

Department of Health and Human Services Tasmania

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The Department of Health and Human Services Tasmania appreciates the opportunity to comment on Proposal P274 Review of minimum age labelling of foods for infants.

The Department strongly supports amendments to Standard 2.9.2 so that the youngest minimum age declaration required on a label of an infant food is 'around 6 months' for consistency with the Australian and New Zealand infant feeding guidelines.

The Department also supports:

- 'around 6 months' should always appear on the front of the food label
- changing the warning statement to 'not before 4 months of age'
- statement indicating the consistency of the food continue to be required

The Department believes that placement of the warning statement **should not** be in association with the minimum age statement as this may create confusion for carers.

The Department supports the warning statement that refers to infants under the age of 4 months is to apply to food labelled as 'around 6 months' and other foods that may be given to young infants such as rusks and infant foods in pouches.

The concept of 'first foods' provides a useful tool to allow carers to differentiate between different stages. 'Suitable for first food', or other words of similar intent used consistently across the market will help carers to identify appropriate food choices.

The Department notes the generous transition period of three years intended to reduce labelling costs for infant food manufacturers, may create some confusion in the market place for carers over a long period where there are potentially different messages on labels for carers.

Is the concept and definition of first food a useful way to apply certain labelling and formulation requirements?

The concept of first foods provides a framework for describing the texture and formulation of foods 'around 6 months' and a point of differentiation for foods intended for '6+ months'.

The concept of 'first food' may help carers to differentiate between labelling of 'around 6 months' and '6 + months' foods which are not necessarily smooth in texture.

The concept of 'first food' would provide further information consistently across a range of different brand for carers.

The concept of 'first food' in association with 'around 6 months' reinforces public health advice to introduce solids at around 6 months and is consistent with language in the Infant Feeding Guidelines (National Health and Medical Research Council, 2012).

Many foods are suitable as a first food e.g. freshly prepared mashed/pureed iron-rich foods (National Health and Medical Research Council, 2012). Labelling products as 'first food' may lead some people

to incorrectly believe packaged products are superior. Including the word 'suitable' or word of similar intent may alleviate this concern.

'By around 6 months of age most infants are able to adapt to different foods, food textures and modes of feeding'(National Health and Medical Research Council, 2012)p 86). However foods offered should be an appropriate texture and consistency for the infants' developmental stage commencing with smooth textures (National Health and Medical Research Council, 2012). The concept of 'suitable first food' may provide an additional risk management strategy for infants introduced to solids before they are developmentally ready, by encouraging carers who have commenced solids earlier than recommended to use a smooth texture to minimise risk of choking or inhalation.

Is the definition of 'first food' enforceable?

The generally understood meaning (as per the Macquarie dictionary) would appear to provide an appropriate definition of soft and smooth consistency for first foods.

Should the use of the age/number 6 on labels of infant food be prohibited, other than in conjunction with the word 'around'? Please explain your view.

There needs to be a clear differentiation between foods intended for first foods 'around 6 months' that are smooth texture and other textures to reduce the risk of inappropriate textures being provided to infants.

Some food currently on the market not intended to be first foods are labelled with '6+months'. There is the possibility of confusion with first foods. Mandating the use of 'around' with '6' is not likely to reduce this confusion, unless 'around 6 months' is reserved only for first foods. There does not appear to be adequate justification for this as infants are able to adapt to different textures. Other mechanisms which may help increase clarity would be to mandate 'suitable for first food' on foods with 'around 6 months' or words of similar intent in addition to a statement on the texture of the food. There is a proposed definition of first foods and this should be clear to carers.

Do the changes to the wording of the warning statements change the intent of these statements? If so, please explain why.

'Not before 4 months' could be considered to be a clearer more directive warning statement than 'not recommended for infants under the age of 4 months' as it has less syllables and a lower reading age.

Should the 'not before 4 months of age' statement apply only to first food represented for infants 'around 6 months' of age? If not, please describe which foods should carry this warning statement and the reasons why.

