosphatidylethanolamine and phosphatidylcholine
 998 (Abrahamse et al., 2012; Giuffrida et al., 2013).

999 The main saturated fatty acid (SFA) in human milk is palmitic acid (16:0), which accounts for around
 1000 26 % of total fatty acids (FA%), and the main monounsaturated fatty acid (MUFA) is oleic acid (18:1,
 1001 n-9), which typically accounts for approximately 35 FA% (Abrahamse et al., 2012). The composition
 1002 of polyunsaturated fatty acids (PUFAs) in human milk varies depending on the dietary intake of the
 1003 mother with milk from vegans having the highest content of linoleic acid (LA, 18:2, n-6) and ALA
 1004 (Sanders and Reddy, 1992; Davis and Kris-Etherton, 2003). Inuit and other populations with a high
 1005 intake of marine animals have the highest breast-milk content of docosahexaenoic acid (DHA, 22:6n-
 1006 3). The concentrations of DHA in breast milk, however, are also influenced by polymorphisms in the
 1007 fatty acid desaturase (FADS) gene cluster (Moltó-Puigmartí et al., 2010). In general, DHA
 1008 concentrations are the most variable of all fatty acid concentrations in human milk, while the content
 1009 of arachidonic acid (ARA, 20:4, n-6) is much more stable (Brenna et al., 2007). Breast-milk usually
 1010 has a low content of *trans*-fatty acids (TFA), around 2-5 FA% (Larqué et al., 2001), and CLA,

1011 0.2-0.6 FA% (Rist et al., 2007), but the content of these fatty acids varies depending on the maternal
 1012 diet (Larqu e et al., 2001; Rist et al., 2007).

1013 Human milk contains little short-chain SFA (SCFA, with a carbon-chain length < 6), but usually
 1014 contains 8-10 FA% as medium-chain SFA (MCFA, usually defined as fatty acids with a carbon length
 1015 of 6-10) (EFSA NDA Panel, 2010d). TAG containing SCFA, MCFA and to some extent also lauric
 1016 acid with 12 carbon atoms are more rapidly hydrolysed by gastrointestinal lipases and the hydrolysis
 1017 products are more easily absorbed as they bypass the enterocytes and chylomicrons and are taken to
 1018 the liver directly via the portal vein (Novak and Innis, 2011). The ingestion of these fatty acids,
 1019 therefore, could provide some benefit under conditions where fat absorption is a limiting factor. The
 1020 MCFA content of human milk varies as it is increased by a high carbohydrate and low fat intake of the
 1021 mother (Koletzko et al., 1992; Sauerwald et al., 2001; Novak and Innis, 2011).

1022 About 70 % of the palmitic acid in human milk is esterified to the *sn*-2 position of the milk TAG
 1023 (Innis, 2011), and as the endogenous lipases hydrolyse dietary TAG mainly at the *sn*-1,3 position,
 1024 palmitic acid may be absorbed in part as glycerol-palmitate. It has been proposed that the absorption
 1025 of unesterified palmitic acid is limited.

1026 **5.3.3. Requirement for total fat and essential fatty acids and Adequate Intakes (AI) of long-**
 1027 **chain (LC) PUFA**

1028 In the Panel’s previous Opinion on nutrient requirements and dietary intakes of infants and young
 1029 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded on levels of intakes
 1030 of fats, essential fatty acids and LCPUFA (unsaturated fatty acids with 20 or more carbon atoms)
 1031 considered adequate for the majority of infants. These are depicted in Table 7.

1032 **Table 7:** Intakes of fat, essential fatty acids and LCPUFA considered adequate for the majority of
 1033 infants.

Age	RI ^(a) total fat	AI LA	AI ALA	AI DHA	AI ARA
	E%	E%	E%	mg/day	mg/day
0 to < 6 months	50-55	4	0.5	100	140
6 to < 12 months	40	4	0.5	100	---

1034 ^(a) RI: Reference Intake range for macronutrients

1035 **5.3.4. Total fat and fatty acid intakes of infants**

1036 Mean total fat intakes in mostly formula-fed European infants below the age of six months were
 1037 available from four studies (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008;
 1038 Lennox et al., 2013) and were between 42 and 46 E%. Intakes of SFAs, MUFAs and PUFAs were
 1039 reported to be around 16-22 E%, 15-17 E% and 6.7-7.0 E%, respectively (Hilbig, 2005; Noble and
 1040 Emmett, 2006; Lennox et al., 2013). Intakes of LA were 3.6-4.2 g/day (around 6-7 E%), of ALA
 1041 0.41-0.48 g/day (around 0.7-0.8 E%) and of DHA 57 mg/day (Fantino and Gourmet, 2008; Schwartz
 1042 et al., 2010). Total fat intake usually decreases once breast-feeding or formula-feeding ceases
 1043 (Niinikoski et al., 2007). In infants between 6 and < 12 months mean total fat intakes were reported
 1044 between 26 and 40 E% (Lagstr m et al., 1997; Noble and Emmett, 2001; Hilbig, 2005; de Boer et al.,
 1045 2006; DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008; Lennox
 1046 et al., 2013). Intakes of SFA, MUFA and PUFA were around 12-16 E%, 9-14 E% and 4.6-7.0 E%,
 1047 respectively (Lagstr m et al., 1997; Noble and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006;
 1048 DGE, 2008). Intakes of LA were 3.4-6.8 g/day (around 3.4-4.4 E%), of ALA 0.40-0.65 g/day (around
 1049 0.5-0.9 E%) and of DHA 28-47 mg/day (Lagstr m et al., 1997; de Boer et al., 2006; Fantino and
 1050 Gourmet, 2008; Schwartz et al., 2010). The Panel, however, notes the skewed distribution of LA, ALA
 1051 and DHA intakes and that in the absence of information on median intakes the given values cannot be
 1052 interpreted.

1053 **5.3.5. Fat sources for IF and FOF**

1054 The obvious and previously used staple sources of fat for use in the production of IF and FOF are
 1055 cow's milk, to a certain extent goat's milk and different types of vegetable oils. Like human milk, the
 1056 lipids in bovine milk are mainly present in globules as an oil-in-water emulsion. Most of the fat is
 1057 saturated and around 11 % of the fatty acids are SCFA, almost half of which is butyric acid (4:0)
 1058 (Månsson, 2008). The SCFA are esterified almost entirely at the *sn*-3 position of the TAG molecules,
 1059 but similar to human milk, cow's milk usually has palmitic acid and MCFA preferentially esterified at
 1060 positions *sn*-2 and *sn*-1 and oleic acid in positions *sn*-1,3. Owing to the hydrogenation of PUFAs
 1061 catalysed by the rumen bacteria, cow's milk has a relatively high content of *t*FA, typically
 1062 2.6-3.9 FA%, of which *cis*-9, 11-*trans* CLA and 11-*trans* vaccenic acid (18:1*t*) are the major ones,
 1063 constituting 0.3-0.5 FA% and 2-3.3 FA%, respectively and a low content of PUFA (Slots et al., 2009).

1064 The average total fat content in goat's milk is similar to that found in other ruminant species as it
 1065 usually ranges from 3 to 6 % (Chilliard and Ferlay, 2004). The fatty acids are arranged in TAG in
 1066 accordance with the milk pattern of other ruminants and the percent of unsaturated fatty acids do not
 1067 differ from that found for cow's milk. The major difference between caprine and bovine milk fat is the
 1068 distribution among specific SFAs, as goat's milk has a lower content of SCFA and more MCFA,
 1069 specifically a higher content of capric acid (10:0) and caprylic acid (8:0) (Strzałkowska et al., 2009).

1070 There are many different vegetable oils that could be used in the production of IF, but most of the
 1071 vegetable oils that are used have a high content of PUFA and less SFA. The TAG positioning of SFA
 1072 in vegetable oils furthermore differs from that in breast-milk, as they will usually have more
 1073 unsaturated fatty acids in the *sn*-2 position and the SFA in position *sn*-1,3. An overview about the
 1074 typical fatty acid composition of human milk and other potential fat sources for IF and FOF is given in
 1075 Table 8.

1076 **Table 8:** Typical fatty acid composition of breast-milk and potential sources of fat for IF and FOF.

FA	Human milk ^(a)	Cow's milk ^(b)	Goat's milk ^(c)	Soybean oil ^(d)	Canola oil ^(d)	Sunflower oil ^(d)	Palm oil ^(d)
	% FA	% FA	% FA	% FA	% FA	% FA	% FA
SFA	45-46	53-84	62-79	16	7	10	49
MUFA	35-40	13-42	17-29	23	63	20-45	37
PUFA	14-19	2-4	3-6	58	28	40-66	9
LA	10-15	1-2	1.5-4	50	18	40-66	9
ARA	0.7-1.1	0.1					
ALA	0.1-2.0	0.2-1.3	0.25-1.3	7	9	0-0.2	0.2
DHA	0.2-0.5						

1077 ^(a) from Greek and Finnish mothers (Antonakou et al., 2013; Mäkelä et al., 2013).

1078 ^(b) Kliem et al. (2013); Ferrand-Calmels et al. (2014).

1079 ^(c) Ferrand-Calmels et al. (2014).

1080 ^(d) USDA (online).

1081 As neither cow's milk nor vegetable oils contain LCPUFAs, oil sources other than those discussed
 1082 above are needed to supply LCPUFAs. LCPUFA sources currently used in IF and FOF are fish oil,
 1083 ARA-rich fungal oil from *Mortierella alpina* and egg PL (lecithin/phosphatidylcholine from egg
 1084 yolk).

1085 **5.3.6. Health consequences**

1086 5.3.6.1. Overall fat intake

1087 The content of fat in IF and FOF is determined by the need for energy for growth and for the supply of
 1088 essential fatty acids. Moreover, fat facilitates the absorption of the fat-soluble vitamins. TAG are the
 1089 predominant source of energy for breast-fed and formula-fed infants. Major changes in body size and
 1090 composition take place during early life and early growth pattern may have both beneficial and
 1091 adverse long-term effects on health and obesity risk. The concern about excessive weight gain in
 1092 infancy has increased as childhood obesity becomes increasingly more prevalent. The role of high fat

1093 intakes as determinants of adiposity in infancy and childhood has been poorly studied and results are
1094 inconclusive (Macé et al., 2006; Agostoni and Caroli, 2012).

1095 5.3.6.2. Fatty acid composition

1096 The background for the concern about the use of myristic and lauric acid in IF and FOF expressed by
1097 the SCF (2003a) is their cholesterol-increasing effects in adults. However, palmitic acid is by far the
1098 most dominant SFA in breast-milk and also increases cholesterol. Furthermore, plasma cholesterol is
1099 higher in breast-fed compared to formula-fed infants and there is no evidence that this has any long-
1100 term adverse health effects (Owen et al., 2008; Owen et al., 2011). With respect to MCFA, the SCF
1101 (2003a) concluded that there was no necessity to add MCFA to IF or FOF. The main purpose of
1102 adding MCFA would be to increase fat absorption (as would lauric acid), but healthy infants do not
1103 appear to have any limitations with respect to fat absorption. Furthermore, MCFA may have potential
1104 negative health effects, as high MCFA intakes may lead to diarrhoea and dicarboxylic-acid-uria
1105 (Borum, 1992; Tserng et al., 1996; Odle, 1997). In infants, TFA may interfere with PUFA metabolism
1106 (Larqué et al., 2001), but no studies have been able to link TFA intake to any growth or developmental
1107 outcomes in infants. CLA, evaluated in the form of CLA-rich oils (*cis*-9, *trans*-11 and *trans*-10, *cis*-12
1108 in a mixture 1:1), has been suggested to have negative health effects (EFSA NDA Panel, 2010a,
1109 2010c). Both TFA and *cis*-9, *trans*-11 CLA are present in milk and therefore are contained in formula
1110 in which milk fat has been used as a fat source and are not of safety concern in amounts which are
1111 naturally introduced to formula from milk fat.

1112 Of importance when it comes to the fatty acid composition of IF is that the PUFA content is high
1113 enough to provide the required amount of essential fatty acids.

1114 ALA is essential in human nutrition as precursor for n-3 LCPUFA. LA, when incorporated into skin
1115 ceramides, is essential for maintaining the water-permeability barrier of the skin and thereby avoiding
1116 excessive trans-epidermal water loss and the accompanying energy loss from water evaporation.
1117 Eicosapentaenoic acid (EPA), docosapentaenoic acid (DPA) and to a lesser degree DHA are
1118 synthesised from ALA. DHA is a component of membrane structural lipids, especially of PL in
1119 nervous tissue and the retina. The developing brain accumulates large amounts of DHA both pre- and
1120 post-natally, particularly during the first two years of life. DHA is predominantly acquired from the
1121 mother via placental transfer and from breast milk or formula, although the capacity of the brain to
1122 synthesise DHA increases with gestational age (EFSA NDA Panel, 2010d). Biochemical changes of
1123 n-3 PUFA deficiency include a decrease in plasma and tissue DHA concentrations. There is no
1124 accepted cut-off concentration of plasma or tissue DHA concentrations below which functions
1125 ascribed to n-3 PUFA such as visual or neurological functions are impaired (IoM, 2005b).

1126 The effects of the addition of fatty acids to formula, such as effects on visual acuity, brain
1127 development, growth, and immune function, have mainly been studied for ALA and DHA.

1128 A meta-analysis of the effect of ALA on growth and development of pre-term and term infants (Udell
1129 et al., 2005) concluded that ALA supplementation had a statistically significant effect on plasma and
1130 erythrocyte PL DHA concentrations but that there was a lack of convincing evidence for the effects of
1131 ALA supplementation of formula on infant growth and development. The meta-analysis did not find
1132 any effects of ALA on growth of pre-term infants and the small differences in weight and length
1133 between term infants fed ALA enriched formula and controls which were observed at 12 months of
1134 age were not sustained at 24 months of age. There was a transient improvement in retinal function in
1135 pre-term but not in term infants and no effect on any of the other developmental indices.

1136 Most studies have compared IF with and without the addition of LCPUFA and more recent studies
1137 have also supplemented lactating mothers with fish oil, which generally result in far higher infant
1138 intakes of especially DHA than those added to IF (around 0.5-1.0 FA% vs. 0.2-0.4 FA%). Because of
1139 the large number of studies in this area, the Panel has chosen to summarise the evidence in this area
1140 based on meta-analyses and large randomised controlled trials (RCTs).

1141 DHA is accreted in the brain during the first two years of life and data mainly from *in vitro* and animal
1142 studies have shown effects of DHA on neuronal cell growth, rhodopsin function and levels of
1143 neurotransmitters (Lauritzen and Carlson, 2011). Studies generally show that the most predictable way
1144 to increase tissue DHA is to supply DHA rather than ALA (Arterburn et al., 2006).

1145 Meta-analyses assessing various functional effects of LCPUFA-intake on cognitive outcomes in RCTs
1146 in both formula-fed and breast-fed term infants have consistently concluded that there are no clear
1147 long-term benefits or harms of addition of LCPUFA to IF and FOF during infancy on
1148 neurodevelopmental outcomes (Delgado-Noguera et al., 2010; Schulzke et al., 2011; Simmer et al.,
1149 2011; Qawasmi et al., 2012). However, these meta-analysis pool studies that vary greatly in intake and
1150 source of LCPUFAs and in the duration of supplementation. The majority of studies have only
1151 measured outcomes in infancy when the range of cognitive functions that can be tested is limited.
1152 Furthermore, the specific cognitive and behavioural properties one would expect to be affected by
1153 LCPUFA and the most appropriate tests and age at testing to detect such effects is still a matter of
1154 debate (Cheatham et al., 2006). Thus, no firm conclusions with respect to the short as well as the long-
1155 term consequences of early LCPUFA supplementation on cognitive function can be drawn.

1156 Some studies have reported negative effects of LCPUFA intakes on infant growth. Two studies on
1157 maternal n-3 LCPUFA-supplementation during lactation and/or pregnancy found that this was
1158 associated with increased head circumference and a decrease in length of the breast-fed infants
1159 (Delgado-Noguera et al., 2010). However, a meta-analysis on the effect of LCPUFA in IF on infant
1160 growth in 14 RCTs with a total of 1 846 infants did not show any significant positive or a negative
1161 effects of LCPUFA on growth (weight, length, or head circumference) (Makrides et al., 2005).

1162 One meta-analysis concluded that post-natal n-3 LCPUFA intake (from fish, fish oil and breast-milk)
1163 decreases childhood asthma (Yang et al., 2013), whereas a systematic review of RCTs found an effect
1164 on asthma and the response to skin prick test only after supplementation during pregnancy, and no
1165 significant effect was seen after post-natal intake (Klemens et al., 2011).

1166 Studies have suggested that polymorphisms in the fatty acid desaturase (FADS) gene cluster that
1167 determine the endogenous conversion of LA and ALA to LCPUFAs alter the effect of breast-feeding
1168 on cognitive outcomes (Caspi et al., 2007; Steer et al., 2010; Martin et al., 2011; Morales et al., 2011;
1169 Steer et al., 2013) and risk of atopy (Rzehak et al., 2010; Standl et al., 2011; Standl et al., 2012).
1170 Different FADS single-nucleotide polymorphisms (SNPs) may have different effects on LCPUFA
1171 synthesis and these may vary with age (Harsløf et al., 2013). The presence of these polymorphisms
1172 could influence the effect of LCPUFA addition and thus further complicate the evaluation of the
1173 effects of addition of LCPUFA to IF and FOF.

1174 The Panel considers that DHA should be added to IF and FOF, even though there is currently no
1175 conclusive evidence for any effects beyond infancy of DHA supplementation on any of the health
1176 outcomes studied. The basis for proposing this addition is that: (1) DHA is an essential structural
1177 component of the nervous tissue and the retina and is involved in normal brain and visual development
1178 (EFSA, 2009); (2) the developing brain has to accumulate large amounts of DHA in the first two years
1179 of life; (3) although DHA can be synthesised in the body from ALA, the intake of pre-formed DHA
1180 generally results in an erythrocyte DHA status more closely resembling that of a breast-fed infant than
1181 is achieved with ALA alone (Brenna et al., 2009); (4) whereas to date there is no convincing evidence
1182 that the addition of DHA to IF and FOF has benefits beyond infancy on any functional outcomes ,
1183 there is also a lack of long-term follow-up data on specific aspects of cognitive and behavioural
1184 function from adequately powered RCTs of DHA addition to IF and FOF to demonstrate any assumed
1185 biologically plausible effect of DHA on these aspects. Considering all of these factors, it seems
1186 prudent to provide pre-formed DHA to formula-fed infants in similar amounts as breast-fed infants,
1187 even though benefits beyond infancy of this practice cannot be established based on the currently
1188 available data.

1189

1190 With respect to the EPA:DHA ratio, the SCF (2003a) recommended the ratio should be kept below
1191 one. However, there are no studies which investigated any potential health risk of high intakes of EPA
1192 in infants, but the content of EPA in breast-milk is usually low, typically in the range of 0.05-0.4 FA%
1193 (Lauritzen and Carlson, 2011).

1194 5.3.6.3. Molecular speciation of fatty acids

1195 In breast-milk, PL that constitute the fat globule membrane have a high content of LCPUFA compared
1196 to the TAG molecules in the core of the milk globules (Abrahamse et al., 2012). The PL supplied by
1197 breast-milk are expected to play a role together with bile PL in the emulsification of the fat in the
1198 infant gut and thus promote digestion, absorption and transport (Ramirez et al., 2001). It has been
1199 proposed that specifically LCPUFA may be better utilised if supplied in PL owing to increased
1200 absorption and tissue incorporation (Abrahamse et al., 2012). Furthermore, as constituents of the
1201 membranes of all cells in the infant, PL are involved in a variety of physiological processes, but these
1202 are usually not expected to be influenced by dietary intake of PL (German, 2011; Küllenberg et al.,
1203 2012; Oosting et al., 2012; Tanaka et al., 2013). Few studies have looked at functional consequences
1204 of inclusion of PL in IF. A meta-analysis that specifically evaluated the effect of formula LCPUFA on
1205 infant growth did not find any differences depending on whether these were added as PL or TAG
1206 (Makrides et al., 2005). The Panel considers that there is no convincing evidence for a beneficial effect
1207 of LCPUFA supplied as PL instead of TAG in IF or FOF. There are no adverse effects reported of the
1208 use of PL to supply LCPUFA in IF and/or FOF instead of TAG. Lecithins are authorised by
1209 Regulation (EC) No 1333/2008¹⁵ to be added to IF and FOF as emulsifier in an amount of 1 g/L.

1210 5.3.6.4. TAG with palmitic acid predominantly in the *sn*-2 position

1211 Structured triglycerides in which palmitic acid has been predominantly esterified in the *sn*-2 position
1212 in order to imitate breast-milk have been studied for a number of health outcomes in healthy term
1213 infants, including mineral absorption and retention, bone mineral density (BMD), growth, stool
1214 consistency, blood lipid profiles and infant crying time.

1215 In these studies no effects on infant growth (Kennedy et al., 1999; Nelson and Innis, 1999;
1216 Litmanovitz et al., 2013) or on phosphorus and magnesium absorption (Carnielli et al., 1996) were
1217 observed. Also, no cause and effect relationship could be established between the feeding of formula
1218 high in *sn*-2 palmitate and stool consistency (EFSA NDA Panel, 2014d). The studies investigating
1219 calcium absorption (EFSA NDA Panel, 2011) and infant crying time (Litmanovitz et al., unpublished;
1220 Zhong et al., unpublished) reported inconsistent results. The only study which used a relevant measure
1221 of BMD did not report consistent results on BMD (Kennedy et al., 1999). A small study (Yaron et al.,
1222 2013) evaluated the effect of formula with high *sn*-2 palmitate as compared to a formula with low *sn*-2
1223 palmitate on infant gut microbiota composition, reporting increases in *Clostridium*, *E. coli*,
1224 *Pseudomonas* and *Staphylococcus* numbers, but only by plate counting and without providing further
1225 characterisation of the bacterial groups analysed to infer possible physiological/clinical consequences
1226 of the changes reported. One study which investigated the effect of *sn*-2 palmitate on blood lipids
1227 found lower HDL-cholesterol and apolipoprotein A1 concentrations and higher apolipoprotein B
1228 concentrations in the group being fed high *sn*-2 palmitate formula (Nelson and Innis, 1999) but the
1229 relevance of this finding in infants is unknown. The Panel considers that there is no convincing
1230 evidence for a beneficial effect of the use of TAG with palmitic acid predominantly esterified in the
1231 *sn*-2 position in IF and/or FOF instead of other TAG. There are no adverse effects reported of the use
1232 of TAG with palmitic acid predominantly esterified in the *sn*-2 position in IF and/or FOF instead of
1233 other TAG.

¹⁵ Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives. OJ L 354, 31/12/2008, p. 16–33.R

1234 **5.3.7. Recommendations**

1235 5.3.7.1. Total fat

1236 According to Directive 2006/141/EC and in line with the SCF (2003a), IF have to provide fat in the
1237 range of 40-55 E% and FOF in the range of 35-55 E%. The Panel had concluded in its previous
1238 Opinion (EFSA NDA Panel, 2013a) on intakes of fat considered adequate for the majority of infants
1239 from birth to below six months of 50-55 E% for the first and of 40 E% for the second half year of life.
1240 The Panel considers that there is no scientific reason to differentiate the fat content of IF and FOF and
1241 that complementary foods that contribute to the dietary intake in the later half of infancy have a low
1242 fat content.

1243 Therefore, the Panel proposes a minimum fat content of IF and FOF of 40 E% (i.e. 4.4 g/100 kcal
1244 (1.1 g/100 kJ)) and a maximum fat content of 55 E% (i.e. 6.0 g/100 kcal (1.4 g/100 kJ)).

1245 5.3.7.2. LA

1246 The range of LA concentrations in IF and FOF can be derived based on the level of LA intakes (4 E%)
1247 which the Panel had considered to be adequate for the majority of infants (EFSA NDA Panel, 2013a)
1248 and the highest concentrations of LA observed in human milk (24 FA%) (Sanders and Reddy, 1992).
1249 These derivations translate into a lower bound of the range of 500 mg/100 kcal (120 mg/100 kJ,
1250 equivalent to 4.5 E%) and an upper bound of the range of 1 200 mg/100 kcal (300 mg/100 kJ,
1251 equivalent to 10.8 E%), in line with what has been recommended previously by the SCF (2003a).

1252 5.3.7.3. ALA

1253 In line with the approach for LA, a lower bound for ALA in IF and FOF can be derived based on the
1254 level of ALA intakes (0.5 E%) which the Panel had considered to be adequate for the majority of
1255 infants (EFSA NDA Panel, 2013a) and an upper bound can be derived based on the highest ALA
1256 concentrations observed in human milk (2 FA%) (Mäkelä et al., 2013). These derivations translate into
1257 a lower bound of the range of 50 mg/100 kcal (12 mg/100 kJ, equivalent to 0.5 E%) and an upper
1258 bound of the range of 100 mg/100 kcal (24 mg/100 kJ, equivalent to 0.9 E%).

