

영유아식의 안전성

Safety of Infant Formula

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1. Introduction
2. cGMP
3. Inspection Procedures
4. cGMP of Infant Formula
5. Summary

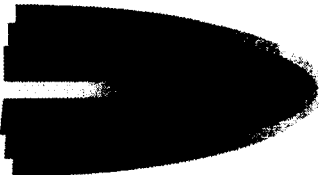
Infant formula

- Product intended for use by infants that simulates human milk or is suitable as a complete or partial substitute for human milk

- Persons not more than 12 months of age



doubling by 4 months of age
tripling by 1 year



“There is simply no margin for error in the production of baby formula.”

Introducti Market

- Powder—late 1800s
- Liquid Concentrate—early 1950s
- Liquid Ready-to-Feed—about 1960

Marketshare Powdered Inf formulas

- Half of U.S. marketshare (d formulas)


(Source: Information Resources, Inc., 1999)

The Infant Formula Act of 1980

- 1978 chloride deficiency.
- 1980 greater regulatory control
Infant Formula Act of 1980 -recall
- 1982 recall procedures
infant formula quality control procedures
- 1985 labeling of infant formula,
exempt infant formulas nutrient
requirements for infant formula

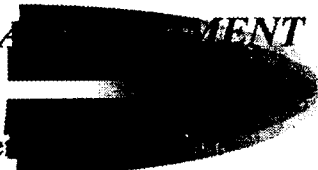
The 1986 Amendments to the Infant Formula Act

- quality control testing
- cGMP
- recordkeeping
- recall requirements



1989 recalls
 1991 infant formula record
 record retention requirements

1996 AGREEMENT



General Provisions.....General Provisions
 Quality Control Procedures for Assuring Current Good
 Nutrient Content of Infant Formulas Manufacturing Practice
 Records and Reports.....Quality Control Procedures.
 Notification Requirements.....Conduct of Audits.
 None.....Quality Factors for Infant
 Formulas.
 None.....Records and Reports.
 None.....Registration, Submission,
 Notification Requirements.

cGMP of Food

- Personnel
- Building and Facility
- Equipment
- Production and Process controls
- Sanitation
- Defect Action Levels, Recall

General Sanitation

- Covered by 21 CFR 110, Food
- Compliance Program 7303.803, Domestic Food Safety
- Compliance Program 7303.037, Domestic and Import Cheese Products
- Compliance Program 7303.030, Pathogen Monitoring of Selected High Risk Foods

(L. Stringer, FDA)

Specialized Regulations

- Covered by Specific Regulation
- 21 CFR 108 & 113, Low-Acid Canned Foods (CPG 7303.803A)
- 21 CFR 108 & 114, Acidified Low-Acid Canned Foods (CPG 7303.803A)
- 21 CFR 123, Fish & Fishery Products (CPG 7303.842)
- 21 CFR 106 & 107, Infant Formula (CPG 7321.006)

High Risk Food Regulations

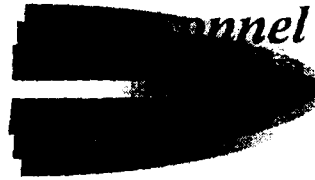
- General Sanitation
- Microbial Risk
 - Soft Cheeses
 - Prepared Foods/Salads
 - Milk and Egg Products
- Microbial Routes of Contamination
 - Water
 - Employees

Low Acid and Acidified Food Regulations

- Must Follow a “Scheduled Process”
- Records

Seafood Regulations

- HACCP Required
- Write and Follow a HACCP Plan
- HACCP Plan Must Address all Significant Hazards
- Special Requirements
 - Smoked Fish
 - Shellfish



- Management
 - Who runs this joint anyway?
- Employees
 - Do they know what they're doing?
 - Are they healthy?
 - Do they have health certificates?
 - No Smoking or Eating



- Environment
 - Proximity to creeks, dump sites, etc.
- Construction, Design and Maintenance
 - Is the building falling apart?
- Waste Disposal
 - Is it controlled?

