

08 November 2013

Food Standards Australia New Zealand  
PO Box 10559  
The Terrace  
Wellington 6143

**Consultation Paper**  
**Proposal P274 - Minimum Age Labelling of Foods for Infants**

Thank you for the opportunity to make feedback on this consultation document.

Dietitians New Zealand (DNZ) is the professional association of registered dietitians and associated nutrition professionals. With a membership of approximately 570, we represent the largest group of fully trained food and nutrition professionals in New Zealand.

This consultation feedback reflects the comments and opinions of the DNZ Paediatric Special Interest Group (Paeds SIG).

DNZ Paeds SIG members are supportive of the Proposed Standard wording for the minimum age of first foods / first complementary foods labelling for infants including

- Minimum age labelling at "around 6 months" for first foods
- Supportive of the warning statement "not before 4 months of age"
- Supportive of using number for ages and not words i.e. 6 months *not* six months, with the knowledge that for some purchasing consumers English is a second language or they may have limited literacy skills

Some dietitians have expressed a preference for labelling to read

- "From around 6 months but not before 4 months"

DNZ Paeds SIG members are supportive of the Proposed Standard wording for Non-first foods

Dietitians have expressed concern that the proposed labelling will include

- Iron content claim as a % of RDI (Recommended Dietary Intake) for age.

The Nutrient Reference Values (NRV's) for New Zealanders and Australians for iron in infancy is Adequate intake (AI) not a RDI

The NRV's for iron in infancy are

Infants 0-6 months AI (per day) 0.2mg

Infants 7-12 months AI (per day) 7mg

DNZ Paeds SIG appreciates the opportunity to comment on this proposal.

Yours sincerely,

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**Paediatric Special Interest Group Convenor  
Dietitians NZ**