1259 The Panel considers that there is no necessity to set a specific ratio for LA:ALA in the presence of
1260 LCPUFA in IF and FOF.

1261 5.3.7.4. LCPUFA

1262 In line with the approach for LA and ALA, a lower bound for DHA in IF and FOF can be derived
1263 based on the level of DHA intakes (100 mg/day) which the Panel had considered to be adequate for
1264 the majority of infants (EFSA NDA Panel, 2013a) and an upper bound can be derived based on the
1265 highest observed DHA concentrations in human milk (around 1 FA%) (Brenna et al., 2009). These
1266 derivations translate into a lower bound of the range of 20 mg/100 kcal (4.8 mg/100 kJ) and an upper
1267 bound of the range of 50 mg/100 kcal (12 mg/100 kJ).

1268 The Panel considers that there is no necessity to set a specific minimum content of ARA or EPA in IF
1269 or FOF nor a specific ratio for DHA:ARA or DHA:EPA. The Panel notes that ARA and EPA will,
1270 however, be introduced to IF and FOF via sources of LCPUFA.

1271 The Panel also notes that there is no convincing evidence that the addition of DHA to IF and FOF has
1272 benefits beyond infancy on any functional outcomes. However, the proposal of the Panel to add DHA
1273 to IF and FOF is based on its structural role in the nervous tissue and the retina and its involvement in
1274 normal brain and visual development, the need of the developing brain to accumulate large amounts of
1275 DHA in the first two years of life and the consideration that the intake of pre-formed DHA generally
1276 results in an erythrocyte DHA status more closely resembling that of a breast-fed infant than is
1277 achieved with ALA alone.

1278 5.3.7.5. SFA and TFA

1279 The Panel considers that there is no evidence which would allow lower or upper bounds of a range for
 1280 specific types of SFA (MCFA or lauric, myristic or palmitic acid) to be proposed in IF or FOF. For
 1281 TFA, the Panel considers the current specifications for TFA content in IF and FOF (< 3 FA%) to be
 1282 adequate. These specifications allow for the use of milk as a source of fat for formulae.

1283 5.3.7.6. Vegetable oils

1284 The Panel considers that the vegetable oils used in the production of IF and FOF should be safe from a
 1285 toxicological point of view (e.g. regarding the content of erucic acid, cyclopentene fatty acids, etc.).
 1286 The use of partially hydrogenated vegetable oils in IF and FOF should be avoided owing to the
 1287 production of some TFA.

1288 5.3.7.7. PL

1289 Taking into account the lack of convincing evidence for a beneficial effect of LCPUFAs supplied as
 1290 PL instead of TAG in IF or FOF, the Panel considers that the use of PL as a source of LCPUFA
 1291 instead of TAG in IF and FOF is not necessary. PL are naturally present in milk and ISP, and may be
 1292 added to IF and FOF for technological purposes, for example as an emulsifier or as a source of
 1293 LCPUFA.

 1294 5.3.7.8. TAG with palmitic acid predominantly in the *sn*-2 position

1295 Taking into account the lack of convincing evidence for a benefit of use of TAG with palmitic acid
 1296 predominantly esterified in the *sn*-2 position in IF and/or FOF, the Panel considers that there is no
 1297 necessity to use TAG with palmitic acid predominantly esterified in the *sn*-2 position in IF and FOF
 1298 instead of TAG from other fat sources.

1299 Table 9 provides an overview of the proposed minimum and maximum content of total fat and an
 1300 adequate range of fatty acids in IF and FOF.

1301 **Table 9:** Proposed minimum and maximum content of fat and adequate range of fatty acids in IF
 1302 and FOF

	Minimum content		Maximum content	
	mg/100 kcal	mg/100 kJ	mg/100 kcal	mg/100 kJ
Total fat	4 400	1 052	6 000	1 434
	Lower bound		Upper bound	
LA	500	120	1 200	300
ALA	50	12	100	24
DHA	20	4.8	50	12
TFA	---	---	3 FA%	3 FA%

 1303 **5.4. Carbohydrates**

1304 Nutritionally, two broad categories of carbohydrates can be differentiated: “glycaemic carbohydrates”,
 1305 i.e. carbohydrates digested and absorbed in the human small intestine with a substantial subsequent
 1306 rise in blood glucose, and “dietary fibre”, i.e. non-glycaemic carbohydrates passing undigested to the
 1307 large intestine and with no rise in blood glucose. The absolute dietary requirement for glycaemic
 1308 carbohydrates is not known because there is no indispensable carbohydrate. For practical purposes
 1309 recommendations for glycaemic carbohydrates will depend on the amount of fat and protein ingested.
 1310 The main glycaemic carbohydrates are monosaccharides, disaccharides, malto-oligosaccharides, and
 1311 starch. Dietary fibre is defined to include all non-digestible carbohydrates (plus lignin) (EFSA NDA
 1312 Panel, 2010e), but for IF and FOF only resistant oligosaccharides (fructo-oligosaccharides (FOS),
 1313 galacto-oligosaccharides (GOS), other resistant oligosaccharides), and resistant starch and chemically
 1314 and/or physically modified starches are of relevance.

1315 **5.4.1. Current compositional requirements of IF and FOF**

1316 Permitted carbohydrates in IF are lactose, maltose, sucrose, glucose, maltodextrins, glucose syrup (or
 1317 dried glucose syrup), pre-cooked starch and gelatinised starch free from gluten. These carbohydrates
 1318 can be used under the conditions outlined in Table 10. For FOF there are no restrictions with respect to
 1319 the type of carbohydrates that can be used as long as they are free from gluten. If honey is used (for
 1320 FOF only), it has to be treated in order to destroy spores of *Clostridium botulinum*.

1321 **Table 10:** Current compositional requirements for IF and FOF with respect to glycaemic
 1322 carbohydrates and FOS plus GOS according to Directive 2006/141/EC.

g/100 kcal	IF with			FOF with		
	Milk protein	ISP	Protein hydrolysates	Milk protein	ISP	Protein hydrolysates
Carbohydrates		9-14			9-14	
of which						
Lactose	≥ 4.5	NR ^(a)	≥ 4.5	≥ 4.5	NR ^(a)	≥ 4.5
Sucrose	not to be added		≤ 20 % of total carbohydrates ^{(b),(c)}	Σ sucrose, fructose, sugar from honey ≤ 20 % of total carbohydrates ^(b)		
Fructose	not to be added					
Glucose	not to be added		≤ 2 ^{(b),(c)}	not to be added		≤ 2 ^{(b),(c)}
Maltose, maltodextrins ^(b)	unrestricted within maximum amounts			unrestricted within maximum amounts		
Starches ^(b)	≤ 2 g/100 mL and ≤ 30 % of total carbohydrates ^(d)			unrestricted within maximum amounts as long as free of gluten		
FOS + GOS ^{(b),(e)}	≤ 0.8 g/100 mL			≤ 0.8 g/100 mL		

1323 ^(a) not required (NR) if more than 50 % of the protein content is from ISP

1324 ^(b) voluntary addition

1325 ^(c) to mask the bitter taste

1326 ^(d) pre-cooked or gelatinised starch only

1327 ^(e) a combination of 90 % oligogalactosyl-lactose and 10 % high molecular weight oligofructosyl-saccharose only

1328 **5.4.2. Carbohydrate content of human milk**

1329 5.4.2.1. Digestible (glycaemic) carbohydrates

1330 The Panel proposes to differentiate between glycaemic and non-glycaemic carbohydrates to underline
 1331 the difference in their physiological function. The first source of glycaemic carbohydrates in infants is
 1332 human milk, in which lactose, a disaccharide of glucose and galactose, is the primary sugar. Lactose
 1333 occurs exclusively in milk and milk products. Human milk has the highest lactose content of all milks,
 1334 about 55-70 g/L or 8.2-10.4 g/100 kcal (corresponding to 33-42 E%), whereas the content of
 1335 monosaccharides is only about 1 % of total carbohydrates (Coppa et al., 1994). Human milk does not
 1336 contain sucrose or fructose but small amounts of sugar alcohols, including inositol (Cavalli et al.,
 1337 2006).

1338 5.4.2.2. Non-digestible (non-glycaemic) carbohydrates in human milk

1339 The third main component in human milk after lactose and fat are neutral and acid oligo- (and
 1340 poly)saccharides in concentrations between around 5-10 g/L (Aggett et al., 2003). The structure of
 1341 about 200 human milk oligosaccharides has been identified (Kunz et al., 2000) with the principal
 1342 oligosaccharide in milk being lacto-N-tetraose. Neutral linear and branched-chain oligosaccharides
 1343 consisting of 3-23 monosaccharide units are fucosylated to a varying degree and make up 90-95 % of
 1344 the total amount. Oligosaccharides containing sialic acid are acidic. The production of
 1345 oligosaccharides is genetically determined and the individual pattern of oligosaccharides differs
 1346 between women (Ninonuevo et al., 2006).

1347 The oligosaccharides of human milk are considered to be one of the principal growth factors, for
1348 example, for bifidobacteria in the infant gut and responsible for the composition of the gut microbiota
1349 found in breast-fed infants. The fermentation of non-digestible oligosaccharides leads to the
1350 generation of organic acids (lactic acid) and SCFA such as acetic, propionic and butyric acid. Butyrate
1351 is a main source of energy for the colonocytes and has effects on cell differentiation. Acetate and
1352 propionate are absorbed from the colon and thus provide energy to the host (Aggett et al., 2003).
1353 Fermentation products, i.e. SCFA, contribute to the energy content of the diet, but less than glycaemic
1354 carbohydrates. Human milk oligosaccharides are not considered in the estimation of the energy
1355 content of the milk.

1356 **5.4.3. Carbohydrate requirements of infants**

1357 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
1358 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded on a Reference
1359 Intake range (RI) for total carbohydrates of 40-45 E% for infants below six months of age and of
1360 45-55 E% for infants from 6 to < 12 months. Fibre intakes are usually not considered in
1361 recommendations up to one year of life.

1362 **5.4.4. Carbohydrate intake of infants**

1363 5.4.4.1. Digestible (glycaemic) carbohydrates

1364 Assuming a human milk intake of 0.8 L/day and a lactose content of 70 g/L, a breast-fed infant would
1365 consume 56 g lactose per day (around 50 E%) during the first six months of life. Mean total
1366 carbohydrate intakes in mostly formula-fed infants were reported in the range of around 63-93 g per
1367 day or 46-50 E% (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008; Lennox et al.,
1368 2013). In infants older than six months, mean total carbohydrate intakes amounted to around 80-140 g
1369 per day or 49-58 E% (Lagström et al., 1997; Noble and Emmett, 2001; Hilbig, 2005; de Boer et al.,
1370 2006; DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008; Lennox
1371 et al., 2013).

1372 5.4.4.2. Non-digestible (non-glycaemic) carbohydrates

1373 Assuming an intake of 0.8 L/day of human milk and an oligosaccharide content of 5-10 g/L, a breast-
1374 fed infant would consume between 4 and 8 g per day of non-digestible oligosaccharides during the
1375 first half of the first year of life. There are no data on the oligosaccharide intakes in infants. Some
1376 European countries (Germany, France, Finland and the Netherlands) have reported the dietary fibre
1377 intake of infants older than six months of around 4-10 g/day (Lagström et al., 1997; Noble and
1378 Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008).

1379 **5.4.5. Health consequences**

1380 5.4.5.1. Type of carbohydrates

1381 Currently only carbohydrates which are free of gluten can be used in IF and FOF. The risk of
1382 developing celiac disease (CD) and type 1 diabetes mellitus (T1DM) has been related to the timing of
1383 gluten introduction into the infant's diet. In 2009, the Panel concluded, based on the available data,
1384 that the early (< 4 months) introduction of gluten might increase the risk of CD and T1DM, whilst the
1385 introduction of gluten between four and six months preferably while still breast-feeding might
1386 decrease the risk of CD and T1DM (EFSA NDA Panel, 2009). CD is a multi-organ disease, triggered
1387 by gluten and related prolamins in genetically pre-disposed subjects. The prevalence in Europe is in
1388 the range of 0.5-1 % (Fasano, 2001; Virta et al., 2009; Catassi et al., 2012).

1389 A current European intervention study on 1 000 infants positive for HLA DQ2/DQ8 and randomised
1390 to receive about 100 mg of gluten per day or placebo will likely provide further evidence regarding the
1391 role of gluten introduction into the infant's diet. However, detailed results of this study have not yet
1392 been published.

1393 The Panel considers that the available data suggest that gluten containing complementary foods could
1394 be introduced between four and six months in small amounts preferably while the infant is still breast-
1395 fed. However, in the case of FOF feeding together with complementary foods, the use of gluten-
1396 containing starches in such formulae could result in amounts of gluten that are too high to be tolerated
1397 in genetically predisposed infants. Therefore, gluten containing starches should not be added to IF and
1398 FOF.

1399 5.4.5.2. Glycaemic carbohydrates

1400 Glycaemic carbohydrates provide carbohydrates to body cells, mainly in the form of glucose. Only
1401 cells in the central nervous system, red blood cells and some other cells dependent on anaerobic
1402 glycolysis have an absolute requirement for glucose. The body can in principle synthesise glucose
1403 from protein and glycerol, but this is not efficient and may lead to ketosis. Therefore, the DRV for
1404 carbohydrates is based on the energy gap between the energy provided by the sum of recommended
1405 protein and fat intakes and the total energy requirement.

1406 5.4.5.2.1. *Lactose*

1407 Lactose should be the preferred carbohydrate in IF and FOF although no absolute requirement of
1408 dietary galactose intake exists. This preference for lactose in formulae is justified by the predominance
1409 of lactose in human milk, the newborn's capacity to hydrolyse lactose from human milk, and the
1410 absence of advantages that other glycaemic carbohydrates might have compared to lactose.

1411 The capacity of the newborn to metabolise lactose was demonstrated in a study on 24 infants of
1412 > 36 weeks gestation, post-natal age 2-16 days, and taking full enteral feeding (n = 6 breast milk, n = 5
1413 formula, n = 11 mixed) which showed that although lactose from formula or human milk provides
1414 glucose and galactose in equimolar amounts to the portal vein, galactose is cleared almost completely
1415 by the liver within 60 minutes after a meal and reaches only 1-2 % of the glucose concentration in
1416 plasma, whilst glucose increased in both the hepatic and systemic circulation without net hepatic
1417 uptake. There was a positive influence of post-natal age on hepatic galactose clearance that could be
1418 attributed to either maturation of enzymes or closure of a patent ductus venosus (shunting blood from
1419 the left portal vein to the vena cava) (Brown et al., 2008).

1420 That there is no requirement for lactose is supported by two RCTs of 12 weeks duration with lactose-
1421 free formulae with maltodextrin and sucrose (Heubi et al., 2000; Lasekan et al., 2011) performed on
1422 healthy term infants in comparison to a standard lactose containing formula in which growth
1423 parameters did not differ. As soy does not contain digestible lactose or galactose naturally and
1424 formulae containing ISP may be used in infants with galactosaemia, these formulae should not contain
1425 any lactose.

1426 5.4.5.2.2. *Sucrose, glucose and fructose*

1427 The ingestion of sucrose and fructose by infants with fructose intolerance, a hereditary disease
1428 affecting approximately 1 in 26 000 infants in Central Europe (Santer et al., 2005), can lead to severe
1429 symptoms, including poor feeding, vomiting and overall failure to thrive (Coffee and Tolan, 2010).
1430 The consumption of sucrose and fructose by healthy infants does not have any advantages over the
1431 consumption of lactose and may, because of their greater sweetness, increase the preference for sweet
1432 tastes in infants. Sucrose may be added to IF containing hydrolysed protein to camouflage the taste of
1433 the hydrolysate. Because complementary food will provide other glycaemic carbohydrates than
1434 lactose, there is no reason to restrict their use in FOF as long as certain maximum levels are not
1435 exceeded.

1436 Glucose is rapidly absorbed with a rapid rise in blood glucose and has, moreover, a higher osmotic
1437 activity than di-, oligo- and polysaccharides. Hyperosmolar feeds may lead to an increased incidence
1438 of diarrhoea. Small amounts of glucose may, however, help mitigate the disagreeable taste of IF and
1439 FOF containing protein hydrolysates.

1440 5.4.5.2.3. *Maltodextrins and starches*

1441 Maltodextrins and starches have the advantage of producing lower osmolality in products than mono-
1442 and disaccharides. The SCF (2003a) recommended that maltodextrins with 5-9 glucose units should be
1443 preferred because this corresponds to the chain-length specificity of the intestinal glucoamylase.

1444 Pancreatic α -amylase concentrations in the infant's duodenum are lower than in adults (Christian et
1445 al., 1999). Shulman et al. (1983) compared the effects of feeding glucose, glucose polymers and
1446 precooked corn starch which were substituted for saccharose in the basal diet for one meal at a dose of
1447 1 g/kg body weight in 16 healthy infants aged between three and four weeks on breath $^{13}\text{CO}_2$, breath
1448 hydrogen and stool ^{13}C abundance taking into account the natural ^{13}C abundance in the different
1449 formulae. The calculated oxidation rate was comparable for the different carbohydrates studied, but
1450 hydrogen production increased with carbohydrate complexity, indicating that more undigested
1451 carbohydrates reached the colon with increasing complexity of the carbohydrates. This finding is
1452 similar to the findings of another study (Shulman et al., 1986) in which it has been shown that long-
1453 chain glucose polymers are absorbed less, and with greater individual variation, than glucose or short-
1454 chain glucose polymers. Carbohydrates that are not digested and absorbed in the small intestine may
1455 be fermented by colonic bacteria. This fermentation increases the net utilisation of complex
1456 carbohydrates, but the capacity for bacterial fermentation can be exceeded by high intakes of complex
1457 carbohydrates (Shulman et al., 1983). Earlier studies reviewed by Fomon (1993) suggested that starch
1458 is tolerated up to daily intakes of 5.5-6 g/kg body weight per day and that most infants from
1459 1-5 months of age are able to digest 10-25 g of starch per day.

1460 5.4.5.3. Non-digestible (non-glycaemic) carbohydrates

1461 Because of the variety, variability, complexity and polymorphism of human milk oligosaccharides the
1462 addition to IF and FOF of a mixture of oligosaccharides mimicking those found in breast milk is not
1463 feasible and oligosaccharides which are currently added to IF and FOF are not comparable to human
1464 milk oligosaccharides. Instead oligofructosyl-saccharose (oligofructose; FOS) and oligogalactosyl-
1465 lactose (oligogalactose; GOS) have been used in IF and FOF. FOS is not found in human milk and
1466 GOS is found only in trace amounts.

1467 Cow's milk contains only traces of oligosaccharides (0.03-0.06 g/L), mostly sialylated derivatives,
1468 whilst the content of neutral and acidic oligosaccharides (AOS) in goat milk is 4-5 times higher than in
1469 cow's milk (Martinez-Ferez et al., 2006).

1470 The SCF (2001d) had earlier assessed the safety of a formula with the addition of 0.8 g/100 mL of a
1471 mixture of 90 % GOS and 10 % high-molecular weight FOS and found no reason for concern nor
1472 conclusive proof of potential beneficial effects for infants in the second half of the first year of life. It
1473 found the evidence insufficient to establish the safety for infants below six months of age. It
1474 recommended that additional information on the suitability and safety of resistant short-chain
1475 oligosaccharides should be submitted, with particular attention to possible effects on water balance.
1476 When reviewing the available evidence in 2003, the SCF (2003a) concluded that the particular mixture
1477 of GOS and FOS which had been evaluated previously did not raise any safety concerns at
1478 concentrations used both in IF and FOF up to a maximum of 0.8 g/100 mL. The SCF also reaffirmed
1479 its conclusions that further information on the safety and benefits of this combination as well as of
1480 other forms of oligosaccharides in IF and FOF should be gathered.

1481 Since the report by the SCF (2003a), other oligosaccharides or combinations of oligosaccharides (e.g.
1482 GOS, inulin-type fructans or their combination or with mixtures of polydextrose and AOS) have been
1483 studied for a number of health outcomes, such as bowel function, gastrointestinal and respiratory tract
1484 infections, atopic dermatitis, eczema, urticaria and asthma. They have also been studied in relation to
1485 any potential untoward effects, such as delayed growth, diarrhoea and an increased risk of inadequate
1486 water balance.

1487 Two recent systematic reviews on the effects of the addition of oligosaccharides to IF and FOF
1488 comprised 12 RCT (Mugambi et al., 2012) and 23 RCT (Braegger et al., 2011), respectively.

1489 The systematic review by the ESPGHAN Committee on Nutrition (Braegger et al., 2011) builds upon
1490 and updates two earlier systematic reviews on “prebiotic” supplementation of full-term infants (Rao et
1491 al., 2009) and on “prebiotics” in the prevention of allergic disease and food hypersensitivity (Osborn
1492 and Sinn, 2007) and included 23 publications of RCTs performed in healthy term infants with
1493 durations between two weeks and six months. The “prebiotics” were added to IF and in two studies to
1494 FOF. In most studies a 9:1 mixture of short-chain GOS and long-chain FOS was used (Moro et al.,
1495 2002; Moro et al., 2003; Bakker-Zierikzee et al., 2005; Decsi et al., 2005; Haarman and Knol, 2005;
1496 Knol et al., 2005; Bakker-Zierikzee et al., 2006; Moro et al., 2006; Alliet et al., 2007; Costalos et al.,
1497 2008; Magne et al., 2008; Scholtens et al., 2008) four studies used GOS alone (Ben et al., 2004;
1498 Bakker-Zierikzee et al., 2005; Bettler and Euler, 2006; Ben et al., 2008), and one each AOS (Fanaro et
1499 al., 2005), GOS/FOS/AOS together (Fanaro et al., 2005), FOS plus inulin (Brunser et al., 2006) and
1500 polydextrose plus GOS (with or without lactulose) (Ziegler et al., 2007; Nakamura et al., 2009). The
1501 concentration in the formula ranged from 0.15 to 0.8 g/100 mL.

1502 The review by Braegger et al. (2011) considered all studies included in the review by Mugambi et al.
1503 (2012) except for the studies by Bruzzese et al. (2009) and Moro et al. (2005). Therefore, the Panel has
1504 taken the review by Braegger et al. (2011) as a basis for the evaluation of data but has also considered
1505 the studies by Bruzzese et al. (2009) and Moro et al. (2005). The Panel is aware of a recent study
1506 which investigated the effect of the addition of a 50:50 mixture of FOS and long-chain inulin to an IF
1507 (Closa-Monasterolo et al., 2013).

1508 Some of the studies reviewed assessed the effect of different oligosaccharides on the reduction of stool
1509 pH or the number of bifidobacteria or lactobacilli in stools. Even if some of the studies reported
1510 significant effects on these outcomes for some of the oligosaccharides used, the relevance of these
1511 effects for infant health is unclear. None of the studies which investigated the effects on numbers of
1512 potentially pathogenic microorganisms in stools reported significant effects on this outcome
1513 (GOS/FOS: five studies (Moro et al., 2002; Moro et al., 2003; Ben et al., 2004; Decsi et al., 2005;
1514 Alliet et al., 2007; Costalos et al., 2008); GOS/FOS/AOS: one study (Fanaro et al., 2005))

1515 The studies which examined the impact of supplementing formula with GOS/FOS (three studies)
1516 (Moro et al., 2002; Moro et al., 2003; Moro et al., 2006; Costalos et al., 2008) or with a mixture of
1517 FOS and long-chain inulin (Closa-Monasterolo et al., 2013) on stool frequency reported statistically
1518 significant effects on stool frequency in infants, whereas the study (Brunser et al., 2006) which used a
1519 combination of FOS and inulin did not. The Panel notes that all these studies had considerable
1520 methodological limitations which severely hamper the conclusions which can be drawn from them.

1521 The effect of GOS/FOS on stool consistency was examined in four studies. Three of these studies
1522 reported statistically significant effects on these outcomes (Moro et al., 2002; Moro et al., 2003; Moro
1523 et al., 2006; Costalos et al., 2008), while one did not (Knol et al., 2005). The studies which used a
1524 combination of GOS/FOS/AOS (Fanaro et al., 2005), polydextrose plus GOS (with or without
1525 lactulose) (Ziegler et al., 2007), or a mixture of FOS and long-chain inulin (Closa-Monasterolo et al.,
1526 2013) reported effects on stool consistency, but not the study by Brunser et al. (2006) which also used
1527 a combination of FOS and inulin. The Panel notes that all these studies had considerable
1528 methodological limitations which severely hamper the conclusions which can be drawn from them.