Residuals

- Source
 - Where are they from?
- Handling
 - How are they received?
- Condition
 - Is any salvaged?
 - Morgue area
- Food Chemicals Codex

Equipment & Utensils

- Clean
 - Is it clean before use?
- Cleanable/Sanitary
 - Can it be cleaned?
- Adequate for Use
 - Are they cutting with a spoon?
- Shovels on floor???
 - Coal - Okay
 - Ice - Not so good

Manufacturing Process

- Process Diagrams
- Floor Diagrams
- Reprocess/Rework
- Cross-Contamination Routes
 - Microorganisms

Manufacturing Process Ingredient Handling

- How are ingredients added to the process?
- Are bags cleaned before opening?
- Tailings?
- Process Delays
 - Does product wait for a long time between steps?

Manufacturing Process Formulas

- No requirements to provide them
 - Coke, secret sauce
- Especially important for allergens
- Is the labeling adequate?

Manufacturing Process

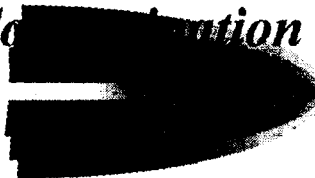
Quality Control

- Inspection System
 - Is product actually rejected?
- Laboratory Tests
 - What kind?
 - Why?
- Manufacturing Codes
 - For recall/complaints



- “Conditions whereby food may become contaminated with filth”
 - Filthy conditions
- “Whereby it may be rendered injurious to health”
 - Microorganisms

Sanitation Routes of Contamination



- Insects - Tailings
- Rodents - Egress points
- Pesticides - Storage
 - Use
 - Exterminators
- Birds

Sanitation
Microbiological Hazards

- Cross-contamination?
- Temperature/time abuses
- Cleaning

Sanitation
Storage

- Warehouse conditions
 - Temperature
 - First In/First Out (FIFO)
- Transportation Vehicles
 - Trucks
 - Trains
 - Barges

Distribution

- Shipping
 - How?
 - Where?
- Promotion and Advertising
- Recall Procedure
- Complaints

cGMP of Inf[er]mulation

1. Manufacturing practices required of drug manufacturers

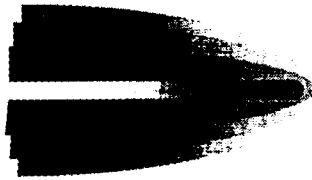


2. cGMP and quality control procedures:

- in-process controls
- sufficient personnel
- recordkeeping
- processing,
- packing
- holding of each infant formula
- nutrient stability testing

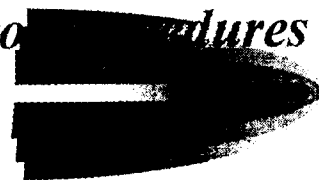


- 3. Controls to Prevent Adulteration by Workers
- 4. Controls to Prevent Adulteration Caused by Facilities
- 5. Controls to Prevent Adulteration Caused by Equipment or Utensil
- 6. Controls to Prevent Adulteration Due to Automatic (Mechanical or Electronic) Equipment
- 7. Controls to Prevent Adulteration Caused by Ingredients, Containers, and Closures



8. Controls to Prevent Adulteration During Manufacturing
9. Controls to Prevent Adulteration from Microorganisms
10. Controls to Prevent Adulteration During Packaging and Labeling of Infant Formula
11. Controls on the Release of Finished Infant Formula
12. Traceability
13. Audits of CGMP regularly scheduled audits

Quality Control Procedures



1. Introduction

INGREDIENT CONTROL
IN-PROCESS CONTROL
FINISHED PRODUCT EVALUATION

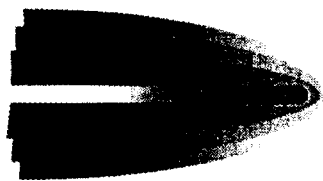


2. Nutrient Testing

3. Stability Testing

4. Quality Control Records

5. Audits of Quality Control Procedures

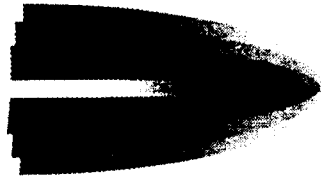


Conduct of Audits

Quality Factors for Infant Formulas

Records and Reports

Registration, Submission, and Notification
Requirements



PART 106--INFANT FORMULA---

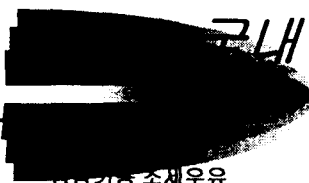
Requirements Pertaining to cGMP, Quality Control procedures, Quality Factors, Records and Reports, and Notifications