Earlier solid introduction shows no benefits and, particularly prior to 4 months, may be associated with negative outcomes such as inadequate nutrient and energy intake due to displacement of breast milk and formula; stress on immature gastrointestinal, immune, and renal systems; increased risk of allergies; and increased rates of diarrheal disease (Arden, 2010; Hamilton, Daniels, White, Murray, & Walsh, 2011; National Health and Medical Research Council, 2012). Among formula-fed infants, introduction of solid foods before 4 months was associated with a six-fold increase in odds of obesity at age 3 years (Huh, Rifas-Shiman, Taveras, Oken, & Gillman, 2011). These risks justify the

use of the warning statement on first foods for 'around 6 months'. Around 35% of infants are provided with solid food before 4 months (AIHW, 2011). The warning statement is appropriate for first foods, and other foods that are likely to be given to young infants for example rusks and infant foods in pouches which may be considered by carers as suitable for first foods due to the packaging.

**Is it important for minimum age to be always displayed on the front of a product?
Please give your reasons. If not, are there any other labelling measures that should be mandated?**

The minimum age for infant foods should always be displayed on the front of the product to enable carers to easily make an informed choice on appropriate products for their infants. Mandating words such as 'suitable for first food' would provide clarity between the minimum age of 'around 6 months' and other foods intended for '6+ months' and ensure consistency across the market to make this clearer for carers.

Will the removal of the association between the relevant minimum age statement and the under 4-month warning statement reduce the risk of caregiver confusion on the age of introducing solid foods?

The Department believes that placement of the warning statement **should not** be in association with the minimum age statement as this may create confusion for carers. This is consistent with current industry practice (in contrast to current regulations). This should be made explicit in the standard, rather than simply removing the association.

Placement of the warning statement 'not before 4 months' in association with the minimum age 'around 6 months' could be confusing for carers and maintain the current situation of promoting solids between 4 and 6 months. Allowing this situation would not be consistent with government-endorsed infant feeding recommendations. There is the possibility of confusion and ambiguity for carers when different guidelines and recommendations are found in books, websites and food labels (Arden, 2010).

Further comments

New Zealand Guidelines

Note the background is inconsistent in its references to the New Zealand recommendations for introduction of solids. It states that current guidelines in New Zealand suggest complementary foods are introduced around 4 to 6 months. These are the 1999 recommendations. The current infant feeding guidelines (partially revised 2012) recommend introduction of solids at around six months of age, which are consistent with the Australian guidelines (New Zealand Ministry of Health, 2012).

Allergies

The Department supports the conclusion that 'around 6 months' as the appropriate age for the introduction of solid foods for infants. Concern that rates of allergies are increasing and that there may be a critical period to minimise the risk between the ages of 4 and 7 months are not conclusive. Allergy risk also appears to be increased with solid foods introduced to infants at less than 4 months of age, based on several cohort studies.

Currently around 35% of infants are introduced to solids before 4 months (AIHW, 2011) potentially increasing their risk of allergy. The endorsed recommendations of 'around 6 months' are not

inconsistent with the hypothesised critical period for introduction of solids and are more likely to support carers in their decision to avoid early introduction of solids. Where there is a higher risk of allergy due to family history or other risk factors, then specific medical advice may be appropriate. However at a population level, it is appropriate to recommend introduction of solids at around 6 months and for labelling of infants foods to be consistent with this.

Conclusion

Australian Infant Feeding Guidelines recommend the introduction of solids at 'around' 6 months' to meet the increased nutritional and developmental needs of infants (National Health and Medical Research Council, 2012).

Consequences of maintaining the status quo potentially reduce the public health gain desired from implementation of the infant feeding guidelines. In addition it could potentially increase public health harm if labelling inconsistent with government recommendations contributes in any way, for example, to increased health care costs from increased rates of food intolerance and allergy associated with early introduction of solids (before 4 months) and increased rates of obesity in formula fed infants who are introduced solids before 4 months. Infant food labelling should be consistent with and support the implementation of the Infant Feeding Guideline.

The Department supports the proposed amendments to Standard to 2.9.2 that the youngest minimum age declaration required on a label of an infant food is 'around 6 months'.

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