1529 The effect of oligosaccharides on the incidence of infections has been studied for GOS/FOS in two
1530 studies (one reported in three publications) (Moro et al., 2006; Arslanoglu et al., 2007; Arslanoglu et
1531 al., 2008; Bruzzese et al., 2009) and for a combination of FOS and inulin in one study (Brunser et al.,
1532 2006). For the administration of GOS/FOS a statistically significant reduced cumulative incidence of
1533 fever and of infectious episodes of the upper respiratory tract requiring antibiotic treatment was
1534 reported in one study (Arslanoglu et al., 2007; Arslanoglu et al., 2008), whilst there was no difference
1535 in the incidence of lower respiratory tract, gastrointestinal and urinary tract infections. In contrast,

1536 Bruzzese et al. (2009) did not report any effect of GOS/FOS on upper respiratory tract infections, but
 1537 on gastrointestinal infections. For the administration of a combination of FOS and inulin (Brunser et
 1538 al., 2006) there was no effect reported on the incidence of gastrointestinal infections. The Panel notes
 1539 that these studies are inconsistent and had considerable methodological limitations which severely
 1540 hamper the conclusions which can be drawn from these studies.

1541 GOS/FOS have also been studied with respect to the occurrence of allergic manifestations. A reduced
 1542 cumulative incidence of atopic dermatitis, of recurrent wheezing and of allergic urticaria as been
 1543 reported in one study (Arslanoglu et al., 2007; Arslanoglu et al., 2008). The Panel notes that this study
 1544 had considerable methodological limitations which severely hamper the conclusions which can be
 1545 drawn from it.

1546 The Panel notes that most of the studies which investigated the effect of non-digestible
 1547 oligosaccharide addition to formula had considerable limitations, including a high drop-out rate, lack
 1548 of consideration of missing values, unclear sequence generation, unclear achievement of allocation
 1549 concealment and/or blinding. All these limitations and the resulting uncertainties greatly limit the
 1550 conclusions which can be drawn from these studies. None of the studies gave rise to concerns on any
 1551 of the studied non-digestible oligosaccharides with respect to growth and adverse effects.

1552 On the basis of the data available and in consideration of the modest quality of the available studies,
 1553 the Panel considers that there is insufficient evidence for beneficial effects on infant health of the non-
 1554 digestible oligosaccharides that have been tested to date in RCTs when added to IF or FOF.

1555 **5.4.6. Recommendations**

1556 5.4.6.1. Total carbohydrates

1557 The minimum and maximum content of carbohydrates in IF and FOF can be calculated based on the
 1558 residual energy in formulae that contain the permitted minimum and maximum amounts of protein and
 1559 fat, and converting this energy into g of carbohydrates (4 kcal/g). The corresponding calculations are
 1560 given in Table 11.

1561 **Table 11:** Calculation of total minimum and maximum carbohydrate content in IF and FOF.

Proposed amounts	IF and FOF with			
	Milk protein		ISP and hydrolysed protein	
	min	max	min	max
Protein (g/100 kcal)	1.8	2.5	2.25	2.8
Protein (E%)	7.2	10	9.0	11.2
Fat (g/100 kcal)	4.4	6.0	4.4	6.0
Fat (E%)	39.6	54	39.6	54
Corresponding calculated amounts	max	min	max	min
Carbohydrates (E%) ^(a)	53.2	36	51.4	34.8
Carbohydrates (g/100 kcal)	13.3	9	12.85	8.7

1562 ^(a) calculated as: 100 – E% protein – E% fat

1563 Rounding up, the Panel proposes a minimum carbohydrate content in IF and FOF of 9 g/100 kcal
 1564 (2.2 g/100 kJ) and a maximum content of 14 g/100 kcal (3.3 g/100 kJ) for all types of formulae.

1566 The Panel considers that only carbohydrates free of gluten should be used in IF and FOF.

1567 5.4.6.2. Glycaemic carbohydrates

1568 5.4.6.2.1. *Lactose*

1569 The Panel considers that lactose should be the preferred carbohydrate in IF and FOF. In line with the
1570 Opinion of the SCF (2003a), the Panel proposes a minimum content of lactose in IF and FOF based on
1571 milk protein and in IF and FOF containing hydrolysed protein of 4.5 g/100 kcal (1.1 g/100 kJ), unless
1572 the formulae are intended to be labelled as “lactose-free”. In such case, IF and FOF should comply
1573 with the existing criterion of a “lactose-free” formula and provide at most 0.01 g/100 kcal
1574 (0.0024 g/100 kJ) lactose.

1575 The Panel notes that the minimum lactose content has its origin in the traditional practice of diluting
1576 cow’s milk to make it more suitable for infant feeding with respect to protein. IF and FOF containing
1577 ISP were traditionally manufactured without lactose which made such formulae suitable for feeding
1578 infants that could not metabolise lactose.

1579 5.4.6.2.2. *Sucrose, glucose and fructose*

1580 The Panel considers that sucrose, glucose and fructose, irrespective of their sources, should not be
1581 added to IF, as sucrose and fructose do not have any advantage over lactose for healthy infants, but
1582 may pose a risk to infants with fructose intolerance and saccharase deficiency and as the addition of
1583 glucose may increase the osmolality of the formula. For FOF, the use of sucrose and fructose can be
1584 tolerated since an infant will receive both from complementary foods. The sum of sucrose, fructose
1585 and sugars from honey in FOF should not constitute more than 20 % of total carbohydrates. Honey
1586 should be treated in order to destroy spores of *Clostridium botulinum*.

1587 However, for gustatory reasons sucrose and glucose are currently permitted to be added to IF
1588 containing protein hydrolysates and glucose is currently permitted to be added to FOF containing
1589 protein hydrolysates in order to mask the bitter taste of these formulae. The maximum concentrations
1590 which may currently be added are $\leq 20\%$ of total carbohydrates for sucrose and ≤ 2 g/100 kcal
1591 (≤ 0.5 g/100 kJ) for glucose. The Panel proposes to retain these values.

1592 5.4.6.2.3. *Maltose and maltodextrins*

1593 In line with the Opinion by the SCF (2003a), the Panel does not consider it necessary to propose any
1594 minimum and maximum amounts for maltose and maltodextrins in IF and FOF, as long as the
1595 maximum content of carbohydrates in IF and FOF is not exceeded.

1596 5.4.6.2.4. *Starches*

1597 Based on the evidence described in Section 5.4.5.2.3 and taking that an infant could tolerate starch in
1598 amounts of around 5.5 g/kg body weight per day and an average body weight at birth of 3.25 kg
1599 (WHO Multicentre Growth Reference Study Group, 2006), this would translate into a daily starch
1600 intake of 18 g/day which could theoretically be tolerated by newborns. However, lower tolerances
1601 have also been reported. Assuming an average formula consumption of 500 kcal/day, a daily starch
1602 intake of 18 g/day would be equivalent to a starch content in formula of 2.2-2.5 g/100 mL. The Panel
1603 notes that this calculated theoretical value is not much higher than the maximum content of starch
1604 which had been proposed by the SCF (2003a) (i.e. 2 g/100 mL). The Panel also notes that there are
1605 considerable uncertainties about the amount of starch which can be tolerated by newborns and that at
1606 current amounts of starch in IF no adverse effects have been reported.

1607 Therefore, the Panel proposes in line with the SCF (2003a) that starches should not be added in
1608 concentrations higher than 2 g/100 mL (2.9-3.3 g/100 kcal (0.7-0.8 g/100 kJ)) and that they should not
1609 constitute more than 30 % of total carbohydrates. For FOF no restrictions need to apply. The Panel
1610 agrees with the SCF (2003a) that only pre-cooked and gelatinised starches free of gluten are suitable
1611 for use in IF and FOF.

1612 5.4.6.3. Non-digestible (non-glycaemic) carbohydrates

1613 In the absence of convincing evidence of any beneficial effects of non-digestible oligosaccharides on
 1614 infant health, the Panel considers that the addition of non-digestible oligosaccharides to IF or FOF is
 1615 not necessary. The Panel considers that there is no evidence to change the previous conclusions of the
 1616 SCF (2001d) that a mixture of 90 % GOS and 10 % of high-molecular weight FOS is safe under the
 1617 current conditions of use (i.e. ≤ 0.8 g/100 mL) in IF and FOF. The safety of any other oligosaccharides
 1618 or any new mixture of oligosaccharides in IF and FOF should be established by clinical evaluation.

1619 Table 12 summarises the conclusions of the Panel regarding the composition of IF and FOF with
 1620 respect to glycaemic carbohydrates.

 1621 **Table 12:** Proposed composition of IF and FOF with respect to glycaemic carbohydrates.

g/100 kcal	IF with			FOF with		
	Milk protein	ISP	Protein hydrolysates	Milk protein	ISP	Protein hydrolysates
Carbohydrates		9-14 ^(f)			9-14 ^(f)	
of which						
Lactose	$\geq 4.5^{(a),(g)}$	NR ^(b)	$\geq 4.5^{(a),(g)}$	$\geq 4.5^{(a),(g)}$	NR ^(b)	$\geq 4.5^{(a),(g)}$
Sucrose	not to be added		≤ 20 % of total carbohydrates ^{(c),(d)}	Σ sucrose, fructose, sugar from honey ≤ 20 % of total carbohydrates ^(c)		
Fructose		not to be added				
Glucose	not to be added		$\leq 2^{(c),(d),(h)}$	not to be added		$\leq 2^{(c),(d),(h)}$
Maltose, maltodextrins ^(c)	unrestricted within maximum amounts			unrestricted within maximum amounts		
Starches ^(c)	≤ 2 g/100 mL and ≤ 30 % of total carbohydrates ^(e)			unrestricted within maximum amounts as long as free of gluten		

1622 ^(a) not applicable to formulae declared as “lactose-free”; in such case the lactose content should not exceed 0.01 g/100 kcal
 1623 (0.0024 g/100 kJ)

1624 ^(b) not required (NR) if more than 50 % of the protein content is from ISP

1625 ^(c) voluntary addition

1626 ^(d) to mask the bitter taste

1627 ^(e) pre-cooked or gelatinised starch only, free of gluten

1628 ^(f) 2.2-3.3 g/100 kJ

1629 ^(g) 1.1 g/100 kJ

1630 ^(h) 0.5 g/100 kJ

 1631 **6. Minimum content of micronutrients in IF and FOF**

1632 From a nutritional point of view, the minimum contents proposed by the Panel cover the nutritional
 1633 needs of virtually all healthy infants born at term and there is no need to exceed these amounts in
 1634 formulae, as nutrients which are not used or stored have to be excreted and this may put a burden on
 1635 the infant’s metabolism and/or other physiological functions. Therefore, the Panel emphasises that the
 1636 proposed minimum contents should be understood as target values for micronutrient contents of IF and
 1637 FOF.

 1638 **6.1. Calcium**

 1639 **6.1.1. Current compositional requirements of IF and FOF**

1640 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
 1641 maximum calcium contents in IF and FOF of 50 mg/100 kcal and 140 mg/100 kcal with a calcium-to-
 1642 available phosphorus-ratio between 1 and 2.

1643 **6.1.2. Calcium content of human milk**

1644 Calcium in breast milk was found to be in the range of 200-300 mg/L (31-46/100 kcal) (Rodriguez
1645 Rodriguez et al., 2002; Hicks et al., 2012; Olausson et al., 2012). The ratio of calcium to phosphorus
1646 in human milk is about 2:1 on a weight basis or about 1.6:1 on a molar basis (Specker et al., 1991;
1647 Steichen and Koo, 1992).

1648 **6.1.3. Calcium requirements of infants**

1649 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
1650 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a calcium intake
1651 of 200 mg/day and 400 mg/day was adequate for the majority of infants in the first half and in the
1652 second half of the first year of life, respectively.

1653 **6.1.4. Calcium intakes of infants**

1654 Assuming a human milk intake of 0.8 L/day and a calcium content of 250 mg/L, an exclusively breast-
1655 fed infant would consume 200 mg calcium per day during the first six months of life. Mean/median
1656 calcium intakes of mostly formula-fed infants below six months of age were reported to be around
1657 370-560 mg/day (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008; Lennox et al.,
1658 2013). Mean/median calcium intakes in infants aged 6 to <12 months were in the range of
1659 450-730 mg/day (Noble and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino
1660 and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

1661 **6.1.5. Health consequences**

1662 Calcium is an integral component of the skeleton where it has a structural role and is needed for bone
1663 rigidity, strength and elasticity. Calcium deficiency in children leads to inadequate growth and bone
1664 deformity. No UL for calcium was set for infants owing to insufficient data. The UL for adults of
1665 2 500 mg per day has been based on the absence of adverse effects in long term human intervention
1666 studies in which 2 500 mg calcium per day were administered (EFSA NDA Panel, 2012a).

1667 The concept of maintaining a certain calcium-to-phosphorus ratio in the diet has little relevance in
1668 adults but may have some utility under conditions of rapid growth. An absorbed calcium-to-
1669 phosphorus molar ratio of around 1.3:1 is assumed to be sufficient to support the sum of bony and soft
1670 tissue growth in infants (IoM, 1997). In order to derive an intake ratio, this value has to be corrected
1671 for the fractional absorption of calcium and phosphorus. Assuming an absorption efficiency of 60 %
1672 for calcium and 80 % for phosphorus the US Institute of Medicine has suggested a calcium-to-
1673 phosphorus molar intake ratio of 2:1 for infants. However, fractional absorption may vary with age
1674 and type of formula consumed and the ratio by itself is of limited value if the consumption of absolute
1675 quantities of both nutrients is insufficient to support adequate growth (IoM, 1997). The currently
1676 permitted lower calcium-to-phosphorus ratio of 1:1 reflects the calcium-to-phosphorus molar ratio of
1677 cow's milk which does not change if cow's milk is diluted for the manufacturing of formula. There are
1678 no reports which indicate that the currently permitted calcium-to-phosphorus ratio together with the
1679 current minimum content of calcium and phosphorus in IF and FOF is insufficient to ensure adequate
1680 growth of infants.

1681 **6.1.6. Recommendations**

1682 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
1683 a basis the intake levels of calcium considered adequate by the Panel for this age group of 200 mg/day
1684 based on calcium intakes from breast milk, this would convert into a required minimum calcium intake
1685 of 40 mg/100 kcal.

1686 The SCF (2003a) considered mean calcium absorption from cow's milk to be around 20 percentage
1687 points lower than from human milk and therefore corrected the theoretical minimum level derived
1688 based on breast-milk content by this factor, yielding a minimum calcium content of 50 mg/100 kcal.
1689 Calcium absorption efficiency was assumed to be about 58 % from human milk and about 38 % from

1690 milk-based IF during the first four months of life. More recent studies have reported calcium
1691 absorption efficiencies from IF based on milk protein and IF containing hydrolysed protein of around
1692 60 % (Abrams, 2010; Hicks et al., 2012; Leite et al., 2013). One of these studies (Hicks et al., 2012)
1693 also assessed fractional calcium absorption from human milk and reported an absorption efficiency
1694 from breast-milk of 76 %. No information on calcium absorption from formula containing ISP is
1695 available. However, no reports are available that current amounts of calcium in formulae containing
1696 ISP would be insufficient for infants.

1697 Considering the potential difference in absorption efficiency of calcium between human milk and
1698 formula, the Panel considers it prudent to maintain the recommendations of the SCF (2003a) with
1699 respect to the minimum calcium content in IF and FOF of 50 mg/100 kcal.

1700 Therefore, the Panel proposes a minimum calcium content in IF and FOF of 50 mg/100 kcal
1701 (12 mg/100 kJ).

1702 With respect to the molar ratio of calcium-to-available phosphorus (based on measured bioavailability,
1703 or calculated as 80 % of total phosphorus in milk protein based formulae or formulae containing
1704 protein hydrolysates and as 70 % of total phosphorus in formulae containing ISP), the Panel proposes
1705 a calcium-to-available phosphorus molar ratio of not less than 1.0 and not greater than 2.0.

1706 **6.2. Phosphorus**

1707 **6.2.1. Current compositional requirements of IF and FOF**

1708 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
1709 maximum phosphorus contents in IF and FOF based on milk protein and IF and FOF containing
1710 hydrolysed protein of 25 mg/100 kcal and 90 mg/100 kcal. For IF and FOF containing ISP the
1711 minimum content should be 30 mg/100 kcal and the maximum 100 mg/100 kcal. The calcium-to-
1712 available phosphorus-ratio should be between 1 and 2.

1713 With respect to the determination of the amount of available phosphorus, the SCF (2003a) concluded
1714 that the amount of available phosphorus should be either measured or calculated as 80 % of total
1715 phosphorus for milk protein or as 70 % for ISP and that at least 20 mg/100 kcal and at most
1716 70 mg/100 kcal of available phosphorus should be contained in the formula.

1717 **6.2.2. Phosphorus content of human milk**

1718 The phosphorus content of human milk has been reported to be in the range of 107-164 mg/L
1719 (17-25 mg/100 kcal) (Fomon, 1993), peaking in early lactation and decreasing as lactation progresses
1720 (Fomon, 1993; Atkinson et al., 1995) with an average concentration of around 120 mg/L
1721 (19 mg/100 kcal) (Atkinson et al., 1995). Motil et al. (1997) reported average \pm SD concentrations
1722 falling from 184 ± 16 mg/L (28 ± 2.4 mg/100 kcal) at six weeks of lactation to 155 ± 17 mg/L
1723 (24 ± 2.6 mg/100 kcal) at 24 weeks.

1724 **6.2.3. Phosphorus requirements of infants**

1725 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
1726 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a phosphorus
1727 intake of 100 mg/day and 300 mg/day was adequate for the majority of infants in the first half and in
1728 the second half of the first year of life, respectively.

1729 **6.2.4. Phosphorus intakes of infants**

1730 Assuming a human milk intake of 0.8 L/day and a phosphorus content of 120 mg/L, an exclusively
1731 breast-fed infant would consume around 100 mg phosphorus per day during the first six months of
1732 life. Mean/median phosphorus intakes of mostly formula-fed infants below six months of age were
1733 reported to be between around 210 mg/day and 330 mg/day (Hilbig, 2005; Fantino and Gourmet,

1734 2008). Mean/median phosphorus intakes in infants aged 6 to < 12 months were in the range of around
1735 360-700 mg/day (Hilbig, 2005; de Boer et al., 2006; Fantino and Gourmet, 2008; Thorsdottir et al.,
1736 2008).

1737 **6.2.5. Health consequences**

1738 Although phosphorus in the form of phosphate ions is essential for numerous body functions, its
1739 metabolism is intricately linked to that of calcium because of the actions of calcium-regulating
1740 hormones. Adequate phosphorus and calcium intakes are needed not only for skeletal growth and
1741 maintenance, but also for many cellular roles, such as energy production (i.e. adenosine triphosphate
1742 (ATP)). Too much phosphorus, in relation to too little dietary calcium, may contribute to bone loss,
1743 and too little phosphorus along with too little dietary calcium may not adequately maintain bone mass
1744 (Anderson, 2005). Data were insufficient to establish a UL for phosphorus (EFSA, 2005a).

1745 **6.2.6. Recommendations**

1746 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
1747 a basis the intake levels of phosphorus considered adequate by the Panel for this age group of
1748 100 mg/day based on phosphorus intakes from breast milk, this convert into a required minimum
1749 intake of available phosphorus of 20 mg/100 kcal. Assuming that 80 % of total phosphorus from milk
1750 protein and 70 % from ISP is available, this translates into a minimum phosphorus content in IF and
1751 FOF based on milk protein of 25 mg/100 kcal and for IF and FOF containing ISP of 28.6 mg/100 kcal
1752 (rounded up to 30 mg/100 kcal).

1753 Therefore, the Panel proposes a minimum phosphorus content in IF and FOF based on milk protein
1754 and IF and FOF containing protein hydrolysates of 25 mg/100 kcal (6.0 mg/100 kJ) and in IF and FOF
1755 containing ISP of 30 mg/100 kcal (7.2 mg/100 kJ).

1756 The molar ratio of calcium-to-available phosphorus (based on measured bioavailability, or calculated
1757 as 80 % of total phosphorus in milk protein based formulae or formulae containing protein
1758 hydrolysates and as 70 % of total phosphorus in formulae containing ISP) should be not less than 1.0
1759 and not greater than 2.0.

1760 **6.3. Magnesium**

1761 **6.3.1. Current compositional requirements of IF and FOF**

1762 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
1763 maximum magnesium contents in IF and FOF of 5 mg/100 kcal and 15 mg/100 kcal.

1764 **6.3.2. Magnesium content of human milk**

1765 Reported concentrations of magnesium in breast milk vary over a wide range (15-64 mg/L
1766 (2.3-9.8 mg/100 kcal)), with a median value of 31 mg/L (4.8 mg/100 kcal) and 75 % of reported mean
1767 concentrations below 35 mg/L (5.4 mg/100 kcal) (Dorea, 2000).

1768 **6.3.3. Magnesium requirements of infants**

1769 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
1770 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a magnesium
1771 intake of 25 mg/day and 80 mg/day was adequate for the majority of infants in the first half and in the
1772 second half of the first year of life, respectively.

1773 **6.3.4. Magnesium intakes of infants**

1774 Assuming a human milk intake of 0.8 L/day and a magnesium content of 31 mg/L, an exclusively
1775 breast-fed infant would consume 25 mg magnesium per day during the first six months of life.
1776 Mean/median magnesium intakes of mostly formula-fed infants below six months of age were

1777 reported to be between around 43 and 70 mg/day (Hilbig, 2005; Fantino and Gourmet, 2008; Lennox
1778 et al., 2013). Mean/median magnesium intakes in infants aged 6 to < 12 months were in the range of
1779 around 75-140 mg/day (Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008;
1780 Marriott et al., 2008; Lennox et al., 2013).

1781 **6.3.5. Health consequences**

1782 Magnesium is the second most abundant intracellular cation after sodium and is a critical cofactor in
1783 several enzymatic reactions. Severe magnesium deficiency is rare and causes neuromuscular
1784 manifestations (Feillet-Coudray and Rayssiguier, 2005). No UL for magnesium normally present in
1785 foods could be established by the SCF. A UL related to readily dissociable forms of magnesium was
1786 set at 250 mg/day for children aged from four years upwards and adults (SCF, 2001a).

1787 **6.3.6. Recommendations**

1788 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
1789 a basis the intake levels of magnesium considered adequate by the Panel for this age group of
1790 25 mg/day based on magnesium intakes from breast milk, this converts into a required minimum
1791 magnesium content in formula of 5 mg/100 kcal.

1792 Therefore, the Panel proposes a minimum magnesium content in IF and FOF of 5 mg/100 kcal
1793 (1.2 mg/100 kJ).

1794 **6.4. Sodium**

1795 **6.4.1. Current compositional requirements of IF and FOF**

1796 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
1797 maximum sodium contents in IF and FOF of 20 mg/100 kcal and 60 mg/100 kcal, respectively.

1798 **6.4.2. Sodium content of human milk**

1799 The average sodium concentration in human milk has been reported to be in the range of
1800 140-160 mg/L (22-25 mg/100 kcal) (IoM, 2005a).

1801 **6.4.3. Sodium requirements of infants**

1802 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
1803 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a sodium intake
1804 of 120 mg/day was adequate for the majority of infants in the first half year of life. The Panel also
1805 concluded that a sodium intake of 170-370 mg/day was adequate for the majority of infants from 6 to
1806 < 12 months of age.

1807 **6.4.4. Sodium intakes of infants**

1808 Assuming a human milk intake of 0.8 L/day and a sodium content of 150 mg/L, an exclusively breast-
1809 fed infant would consume 120 mg sodium per day during the first six months of life. Mean/median
1810 sodium intakes in mostly formula-fed infants from 0 to < 6 months of age were reported to be in the
1811 range of around 180-240 mg/day (Fantino and Gourmet, 2008; Lennox et al., 2013) and in the second
1812 half of the first year of life of 270-730 mg/day (DGE, 2008; Fantino and Gourmet, 2008; Marriott et
1813 al., 2008; Lennox et al., 2013).

1814 **6.4.5. Health consequences**

1815 Cell membrane potentials in cells throughout the body are controlled by the concentrations of sodium
1816 and potassium. Their concentration gradients are tightly regulated as they provide the potential for
1817 neural transmission, muscle contraction and vascular tone as well as the drive for active transport of
1818 nutrients (e.g. glucose). Sodium deficiency arising from inadequate dietary intakes is unlikely because
1819 of the ubiquity of this element (SCF, 1993a). The major adverse effect of increased sodium chloride

1820 intake is elevated blood pressure. It has also been suggested that taste preferences later in life are
1821 influenced by salt intakes in early life (Stein et al., 2012). No UL for sodium could be derived by the
1822 Panel owing to insufficient data (EFSA, 2005d).