Microorganism  *Value*

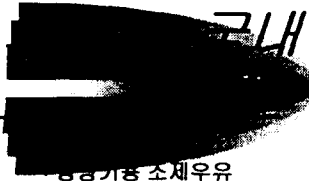
Aerobic Plate Count(APC)....	10,000CFU/gram (g)
Coliforms	3.05 MPN/g.
Salmonella.....	0
Listeria monocytogenes.....	0
Staphylococcus aureus.....	3.05 MPN/g.
Bacillus cereus	100 MPN/g or CFU/g.

항목	유형	조제분유 · 조제우유	조제분유 · 조제우유
성상		고유의 색택과 향미를 가지고 이미·이취가 없어야 한다.	고유의 색택과 향미를 가지고 이미·이취가 없어야 한다.
수분(%)		5.0 이하 (단, 액상제품 제외)	5.0 이하 (단, 액상제품 제외)
조단백질(%)		9.0~20.0	12.0~27.5
조지방(%)		15.0~30.0 (리놀렌산은 조지방 함량의 9.0% 이상이어야 한다)	15.0~30.0 (리놀렌산은 조지방 함량의 9.0% 이상이어야 한다)
유성분(%)		60.0 이상	60.0 이상

항목	유형	조제분유 · 조제우유	조제분유 · 조제우유
비타민A (IU/100g)		1250~2500	1250~3750
비타민D (IU/100g)		200~400	200~600
비타민C (mg/100g)		40 이상	40 이상
비타민B ₁ (mg/100g)		0.20 이상	0.20 이상
비타민B ₂ (mg/100g)		0.30 이상	0.30 이상
니코틴산 (μg/100g)		1250 이상	1250 이상
비타민B ₆ (μg/100g)		175 이상	225 이상
엽산 (μg/100g)		20 이상	20 이상
판토텐산 (μg/100g)		1500 이상	1500 이상
비타민B ₁₂ (μg/100g)		0.5 이상	0.75 이상
비타민K ₁ (μg/100g)		20 이상	20 이상
비타민E (IU/100g)		3.5 이상	3.5 이상



항목	유형	조제분유·조제우유	일반기종 조제우유
나트륨 (mg/100g)		100~300	100~425
칼륨 (mg/100g)		400~1000	400 이상
영소 (mg/100g)		275~750	275 이상
칼슘 (mg/100g)		250 이상	450 이상
인 (mg/100g)		125 이상	300 이상
마그네슘 (mg/100g)		30.0 이상	30.0 이상
철 (mg/100g)		1.25 이상	5.0~10.0
요오드 (µg/100g)		25 이상	-
구리 (µg/100g)		300 이상	1500 이상
아연 (mg/100g)		2.5 이상	2.5 이상
망간 (µg/100g)		25 이상	25 이상



항목	유형	조제분유·조제우유	일반기종 조제우유
인공감미료		검출되어서는 안된다.	검출되어서는 안된다.
타르색소		검출되어서는 안된다.	검출되어서는 안된다.
세균수		1g당 20000 이하 (조제우유는 음성이어야 한다.)	1g당 20000 이하 (조제우유는 음성이어야 한다.)
대장균군		음성이어야 한다.	음성이어야 한다.

