

**Міністерство освіти і науки України
Національний університет харчових технологій**



**ЗБІРНИК
наукових матеріалів
V Міжнародної науково-практичної
конференції**

**ЗДОРОВЕ ХАРЧУВАННЯ ВІД ДИТИНСТВА ДО
ДОВГОЛІТТЯ: КОМПЛЕКСНИЙ ПІДХІД, СТАН
ТА ПЕРСПЕКТИВИ**

23—24 жовтня 2025 року, м. Київ, НУХТ

2025

УДК: 613.2-053.2:339.13:346.545(477)

LEGISLATIVE REGULATION OF THE USE OF SEMI-FINISHED PRODUCTS IN CHILDREN'S NUTRITION IN UKRAINE

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Ensuring safe and balanced nutrition for children is one of the priorities of Ukraine's public health policy. In this context, particular attention is paid to the quality of ingredients used in the production of children's food products. Semi-finished products, which are widely used in general food manufacturing, raise concerns regarding their acceptability in children's diets. The main regulatory documents that define the requirements for children's nutrition, including the use of semi-finished products, are the Law of Ukraine "On Preschool Education", the Law of Ukraine "On the Basic Principles and Requirements for the Safety and Quality of Food Products", the "Procedure for Organizing Nutrition in Educational Institutions and Children's Health and Recreation Facilities" approved by the Cabinet of Ministers of Ukraine, and the DSTU (State Standards of Ukraine), which establish technical requirements for certain types of semi-finished products if their use is permitted for children's and dietary nutrition. For example, DSTU 4437:2005 contains specific requirements for meat-based semi-finished products recommended for children's and dietary nutrition, particularly regarding salt and fat content [1—3].

Ukrainian legislation sets clear requirements for the composition of children's food, restricting or prohibiting the use of semi-finished products if they do not meet safety, processing, and nutritional standards.

According to Article 35 of the Law of Ukraine "On Preschool Education" No. 3788-IX, the organization of children's nutrition in preschool institutions is based on a natural set of food products determined by the central executive authorities in the fields of health and education. Semi-finished products may be used only if they comply with sanitary norms, contain no prohibited additives, have verified origin, and ensure safe, balanced nutrition appropriate to the age-specific needs of children [1].

The Law "On Basic Principles and Requirements for the Safety and Quality of Food Products" (Article 32—1) establishes special requirements for children's nutrition, in-

cluding a ban on flavorings (except vanillin, ethylvanillin, and vanilla extract), ingredients that have not undergone state registration, and components that do not meet sanitary standards. Sanitary norms and DSTU additionally regulate acceptable levels of salt, sugar, fats, and thermal processing requirements. Semi-finished products that do not meet these standards cannot be used in children’s nutrition [2].

Manufacturers of children’s food are required to undergo state registration, certification, and sanitary-epidemiological examination. Each batch of products is subject to control, and the use of semi-finished products is allowed only if they fully comply with safety requirements (table 1) [1—3].

Table 1. Permitted and Prohibited Components in Children’s Nutrition According to Current Legislation

Ingredient Category	Allowed in Children's Nutrition	Examples of Allowed Substances	Prohibited in Children's Nutrition	Examples of Prohibited Substances
Flavorings	Limited	Vanillin, ethylvanillin, vanilla extract	Yes	Artificial flavorings, unregistered substances
Preservatives	No	—	Yes	Sodium benzoate, potassium sorbate
Colorants	No	—	Yes	Tartrazine, azorubine
Meat-based semi-finished	Yes (if compliant)	Boiled meat, steamed cutlets	Yes (if additives present)	Sausages, frankfurters, smoked meats
Fish-based semi-finished	Yes (if compliant)	Steamed fillet, fish balls	Yes (if flavorings present)	Smoked fish, fish sticks
Salt, sugar	Limited	Within regulated norms	Yes (if excessive)	Excessive salt or sugar
Fats	Yes	Vegetable oils, butter	Yes (trans fats)	Margarine, hydrogenated fats

Ukrainian legislation regulating children's nutrition is quite strict and aims to ensure the safety and quality of products consumed by children, especially in educational, health, and recreational institutions. The use of semi-finished products in this area is significantly restricted or prohibited for certain categories. The strictest limitations apply to the nutrition of children in preschool, general secondary education institutions, and health and recreation facilities. According to the Procedure for Organizing Nutrition, these institutions are prohibited from ordering and using technologically processed meat and fish products, including sausages, frankfurters, pâtés, smoked meats, canned meat and fish (except those intended for special dietary nutrition), as well as frozen industrial semi-finished products such as ready-made cutlets, dumplings, and khinkali. These restrictions aim to minimize children’s consumption of products with high levels of salt, fats, added sugars, and food additives (preservatives, colorants, flavor enhancers), which are often present in industrial semi-finished products.

Even if a semi-finished product is specifically developed and labeled as a "children's food product", its production is subject to enhanced requirements. The composition of such products must be strictly regulated in terms of proteins, fats, carbohydrates, vitamins, and minerals. The use of artificial flavorings (except vanillin, ethylvanillin, and vanilla extract), colorants, sweeteners (except in functional children's nutrition), preservatives, stabilizers, and flavor enhancers is prohibited. The mass fraction of table salt in semi-finished products recommended for children's nutrition must not exceed established norms, for example, 0.9—1.2% according to DSTU 4437:2005. The use of raw materials that do not meet established sanitary measures, as well as frozen meat raw materials for the production of semi-finished products intended for preschool and school-age children, is prohibited. Labeling must clearly indicate the age from which the product is suitable for consumption and provide a complete list of all ingredients.

Thus, the legislative regulation of the use of semi-finished products in children's nutrition in Ukraine operates on two levels. For organized groups such as kindergartens, schools, and camps, there is a direct ban on the use of most industrially processed meat, fish, and other semi-finished products to ensure the healthiest and freshest nutrition possible. For the production of food intended for children in retail, manufacturers must comply with particularly strict requirements regarding composition, safety, additive content, and labeling, which significantly limit the use of preservatives, colorants, flavor enhancers, and excessive salt. Ukrainian legislation is focused on protecting children's health by encouraging the use of minimally processed raw materials in institutions and ensuring the quality control of specialized semi-finished products, thereby guaranteeing that products meet age-specific needs, safety standards, and nutritional value.

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