1823 **6.4.6. Recommendations**

1824 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
1825 a basis the intake level of sodium considered adequate by the Panel for this age group of 120 mg/day
1826 based on sodium intakes from breast milk, this converts, into a required minimum sodium content of
1827 formula of 24 mg/100 kcal (after rounding 25 mg/100 kcal).

1828 Therefore, the Panel proposes a minimum sodium content in IF and FOF of 25 mg/100 kcal
1829 (6.0 mg/100 kJ).

1830 **6.5. Chloride**

1831 **6.5.1. Current compositional requirements of IF and FOF**

1832 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
1833 maximum chloride contents in IF and FOF of 50 mg/100 kcal and 160 mg/100 kcal.

1834 **6.5.2. Chloride content of human milk**

1835 The average chloride content in human milk has been reported to be 0.4 g/L (IoM, 2005a).

1836 **6.5.3. Chloride requirements of infants**

1837 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
1838 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a chloride intake
1839 of 300 mg/day was adequate for the majority of infants in the first half year of life. The Panel also
1840 concluded that a chloride intake of 270-570 mg/day was adequate for the majority of infants from 6 to
1841 < 12 months of age.

1842 **6.5.4. Chloride intakes of infants**

1843 Assuming a human milk intake of 0.8 L/day and a chloride content of 0.4 g/L, an exclusively breast-
1844 fed infant would consume 320 mg chloride per day during the first six months of life. No information
1845 on chloride intakes in infants living in the Europe is available.

1846 **6.5.5. Health consequences**

1847 Chloride is the most abundant anion in the extracellular fluid and counterbalances the intracellular
1848 negative charges provided by proteins. Chloride also plays a major role as a constituent of
1849 hydrochloric acid excreted in the gastric juice. Chloride deficiency arising from inadequate dietary
1850 intakes is unlikely because of the ubiquity of this element (SCF, 1993a). The major adverse effect of
1851 increased intake of chloride, as sodium chloride, is elevated blood pressure. No UL for chloride was
1852 derived by the Panel owing to insufficient data (EFSA, 2005c).

1853 **6.5.6. Recommendations**

1854 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
1855 a basis the intake level of chloride considered adequate by the Panel for this age group of 300 mg/day
1856 based on chloride intakes from breast milk, this converts into a minimum chloride content of formula
1857 of 60 mg/100 kcal.

1858

1859 Therefore, the Panel proposes a minimum chloride content in IF and FOF of 60 mg/100 kcal
1860 (14.3 mg/100 kJ).

1861 **6.6. Potassium**

1862 **6.6.1. Current compositional requirements of IF and FOF**

1863 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
1864 maximum potassium contents in IF and FOF of 60 mg/100 kcal and 160 mg/100 kcal.

1865 **6.6.2. Potassium content of human milk**

1866 The average content of potassium in human milk has been reported to be around 500 mg/L
1867 (80 mg/100 kcal) (IoM, 2005a).

1868 **6.6.3. Potassium requirements of infants**

1869 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
1870 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a potassium
1871 intake of 400 mg/day was adequate for the majority of infants in the first half year of life. The Panel
1872 also concluded that a potassium intake of 800 mg/day was adequate for the majority of infants from 6
1873 to < 12 months of age.

1874 **6.6.4. Potassium intakes of infants**

1875 Assuming a human milk intake of 0.8 L/day and a potassium content of 0.5 g/L, an exclusively breast-
1876 fed infant would consume 400 mg potassium per day during the first six months of life. Mean/median
1877 potassium intakes of mostly formula-fed infants in the first half year of life ranged from around
1878 490-900 mg/day (Hilbig, 2005; Noble and Emmett, 2006; Lennox et al., 2013) and in the second half
1879 year of life they ranged from around 1 000-1 400 mg/day (Noble and Emmett, 2001; Hilbig, 2005;
1880 DGE, 2008; Marriott et al., 2008; Lennox et al., 2013).

1881 **6.6.5. Health consequences**

1882 Cell membrane potentials in cells throughout the body are controlled by the concentrations of sodium
1883 and potassium. Their concentration gradients are tightly regulated as they provide the potential for
1884 neural transmission, muscle contraction and vascular tone as well as the drive for active transport of
1885 nutrients (e.g. glucose). Potassium deficiency arising from inadequate dietary intakes is unlikely
1886 because of the ubiquity of the element (SCF, 1993a). No UL for potassium was derived by the Panel
1887 owing to insufficient data (EFSA, 2005b). Prolonged high potassium intake can lead to high
1888 concentrations of blood potassium that may affect cardiac function, especially with impaired kidney
1889 function.

1890 **6.6.6. Recommendations**

1891 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
1892 a basis the intake level of potassium considered adequate by the Panel for this age group of
1893 400 mg/day, based on potassium intakes from breast milk, this converts into a required minimum
1894 potassium intake of 80 mg/100 kcal.

1895 Therefore, the Panel proposes a minimum potassium content in IF and FOF of 80 mg/100 kcal
1896 (19.1 mg/100 kJ).

1897 **6.7. Iron**

1898 **6.7.1. Current compositional requirements of IF and FOF**

1899 Currently permitted minimum and maximum content of iron in IF and FOF as compared to the
1900 recommendations by the SCF (2003a) are depicted in Table 13.

1901 **Table 13:** Currently permitted minimum and maximum content of iron in IF and FOF as laid down
 1902 in Directive 2006/141/EC in comparison to the recommendations by the SCF (2003a).

Formula	IF				FOF			
	Directive 2006/141/EC		SCF (2003a)		Directive 2006/141/EC		SCF (2003a)	
mg per 100 kcal	min	max	min	max	min	max	min	max
Cow's milk	0.30	1.30	0.30	1.30	0.60	2.00	0.60	1.70
Goat's milk	0.30	1.30	0.30	1.30	0.60	2.00	0.60	1.70
Protein hydrolysates	0.30	1.30	0.30	1.30	0.60	2.00	0.60	1.70
ISP	0.45	2.00	0.45	1.90	0.90	2.50	0.90	2.50

1903 **6.7.2. Iron content of human milk**

1904 The iron concentration in human milk is around 0.2-0.4 mg/L (0.03-0.06 mg/100 kcal). The average
 1905 concentration given by the US Institute of Medicine is 0.35 mg/L (0.05 mg/100 kcal) (IoM, 2001). In
 1906 line with previous published values is a new analysis showing concentrations of iron in breast-milk to
 1907 be 0.28 mg/L (0.054 mg/100 kcal) (Concha et al., 2013). The absorption of iron from human milk is
 1908 high. Absorption efficiencies up to 50 % have been reported but have been observed to vary down to
 1909 25 % with infant age and total dietary iron intake (Domellöf et al., 2002; Domellöf, 2007; Quinn,
 1910 2014).

1911 **6.7.3. Iron requirements of infants**

1912 Full-term infants have iron stores sufficient to cover their needs for a couple of months and when
 1913 exclusively breast-fed no extra iron is needed for up to six months of age for most healthy term infants
 1914 (Domellöf et al., 2002; Domellöf, 2007, 2011; Jonsdottir et al., 2012).

1915 Most of the body iron in healthy term newborns is in haemoglobin and about one fourth is in iron
 1916 stores. Haemoglobin falls from an average of 170 g/L to about 120 g/L during the first six weeks of
 1917 life and as iron from erythrocytes is recycled the size of the body's iron stores grows. In the coming
 1918 months iron is moved back from stores to red blood cells (Domellöf, 2007). Together with the intake
 1919 of iron from breast milk or other foods these iron stores serve as back-up for the growing infant for
 1920 increasing blood volume and for meeting other needs. Exclusive breast-feeding during this period can
 1921 meet the infant's additional iron requirements despite the low concentration of iron in breast milk as
 1922 iron absorption from breast milk is high, and the newborn's iron needs are also supported through the
 1923 iron stores at birth and the recycling.

1924 The Panel considered in its Opinion on nutrient requirements and dietary intakes of infants and young
 1925 children in the European Union that observed mean iron intakes from breast milk of 0.3 mg/day were
 1926 generally sufficient to ensure that iron status in the first half year of life remains within the normal
 1927 range for most healthy term infants in industrialised countries (Jonsdottir et al., 2012; EFSA NDA
 1928 Panel, 2013a). This advice was based on an assumed iron content in breast milk of 0.35 mg/L
 1929 assuming an average consumption of breast milk of 0.8 L/day, equal to around 500 kcal/day, leading
 1930 to iron intakes of 0.28 mg/day (rounded up to 0.3 mg/day). With the absorption efficiency of iron in
 1931 human milk taken as 50 %, around 0.15 mg of iron per day is thus supplied to the body. This value
 1932 would be lower if a lower absorption efficiency and a lower iron content of breast milk is assumed.
 1933 Therefore, the estimate of 0.15 mg/day of absorbed iron could be considered a high estimate.

1934 When iron is provided through formula, in which it is assumed to be less available than in breast milk,
 1935 a daily iron intake of 0.3 mg cannot be considered to be adequate anymore for the majority of infants
 1936 and additional dietary iron needs to be provided in these formulae in order to ensure a sufficient iron
 1937 supply to formula-fed infants. Assuming that on average 0.15 mg/day of iron has to be absorbed from
 1938 formula in the first four to six months of life and that under a conservative assumption the absorption
 1939 efficiency is around 10 % (range 7-14 %) (Quinn, 2014) an iron intake from formula of 1.5 mg/day in
 1940 the first four to six months of life would ensure a sufficient iron supply to the infant.

1941 For the second half year of life, the Panel considered an iron intake of 8 mg/day adequate for the
1942 majority of infants (EFSA NDA Panel, 2013a).

1943 **6.7.4. Iron intakes of infants**

1944 Mean/median iron intakes of infants below six months of age were reported to be between 0.3 and
1945 8 mg/day in mostly formula-fed infants (Hilbig, 2005; Noble and Emmett, 2006; Fantino and
1946 Gourmet, 2008; Lennox et al., 2013). Mean/median iron intakes in infants aged 6 to < 12 months were
1947 in the range of around 4-10 mg/day (Noble and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006;
1948 DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al.,
1949 2013).

1950 **6.7.5. Health consequences**

1951 Iron has the biological ability to donate and accept an electron and change between two oxidation
1952 states, the ferrous (Fe^{2+}) and ferric (Fe^{3+}) iron, respectively. Iron has many functions in the body such
1953 as in the oxygen transporting haemoglobin and myoglobin and in enzymes in many metabolic
1954 pathways in the liver, brain and endocrine organs. The growth and development of the central nervous
1955 system is rapid during early childhood and iron is critical for this process. Iron deficiency and iron
1956 deficiency anaemia can have a serious impact on infants' and children's health and later development,
1957 i.e. alteration of the immune status, adverse effects on morbidity, delayed behavioural and mental
1958 development, below average school achievements and growth retardation, as well as adverse effects
1959 on cognition that may or may not be reversible with iron supplementation (Moffatt et al., 1994;
1960 Iannotti et al., 2006; Hermoso et al., 2011). Even severe iron deficiency anaemia in infancy may pass
1961 unnoticed, as symptoms such as pallor, fatigue, and developmental or behavioural disturbances are
1962 quite subtle.

1963 Active excretion of iron in humans is minimal. An overload of iron in the body is a risk for those with
1964 hereditary haemochromatosis, a relatively common disorder especially in Northern Europe, with a
1965 reported frequency of homozygosity for the C282Y mutation of around 0.7 % (Thorstensen et al.,
1966 2010), but overload may also occur in infancy without this hereditary disease. Studies support that the
1967 absorption of iron cannot be down-regulated before the age of nine months with a risk for overload in
1968 those infants with sufficient iron stores but high iron intakes. Iron-replete infants might therefore be at
1969 risk for negative health consequences if given extra iron.

1970 The evidence for risk and benefit of iron supplementation in infancy and young childhood in
1971 developing countries were reviewed by Iannotti et al. (2006). Iron doses were 10-50 mg/day. It was
1972 reported that three out of 10 studies showed a lower weight gain in the iron fortified groups and four
1973 out of 16 an increased incidence of infections. The authors concluded that supplementation may need
1974 to be targeted to iron deficient children. A study on infants in Sweden and Honduras observed
1975 negative growth consequences associated with higher iron intakes (supplementation at 1 mg/kg body
1976 weight per day vs. no supplementation), which were however small, i.e. 0.2-0.6 cm difference in
1977 length gain both in Honduras and Sweden between four and nine months of age, and in Swedish
1978 infants there was a difference in weight gain of 100-200 g and head circumference of 0.2-0.3 cm in the
1979 five month interval (Dewey et al., 2002). In this study there was an increased likelihood of diarrhoea
1980 in a sub-group of infants with adequate iron status. In a follow-up of the study by Walter et al. (1998)
1981 at 10 years of age (Lozoff et al., 2012), the group who had received high iron formula
1982 (1.95 mg/100 kcal) scored statistically significantly lower on tests for spatial memory and visual motor
1983 integration, but not on intelligence quotient, visual perception, motor coordination and arithmetic
1984 achievement. Effects were generally small. In a subgroup of children with the highest haemoglobin
1985 concentrations at six months of age, the children who had been fed the high iron formula scored
1986 statistically significantly lower in all tests (i.e. intelligence quotient, spatial memory, visual motor
1987 integration, visual perception, motor coordination and arithmetic achievement). The drop-out between
1988 infancy and the age of 10 years was over 40 %. Other studies which investigated FOF with the
1989 currently permitted maximum concentrations of iron (i.e. 2 mg/100 kcal (12-14 mg/L)) (Fuchs et al.,

1990 1993; Stevens and Nelson, 1995; Daly et al., 1996; Gill et al., 1997; Morley et al., 1999; Williams et
1991 al., 1999) did not show any adverse effects at the levels of iron intake provided by these formulae.

1992 The Panel notes that even though some data suggest that iron supplementation in iron-replete infants
1993 may lead to impaired growth and development and an increased risk of infections, the evidence is
1994 limited and does not allow conclusions to be drawn for the establishment of maximum iron content in
1995 IF and FOF.

1996 In a recent review of the evidence, the ESPGHAN Committee on Nutrition (Domellöf et al., 2014)
1997 considered that formula-fed infants should receive a formula with a minimum content of iron of
1998 4 mg/L (around 0.6 mg/100 kcal) based on current fortification practices, but acknowledged that based
1999 on theoretical considerations a minimum level of iron of 2 mg/L (around 0.3 mg/100 kcal) would be
2000 sufficient. Some RCTs have investigated the impact of feeding formulae of varying iron
2001 concentrations to infants before the age of six months. In three trials performed in the UK, Sweden
2002 and Canada (Moffatt et al., 1994; Hernell and Lönnerdal, 2002; Tuthill et al., 2002) the impact of
2003 feeding IF with iron concentrations at or below currently required minimum iron concentrations in IF
2004 (i.e. 1.8-2.1 mg/L (around 0.3 mg/100 kcal)) has been investigated with respect to their effect on iron
2005 status in infants below six month of age. The studies by Tuthill et al. (2002) and by Hernell and
2006 Lönnerdal (2002) which investigated IF with iron concentrations of < 1 vs. 5 mg/L (around < 0.2 vs.
2007 0.8 mg/100 kcal) and 2 vs. 4 mg/L (around 0.3 vs. 0.6 mg/100 kcal), respectively, did not find any
2008 differences in iron status at three and six months of age, respectively. However, study formulae in the
2009 study by Tuthill et al. (2002) were only consumed in the first three months of life which does not
2010 allow any conclusions to be drawn with respect to the effect of a formula with a similar iron content
2011 consumed for the entire period of six months. The study by Moffatt et al. (1994) which investigated
2012 the impact of a formula with an iron concentration of 1.1 vs. 12.8 mg/L (around 0.2 vs. 2 mg/100 kcal)
2013 found a statistically significant difference in iron status between the two formula groups. However,
2014 this study was conducted in a poor population with high prevalence of anaemia which could not
2015 necessarily be considered representative of the current European infant population.

2016 These data show that an IF providing iron at an amount of 0.3 mg/100 kcal (2 mg/L) is adequate to
2017 maintain iron status within the normal range within the first six months of life and is also supported by
2018 the theoretically calculated value of 1.5 mg/day based on iron concentrations in breast milk and
2019 differences in absorption efficiency.

2020 One RCT (Walter et al., 1998) investigated the effect on iron status of FOF containing 2.3 mg/L
2021 (0.35 mg/100 kcal) iron (n = 405) vs. a formula providing 12.7 mg/L (1.95 mg/100 kcal) iron
2022 (n = 430) which were fed for six months to six-month-old non-anaemic infants who had been partially
2023 or exclusively breast-fed. Iron status was assessed at 12 months, and at 18 months of age in those
2024 infants who were not classified as anaemic at the 12 months follow-up. Iron deficiency was defined as
2025 two out of three measures of iron status in the abnormal range (serum ferritin < 12 µg/L, erythrocyte
2026 protoporphyrin > 100 µg/L red blood cells, or mean cell volume < 70 fL). At 12 months of age 39 %
2027 of infants were classified as iron deficient in the low iron formula group vs. 20 % in the high iron
2028 formula group (p < 0.001). At 18 months of age, this was 35 % vs. 17 % (p < 0.01). There was no
2029 significant difference in the prevalence of iron deficiency anaemia between groups at both time points.

2030 The Panel notes that consumption of FOF containing 0.35 mg/100 kcal iron led to a significantly
2031 lower iron status in infants older than six months of age than formula with higher iron content.
2032 However, the prevalence of iron deficiency was also high in the group consuming high iron formula
2033 and there were no indications of long-term adverse effects on cognitive outcomes of consumption of a
2034 formula containing 0.35 mg/100 kcal iron during the second half of infancy. The Panel considers that
2035 in the absence of data investigating the impact of varying concentrations of iron, especially in the
2036 lower range of iron concentrations in FOF, no conclusions can be drawn from this study with respect
2037 to the nutritional adequacy of a FOF containing 0.35 mg/100 kcal iron and consumed throughout the
2038 second half of the first year of life.

2039 FOF containing the lowest currently permitted concentrations of iron (0.6 mg/100 kcal) would provide
 2040 around 2.3 mg iron per day, if an average formula consumption of 600 mL/day is assumed at this age
 2041 (Fantino and Gourmet, 2008). Such concentrations require that complementary foods provide around
 2042 70 % of the daily iron intake. In the survey by Lennox et al. (2013) conducted in the framework of the
 2043 UK Rolling Programme complementary contributed to around 52 % of total daily iron intakes of
 2044 infants between 7-9 months of age and at 10-11 months of age this was 58 % with median total iron
 2045 intakes of 7.4 mg/day and 7.6 mg/day, respectively. In a study in US breast-fed infants iron intakes
 2046 from complementary foods were reported to be 1.5 mg/day and 7.2 mg/day at seven and nine months,
 2047 respectively in the group consuming meat and 7.2 mg/day and 8.5 mg/day at seven and nine months,
 2048 respectively in the group consuming iron fortified cereal (Krebs et al., 2006). Therefore, the Panel
 2049 considers it reasonable to assume that complementary foods could provide the remaining around
 2050 5.7 mg iron per day which would be needed to be supplied to infants in order to reach daily iron
 2051 intakes of 8 mg/day if a FOF with a minimum content of iron of 0.6 mg/100 kcal was consumed.

2052 **6.7.6. Recommendations**

2053 The physiological changes in iron metabolism during the first year of life are considerable. At an age
 2054 below six months, most infants need little dietary iron and endogenous iron compensates for low
 2055 intakes.

2056 Based on clinical data indicating that an IF providing iron at a level of 0.3 mg/100 kcal is adequate to
 2057 maintain iron status within the normal range within the first four to six months of life, the Panel
 2058 proposes a minimum iron content in IF of 0.3 mg/100 kcal (0.07 mg/100 kJ). This is supported by the
 2059 theoretically calculated value based on iron concentrations in breast milk and assumed differences in
 2060 absorption efficiency.

2061 Based on the consideration that around 70 % of daily iron (equivalent to 5.7 mg iron per day) could be
 2062 supplied by complementary foods, a minimum content of iron in FOF of 0.6 mg/100 kcal is proposed,
 2063 in line with the SCF (2003a).

2064 There is no new evidence with respect to the impact of different iron contents in IF and FOF
 2065 containing ISP. Therefore, the Panel proposes to maintain the recommendations of the SCF (2003a)
 2066 with respect to the minimum iron content in such formulae (i.e. 0.45 mg/100 kcal), considering a
 2067 potentially lower absorption efficiency of iron from formula containing ISP.

2068 Therefore, the Panel proposes the minimum iron content in IF and FOF as given in Table 14.

2069 **Table 14:** Proposed minimum content of iron in IF and FOF.

	Minimum IF		Minimum FOF	
	mg/100 kcal	mg/100 kJ	mg/100 kcal	mg/100 kJ
Cow's milk	0.30	0.07	0.60	0.14
Goat's milk	0.30	0.07	0.60	0.14
Protein hydrolysates	0.30	0.07	0.60	0.14
ISP	0.45	0.11	0.90	0.22

2070

2071 If the same formula is to be used from the first months of infancy and be suitable for the whole first
 2072 year of life the minimum iron content should be 0.6 mg/100 kcal (0.14 mg/100 kJ) for milk-based
 2073 formulae and formulae containing protein hydrolysates and 0.9 mg/100 kcal (0.22 mg/100 kJ) for
 2074 formulae containing ISP.

2075 **6.8. Zinc**

2076 **6.8.1. Current compositional requirements of IF and FOF**

2077 Directive 2006/141/EC provides for minimum and maximum zinc contents in IF and FOF, irrespective
2078 of the protein source, of 0.5 mg/100 kcal and 1.5 mg/100 kcal. Contrary to the Directive, the SCF
2079 (2003a) had advised on a higher zinc content in IF and FOF containing ISP, namely 0.75 mg/100 kcal
2080 and 2.4 mg/100 kcal, for the minimum and maximum content, respectively.

2081 **6.8.2. Zinc content of human milk**

2082 A comprehensive review of breast milk zinc concentrations which covered 63 studies globally,
2083 including 12 from European countries (Brown KH et al., 2009) reported zinc concentrations
2084 (mean \pm SD) of: 4.11 ± 1.50 mg/L below 1 month (n = 74), 1.91 ± 0.53 mg/L at 1-2 months (n = 42),
2085 0.98 ± 0.35 mg/L at 3-5 months (n = 24), and 0.77 ± 0.22 mg/L at 6-11 months (n = 24) *post partum*.

2086 For the first four to six months of life, breast milk provides sufficient zinc for infants (Prasad, 2003).

2087 **6.8.3. Zinc requirements of infants**

2088 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2089 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded on levels of zinc
2090 intakes which were considered adequate for the majority of breast-fed infants in the first half year of
2091 life of 2 mg/day and of 4 mg/day for the majority of infants in the second half of the first year of life,
2092 respectively. In a more recent draft Opinion on DRVs for zinc (EFSA NDA Panel, 2014a) to be
2093 released for public consultation, the Panel proposes a PRI for infants in the second half of the first year
2094 of life of 2.9 mg/day.

2095 **6.8.4. Zinc intakes of infants**

2096 Assuming a human milk intake of 0.8 L/day and a zinc content of 4 mg/L at two weeks of life and of
2097 1.5 mg/L at three months of life, an exclusively breast-fed infant would consume 3.2 mg zinc per day
2098 during the first month of life and 1.2 mg/day at around three months of life. Mean/median zinc intakes
2099 of mostly formula-fed infants below six months of age were reported to range from 2.1-4.7 mg/day
2100 (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008; Lennox et al., 2013) with the
2101 two studies which investigated zinc intake from only formula-fed infants reporting intakes of around
2102 4 mg/day. For infants aged 6 to < 12 months zinc intakes were observed in the range of 3.1-6.7 mg/day
2103 (Noble and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet,
2104 2008; Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

2105 **6.8.5. Health consequences**

2106 Zinc is involved in many aspects of cell metabolism, with several enzymes depending on zinc for
2107 catalytic activity. It plays a role in immune function, protein synthesis, wound healing,
2108 deoxyribonucleic acid (DNA) synthesis and cell division. The current understanding of zinc deficiency
2109 in humans, much of which is marginal zinc deficiency, is based on responses to zinc supplementation.
2110 Studies have shown that physical growth and cognitive performance improved following zinc
2111 supplementation in zinc-deficient children (Fischer Walker and Black, 2004). While signs of acute
2112 zinc intoxication are gastrointestinal disturbances, chronic zinc toxicity is associated with symptoms
2113 of copper deficiency. A UL for zinc of 7 mg/day for one to three-year-old children was derived by the
2114 SCF (2002c).