US

Nutrient	Minimum	Maximum
Protein (gm)	1.8 ²	4.5
Fat : gm percent cal	3.3 30.0	6.0 54.0
Essential fatty acid(linoeate): percent cal mg	2.7 300.0	

(mins)

Nutrient	Minimum	Maximum
Vitamins A (IU)	250.0 (75 µg) ³	
Vitamins D (IU)	40.0	100.0
Vitamins K ₁ (µg)	4.0	
Vitamins E (IU)	0.7 (with 0.7 IU/gm linoleic acid)	
Vitamins C (mg)	8.0	
Vitamins B ₁ (mg)	40.0	
Vitamins B ₂ (mg)	60.0	
Vitamins B ₆ (µg)	35.0	
Vitamins B ₁₂ (µg)	0.15	
Niacin (µg)	250.0	
Folic acid (µg)	4.0	
Pantothenic acid (µg)	300.0	
Biotin (µg)	1.5 ⁴	
Choline (mg)	7.0 ⁴	
Inositol (mg)	4.0 ⁴	

[REDACTED] (arals)
[REDACTED]

Nutrient	Minimum	Maximum
Calcium (mg)	50.0 ⁵	
Phosphorus (mg)	25.0 ⁵	
Magnesium (mg)	6.0	
Iron (mg)	0.15	
Iodine (µg)	5.0	
Zinc (mg)	0.5	
Copper (µg)	60.0	
Magnesium (µg)	5.0	
Sodium (mg)	20.0	60.0
Potassium (mg)	80.0	200.0
Chloride (mg)	55.0	150.0

Regulations for Infant Food Labels

[REDACTED]

- Preparation and use instructions include
 - Product storage
 - “Sterilization” of water, bottle, and nipples, when necessary
 - Dilution for powder and liquid concentrates, including pictogram showing major steps for preparation

(Source: Title 21 Code of Federal Regulations 107.20)
(S.A. Anderson, FDA)

Federal Regulations for Infant Formula Labels

- Other required information
 - “The health of your infant depends on carefully following the directions for preparation and use.”
 - “Use as directed by a physician.”
 - “Use by” date

(Source: Title 21 Code of Federal Regulations 107.20)

Examples of Manufacturers’ Label Instructions for Powdered Formulas

- Water Preparation
 - Bring water to a boil then cool to 100°F(40°C).
 - Boil additional water for formula to a rolling boil (approximately 1 minute), then let cool to lukewarm temperature.
 - Boil water for 5 minutes. Cool to a warm temperature (120° - 130° F)

(Source: Title 21 Code of Federal Regulations 107.20)

***Examples of Manufacturers' Label
Instructions for Powdered Formulas***

- Water Preparation
 - Ask your baby's doctor about infant formula use, including the need to boil water for formula, bottle, and nipple assembly. Pour desired amount of warm water into bottle.
 - Ask your baby's doctor if you need to boil (sterilize) water for formula and bottle preparations. Pour desired amount of warm water into bottle.

***Examples of Manufacturers' Label
Instructions for Powdered Formulas***

- Feeding and storage
 - Feed immediately or cover and refrigerate prepared formula. Use within 48 hours.
 - Cover prepared formula not used immediately. Store in refrigerator and use within 48 hours.

***Examples of Manufacturers' Label
Instructions for Powdered Formulas***

- Feeding and storage
 - Feed immediately or cover and refrigerate bottled formula to be used within 24 hours.
 - Feed immediately, or cover and refrigerate bottled formula until needed. Use within 24 hours.
 - Store in refrigerator until used. Use within 24 hours after mixing.

***Examples of Manufacturers' Label
Instructions for Powdered Formulas***

- Disposal of unused formula after feeding
 - Discard unused formula in bottle after feeding.
 - Throw away prepared formula left in feeding bottle or cup within one hour after feeding begins

***Preparation of Formulas for Infants
Guidelines for Health Care Facilities***

Recommendations developed by The American
Dietetic Association (ADA)

2002 revised and abbreviated version:

<http://www.eatright.org/formulaguide.html>

***Guidelines for Infant Formula Use
for Nipple-Using Infants***

- Feed within 4 hours of preparation
- Cover and refrigerate for up to 24 hours
- If warmed, warming should take less than 15 minutes
- Discard any product remaining in bottle one hour after feeding begins

(Source: The American Dietetic Association, 2002)

***Guidelines for Infant Formula Use
for Term Infants***

- Feed within 4 hours of preparation
- Cover and refrigerate for up to 24 hours
- Intermittent (bolus)—Package in amounts for one feeding or for a 4-hour period
- Continuous—Hang time should not exceed 4 hours

(Source: The American Dietetic Association, 2002)

Summary

- Powders are not sterile products.
- Detailed Infant Formula regulation required.