

I am writing to support the alignment of food labelling requirements with current infant feeding guidelines. Labels such as “suitable from 4 months” on infant foods need to be removed and a more appropriate “around 6 months” should be the minimum age on all infant foods. The following points support my suggestion;

- The National Health and Medical Research Council (NHRMC) recommends exclusive breastfeeding until around 6 months of age – this is in line with the World Health Organization (WHO) recommendation. Changing food labelling to reflect the position of WHO and NHRMC makes sense and gives a consistent message to parents.
- Exclusive breastfeeding means no other food or fluids (including water). If exclusive breastfeeding is not possible, infant formula should be used.
- Breastmilk is the normal food for human infants. It contains all the nutritional requirements for a baby's growth for the first 6 months and remains the most important part of the infant's diet, with the addition of family foods, until around 12 months. Breastmilk continues to be a valuable source of nutrition for as long as mother and baby breastfeed.
- Babies don't need routine supplementation with iron or other such minerals – if supplementation is necessary it should be done on a case-by-case basis in consultation with a medical adviser.
- There is clear evidence that introducing solid foods to babies under the age of 4 months increases risk to babies:
  - o Greater risk of infection from pathogens in foods
  - o Greater risk of allergies to foods (this risk is reduced by introducing solid foods between 4-7 months)
  - o Can reduce maternal supply of breastmilk leading to premature weaning
  - o Can lead to malnutrition in extreme cases as babies' guts are not mature enough to process solid foods.
- Food labels in Australia currently allow baby food to be labelled as suitable from ‘4 months plus’. Unfortunately, very few babies are exclusively breastfed to 6 months. Statistics from the 2010 Australian National Infant Feeding Survey results indicate that less than one quarter (15%) of babies are exclusively breastfed to 5 months (less than 6 months). To help improve the rate of babies who are exclusively breastfed for around 6 months, food labels in Australia should be changed to ‘around 6 months’ in line with NHRMC and WHO guidelines.
- The Australian general public is highly susceptible to aggressive food marketing and believe that baby food is highly regulated. This is evidenced by the large body of public health research demonstrating that parents are largely ill informed about food labelling and nutritional content and highly influenced by food marketing. If a product states it can be consumed at ‘4 months’ consumers wrongly think this is safe to do and is based on a government-endorsed position, informed by peak bodies such as the NHMRC and WHO.

- Caregivers may interpret their child as being developmentally 'advanced' and introduce solids prior to the recommended age. Regardless of whether a child is behaviourally developmentally advanced or not, no child's gastrointestinal tract is developmentally advanced enough to receive solids at 4 months of age or younger. Making a recommendation to introduce solids at 4 months of age places these children at higher risk of receiving solids even earlier than 4 months putting them at higher risk of the adverse events associated with the introduction of solids too soon.

Please make the appropriate changes to Standard 2.9.2 - Infant Foods of the Australia New Zealand Food Standards Code so that is aligned with current infant feeding guidelines and help us protect the most vulnerable in our society - infants that suffer the consequences of their big-business-fancy-marketing-influenced parents' ill-informed decisions.