2115 **6.8.6. Recommendations**

2116 The Panel's previous Opinion (EFSA NDA Panel, 2013a) only provided advice on the levels of zinc
2117 intake considered adequate for the majority of breast-fed infants (approx. 0.4 mg/100 kcal) but did not
2118 include formula-fed infants. Therefore, the conclusions on the minimum amount of zinc in IF cannot
2119 be based on the Panel's previous considerations. Evidence supports the concept that zinc in formula

2120 can be less available than from human milk, which needs to be considered in the establishment of the
2121 minimum content of zinc in IF and FOF.

2122 As there are no reports that zinc deficiency occur in formula-fed infants at current levels of zinc
2123 intakes from formulae, the Panel proposes maintain the minimum content of zinc in IF and FOF based
2124 on milk protein or containing protein hydrolysates proposed by the SCF (2003a)

2125 As phytic acid has been shown to reduce zinc absorption efficiency (Lönnerdal et al., 1984; Davidsson
2126 et al., 1994; Davidsson et al., 2004), the Panel proposes to also retain the minimum content of zinc in
2127 IF and FOF containing ISP established by the SCF (2003a)

2128 Therefore, the Panel proposes a minimum zinc content in IF and FOF based on milk protein or
2129 containing protein hydrolysates of 0.5 mg/100 kcal (0.12 mg/100 kJ). For IF and FOF containing ISP a
2130 minimum content of 0.75 mg/100 kcal (0.18 mg/100 kJ) is proposed.

2131 **6.9. Copper**

2132 **6.9.1. Current compositional requirements of IF and FOF**

2133 Based on the Opinion of SCF (2003a), Directive 2006/141/EC lays down a minimum content of
2134 copper in IF and FOF of 35 µg/100 kcal and maximum content of 100 µg/100 kcal.

2135 **6.9.2. Copper in human milk**

2136 Mean concentrations of copper in breast milk observed in Europe range from 329-390 µg/L
2137 (51-60 µg/100 kcal), with medians between 368 and 400 µg/L (57-62 µg/100 kcal) (Krachler et al.,
2138 1998; Rodriguez Rodriguez et al., 2002; Leotsinidis et al., 2005).

2139 **6.9.3. Copper requirements of infants**

2140 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2141 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded on levels of copper
2142 intakes which were considered adequate for the majority infants of 300 µg/day.

2143 **6.9.4. Copper intakes of infants**

2144 Assuming a human milk intake of 0.8 L/day and a copper content of 350 µg/L, an exclusively breast-
2145 fed infant would consume 280 µg copper per day during the first six months of life. Mean/median
2146 copper intakes of breast-fed and formula-fed infants below six months of age were 200-400 µg/day
2147 (Hilbig, 2005; Lennox et al., 2013). Median copper intakes of infants from 6 to < 12 months were
2148 400-900 µg/day (Hilbig, 2005; Marriott et al., 2008; Lennox et al., 2013).

2149 **6.9.5. Health consequences**

2150 Copper is an essential nutrient and an indispensable cofactor of many proteins including enzymes
2151 involved in oxidative reactions, in the production of collagen and of pigment, in iron metabolism and
2152 in the function of the heart, brain and the immune system. Copper deficiency is rare in humans and
2153 occurs predominantly in premature and small for gestational age infants fed cow's milk formulae,
2154 patients with malnutrition and patients receiving total parenteral nutrition (TPN) devoid of copper or
2155 subjects consuming high-dose zinc supplements. Signs of severe copper deficiency include anaemia,
2156 leucopenia and neutropenia. Osteoporosis has also been observed when bones are still growing
2157 (Turnlund, 2006). Copper excess is rare and results acutely in gastrointestinal symptoms and
2158 chronically in liver and kidney dysfunction. A UL for copper of 1 000 µg/day was derived by the SCF
2159 (2003c) for children aged one to three years.

2160 **6.9.6. Recommendations**

2161 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2162 a basis the intake levels of copper considered adequate by the Panel for this age group of 300 µg/day
2163 based on copper intakes from breast milk, this converts into a required minimum copper content of
2164 formulae of 60 µg/100 kcal.

2165 Therefore, the Panel proposes a minimum copper content in IF and FOF of 60 µg/100 kcal
2166 (14.3 µg/100 kJ).

2167 **6.10. Selenium**

2168 **6.10.1. Current compositional requirements of IF and FOF**

2169 Directive 2006/141/EC provides for minimum and maximum selenium contents in IF and FOF of
2170 1 µg/100 kcal and 9 µg/100 kcal while the SCF (2003a) had recommended minimum and maximum
2171 contents of 3 µg/100 kcal and 9 µg/100 kcal.

2172 **6.10.2. Selenium content of human milk**

2173 A wide range of selenium concentrations in human milk have been observed, depending on the
2174 amount of selenium consumed by the mother from natural foods. Breast milk concentrations of
2175 selenium in Europe range from 3-84 µg/L (0.46-12.9 µg/100 kcal), with a mean value of
2176 16.3 ± 4.7 µg/L (2.51 ± 0.72 µg/100 kcal) (Krachler et al., 1998; Zachara and Pilecki, 2000; Navarro-
2177 Blasco and Alvarez-Galindo, 2003; Özdemir et al., 2008).

2178 **6.10.3. Selenium requirements of infants**

2179 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2180 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a selenium
2181 intake of 12.5 µg/day and 15 µg/day was adequate for the majority of infants in the first half and in the
2182 second half of the first year of life, respectively.

2183 **6.10.4. Selenium intakes of infants**

2184 Assuming a human milk intake of 0.8 L/day and a selenium content of 16 µg/L, an exclusively breast-
2185 fed infant would consume 12.8 µg selenium per day during the first six months of life. Mean selenium
2186 intakes in breast-fed and formula-fed infants in the first half year of life were reported to be 15 µg/day
2187 in one study in the UK (Lennox et al., 2013). For infants in the second half year of life selenium
2188 intakes were reported in the range of 18-22 µg/day in the Netherlands and the UK (de Boer et al.,
2189 2006; Lennox et al., 2013).

2190 **6.10.5. Health consequences**

2191 Selenocysteine is an indispensable constituent of 25 different selenoproteins. Most selenoproteins are
2192 involved in redox reactions and three deiodinases convert thyroxine to triiodothyronine. Selenium
2193 deficiency, for example following long-term TPN, malabsorption syndromes or use of special diets
2194 containing insufficient selenium, leads to impaired muscle function and loss of pigment in hair and
2195 skin. Chronic selenium excess is characterised by hair loss and nail dystrophy, breath smelling of
2196 garlic, dermatitis and neurological and endocrinological symptoms (selenosis). The SCF (2000g) has
2197 set a UL for selenium of 60 µg per day for children aged one to three years.

2198 **6.10.6. Recommendations**

2199 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2200 a basis the intake levels of selenium considered adequate by the Panel for this age group of
2201 12.5 µg/day based on selenium intakes from breast milk, this converts into a required minimum
2202 selenium content in formula of 2.5 µg/100 kcal (rounding up to 3 µg/100 kcal)

2203 Therefore, the Panel proposes a minimum selenium content in IF and FOF of 3 µg/100 kcal
2204 (0.72 µg/100 kcal).

2205 **6.11. Iodine**

2206 **6.11.1. Current compositional requirements of IF and FOF**

2207 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2208 maximum iodine contents in IF and FOF of 10 µg/100 kcal and 50 µg/100 kcal, respectively.

2209 **6.11.2. Iodine content of human milk**

2210 The iodine concentration of breast milk in Europe has been observed in the range of around
2211 50-100 µg/L (8-15 µg/100 kcal) (Costeira et al., 2009; EFSA NDA Panel, 2014b).

2212 **6.11.3. Iodine requirements of infants**

2213 In its Draft Scientific Opinion on the Dietary Reference Values for iodine (EFSA NDA Panel, 2014b),
2214 the Panel proposed an AI of iodine of 70 µg/day for infants from 7-11 months of age. No AI was set
2215 for infants from birth to six months of age, where exclusive breastfeeding is assumed to provide an
2216 adequate iodine supply. In the Panel's previous Opinion on nutrient requirements and dietary intakes
2217 of infants and young children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded
2218 that an iodine intake of 90 µg/day was adequate for the majority of infants. Since there is no reason to
2219 assume that infants from birth to six months of age need more iodine than infants in the second half of
2220 the first year of life, the Panel considers in line with its most recent evaluation (EFSA NDA Panel,
2221 2014b) that an intake of iodine of 70 µg/day is adequate for the majority of infants from birth to
2222 12 months of age.

2223 **6.11.4. Iodine intakes of infants**

2224 Assuming a human milk intake of 0.8 L/day and an iodine content of 50-100 µg/L, an exclusively
2225 breast-fed infant would consume 40-80 µg iodine per day during the first six months of life.
2226 Mean/median iodine intakes in breast-fed and formula-fed infants from birth to below six months were
2227 reported to range from around 35-94 µg/day in Germany and the UK (Hilbig, 2005; Noble and
2228 Emmett, 2006; Lennox et al., 2013). In infants from 6 to < 12 months mean/median iodine intakes
2229 were between 42 and 118 µg/day in Germany and the UK (Noble and Emmett, 2001; Hilbig, 2005;
2230 DGE, 2008; Lennox et al., 2013).

2231 **6.11.5. Health consequences**

2232 The most critical physiological role for iodine is the normal functioning of the thyroid gland. Iodine
2233 deficiency disorders (IDD) are caused by insufficient iodine intakes leading to hypothyroidism. IDD
2234 are particularly of concern in pregnancy and infancy because of the risk of developmental brain
2235 damage. Chronic iodine deficiency may also lead to compensatory thyroid hyperplasia with goitre.
2236 Chronic excessive iodine intake can also lead to goitre. A UL for iodine was set at 200 µg/day for
2237 children aged one to three years based on biochemical changes in thyroid-stimulating hormone levels
2238 (SCF, 2002a).

2239 **6.11.6. Recommendations**

2240 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2241 the basis the intake levels of iodine considered adequate by the Panel for this age group of 70 µg/day
2242 based on iodine intakes from breast milk, this converts into a required minimum iodine content of
2243 formula of 14 µg/100 kcal (rounded up to 15 µg/100 kcal).

2244 Therefore, the Panel proposes a minimum iodine content in IF and FOF of 15 µg/100 kcal
2245 (3.6 µg/100 kJ).

2246 **6.12. Chromium**

2247 **6.12.1. Current compositional requirement of IF and FOF**

2248 The SCF (2003a) concluded that there were no biological or nutritional data to define a minimum and
2249 maximum content of chromium in IF and FOF. No minimum and maximum chromium content in IF
2250 and FOF is specified by Directive 2006/141/EC.

2251 **6.12.2. Chromium content of human milk**

2252 In Europe, mean concentrations of chromium in mature breast milk are highly variable ranging from
2253 0.19-10.8 µg/L (0.03-1.7 µg/100 kcal) (Kumpulainen and Vuori, 1980; Kumpulainen et al., 1980;
2254 Clemente et al., 1982; Deelstra et al., 1988; Bougle et al., 1992; Cocho et al., 1992; Aquilio et al.,
2255 1996; Wappelhorst et al., 2002).

2256 **6.12.3. Chromium requirements of infants**

2257 No AR and no PRI for chromium for the performance of physiological functions can be defined.

2258 **6.12.4. Health consequences**

2259 The case for the essentiality of dietary Cr³⁺ for humans was uncertain when the SCF considered the
2260 element twenty years ago (SCF, 1993a), then, as now, the postulation of its essentiality was almost
2261 entirely based on case reports of patients on long-term TPN who developed metabolic and
2262 neurological defects which responded to Cr³⁺. The Panel considers that there is as yet no convincing
2263 evidence that chromium is an essential nutrient, because no specific physiological changes due to
2264 experimental chromium deficiency have been identified. No AR for the performance of essential
2265 physiological functions can be defined. Owing to limited data the SCF (2003b) was unable to set a
2266 UL. It was stated that in a number of limited studies there was no evidence of adverse effects in adults
2267 associated with supplementary intake of chromium up to a dose of 1 mg/day.

2268 **6.12.5. Recommendations**

2269 Because of the unproven essentiality of chromium together with the fact that no specific physiological
2270 function can be ascribed to chromium, the Panel considers that the addition of chromium to IF and
2271 FOF is not necessary.

2272 **6.13. Molybdenum**

2273 **6.13.1. Current compositional requirements of IF and FOF**

2274 The SCF (2003a) concluded that there were no biological or nutritional data to define a minimum and
2275 maximum content of molybdenum in IF and FOF. No minimum and maximum molybdenum content
2276 in IF and FOF is specified by Directive 2006/141/EC.

2277 **6.13.2. Molybdenum content of human milk**

2278 Mean molybdenum concentrations in human milk were reported to range between 0.72 µg/L and
2279 4 µg/L (0.11-0.62 µg/100 kcal) with a mean of around 2.5 µg/L (0.38 µg/100 kcal) (EFSA NDA
2280 Panel, 2013c).

2281 **6.13.3. Molybdenum requirements of infants**

2282 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2283 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a molybdenum
2284 intake of 2 µg/day and 10 µg/day was adequate for the majority of infants in the first half and in the
2285 second half of the first year of life, respectively.

2286 **6.13.4. Molybdenum intakes of infants**

2287 Assuming a human milk intake of 0.8 L/day and a molybdenum content of 2.5 µg/L, an exclusively
2288 breast-fed infant would consume 2 µg molybdenum per day during the first six months of life. No data
2289 on molybdenum intakes in infants in the first year of live living in Europe are available.

2290 **6.13.5. Health consequences**

2291 In humans, sulphite oxidase, xanthine oxidoreductase, aldehyde oxidase and mitochondrial amidoxime
2292 reducing component require molybdenum linked with a pterin (molybdopterin) as cofactor. Only one
2293 human case report of likely dietary molybdenum deficiency has been reported in an adult patient on
2294 TPN because of short-bowel syndrome (Abumrad et al., 1981). A UL for molybdenum for children
2295 1-3 years old was set at 100 µg/day (SCF, 2000d). This UL was extrapolated from the UL for adults
2296 (600 µg/day) which was based on reproductive toxicity and adverse effects on growth in rats.

2297 **6.13.6. Recommendations**

2298 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2299 the basis the intake levels of molybdenum considered adequate by the Panel for this age group of
2300 2 µg/day based on molybdenum intakes from breast milk, this converts into a required minimum
2301 molybdenum content of formula of 0.4 µg/100 kcal. Therefore, the Panel proposes a minimum
2302 molybdenum content in IF and FOF of 0.4 µg/100 kcal (0.1 µg/100 kJ).

2303 **6.14. Manganese**

2304 **6.14.1. Current compositional requirements of IF and FOF**

2305 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2306 maximum manganese contents in IF and FOF of respectively 1 µg/100 kcal and 100 µg/100 kcal.

2307 **6.14.2. Manganese content of human milk**

2308 The mean manganese concentrations of human milk of European mothers vary from 3-30 µg/L
2309 (0.46-4.6 µg/100 kcal), but most values are around 4 µg/L (0.62 µg/100 kcal) (Mullee et al., 2012).

2310 **6.14.3. Manganese requirements of infants**

2311 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2312 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a manganese
2313 intake of 3 µg/day and 20-500 µg/day was adequate for the majority of infants in the first half and in
2314 the second half of the first year of life, respectively.

2315 **6.14.4. Manganese intakes of infants**

2316 Assuming an average milk intake of 0.8 L/day and a manganese content of 3-30 µg/L, an exclusively
2317 breast-fed infant would consume 2.4-24 µg manganese per day in the first six months of life. Reports
2318 on median manganese intakes of infants are only available for German infants (Hilbig, 2005) and were
2319 30 µg/day for breast-fed and formula-fed infants between birth and six months of age and 500 µg/day
2320 for infants from 6 to < 12 months of age.

2321 **6.14.5. Health consequences**

2322 Manganese is an essential dietary mineral for mammals; it is a component of metalloenzymes such as
2323 superoxide dismutase, arginase and pyruvate carboxylase, and is involved in amino acid, lipid and
2324 carbohydrate metabolism. In animals glycosyltransferases and xylosyltransferases, which are involved
2325 in proteoglycan synthesis (e.g. for bone formation), are sensitive to manganese status (Nielsen, 1999).
2326 No specific manganese deficiency syndrome has been described in humans. The symptoms of
2327 manganese toxicity can result in a permanent neurological disorder known as manganism (ATSDR,
2328 2012). Professional exposure by inhalation is the main cause of manganism but oral exposure to

2329 manganese, especially from contaminated water sources, can also cause adverse health effects, which
2330 are similar to those observed from inhalation exposure. No UL for manganese has been set (SCF,
2331 2000f).

2332 **6.14.6. Recommendations**

2333 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2334 the basis the intake levels of manganese considered adequate by the Panel for this age group of
2335 3 µg/day based on manganese intakes from breast milk, this would convert into a required minimum
2336 manganese content in IF and FOF of 0.6 µg/day. Taking into account that manganese from formula
2337 may be absorbed less than from human milk, the Panel proposes to retain the minimum manganese
2338 content in IF and FOF of 1 µg/100 kcal as proposed by the SCF (2003a).

2339 Therefore, the Panel proposes a minimum manganese content in IF and FOF of 1 µg/100 kcal
2340 (0.24 µg/100 kJ).

2341 **6.15. Vitamin A**

2342 **6.15.1. Current compositional requirements of IF and FOF**

2343 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2344 maximum vitamin A contents in IF and FOF of 60 µg retinol equivalents (RE)/100 kcal and 180 µg
2345 RE/100 kcal. Retinol sources authorised for use in IF and FOF are retinol and two forms of retinyl
2346 esters, i.e. retinyl palmitate and retinyl acetate. Carotenoids are not considered in contributing to
2347 vitamin A intakes in infants owing to a lack of knowledge on the bioconversion of carotenoids in
2348 infants. Therefore, they are not considered as a source of vitamin A in IF and FOF.

2349 **6.15.2. Vitamin A content of human milk**

2350 Pre-formed vitamin A concentrations in human milk in Western countries were traditionally
2351 considered to be between 450 and 600 µg RE/L (69-92 µg RE/100 kcal), whereas considerably lower
2352 values were reported in two recent studies in Europe: 80 µg RE/L (12 µg RE/100 kcal) (Tijerina-Saenz
2353 et al., 2009) and 85 µg RE/L (13 µg RE/100 kcal) (Szlगतatys-Sidorkiewicz et al., 2012).

2354 **6.15.3. Vitamin A requirements of infants**

2355 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2356 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a vitamin A
2357 intake of 350 µg RE/day was adequate for the majority of infants. This was based on assumed mean
2358 vitamin A content in breast milk of 450 µg/L and a daily intake of 0.8 L and rounding down.

2359 **6.15.4. Vitamin A intakes of infants**

2360 Assuming a human milk intake of 0.8 L/day and a pre-formed vitamin A content of 450 µg/L, an
2361 exclusively breast-fed infant would consume 360 µg of pre-formed vitamin A per day during the first
2362 six months of life. Mean/median vitamin A intakes of mostly formula-fed infants below six months of
2363 age were reported to range from around 510-980 µg RE/day (Hilbig, 2005; Noble and Emmett, 2006;
2364 Fantino and Gourmet, 2008; Lennox et al., 2013). For infants aged 6 to < 12 months mean/median
2365 total vitamin A intakes were observed in the range of 530-1 090 µg RE/day (Noble and Emmett, 2001;
2366 Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008;
2367 Thorsdottir et al., 2008; Lennox et al., 2013).

2368 **6.15.5. Health consequences**

2369 Vitamin A has several important functions, including a role in vision, maintenance of epithelial
2370 surfaces, immune competence, growth, development and reproduction (Nordic Council of Ministers,
2371 2013). Deficiency of vitamin A leads to neonatal growth retardation and affects several functions such
2372 as vision, immunity, and reproduction. The most specific clinical consequence of severe vitamin A

2373 deficiency is xerophthalmia and deficient dark adaptation (night blindness). The deficient dark
2374 adaptation due to inadequate vitamin A intake disappears after retinol or β -carotene supplementation
2375 (Chase et al., 1971; Sauberlich et al., 1974). In a systematic review and meta-analysis of studies on
2376 children living in Asia, Africa and Latin America aged six months to five years vitamin A
2377 supplementation was associated with reductions in mortality, morbidity, and vision problems (Mayo-
2378 Wilson et al., 2011). Vitamin A deficiency in healthy exclusively breast-fed and formula-fed infants
2379 has not been observed in Europe. Children are particularly sensitive to vitamin A, with daily intakes of
2380 about 450 $\mu\text{g RE/kg}$ body weight per day leading to toxicity (Bendich and Langseth, 1989; Hathcock
2381 et al., 1990; Coghlan and Cranswick, 2001; Allen and Haskell, 2002). Signs of chronic
2382 hypervitaminosis A in infants are reported as loss of appetite, dermal dryness, loss of hair, fissuring of
2383 the corners of the mouth, bone pain, hepatomegaly, increased intracranial pressure, and failure to
2384 thrive (Fomon, 1993). A UL for preformed vitamin A (retinol and retinyl esters) for children one to
2385 three years of age of 800 $\mu\text{g RE/day}$ has been set based on the risk of hepatotoxicity and teratogenicity
2386 and subsequent extrapolation to children (SCF, 2002b).

2387 There is an interaction between iron and vitamin A. Vitamin A deficiency impairs iron mobilisation
2388 and vitamin A supplementation improves haemoglobin concentrations. Iron supplementation
2389 combined with vitamin A seem to be more effective than iron alone to improve haemoglobin
2390 concentrations (Michelazzo et al., 2013). No consistent relationship between zinc and vitamin A status
2391 was established in humans (Christian and West, 1998) although zinc supplementation improved dark
2392 adaptation in zinc-deficient patients (Morrison et al., 1978).

2393 **6.15.6. Recommendations**

2394 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2395 a basis the intake levels of vitamin A considered adequate by the Panel for this age group of 350 μg
2396 RE/day based on pre-formed vitamin A intakes from breast milk, this converts into a required
2397 minimum vitamin A content of formula of 70 $\mu\text{g RE/100 kcal}$.

2398 Therefore, the Panel proposes a minimum vitamin A content in IF and FOF of 70 $\mu\text{g RE/100 kcal}$
2399 (16.7 $\mu\text{g RE/100 kJ}$).

2400 The vitamin A activity in IF and FOF should be provided by retinol or retinyl esters. In view of the
2401 existing uncertainties as to the relative equivalence of β -carotene and retinol in infants, any content of
2402 carotenes should not be included in the calculation and declaration of vitamin A activity.

2403 **6.16. Vitamin D**

2404 **6.16.1. Current compositional requirements of IF and FOF**

2405 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC lays down 1 $\mu\text{g/100 kcal}$ as the
2406 minimum and 2.5 $\mu\text{g/100 kcal}$ as the maximum vitamin D content in IF and 1 $\mu\text{g/100 kcal}$ as the
2407 minimum and 3 $\mu\text{g/100 kcal}$ as the maximum vitamin D content in FOF.

2408 **6.16.2. Vitamin D content of human milk**

2409 The mean vitamin D content of breast milk in healthy women has been reported to be in the range
2410 0.25-2.0 $\mu\text{g/L}$ (0.04-0.31 $\mu\text{g/100 kcal}$) (Dawodu and Tsang, 2012). There is general agreement that
2411 human milk does not contain sufficient vitamin D to prevent rickets, even if the mother takes
2412 vitamin D supplements (Olafsdottir et al., 2001).

2413 **6.16.3. Vitamin D requirements of infants**

2414 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2415 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a vitamin D
2416 intake of 10 $\mu\text{g/day}$ was adequate for the majority of infants having minimal sun exposure. Vitamin D
2417 can also be synthesised in the skin under the influence of ultraviolet B light. Consequently,

2418 requirements of dietary vitamin D depend also on geographical area and lifestyle factors determining
2419 the exposure of skin to sunlight.

2420 **6.16.4. Vitamin D intakes of infants**

2421 Mean/median vitamin D intakes of formula-fed infants below six months of age were reported to be
2422 around 9-10 µg/day in formula-fed infants (Noble and Emmett, 2006; Fantino and Gourmet, 2008;
2423 Lennox et al., 2013) and 3.5 µg/day in breast-fed infants (Lennox et al., 2013). For infants aged 6 to
2424 < 12 months mean/median vitamin D intakes were observed in the range of 3.6-10.4 µg/day (Noble
2425 and Emmett, 2001; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008;
2426 Thorsdottir et al., 2008; Lennox et al., 2013). The Panel notes that given that vitamin D can be
2427 synthesised endogenously low vitamin D intakes do not necessarily lead to an inadequate vitamin D
2428 status.

2429 **6.16.5. Health consequences**

2430 Vitamin D plays a key role in calcium and phosphate metabolism and is essential for bone health.
2431 There is no evidence from interventional studies to support vitamin D supplementation for other health
2432 benefits (muscle strength, prevention of infectious or allergic diseases or T1DM) in infants and young
2433 children (Braegger et al., 2013). Early signs of vitamin D deficiency are subclinical and include
2434 decreased serum concentrations of calcium and phosphorus while later signs comprise inadequate
2435 skeletal mineralisation (rickets and osteomalacia), bone deformities, bone pain, and alterations in
2436 muscle metabolism and respiratory function (SCF, 1993a). Reports of clinically manifest rickets in
2437 healthy infants have become few in Europe. In its recent consensus statement the ESPGHAN
2438 Committee on Nutrition noted that reports on vitamin D intoxication were scarce and that there was no
2439 agreement on a vitamin D toxicity threshold (Braegger et al., 2013). However, a UL might be defined
2440 even in the lack of toxicity threshold data. Recent intervention studies using doses up to 25 µg
2441 vitamin D per day (plus the amount ingested via fortified IF) for up to five months after birth did not
2442 indicate that these intakes were associated with hypercalcaemia in infants and a UL of 25 µg
2443 vitamin D per day has been established by the Panel (EFSA NDA Panel, 2012b).

2444 **6.16.6. Recommendations**

2445 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2446 a basis the intake levels of vitamin D considered adequate by the Panel for this age group of 10 µg/day
2447 based on achievable 25(OH)D vitamin serum concentrations, this converts into a minimum vitamin D
2448 content in formula of 2 µg/100 kcal.

2449 Therefore, the Panel proposes a minimum vitamin D content in IF and FOF of 2 µg/100 kcal
2450 (0.48 µg/100 kJ).

2451 **6.17. Vitamin E**

2452 **6.17.1. Current compositional requirements of IF and FOF**

2453 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC lays down 0.5 mg α-tocopherol
2454 equivalents (TE)/g PUFA but not less than 0.5 mg TE/100 kcal as the minimum and 5 mg
2455 α-TE/100 kcal as the maximum vitamin E concentration in IF and FOF.

2456 **6.17.2. Vitamin E content of human milk**

2457 The value traditionally used for characterising α-tocopherol content in human milk was 3.49 mg
2458 α-TE/L (0.54 mg α-TE/100 kcal) (Jansson et al., 1981). This value was closely corroborated in three-
2459 month-old infants in one recent study (3.48 mg α-TE/L (0.54 mg α-TE/100 kcal) (Antonakou et al.,
2460 2011), whereas different values have been reported in other studies, i.e. 2.32 mg α-TE/L (0.36 mg
2461 α-TE/100 kcal) (Tijerina-Saenz et al., 2009) and 1.10 mg α-TE/L (0.17 mg α-TE/100 kcal) (Szlągatys-
2462 Sidorkiewicz et al., 2012)).

2463 **6.17.3. Vitamin E requirements of infants**

2464 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2465 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a vitamin E
2466 intake of 3 mg α -tocopherol per day and 5 mg α -tocopherol per day was adequate for the majority of
2467 infants in the first and second half year of life, respectively.

2468 **6.17.4. Vitamin E intakes of infants**

2469 Assuming a human milk intake of 0.8 L/day and a vitamin E content of 3.5 mg α -TE/L, an exclusively
2470 breast-fed infant would consume 2.8 mg vitamin E per day during the first six months of life.
2471 Mean/median vitamin E intakes of breast-fed and formula-fed infants below six months of age were
2472 reported to be around 3.6-6.0 mg TE/day (Hilbig, 2005; Fantino and Gourmet, 2008). For infants aged
2473 6 to < 12 months mean/median vitamin E intakes were observed in the range of 4.3-6.5 mg TE/day
2474 (DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008).

2475 **6.17.5. Health consequences**

2476 The major biological role of α -tocopherol is its antioxidant activity contributing to the prevention of
2477 propagation of free radicals in various lipid structures within the organism. RRR- α -tocopherol is the
2478 principal isomer in animal tissues and as this form is relatively unstable, more stable tocopherol esters
2479 are commonly used in the production of IF and FOF. These forms have a biological activity lower than
2480 the one of RRR- α -tocopherol. Muscle and neurological problems can be direct consequence of human
2481 vitamin E deficiency; however, they usually develop only in sick infants and young children (e.g. in
2482 those with fat malabsorption). Vitamin E appears to have very low toxicity, and amounts of
2483 100-200 mg/day of synthetic α -tocopherols were consumed widely as supplements in adults without
2484 reported untoward effects. No adverse effects have been described from intakes provided by food
2485 sources (Nordic Council of Ministers, 2013). The SCF (2003d) did not set a UL for infants and
2486 children. For adults, a UL of 300 mg/day was derived.

2487 **6.17.6. Recommendations**

2488 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2489 a basis the intake levels of vitamin E considered adequate by the Panel for this age group of 3 mg α -
2490 tocopherol per day based on vitamin E intakes from breast milk, this converts into a required
2491 minimum vitamin E intake of 0.6 mg α -tocopherol/100 kcal as RRR- α -tocopherol.

2492 Therefore, the Panel proposes a minimum vitamin E content in IF and FOF of 0.6 mg
2493 α -tocopherol/100 kcal (0.14 mg/100 kJ). This figure is based on RRR- α -tocopherol activity.

2494 **6.18. Vitamin K**

2495 **6.18.1. Current compositional requirements of IF and FOF**

2496 Directive 2006/141/EC lays down 4 μ g/100 kcal as the minimum and 25 μ g/100 kcal as the maximum
2497 vitamin K content in IF and FOF, while the SCF (2003a) had proposed 4 μ g/100 kcal as the minimum
2498 and 20 μ g/100 kcal as the maximum content.

2499 **6.18.2. Vitamin K content of human milk**

2500 Mean vitamin K concentrations in human milk are around 2.5 μ g/L (0.38 μ g/100 kcal) but vary
2501 considerably from 0.85-9.2 μ g/L (0.13-1.4 μ g/100 kcal) (IoM, 2001).

2502 **6.18.3. Vitamin K requirements of infants**

2503 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2504 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a vitamin K
2505 intake of 5 μ g/day and 8.5 μ g/day was adequate for the majority of infants in the first and second half

2506 year of life respectively. These values were based on the guidance value proposed by the SCF (1993a)
2507 of 1 µg/kg body weight per day.

2508 **6.18.4. Vitamin K intakes of infants**

2509 Assuming a human milk intake of 0.8 L/day and a vitamin K content of 2.5 µg/L, an exclusively
2510 breast-fed infant would consume 2 µg vitamin K per day during the first six months of life. No
2511 information on vitamin K intakes in infants living in Europe is available.

2512 **6.18.5. Health consequences**

2513 Vitamin K is needed primarily for the synthesis of various factors and proteins involved in blood
2514 coagulation. Following the postnatal period when haemorrhagic disease of the neonate may develop,
2515 no studies have been conducted that assess any functional marker of vitamin K sufficiency or
2516 deficiency in infants and young children. The suggested associations between phyloquinone intakes
2517 and bone health or prevention of atherosclerosis are inconsistent (Nordic Council of Ministers, 2013).
2518 While low vitamin K stores at birth may predispose to haemorrhages in healthy neonates and young
2519 infants, later in life clinical consequences of vitamin K deficiency are seen almost exclusively in sick
2520 children. Natural vitamin K seem free of toxic side effects. The SCF concluded in its Opinion that
2521 there was no evidence of adverse effects associated with supplementary intakes of vitamin K in the
2522 form of phyloquinone of up to 10 mg/day for limited periods of time (SCF, 2003a).

2523 **6.18.6. Recommendations**

2524 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2525 a basis the intake levels of vitamin K considered adequate by the Panel for this age group of 5 µg/day,
2526 this converts into a required minimum vitamin K content of formula of 1 µg/100 kcal.

2527 Therefore, the Panel proposes a minimum vitamin K content in IF and FOF of 1 µg/100 kcal
2528 (0.24 µg/100 kJ).

2529 **6.19. Thiamin (vitamin B1)**

2530 **6.19.1. Current compositional requirements of IF and FOF**

2531 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2532 maximum thiamin contents in IF and FOF of 60 µg/100 kcal and 300 µg/100 kcal.

2533 **6.19.2. Thiamin content of human milk**

2534 The average content of thiamin in human milk is 200 µg/L (31 µg/100 kcal) (IoM, 1998) with a range
2535 of 150-330 µg/L (23-51 µg/100 kcal) (SCF, 2003a).

2536 **6.19.3. Thiamin requirements of infants**

2537 The SCF (1993a) defined the AR and PRI for thiamin for all age groups to be 72 µg/MJ
2538 (30 µg/100 kcal) and 100 µg/MJ (42 µg/100 kcal), respectively. In the Panel's previous Opinion on
2539 nutrient requirements and dietary intakes of infants and young children in the European Union (EFSA
2540 NDA Panel, 2013a), the Panel concluded that a thiamin intake of 200 µg/day and 300 µg/day was
2541 adequate for the majority of infants in the first half and in the second half of the first year of life,
2542 respectively.

2543 **6.19.4. Thiamin intakes of infants**

2544 Assuming a human milk intake of 0.8 L/day and a thiamin content of 200 µg/L, an exclusively breast-
2545 fed infant would consume 160 µg thiamin per day during the first six months of life. Mean/median
2546 thiamin intakes in mostly formula-fed infants from birth to six months were reported to range from
2547 around 150-700 µg/day (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008; Lennox
2548 et al., 2013) and in infants from 6 to < 12 months from around 300-1 000 µg/day (Noble and Emmett,

2549 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008; Marriott et al.,
2550 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

2551 **6.19.5. Health consequences**

2552 Thiamin in its phosphorylated forms is a coenzyme in the oxidative decarboxylation of 2-oxoacids, for
2553 example pyruvate, 2-oxoglutarate, branched-chain 2-oxoacids and in the transketolase reaction among
2554 hexose and pentose phosphates. of the rate of thiamin utilisation depends on carbohydrate intake and is
2555 related to energy intake. Thiamin deficiency as a consequence of dietary insufficiency has been shown
2556 to lead to growth restriction, recurrent infections and sudden infant death. Thiamin deficiency is rare
2557 in higher income countries but an outbreak of lactic acidosis and encephalopathy was reported in
2558 young infants who had received a formula unintentionally devoid of thiamin as the sole source of
2559 nutrition (Fattal-Valevski et al., 2005). There are no adverse effects known to be associated with
2560 excessive thiamin consumption. No UL for thiamin was set by the SCF (2001b).

2561 **6.19.6. Recommendations**

2562 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2563 a basis the intake levels of thiamin considered adequate by the Panel for this age group of 200 µg/day
2564 based on thiamin intakes from breast milk, this converts into a required minimum thiamin content in
2565 formula of 40 µg/100 kcal.

2566 Therefore, the Panel proposes a minimum thiamin content in IF and FOF of 40 µg/100 kcal
2567 (9.6 µg/100 kJ).

2568 **6.20. Riboflavin (vitamin B2)**

2569 **6.20.1. Current compositional requirements of IF and FOF**

2570 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2571 maximum riboflavin contents in IF and FOF of 80 µg/100 kcal and 400 µg/100 kcal.

2572 **6.20.2. Riboflavin content of human milk**

2573 The average content of riboflavin in human milk is around 350-600 µg/L (54-92 µg/100 kcal)
2574 (Picciano, 1995; IoM, 1998).

2575 **6.20.3. Riboflavin requirements of infants**

2576 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2577 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a riboflavin
2578 intake of 300 µg/day and 400 µg/day was adequate for the majority of infants in the first half and in
2579 the second half of the first year of life, respectively.

2580 **6.20.4. Riboflavin intakes of infants**

2581 Assuming a human milk intake of 0.8 L/day and a riboflavin content of 450 µg/L, an exclusively
2582 breast-fed infant would consume 360 µg riboflavin per day during the first six months of life.
2583 Mean/median riboflavin intakes in mostly formula-fed infants from birth to six months were reported
2584 to range from around 300-700 µg/day (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet,
2585 2008; Lennox et al., 2013) and in infants from 6 to < 12 months from around 500-1 400 µg/day (Noble
2586 and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008;
2587 Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

2588 **6.20.5. Health consequences**

2589 Riboflavin is a precursor of two flavin co-enzymes, flavin mononucleotide (FMN) and flavin adenine
2590 dinucleotide (FAD). FMN and FAD have a role in many biochemical reactions, as components of
2591 enzymes that catalyse oxidation/reduction reactions in numerous metabolic pathways. They are

2592 required for lipid degradation, synthesis of steroids and glycogen and amino acid metabolism. Flavo-
2593 enzymes are also involved in niacin synthesis from tryptophan, in the conversion of vitamin B6 into
2594 pyridoxalphosphate, and in the production of methyl-tetrahydrofolate. There is an interaction with iron
2595 metabolism. Dietary riboflavin deficiency is rare. It leads to non-specific symptoms, particularly of
2596 mucosal tissues (cheilosis, glossitis, keratitis, gastrointestinal disturbances) and in a late stadium to
2597 hypochromic anaemia. Excess riboflavin consumption has not been associated with adverse effects in
2598 humans. Therefore, no UL could be established by the SCF (2000a).

2599 **6.20.6. Recommendations**

2600 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2601 a basis the intake levels of riboflavin considered adequate by the Panel for this age group of
2602 300 µg/day based on riboflavin intakes from breast milk, this converts into a required minimum
2603 riboflavin content of formula of 60 µg/100 kcal.

2604 Therefore, the Panel proposes a minimum riboflavin content in IF and FOF of 60 µg/100 kcal
2605 (14.3 µg/100 kJ).

2606 **6.21. Niacin**

2607 **6.21.1. Current compositional requirements of IF and FOF**

2608 Directive 2006/141/EC provides for minimum and maximum niacin contents in IF and FOF of
2609 0.3 mg/100 kcal and 1.5 mg/100 kcal. The SCF (2003a) concluded in its Opinion on minimum and
2610 maximum contents in IF and FOF of 0.3 mg/100 kcal and 1.2 mg/100 kcal.

2611 **6.21.2. Niacin content of human milk**

2612 The average content of niacin in mature human milk from European mothers has been reported to be
2613 in the range of 1.8-2.2 mg/L (0.28-0.34 mg/100 kcal) (DHSS, 1977; Ford et al., 1983).

2614 **6.21.3. Niacin requirements of infants**

2615 Niacin requirements are given as niacin equivalents (NE), the sum of preformed niacin plus niacin
2616 produced from tryptophan (assuming that 60 mg tryptophan are equivalent to 1 mg NE); this definition
2617 is valid only when the diet contains both niacin and sufficient tryptophan. The niacin requirement is
2618 moreover dependent on the energy intake, with an AR and PRI for all age groups of 1.3 mg NE/MJ
2619 (0.55 mg NE/100 kcal) and 1.6 mg NE/MJ (0.67 mg NE/100 kcal), respectively.

2620 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2621 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a niacin intake
2622 of 2 mg NE/day and 5 mg NE/day was adequate for the majority of infants in the first half and in the
2623 second half of the first year of life, respectively. These values are in line with a more recent draft
2624 Opinion on DRVs for niacin endorsed by the Panel for public consultation (EFSA NDA Panel,
2625 2013d).

2626 **6.21.4. Niacin intakes of infants**

2627 Assuming a human milk intake of 0.8 L/day and a niacin content of 2 mg/L, an exclusively breast-fed
2628 infant would consume 1.6 mg niacin per day during the first six months of life. Mean/median niacin
2629 intakes in mostly formula-fed infants from birth to six months were reported to range from around
2630 4-10 mg NE/day (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet, 2008; Lennox et al.,
2631 2013) and in infants from 6 to < 12 months from around 4.5-14 mg NE/day (Noble and Emmett, 2001;
2632 Hilbig, 2005; DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir et al., 2008;
2633 Lennox et al., 2013).

2634 **6.21.5. Health consequences**

2635 Niacin, that is both nicotinic acid and nicotinamide, is the precursor of the nicotinamide nucleotide
2636 coenzymes nicotinic adenine dinucleotide (NAD) and nicotinamide adenine dinucleotide phosphate
2637 (NADP), which are crucial for many oxidation/reduction reactions and associated with both catabolic
2638 and anabolic processes. It can be provided in the diet and be formed in the human body from its
2639 precursor amino acid tryptophan. Long-term inadequate intake of niacin and tryptophan can lead to the
2640 development of pellagra. The profile of adverse effects after excessive intake of nicotinic acid and
2641 nicotinamide is different. For nicotinic acid the main adverse effects are flushing and hepatotoxicity.
2642 For nicotinamide no such adverse effects have been reported at intakes of several grams per day,
2643 except for hepatotoxicity in rare cases when slow-release preparations of nicotinamide were applied.
2644 The UL for children aged one to three years of nicotinic acid (2 mg/day) and nicotinamide
2645 (150 mg/day) have been derived from adult values on the basis of reference body weights (SCF,
2646 2002d).

2647 **6.21.6. Recommendations**

2648 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2649 a basis the intake levels of niacin considered adequate by the Panel for this age group of 2 mg/day
2650 based on niacin intakes from breast milk, this converts into a required minimum niacin concentration
2651 of 0.4 mg/100 kcal.

2652 Therefore, the Panel proposes a minimum niacin content in IF and FOF of 0.4 mg/100 kcal
2653 (0.10 mg/100 kJ). This is preformed niacin.

2654 **6.22. Pantothenic acid**

2655 **6.22.1. Current compositional requirements of IF and FOF**

2656 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2657 maximum pantothenic acid contents in IF and FOF of 0.4 mg/100 kcal and 2 mg/100 kcal.

2658 **6.22.2. Pantothenic acid content of human milk**

2659 The average content of pantothenic acid in human milk is reported to be around 2.5 mg/L
2660 (0.38 mg/100 kcal) (EFSA NDA Panel, 2014e).

2661 **6.22.3. Pantothenic acid requirements of infants**

2662 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2663 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a pantothenic
2664 acid intake of 2 mg/day and 3 mg/day was adequate for the majority of infants in the first half and in
2665 the second half of the first year of life, respectively. These values are in line with the more recent
2666 Opinion of the Panel on DRVs for pantothenic acid (EFSA NDA Panel, 2014e).

2667 **6.22.4. Pantothenic acid intakes of infants**

2668 Assuming a human milk intake of 0.8 L/day and a pantothenic acid content of 2.5 mg/L, an
2669 exclusively breast-fed infant would consume 2 mg pantothenic acid per day during the first six months
2670 of life. No information on pantothenic acid intakes in infants living in Europe is available.

2671 **6.22.5. Health consequences**

2672 Pantothenic acid is required in the synthesis of coenzyme A (CoA) and acyl carrier proteins and thus
2673 has a central role in a wide variety of metabolic pathways. Pantothenic acid deficiency is rare because
2674 of the wide spread nature of this nutrient. Deficiency occurs only in individuals on a diet free of
2675 pantothenic acid or given pantothenic acid antagonists (EFSA NDA Panel, 2013a). Pantothenic acid
2676 has a very low toxicity and minor adverse gastrointestinal effects occurred only at very high intake

2677 levels (10-20 g/day). The SCF estimated that no UL could be established for pantothenic acid (SCF,
2678 2002e).

2679 **6.22.6. Recommendations**

2680 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2681 the basis the intake levels of pantothenic acid considered adequate by the Panel for this age group of
2682 2 mg/day based on pantothenic acid intakes from breast milk, this converts into a required minimum
2683 pantothenic acid content of formula of 0.4 mg/100 kcal.

2684 Therefore, the Panel proposes a minimum pantothenic acid content in IF and FOF of 0.4 mg/100 kcal
2685 (0.10 mg/100 kJ).

2686 **6.23. Vitamin B6**

2687 **6.23.1. Current compositional requirements of IF and FOF**

2688 Directive 2006/141/EC provides for minimum and maximum vitamin B6 contents in IF and FOF of
2689 35 µg/100 kcal and 175 µg/100 kcal. The SCF (2003a) concluded in its Opinion on minimum and
2690 maximum contents in IF and FOF of 35 µg/100 kcal and 165 µg/100 kcal.

2691 **6.23.2. Vitamin B6 content of human milk**

2692 The content of vitamin B6 in breast milk varies greatly and is dependent on maternal intakes. The
2693 average concentration of vitamin B6 in milk of unsupplemented well-nourished mothers is 130 µg/L
2694 (20 µg/100 kcal), reflecting a maternal vitamin B6 intake of less than 2.5 mg/day (IoM, 1998). The
2695 pyridoxine content of human milk may be marginal for infants whose mothers' vitamin B6 intake is
2696 low.

2697 **6.23.3. Vitamin B6 requirements of infants**

2698 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2699 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a vitamin B6
2700 intake of 100 µg/day and 400 µg/day was adequate for the majority of infants in the first half and in
2701 the second half of the first year of life, respectively. The dietary requirement for vitamin B6 varies in
2702 relation to the dietary consumption of protein (Hansen et al., 1996).

2703 **6.23.4. Vitamin B6 intakes of infants**

2704 Assuming a human milk intake of 0.8 L/day and a vitamin B6 content of 130 µg/L, an exclusively
2705 breast-fed infant would consume 104 µg vitamin B6 per day during the first six months of life.
2706 Mean/median vitamin B6 intakes in mostly formula-fed infants from birth to six months were reported
2707 to range from around 200-500 µg/day (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet,
2708 2008; Lennox et al., 2013) and in infants from 6 to < 12 months from around 400-1 150 µg/day (Noble
2709 and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008;
2710 Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

2711 **6.23.5. Health consequences**

2712 Pyridoxine and pyridoxal found in plants and animal products, respectively, are converted to pyridoxal
2713 phosphate in tissues. Pyridoxal phosphate acts as a co-enzyme in the metabolic transformation of
2714 amino acids, decarboxylation, transamination and racemization, the metabolism of lipids and nucleic
2715 acids and in glycogen metabolism. Symptomatic dietary vitamin B6 deficiency was described in
2716 infants with pyridoxine responsive convulsive seizures in the early 1950s associated with hypochromic
2717 microcytic anaemia, vomiting, diarrhoea, failure to thrive, lethargy or hyper-irritability (Borschel,
2718 1995). It was concluded that an intake below 50 µg/day can cause vitamin B6 deficiency whilst an
2719 intake of about 70 µg/day did not. Reversible acute neuropathy and encephalopathy were observed in
2720 an infant with infantile type I hyperoxaluria at age 10 weeks under treatment with megadoses of

2721 pyridoxine (1 000 mg/day); symptoms disappeared with 400 mg/day (de Zegher et al., 1985). The UL
2722 for vitamin B6 is based on neurotoxicity which may appear in a mild form at doses of 100 mg/day in
2723 adults. By applying an uncertainty factor of 4, the UL of 25 mg for adults was derived. A UL for
2724 children 1-3 years of age of 5 mg/day has been set by extrapolation from adults (SCF, 2000b).

2725 **6.23.6. Recommendations**

2726 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2727 a basis the intake levels of vitamin B6 considered adequate by the Panel for this age group of
2728 100 µg/day based on vitamin B6 intakes from breast milk, this converts into a required minimum
2729 vitamin B6 content in formula of 20 µg/100 kcal.

2730 Therefore, the Panel proposes a minimum vitamin B6 content in IF and FOF of 20 µg/100 kcal
2731 (4.8 µg/100 kJ).

2732 **6.24. Biotin**

2733 **6.24.1. Current compositional requirements of IF and FOF**

2734 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2735 maximum biotin contents in IF and FOF of 1.5 µg/100 kcal and 7.5 µg/100 kcal.

2736 **6.24.2. Biotin content of human milk**

2737 The average content of biotin in human milk is around 5 µg/L (0.8 µg/100 kcal) (EFSA NDA Panel,
2738 2014c).

2739 **6.24.3. Biotin requirements of infants**

2740 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2741 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a biotin intake of
2742 4 µg/day and 6 µg/day was adequate for the majority of infants in the first half and in the second half
2743 of the first year of life, respectively. These values are in line with the more recent Opinion of the Panel
2744 on DRVs for biotin (EFSA NDA Panel, 2014c).

2745 **6.24.4. Biotin intakes of infants**

2746 Assuming a human milk intake of 0.8 L/day and a biotin content of 5 µg/L, an exclusively breast-fed
2747 infant would consume 4 µg biotin per day during the first six months of life. No information on biotin
2748 intakes in infants from birth to six months living in Europe is available. For infants from 6 to
2749 < 12 months of age data are available from one study only (DGE, 2008), which reported median biotin
2750 intakes of around 20-23 µg/day.

2751 **6.24.5. Health consequences**

2752 Biotin is a co-factor for the enzymes acetyl-CoA carboxylase, propionyl-CoA carboxylase,
2753 β-methylcrotonyl-CoA carboxylase and pyruvate carboxylase, which play critical roles in the synthesis
2754 of fatty acids, the catabolism of branched-chain amino acids and gluconeogenesis. Dietary biotin
2755 deficiency is rare and does not occur in breast-fed infants. It is characterised by fine scaly dermatitis,
2756 hair loss, conjunctivitis, ataxia and delayed child development. Cases of biotin deficiency have been
2757 observed in patients receiving long-term TPN without biotin supplementation and in patients with
2758 biotinidase deficiency, as well as in people who had consumed large amounts of raw eggs. The SCF
2759 estimated that no UL could be established for biotin (SCF, 2001c).

2760 **6.24.6. Recommendations**

2761 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2762 a basis the intake levels of biotin considered adequate by the Panel for this age group of 4 µg/day

2763 based on biotin intakes from breast milk, this converts into a minimum biotin content of formula of
2764 0.8 µg/100 kcal (rounding up to 1 µg/100 kcal).

2765 Therefore, the Panel proposes a minimum biotin content in IF and FOF of 1 µg/100 kcal
2766 (0.24 µg/100 kJ).

2767 **6.25. Folate**

2768 **6.25.1. Current compositional requirements of IF and FOF**

2769 Directive 2006/141/EC provides for minimum and maximum folate contents in IF and FOF of
2770 10 µg/100 kcal and 50 µg/100 kcal. In its Opinion, the SCF (2003a) concluded on minimum and
2771 maximum contents of folate in IF and FOF of 10 µg/100 kcal and 30 µg/100 kcal.

2772 **6.25.2. Folate content of human milk**

2773 The average content of folate in human milk was found to be around 80 µg/L (12.3 µg/100 kcal)
2774 (Houghton et al., 2009).

2775 **6.25.3. Folate requirements of infants**

2776 Because the absorption efficiency of folates varies depending on their chemical form, dietary folate
2777 equivalents (DFE) have been defined by IoM (1998) as 1 DFE = 1 µg food folate = 0.6 µg folic acid
2778 from fortified food or as a supplement consumed with food = 0.5 µg of a folic acid supplement taken
2779 on an empty stomach. In the Panel's previous Opinion on nutrient requirements and dietary intakes of
2780 infants and young children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded
2781 that a folate intake of 65 µg DFE/day and 80 µg DFE/day was adequate for the majority of infants in
2782 the first half and in the second half of the first year of life, respectively.

2783 **6.25.4. Folate intakes of infants**

2784 Assuming a human milk intake of 0.8 L/day and a folate content of 80 µg/L, an exclusively breast-fed
2785 infant would consume 64 µg folate per day during the first six months of life. None of the surveys
2786 conducted in infants from birth to below six months of life reported folate intakes as DFE. For infants
2787 from 6 to <12 months only the German VELs study (Verzehrsstudie zur Ermittlung der
2788 Lebensmittelaufnahme von Säuglingen und Kleinkindern) (DGE, 2008) reported folate intakes as
2789 DFE. Median folate intakes in this study were 62 µg and 78 µg DFE per day in girls and boys
2790 respectively.

2791

2792 **6.25.5. Health consequences**

2793 Folate is essential for one-carbon transfer reactions, including those involved in glycine/serine and
2794 homocysteine/methionine interconversion, and in purine and pyrimidine synthesis. Folate deficiency
2795 impairs *de novo* DNA synthesis and consequently cellular replication. Folate deficiency has also been
2796 associated with irritability, forgetfulness, neuropathy and depression. Poor folate status in the
2797 periconceptual period increases the risk for neural tube defects. Folate deficiency has not been
2798 reported in breast-fed infants even in mothers with low folate status. Excess dietary folate is mainly
2799 excreted in the urine. Consumption of high amounts of folic acid by subjects deficient in cobalamin
2800 increases the risk of neurological damage by masking the haematological manifestations of cobalamin
2801 deficiency. The SCF noted that in nearly all studies showing neurological damage, the folic acid dose
2802 was ≥ 5 mg folic acid/day which was taken to represent the Lowest Observed Adverse Effect Level
2803 (LOAEL). Using an uncertainty factor of 5 the UL for adults was set at 1 mg/day. The UL for folic
2804 acid for children aged one to three years of 200 µg/day was derived by extrapolation based on body
2805 weight (SCF, 2000c). A UL for food folate was not set.

2806 **6.25.6. Recommendations**

2807 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2808 a basis the intake levels of folate considered adequate by the Panel for this age group of 65 µg
2809 DFE/day based on folate intakes from breast milk, this converts into a minimum folate content in
2810 formula of 13 µg/100 kcal (rounded up to 15 µg/100 kcal).

2811 The Panel proposes a minimum folate content in IF and FOF of 15 µg DFE/100 kcal (3.6 µg
2812 DFE/100 kJ).

2813 **6.26. Cobalamin (vitamin B12)**

2814 **6.26.1. Current compositional requirements of IF and FOF**

2815 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2816 maximum cobalamin contents in IF and FOF of 0.1 µg/100 kcal and 0.5 µg/100 kcal.

2817 **6.26.2. Cobalamin content of human milk**

2818 The mean value in breast milk of a group of 24 healthy Californian women, most of whom had
2819 consumed supplements containing 6 µg cobalamin/day during pregnancy, was 1.2 µg/L
2820 (0.18 µg/100 kcal) (range: 0.2–5.0 µg/L (0.03–0.77 µg/100 kcal) (Lildballe et al., 2009). In a recent
2821 longitudinal study, cobalamin concentration of breast milk from 25 Danish mothers was measured at
2822 two weeks, four months and nine months of lactation (Greibe et al., 2013). Most women were taking
2823 daily multivitamins supplements, providing 1.0–4.5 µg cobalamin. Median (range) concentrations of
2824 cobalamin in hindmilk were 1.03 (0.28–2.55), 0.39 (0.19–0.94), and 0.60 (0.22–2.63) µg/L at two
2825 weeks, four months, and nine months, respectively. The respective concentrations per 100 kcal were
2826 0.16 (0.04–0.39), 0.06 (0.03–0.14), and 0.09 (0.03–0.40) µg/100 kcal.

2827 **6.26.3. Cobalamin requirements of infants**

2828 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2829 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a cobalamin
2830 intake of 0.4 µg/day and 0.5 µg/day was adequate for the majority of infants in the first half and in the
2831 second half of the first year of life, respectively.

2832 **6.26.4. Cobalamin intakes of infants**

2833 Assuming a human milk intake of 0.8 L/day and a cobalamin content of 0.5 µg/L, an exclusively
2834 breast-fed infant would consume 0.4 µg cobalamin per day during the first six months of life.
2835 Mean/median cobalamin intakes in mostly formula-fed infants from birth to six months were reported
2836 to range from around 1.3–1.8 µg/day (Noble and Emmett, 2006; Fantino and Gourmet, 2008; Lennox
2837 et al., 2013) and in infants from 6 to < 12 months from around 1.2–3.6 µg/day (Noble and Emmett,
2838 2001; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008; Marriott et al., 2008; Thorsdottir
2839 et al., 2008; Lennox et al., 2013).

2840 **6.26.5. Health consequences**

2841 In humans, cobalamin is required as a coenzyme for two reactions: the isomerisation of
2842 methylmalonyl-CoA to succinyl-CoA by mitochondrial methylmalonyl-CoA mutase and the
2843 methylation of homocysteine to methionine by methionine synthase. Cobalamin deficiency is rare in
2844 infants but can occur in infants breast-fed by vegan mothers with (subclinical) cobalamin deficiency.
2845 In infants, cobalamin deficiency results in cerebral atrophy and symptoms of encephalopathy with
2846 developmental retardation. No adverse effects have been associated with excess cobalamin intake
2847 from food or supplements in healthy individuals. No UL could be established by the SCF for
2848 cobalamin (SCF, 2000e).

2849 **6.26.6. Recommendations**

2850 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2851 a basis the intake levels of cobalamin considered adequate by the Panel for this age group of
2852 0.4 µg/day based on cobalamin intakes from breast milk, this converts into a minimum cobalamin
2853 content in formula of 0.08 µg/100 kcal (rounded up to 0.1 µg/100 kcal).

2854 Therefore, the Panel proposes a minimum cobalamin content in IF and FOF of 0.1 µg/100 kcal
2855 (0.02 µg/100 kJ).

2856 **6.27. Vitamin C**

2857 **6.27.1. Current compositional requirements of IF and FOF**

2858 Based on the Opinion of the SCF (2003a), Directive 2006/141/EC provides for minimum and
2859 maximum vitamin C contents in IF and FOF of 10 mg/100 kcal and 30 mg/100 kcal.

2860 **6.27.2. Vitamin C content of human milk**

2861 Mean vitamin C concentrations in human milk were reported to range from 35-90 mg/L
2862 (5.4-13.8 mg/100 kcal) (EFSA NDA Panel, 2013e). The amount of vitamin C excreted via breast milk
2863 depends on the vitamin C status of the mother, and the vitamin C content in human milk reflects
2864 maternal vitamin C intake more than the infant's requirement (WHO/FAO, 2004).

2865 **6.27.3. Vitamin C requirements of infants**

2866 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2867 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a vitamin C
2868 intake of 20 mg/day was adequate for the majority of infants.

2869 **6.27.4. Vitamin C intakes of infants**

2870 Assuming a human milk intake of 0.8 L/day and a vitamin C content of 60 mg/L, an exclusively
2871 breast-fed infant would consume 48 mg vitamin C per day during the first six months of life.
2872 Mean/median vitamin C intakes in mostly formula-fed infants from birth to six months were reported
2873 to range from around 40-90 mg/day (Hilbig, 2005; Noble and Emmett, 2006; Fantino and Gourmet,
2874 2008; Lennox et al., 2013) and in infants from 6 to < 12 months from around 33-94 mg/day (Noble
2875 and Emmett, 2001; Hilbig, 2005; de Boer et al., 2006; DGE, 2008; Fantino and Gourmet, 2008;
2876 Marriott et al., 2008; Thorsdottir et al., 2008; Lennox et al., 2013).

2877 **6.27.5. Health consequences**

2878 Vitamin C (L-ascorbic acid and dehydroascorbic acid) is an enzyme cofactor for biochemical reactions
2879 catalysed by mono-oxygenases, dioxygenases and mixed function oxygenases. Vitamin C plays an
2880 important role in the biosynthesis of collagen, is essential for the synthesis of carnitine and
2881 catecholamines, and is also involved in the metabolism of cholesterol to bile acids. Vitamin C in
2882 aqueous solution readily scavenges reactive oxygen and nitrogen species, as well as singlet oxygen
2883 and hypochlorite, and is part of the antioxidant network of the body (EFSA NDA Panel, 2013e). Frank
2884 vitamin C deficiency leads to scurvy but has been observed only after the sixth month of life in infants
2885 fed a diet consisting of cow's milk with no fruits and vegetables. Vitamin C is of low acute toxicity
2886 and available data on adverse effects are limited. No UL has been set by the Panel but available human
2887 data suggest that supplemental daily doses of vitamin C up to about 1 g in addition to normal dietary
2888 intakes in adults are not associated with adverse effects (EFSA, 2004).

2889 **6.27.6. Recommendations**

2890 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2891 the basis the intake levels of vitamin C considered adequate by the Panel for this age group of

2892 20 mg/day, based on three times the amount known to prevent scurvy, this converts into a minimum
2893 vitamin C content of formula of 4 mg/100 kcal.

2894 Therefore, the Panel proposes a minimum vitamin C content in IF and FOF of 4 mg/100 kcal
2895 (0.96 mg/100 kJ).

2896 **7. Maximum content of micronutrients in IF and FOF**

2897 As the different protein and fat sources used in the manufacture of formula and the water used to
2898 reconstitute powdered formula contribute to the total nutrient content of a formula in varying amounts,
2899 maximum contents of nutrients have been established in order to ensure the safe use of formula while
2900 limiting technological manipulations of the natural nutrient content of food constituents used in the
2901 production of formulae.

2902 From a nutritional point of view, the minimum contents proposed by the Panel cover the nutritional
2903 needs of virtually all healthy infants born at term and there is no need to exceed these amounts in
2904 formulae, as nutrients which are not used or stored have to be excreted and this may put a burden on
2905 the infant's metabolism. Therefore, the Panel emphasises that maximum amounts should not be
2906 interpreted as target values but rather as upper limits of a range which should not be exceeded.

2907 Specifications for the currently permitted maximum amounts of micronutrients in formulae were
2908 generally calculated as three to five times the minimum amounts established at the time, took into
2909 account established history of apparent safe use (Codex Stan 72-1981, Codex Stan 156-1987, the
2910 Directive 2006/141/EC, and the SCF (2003a)), and were not based on scientific evidence for adverse
2911 effects owing to the lack of such evidence for most nutrients.

2912 The Panel notes that there are no reports on any adverse effects associated with the use of formulae
2913 complying with the current specifications as laid down in Directive 2006/141/EC, although there are
2914 no studies available which were designed to investigate the short or long-term health consequences of
2915 consumption of formulae containing the currently permitted maximum amounts of micronutrients in
2916 IF or FOF.

2917 The Panel acknowledges that the scientific data available to derive ULs for infants remain scarce for
2918 most micronutrients and only for vitamin D a UL for infants could be set (EFSA NDA Panel, 2012b).
2919 For magnesium, zinc, selenium, iodine, molybdenum, vitamin A, niacin, vitamin B6 and folic acid,
2920 ULs for children aged one to three years have been established (SCF, 2000b, 2000c, 2000d, 2000g,
2921 2001a, 2002b, 2002d, 2002a, 2002c). Assuming an energy intake from formula of 500 kcal/day
2922 (average of the AR for energy of boys and girls aged three to four months), regular consumption of a
2923 formula by an infant containing the currently permitted maximum amounts of zinc, iodine, vitamin A
2924 and folate (if the whole amount is provided in the form of folic acid) would imply that the ULs would
2925 be exceeded for these nutrients. Assuming an energy intake from formula of 700 kcal/day (highest
2926 observed mean energy intakes in infants below six months of age), intakes of selenium would also
2927 exceed the UL. The Panel acknowledges that the ULs used in this estimation were those derived for
2928 young children and there is considerable uncertainty with respect to the extrapolation to infants.

2929 **8. Specifications for other ingredients in IF and FOF**

2930 **8.1. Choline**

2931 Choline is currently mandatory in IF and Directive 2006/141/EC provides for minimum and maximum
2932 choline contents of 7 mg/100 kcal and 50 mg/100 kcal, respectively. In its Opinion, the SCF (2003a)
2933 concluded on minimum and maximum contents of choline in IF of 7 mg/100 kcal and 30 mg/100 kcal.

2934 In human milk, choline is found as free choline, phosphocholine, glycerophosphocholine,
2935 sphingomyelin, and phosphatidylcholine all of which are available to the nursing infant. Total choline
2936 concentrations in human milk are influenced by maternal choline intake, length of lactation and

2937 genetic polymorphisms. The concentration of total choline in mature milk is 160-210 mg/L
2938 (25-32 mg/100 kcal) (Holmes-McNary et al., 1996; Holmes et al., 1996). In one study (reported in two
2939 publications) mean choline levels were found to range between 144 and 170 mg/L
2940 (22-26 mg/100 kcal) and to increase from 70 mg/L (11 mg/100 kcal) in colostrum to 151 mg/L
2941 (23 mg/100 kcal) (range 57-318 mg/L (9-49 mg/100 kcal)) in mature milk (Ilcol et al., 2005; Allen,
2942 2012). In a second study (Fischer et al., 2010) comparing breast milk concentrations in
2943 unsupplemented and supplemented mothers, the average choline content in breast milk amounted to
2944 125 and 149 mg/L (19 and 23 mg/100 kcal), respectively. The average total choline concentration in
2945 mature human milk can be taken to be around 160 mg/L (20 mg/100 kcal).

2946 Choline is predominantly provided via the diet, but the human body can also form choline *de novo* via
2947 two pathways that both lead to phosphatidylcholine. The extent to which choline is a required dietary
2948 constituent under normal circumstances is not clear. However, in conditions of increased need or of
2949 impaired synthesis, choline is considered to be conditionally indispensable. Choline has a number of
2950 important functions: it is a precursor of phospholipids, platelet activating factor, betaine and the
2951 neurotransmitter acetylcholine and it is involved in the metabolism and transport of lipids. Dietary
2952 deficiency of choline in adults has been reported to cause liver steatosis (Buchman et al., 1995) and
2953 liver (Zeisel et al., 1991) and muscle damage (Fischer et al., 2007). Choline was not considered in the
2954 derivation of ULs in the EU. . A UL for choline of 1 g/day for children aged one to three years has
2955 been set by IoM (1998). The UL was extrapolated from the UL of adults based on relative body
2956 weights. The UL for adults was based on a case report of hypotension and several studies involving
2957 cholinergic effects and fishy body odour after oral administration of large doses of choline. No UL for
2958 infants was set owing to the lack of data and concerns about the infant's ability to handle excess
2959 amounts.

2960 In the Panel's previous Opinion on nutrient requirements and dietary intakes of infants and young
2961 children in the European Union (EFSA NDA Panel, 2013a), the Panel concluded that a choline intake
2962 of 130 mg/day was adequate for the majority of infants below six months of age and of 150 mg/day
2963 for infants from 6 to < 12 months.

2964 Assuming an average energy intake of an infant below six months of age of 500 kcal/day and taking as
2965 a basis the intake level of choline considered adequate by the Panel for this age group of 130 mg/day
2966 based on choline intakes from breast milk, this converts into a minimum choline content in formula of
2967 26 mg/100 kcal (rounded down to 25 mg/100 kcal). Therefore, the Panel proposes a minimum choline
2968 content in IF of 25 mg/100 kcal (6.0 mg/100 kJ) and. The addition of choline to FOF is not necessary.

2969 **8.2. There are no reports on adverse effects occurring with the current specifications of**
2970 **choline in IF. Inositol**

2971 Inositol is currently mandatory in IF and Directive 2006/141/EC provides for minimum and maximum
2972 inositol contents of 4 mg/100 kcal and 40 mg/100 kcal, respectively, in line with the SCF (2003a).

2973 In addition to sugars such as lactose, glucose, galactose and mannose, human milk also contains sugar
2974 alcohols/polyols, in particular inositol, mostly as myo-inositol, either free or in phosphorylated forms.
2975 The myo-inositol concentration has been found to be higher in colostrum and reaches a relatively
2976 stable concentration of around 130-325 mg/L (20-50 mg/100 kcal) in mature human milk (Cavalli et
2977 al., 2006; Jóźwwik et al., 2013). Inositol plays a role in many important biological functions including
2978 the regulation of cell osmolality, processes of cell signalling, as structural components of the
2979 developing neural system and in the production of the phospholipids for pulmonary surfactant.
2980 Endogenous *de-novo* synthesis of inositol appears to be efficient in newborn infants. Together with
2981 inositol provided by human milk, this makes it unlikely that healthy, term, breast-fed infants could
2982 become depleted of inositol (Brown LD et al., 2009). However, it is not known if endogenous inositol
2983 synthesis is sufficient in the absence of dietary inositol.

2984 Considering that it is unknown if endogenous synthesis of inositol in newborns is sufficient in the
2985 absence of dietary inositol, the Panel proposes to maintain the minimum inositol content in IF of
2986 4 mg/100 kcal (0.96 mg/100 kJ) proposed in 2003 by the SCF. The Panel considers that the addition of
2987 inositol to FOF is not necessary, as the supply from complementary food is sufficient in older infants.

2988 There are no reports on adverse effects occurring with the current specifications of inositol in IF.

2989 **8.3. Taurine**

2990 The addition of taurine to IF and FOF is currently permitted by Directive 2006/141/EC on a voluntary
2991 basis up to a maximum of 12 mg/100 kcal. Taurine concentrations in term milk have been found to be
2992 around 4.7 mg/100 kcal (Zhang et al., 2013) with highest observed taurine concentrations of around
2993 12 mg/100 kcal (Rassin et al., 1978).

2994 It has been suggested that taurine plays a role in intestinal fat absorption, hepatic function, and
2995 auditory and visual development in pre-term or low-birth-weight infants. However, clinical data on
2996 long-term effects on neurological development in these infants are lacking (Verner et al., 2007) as is
2997 evidence that the addition of taurine to IF has any clinical benefits for term infants.

2998 Taking into account the lack of convincing evidence for a benefit of the addition of taurine to IF
2999 and/or FOF, the Panel considers that the addition of taurine to IF or FOF is not necessary.

3000 There are no reports on adverse effects occurring with the current specifications of taurine in formula.

3001 **8.4. L-Carnitine**

3002 The addition of L-carnitine at an amount of at least 1.2 mg/100 kcal is currently mandatory for IF
3003 containing ISP or protein hydrolysates but not for IF based on cow's or goat's milk protein, as the
3004 latter were considered to provide L-carnitine naturally from the respective milk source.

3005 L-Carnitine is considered an indispensable nutrient for newborn infants because of a temporarily
3006 insufficient synthesising capacity. In studies investigating L-carnitine concentrations in milk from
3007 different species, mean total carnitine concentrations have been reported to be in the range of
3008 0.9-1.6 mg/100 kcal in human milk (Sandor et al., 1982; Penn et al., 1987; Ferreira, 2003),
3009 4.1-6.7 mg/100 kcal in cow's milk (Sandor et al., 1982; Penn et al., 1987; Ferreira, 2003) and
3010 3.2-4.4 mg/100 kcal in goat's milk (Sandor et al., 1982; Penn et al., 1987). The natural carnitine
3011 content of animal milks may be decreased by dilution or fractionation of the milk source when cow's
3012 and goat's milk proteins are used in the manufacture of IF. Therefore, a minimum L-carnitine content
3013 should be also set for IF based on milk protein.

3014 The Panel notes that no new data have become available since the Opinion of the SCF (2003a) which
3015 would indicate that a minimum content of L-carnitine of 1.2 mg/100 kcal in IF is insufficient to ensure
3016 adequate growth and development of infants. The Panel proposes a minimum L-carnitine content in IF
3017 of 1.2 mg/100 kcal (0.3 mg/100 kJ), irrespective of the protein source used, which is an amount
3018 similar to the content of L-carnitine in human milk. The Panel considers that the addition of L-carnitine
3019 to FOF is not necessary, as the supply from complementary food and from endogenous synthesis is
3020 sufficient in older infants.

3021 **8.5. Nucleotides and nucleosides**

3022 The addition of nucleotides to IF and FOF is currently permitted by Directive 2006/141/EC on a
3023 voluntary basis up to a maximum of 5 mg/100 kcal. If added, the maximum nucleotide content is
3024 regulated to be: cytidine 5'-monophosphate (CMP) 2.5 mg/100 kcal, uridine 5'-monophosphate
3025 (UMP) 1.75 mg/100 kcal, adenosine 5'-monophosphate (AMP) 1.50 mg/100 kcal, guanosine 5'-
3026 monophosphate (GMP) 0.50 mg/100 kcal, inosine 5'-monophosphate (IMP) 1.00 mg/100 kcal.

3027 Nucleotides and nucleosides are dispensable nutrients synthesised *de novo* in human metabolism.
3028 Nucleotides are structural components of ribonucleic acid (RNA) and DNA. Nucleotides, such as
3029 ATP, transfer chemical energy. Other nucleotides are involved in the synthesis of proteins, lipids and
3030 carbohydrates (e.g. NAD, FAD) (SCF, 2003a).

3031 Human milk contains free nucleosides, free nucleotides, RNA and DNA. The concentrations of “total
3032 potentially available nucleotides”, defined by some authors as the sum of free nucleosides, free
3033 nucleotides, nucleotide-containing adducts (such as NAD and uridinediphosphate (UDP) glucose), and
3034 nucleotide polymers were reported to be around 10.5-11.0 mg/100 kcal in milk from Asian, American
3035 and European mothers. The major sources were nucleotide polymers, primarily RNA, (around
3036 43-48 %), free nucleotides (around 36-40 %) and free nucleosides (around 6.5-8 %) (Leach et al.,
3037 1995; Tressler et al., 2003). Average concentrations of nucleotides in human milk were observed to be
3038 in the range of around 0.7-4.5 mg/100 kcal for CMP, 0.3-2.3 mg/100 kcal for UMP,
3039 0.05-1.9 mg/100 kcal for GMP, 0.2-1.7 mg/100 kcal and 0-1.4 mg/100 kcal for IMP (Gil and Sanchez-
3040 Medina, 1982; Janas and Picciano, 1982; Leach et al., 1995; Thorell et al., 1996; Tressler et al., 2003;
3041 Liao et al., 2011) with four studies out of six reporting IMP concentrations below the limit of
3042 detection.

3043 It should be noted that the presence of nucleotides and nucleosides in human milk does not necessarily
3044 indicate a specific benefit for the infants as they may also be by-products of milk formation that reflect
3045 metabolic activity of the mammary gland tissue, shedding of somatic cells and occurrence of
3046 microorganisms, without having a specific function for the infant (SCF, 2003a).

3047 Nucleotides have been studied in healthy term infants with respect to their effect on clinically relevant
3048 outcomes such as antibody titres after vaccination (Pickering et al., 1998; Yau et al., 2003; Schaller et
3049 al., 2004), the incidence or severity of infections (Carver et al., 1991; Brunser et al., 1994; Yau et al.,
3050 2003), the incidence of diarrhoea (Brunser et al., 1994; Yau et al., 2003; Singhal et al., 2008) and
3051 growth (Carver et al., 1991; Pickering et al., 1998; Lasekan et al., 1999; Yau et al., 2003; Schaller et
3052 al., 2004; Singhal et al., 2010). The Panel notes that even if effects on some of the antibody titres
3053 measured in the studies were observed, these effects were not consistent and that no effects of
3054 nucleotides on the incidence or severity of infections, on the incidence of diarrhoea, and on growth
3055 were observed.

3056 Taking into account the lack of convincing evidence for a benefit of the addition of nucleotides to IF
3057 and/or FOF, the Panel considers that the addition of nucleotides to IF or FOF is not necessary.

3058 There are no reports on adverse effects occurring with the current specifications of nucleotides in
3059 formula.

3060 **8.6. “Probiotics” and “synbiotics”**

3061 The addition of live microorganisms to IF and FOF was not mentioned in the corresponding Directives
3062 except for production of acidified IF and FOF, for which the use of non-pathogenic L (+)-lactic acid
3063 producing bacterial cultures is permitted (Regulation (EC) No 1333/2008). However, according to
3064 Directive 2006/141/EC, IF and FOF may contain other food ingredients than those listed in Annex I
3065 and II, provided those ingredients have been shown to be suitable for infants through a systematic
3066 review of the available data or, when necessary, by appropriate studies (Article 5 and 6).

3067 IF and FOF with added live bacteria, claiming to confer health benefits (known as “probiotics”), have
3068 been introduced into the EU market. Several bacterial strains included in IF and FOF have been
3069 evaluated with regard to safety and potential beneficial health effects to date. These include,
3070 *Bifidobacterium animalis* subsp. *lactis* CNCMI-3446 (also named *B. bifidum* and *B. lactis* Bb12),
3071 alone or in combination with either *Streptococcus thermophilus* or with both *S. thermophilus* and
3072 *Lactobacillus helveticus*, *L. johnsonii* La1, *B. longum* BL999 plus *L. rhamnosus* LPR, *L. rhamnosus*
3073 GG, *L. reuteri* ATCC 55730, *L. salivarius* CECT5713 and *L. fermentum* CECT5716 (Braegger et al.,
3074 2011; Gil-Campos et al., 2012; Maldonado et al., 2012; Mugambi et al., 2012).

3075 The health outcomes evaluated in RCTs include growth, gastrointestinal infections/diarrhoea,
3076 respiratory tract infections/symptoms, colic/irritability, allergic manifestations, stool frequency and
3077 consistency, and antibody production (Braegger et al., 2011; Gil-Campos et al., 2012; Holscher et al.,
3078 2012; Mugambi et al., 2012; Szajewska and Chmielewska, 2013).

3079 The most recent systematic reviews (Mugambi et al., 2012; Szajewska and Chmielewska, 2013)
3080 concluded that many of the studies conducted with IF and FOF supplemented with “probiotic” bacteria
3081 did not exert significant physiological or health effects compared to non-supplemented formulae.
3082 These reviews also revealed uncertainty regarding the beneficial effects reported for formula
3083 supplemented with some of the strains through lack of consistency across studies, to methodological
3084 limitations and to the existence of data from single studies only (Braegger et al., 2011; Szajewska and
3085 Chmielewska, 2013). Such uncertainty applies to the effects of IF supplemented with *B. animalis*
3086 subsp. *lactis* CNCMI-3446 (alone or in combination) on diarrhoea, which were not consistent across
3087 studies with substantial methodological limitations and also applies to the effects of other strains
3088 evaluated only in single studies such as *L. johnsonii* La1 and *L. salivarius* CECT5713 on diarrhoea,
3089 *L. salivarius* CECT 5713 on respiratory tract infections, and *L. rhamnosus* LGG on defecation
3090 frequency and stool consistency (Braegger et al., 2011).

3091 A couple of recent studies have evaluated the effects of the strain *L. fermentum* CECT 5716, isolated
3092 from human milk, added to GOS containing IF compared to the same IF without the bacterium. The
3093 first study was designed to evaluate the safety and tolerance of the IF supplemented with *L. fermentum*
3094 CECT 5716 in infants of one to six months of age and, as secondary outcomes, also evaluated
3095 infections, reporting reductions in the incidence rate of gastrointestinal infections, but not of
3096 respiratory or total infections (Gil-Campos et al., 2012). The second study was conducted on healthy
3097 six-month-old infants and reported reductions in the incidence rate of gastrointestinal and upper
3098 respiratory tract infections, but not on lower respiratory tract infections, otitis, urinary tract infections
3099 or febrile episodes, between the ages of 6 and 12 months in the *L. fermentum* CECT 5716 group
3100 compared to the control group (Maldonado et al., 2012). The Panel notes that the two studies were not
3101 consistent regarding the effects on respiratory tract infections and that one of the studies on
3102 gastrointestinal infections was not designed for this purpose but for evaluating safety. Another recent
3103 single study reported that *B. animalis* subsp. *lactis* CNCMI-3446 added to formula containing partially
3104 hydrolysed whey protein increased anti-poliovirus-specific immunoglobulin A (IgA) concentration
3105 ($p < 0.05$) but not anti-rotavirus-specific IgA, following immunisation, and only in a subgroup of
3106 caesarean delivered infants (Holscher et al., 2012).

3107 IF and FOF containing “probiotics” have also been studied in relation to any potential untoward
3108 effects, such as delayed growth, diarrhoea and allergic reactions (Braegger et al., 2011; Gil-Campos et
3109 al., 2012; Maldonado et al., 2012; Azad et al., 2013). It has been generally concluded that currently
3110 evaluated “probiotic”-supplemented IF do not raise safety concerns with regard to growth or other
3111 adverse effects, although in many studies adverse events were inconsistently reported (Azad et al.,
3112 2013) and further evaluations of safety in long-term studies are needed (Braegger et al., 2011).

3113 A few studies have been conducted with IF or FOF supplemented with combinations of “probiotics”
3114 and “prebiotics” (named “synbiotics”) on growth, infections, asthma/wheezing, crying and stool
3115 frequency/constipation (reviewed by Braegger et al., 2011; and Azad et al., 2013). The synbiotics
3116 evaluated in RCTs in infants include: *B. longum* BL999 plus GOS/FOS, *B. longum* BL999 plus *L.*
3117 *rhamnosus* LPR plus GOS/FOS, *B. longum* BL999 plus *Lactobacillus paracasei* ST11 plus GOS/FOS,
3118 *L. paracasei* subsp. *paracasei* plus *B. animalis* subsp. *lactis* plus GOS and *Bifidobacterium breve* M-
3119 16V plus GOS/FOS. The evidence on the effectiveness is very limited and only data from single
3120 studies are available. These have reported effects on increased stool frequency for three of the
3121 synbiotics tested (*B. longum* BL999 plus GOS/FOS, *B. longum* BL999 plus *L. rhamnosus* LPR plus
3122 GOS/FOS and *L. paracasei* subsp. *paracasei* plus *B. animalis* subsp. *lactis* plus GOS) (reviewed by
3123 Braegger et al., 2011) and on parents-reported asthma-like symptoms, but not on total serum IgE and
3124 specific IgE against aeroallergens (van der Aa et al., 2011 reviewed by Azad et al., 2013).

3125 Safety of “synbiotics” added to IF and FOF has also been evaluated concluding that they do not raise
3126 concerns with regard to growth or other adverse effects, although evidence is limited (Braegger et al.,
3127 2011).

3128 The Panel notes that evidence available on beneficial effects of IF or FOF supplemented with
3129 “probiotics” and “synbiotics” on infant health mainly comes from single studies and studies with
3130 methodological limitations or it is inconsistent across the few studies that are comparable. Therefore,
3131 the Panel considers that there is insufficient information to draw conclusions on beneficial effects on
3132 infant health of “probiotics” added to IF and FOF and even less in the case of synbiotics. There is no
3133 evidence to raise concerns about the safety of the tested “probiotics” or “synbiotics”.

3134 Taking into account the lack of convincing evidence for a benefit of the addition of “probiotics” or
3135 “synbiotics” to IF and/or FOF, the Panel considers that the addition of “probiotics” and/or “synbiotics”
3136 to IF or FOF is not necessary.

3137 **9. Use of formulae by young children**

3138 The Panel was also asked to advise the Commission with respect to the appropriate age range of use
3139 and the essential composition of so-called “growing-up milks” or young-child formulae.

3140 In its previous Opinion (EFSA NDA Panel, 2013a) the Panel considered that, despite the fact that an
3141 adequate amount of energy and nutrients can be supplied by a balanced and varied diet, intakes of
3142 ALA, DHA, iron, vitamin D and iodine in some infants and young children living in Europe are low
3143 and some sub-groups in this population may be at risk of inadequacy.

3144 In the same Opinion the Panel noted that formulae, including young-child formulae, are one of several
3145 means to increase intakes of these critical nutrients in infants and young children living in Europe with
3146 inadequate or at risk of inadequate status of these nutrients. However, other means, such as fortified
3147 cow’s milk, fortified cereals and cereal-based foods, supplements or the early introduction of meat and
3148 fish into complementary feeding and their continued regular consumption, are efficient alternatives to
3149 increase intakes of these nutrients. The selection of the appropriate form and vehicle through which
3150 these nutrients are provided in the diet will depend on national dietary habits, health authorities, the
3151 regulatory context and caregivers’ preference.

3152 The Panel concluded that no unique role of young-child formulae with respect to the provision of
3153 critical nutrients in the diet of infants and young children living in Europe can be identified, so that
3154 they cannot be considered as a necessity to satisfy the nutritional requirements of young children when
3155 compared to other foods that may be included in the normal diet of young children. The median
3156 content of ALA, DHA (if added), iron, vitamin D and iodine in currently marketed young-child
3157 formulae is within the range of permitted concentrations in FOF and, except for iron, also in IF. The
3158 Panel notes that formula consumed during the first year of life can continue to be used by young
3159 children. Therefore, the Panel does not consider it necessary to propose specific compositional criteria
3160 for formulae consumed after one year of age.

3161 **10. Recommendations for further research**

3162 The Panel emphasises:

- 3163 • the necessity to generate reliable analytical data on the amino acid pattern of human milk
3164 protein at different stages of lactation;
- 3165 • the necessity for appropriate studies to fill the gaps in the knowledge of protein requirements
3166 of infants in the second half of the first year of life;
- 3167 • the lack of human studies evaluating the safety and adequacy of most IF and FOF presently on
3168 the market containing protein hydrolysates;

3169 • the necessity to generate data on the decrease of bioavailability of certain amino acids through
3170 different methods of processing;

3171 • the lack of non-digestible oligosaccharides that mimic those present in human milk and
3172 appropriate human studies evaluating the safety and potential health benefits of non-digestible
3173 oligosaccharides and bacteria whose growth in the infant's gut is promoted by breast-milk.

3174 CONCLUSIONS

3175 The Panel concludes that:

3176 • There is consensus that breast milk is the preferred food for all healthy infants and provides an
3177 adequate supply of all nutrients to support healthy growth and development (with the
3178 exception of vitamin K during the first weeks of life and of vitamin D).

3179 • All formulae intended for infants must be safe and suitable in meeting the nutritional
3180 requirements and to promote growth and development of infants born at term when used as a
3181 sole source of nutrition during the first months of life and when used as the principal liquid
3182 element in a progressively diversified diet after the introduction of appropriate complementary
3183 feeding. Nutrients and substances should be added to formulae for infants only in amounts that
3184 serve a nutritional or other health benefit.

3185 • The minimum content of a nutrient in formula proposed in this Opinion is derived from the
3186 intake levels the Panel had considered adequate for the majority of infants in the first half of
3187 the first year of life in its previous Opinion and an average amount of formula consumed
3188 during this period (500 kcal/day). From a nutritional point of view, the minimum contents
3189 proposed by the Panel cover the nutritional needs of virtually all healthy infants born at term
3190 and there is no need to exceed these amounts in formulae, as nutrients which are not used or
3191 stored have to be excreted and this may put a burden on the infant's metabolism and/or
3192 physiological functions.

3193 • Specifications for the currently permitted maximum amounts of micronutrients in formulae
3194 were generally calculated as three to five times the minimum amounts established at the time
3195 and took into account established history of apparent safe use (Codex Stan 72-1981, Codex
3196 Stan 156-1987, the Directive 2006/141/EC, and SCF (2003a)) and were not based on scientific
3197 evidence for adverse effects owing to the lack of such evidence for most nutrients. It is
3198 emphasised that maximum amounts should not be interpreted as target values but rather as
3199 upper limits of a range which should not be exceeded.

3200 • There are no reports on any adverse effects associated with the use of formulae complying
3201 with the current specifications for micronutrients as laid down in Directive 2006/141/EC,
3202 although there are no studies available which were designed to investigate the short or long-
3203 term health consequences of consumption of formulae containing the currently permitted
3204 maximum amounts of micronutrients in IF or FOF. Assuming an energy intake from formula
3205 of 500 kcal/day (average of the AR for energy of boys and girls aged three to four months),
3206 regular consumption of a formula by an infant containing the currently permitted maximum
3207 amounts of zinc, iodine, vitamin A and folate (if the whole amount is provided in the form of
3208 folic acid) would imply that the ULs would be exceeded for these nutrients. Assuming an
3209 energy intake from formula of 700 kcal/day (highest observed mean energy intakes in infants
3210 below six months of age), intakes of selenium would also exceed the UL. The Panel
3211 acknowledges that the ULs used in this estimation were those derived for young children and
3212 there is uncertainty with respect to the extrapolation to infants.

3213 • Cow's milk, goat's milk and ISP are safe and suitable protein sources for use in IF and FOF
3214 based on intact protein. The use of other protein sources in IF and FOF and/or the introduction

3215 of new technologies need clinical evaluation and their safety and suitability should be
 3216 established in the target population prior to their general use in IF and FOF.

3217 • Formulae containing protein hydrolysates are insufficiently characterised by the declared
 3218 protein content even if they fulfil regulatory criteria concerning amino acid patterns and
 3219 contents; therefore the safety and suitability of each specific IF or FOF containing protein
 3220 hydrolysates has to be established by clinical evaluation.

3221 • The use of a default conversion factor of 6.25 to calculate the protein content from the total
 3222 nitrogen content is proposed, irrespective of the protein source.

3223 • IF and FOF should provide on an energy basis indispensable and conditionally indispensable
 3224 amino acids in amounts at least equal to the reference protein (i.e. breast milk), irrespective of
 3225 the protein source and the following reference pattern is proposed:

Amino acid	mg/100 g protein	mg/100 kcal	mg/100 kJ
Cysteine	2.1	38	9
Histidine	2.2	40	10
Isoleucine	5.0	90	22
Leucine	9.2	166	40
Lysine	6.3	113	27
Methionine	1.3	23	5
Phenylalanine	4.6	83	20
Threonine	4.3	77	18
Tryptophan	1.8	32	8
Tyrosine	4.2	76	18
Valine	4.9	88	21

3226 • The sum of methionine and cysteine and the sum of tyrosine and phenylalanine in IF may be
 3227 used for calculation purposes. If the ratio between methionine to cysteine and the ratio
 3228 between tyrosine and phenylalanine, respectively, exceeds two, this must be justified by
 3229 clinical evaluation. For FOF no restrictions with respect amino acid ratios need to apply,
 3230 owing to the fact that complementary foods will contribute to amino acid intakes and the
 3231 metabolism of older infants is more mature with respect to the capacity to convert methionine
 3232 to cysteine and phenylalanine to tyrosine.
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- The following composition of IF and FOF based on intact cow's and goat's milk protein is proposed:

	Unit	Range		Unit	Range	
		IF	FOF		IF	FOF
Energy	kcal/100 mL	60-70		kJ/100 mL	250-293	
Protein	g/100 kcal	1.8-2.5		g/100 kJ	0.43-0.60	
Total fat	g/100 kcal	4.4-6.0		g/100 kJ	1.1-1.4	
LA	mg/100 kcal	500-1 200		mg/100 kJ	120-300	
ALA	mg/100 kcal	50-100		mg/100 kJ	12-24	
DHA	mg/100 kcal	20-50		mg/100 kJ	4.8-12	
TFA	FA%	≤ 3		FA%	≤ 3	
Carbohydrates	g/100 kcal	9-14		g/100 kJ	2.2-3.3	
Lactose, unless	g/100 kcal	≥ 4.5		g/100 kJ	≥ 1.1	
"lactose-free"	g/100 kcal	≤ 0.01		g/100 kJ	≤ 0.0024	
Sucrose, fructose and sugars from honey	% of total CHO	0	≤ 20	% of total CHO	0	≤ 20
Glucose	g/100 kcal	0	0	g/100 kJ	0	0
Starches	≤ 2 g/100 mL, not more than 30 % of total CHO					
	Unit	Minimum		Unit	Minimum	
		IF	FOF		IF	FOF
Calcium	mg/100 kcal	50		mg/100 kJ	12	
Phosphorus	mg/100 kcal	25		mg/100 kJ	6	
Magnesium	mg/100 kcal	5		mg/100 kJ	1.2	
Sodium	mg/100 kcal	25		mg/100 kJ	6	
Chloride	mg/100 kcal	60		mg/100 kJ	14.3	
Potassium	mg/100 kcal	80		mg/100 kJ	19.1	
Iron	mg/100 kcal	0.3	0.6	mg/100 kJ	0.07	0.14
Zinc	mg/100 kcal	0.5		mg/100 kJ	0.12	
Copper	µg/100 kcal	60		µg/100 kJ	14.3	
Selenium	µg/100 kcal	3		µg/100 kJ	0.72	
Iodine	µg/100 kcal	15		µg/100 kJ	3.6	
Molybdenum	µg/100 kcal	0.4		µg/100 kJ	0.1	
Manganese	µg/100 kcal	1		µg/100 kJ	0.24	
Vitamin A ^(a)	µg/100 kcal	70		µg/100 kJ	16.7	
Vitamin D	µg/100 kcal	2		µg/100 kJ	0.48	
Vitamin E ^(b)	mg α-TE/100 kcal	0.6		mg α-TE/100 kJ	0.14	
Vitamin K	µg/100 kcal	1		µg/100 kJ	0.24	
Thiamin	µg/100 kcal	40		µg/100 kJ	9.6	
Riboflavin	µg/100 kcal	60		µg/100 kJ	14.3	
Niacin ^(c)	mg/100 kcal	0.4		mg/100 kJ	0.10	
Pantothenic acid	mg/100 kcal	0.4		mg/100 kJ	0.10	
Vitamin B6	µg/100 kcal	20		µg/100 kJ	4.8	
Biotin	µg/100 kcal	1		µg/100 kJ	0.24	
Folate	µg DFE/100 kcal	15		µg DFE/100 kJ	3.6	
Cobalamin	µg/100 kcal	0.1		µg/100 kJ	0.02	
Vitamin C	mg/100 kcal	4		mg/100 kJ	0.96	
Choline	mg/100 kcal	25	NN	mg/100 kcal	6	NN
L-Carnitine	mg/100 kcal	1.2	NN	mg/100 kJ	0.3	NN
Inositol	mg/100 kcal	4	NN	mg/100 kJ	0.96	NN

^(a) pre-formed vitamin A, ^(b) RRR-α-tocopherol activity, ^(c) pre-formed niacin

Abbreviations: NN: not necessary; CHO: carbohydrates.

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- For IF and FOF containing hydrolysed protein the same requirements as for formula based on intact cow's and goat's milk protein should apply, except for the minimum protein content which cannot be proposed and the adequacy of the protein content of a specific IF or FOF containing hydrolysed proteins needs to be established based on clinical evaluation. The maximum protein content should, however, not exceed 2.8 g/100 kcal (0.67 g/100 kJ).
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- Also for IF and FOF containing ISP the same requirements as for formula based on intact cow's and goat's milk protein should apply, except for a minimum and maximum protein content of 2.25-2.8 g/100 kcal (0.54-0.67 g/100 kJ), a minimum phosphorus content of 30 mg/100 kcal (7.2 mg/100 kJ), a minimum iron content of 0.45 mg/100 kcal (0.11 mg/100 kJ) for IF and 0.90 mg/100 kcal (0.22 mg/100 kJ) for FOF and a minimum zinc content of 0.75 mg/100 kcal (0.18 mg/100 kJ). There should be no requirement for a minimum lactose content in IF and FOF containing ISP.
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- The minimum content of nutrients in IF and FOF proposed by the Panel is identical with the exception of iron. If the same formula is to be used from the first months of infancy and be suitable for the whole first year of life the minimum iron content should be 0.6 mg/100 kcal (0.14 mg/100 kJ) for formulae based on intact cow's and goat's milk protein and formulae containing protein hydrolysates and 0.9 mg/100 kcal (0.22 mg/100 kJ) for formulae containing ISP.
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- There is no necessity to add ARA, EPA, chromium, taurine, nucleotides, non-digestible oligosaccharides, "probiotics" or "synbiotics" to IF and FOF. There is also no necessity to use PL as a source of LCPUFA instead of TAG in IF and FOF or to use TAG with palmitic acid predominantly esterified in the *sn*-2 position in IF and FOF instead of TAG from other fat sources. For FOF, contrary to IF, the addition of L-carnitine, inositol and choline is not necessary.
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- It is not necessary to propose specific compositional criteria for formula consumed after one year of age, as formulae consumed during the first year of life can continue to be used by young children.

3267 **DOCUMENTATION PROVIDED TO EFSA**

3268 Evidence report related to an extensive literature search and review as preparatory work for the
3269 evaluation of the essential composition of infant and follow-on formulae and growing-up milks
3270 provided by Pallas Health Research and Consultancy following a procurement procedure.

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4276 **ABBREVIATIONS**

AAP	American Academy of Pediatrics
AI	Adequate Intake
ALA	alpha-linolenic acid
AMP	adenosine 5'-monophosphate
AR	Average Requirement
ARA	arachidonic acid
ATP	adenosine triphosphate
BMD	bone mineral density
BMI	body mass index
CD	celiac disease
CLA	conjugated-linoleic acid
CMP	cytidine 5'-monophosphate
CoA	coenzyme A
DFE	dietary folate equivalent
DHA	docosahexaenoic acid
DNA	deoxyribonucleic acid
DPA	docosapentaenoic acid
DRV	Dietary Reference Value
E%	percentages of the total energy intakes
EPA	eicosapentaenoic acid
ESPGHAN	European Society for Paediatric Gastroenterology Hepatology and Nutrition
FA%	percentage of total fatty acids
FAD	flavin adenine dinucleotide
FADS	fatty acid desaturase
FMN	flavin mononucleotide
FOF	follow-on formulae

FOS	fructo-oligosaccharides
GMP	guanosine 5'-monophosphate
GOS	galacto-oligosaccharides
IDD	iodine deficiency disorders
IF	infant formula
Ig	immunoglobulin
IGF	insulin-like growth factor
IGFBP	IGF-binding protein
IMP	inosine 5'-monophosphate
ISP	isolated soy protein
LA	linoleic acid
LC	long-chain
LOAEL	Lowest Observed Adverse Effect Level
MCFA	medium-chain fatty acid
MUFA	monounsaturated fatty acid
NAD	nicotine adenine dinucleotide
NE	niacin equivalents
NPN	non-protein nitrogen
PL	phospholipid
PRI	Population Reference Intake
PUFA	polyunsaturated fatty acid
RCT	randomised controlled trial
RI	Reference Intake range for macronutrients
RNA	ribonucleic acid
SCF	Scientific Committee on Food
SCFA	short-chain fatty acid
SD	standard deviation
SFA	saturated fatty acid

SNP	single-nucleotide polymorphism
T1DM	type 1 diabetes mellitus
TAG	triacylglycerol
TE	tocopherol equivalents
TFA	<i>trans</i> -fatty acids
ToR	Terms of Reference
TPN	total parenteral nutrition
UDP	uridinediphosphate
UL	Tolerable Upper Intake Level
UMP	uridine 5'-monophosphate
VELS	Verzehrsstudie zur Ermittlung der Lebensmittelaufnahme von Säuglingen und Kleinkindern
WHO	World Health Organization

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