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Submission DUE by 6pm on 12 November 2013

### **SUBMISSION ON PROPOSAL P274 - MINIMUM AGE LABELLING OF FOODS FOR INFANTS**

The Department of Health Western Australia (DOHWA) would like to thank the Food Regulation Standing Committee for seeking comment on Proposal 274 – Minimum Age Labelling of Foods for Infants. Given that there is a lack of knowledge amongst Western Australian adults on the appropriate timing for the introduction of solids, the DOHWA considers the minimum age labelling of foods for infants an important area of work.

This submission has been prepared by the Department of Health Western Australia, Environmental Health Directorate. Comments in response to the questions raised in the consultation paper are as follows:

#### **4.1.1.2 Food intended as first food**

**Question 1: Is the concept and definition of first food a useful way to apply certain labelling and formulation requirements?**

DOHWA supports the concept and the provision of the definition of first food. The definition in this paper appears to be appropriate, and the term 'first food' a suitable way to identify the type of solid foods introduced to infants "around six months" for the purpose of the first stage of weaning.

#### **4.1.1.2 Food intended as first food**

**Question 2: Is the definition of "first food" enforceable**

DOHWA considers that the criteria specified in the proposed standard for 'first food' are enforceable.

#### **4.1.1.3 Impact of labelling on other infant food**

**Question 1: Should the use of age/number 6 on labels be prohibited, other than in conjunction with the word “around”? Please explain your view**

DOHWA considers that it is important to use the ‘age/number 6’ in conjunction with the word ‘around’ to remain consistent with both the Australian Infant Feeding Guidelines and the New Zealand Ministry of Health Infant Feeding Guidelines, given the guidelines are based on the current best scientific evidence.

#### **4.1.2 Mandatory advisory statements**

**Question 1: Do the changes to the wording of the warning statements change the intent of these statements? If so, please explain why?**

No. DOHWA does not consider that the wording changes the intent, and supports the change to the simplified wording.

#### **4.1.2 Mandatory advisory statements**

**Question 2: Should the ‘not before 4 months of age’ statement apply to food is represented for infants ‘around six months’ of age only? If not, please describe which foods should carry this warning statement, and the reasons why.**

Yes

#### **4.1.3 Location of mandatory statements on infant food labels**

**Question 1: Is it important for minimum age to be always located on the front of a product? Please give your reasons. If not, are there any other labelling measures that should be mandated?**

Yes. DOHWA considers it is important that the minimum age is located on the front of the product. This is based on the evidence provided by the FSANZ research that found consumers valued age and consistency labelling, and that the front of pack label information was the key information that consumers noticed first and to which they paid most attention.

#### **4.1.3 Location of mandatory statements on infant food labels**

**Question 2: Will the removal of the association between the relevant minimum age statement and the 4-month warning statement reduce the risk of caregiver confusion on the age of introducing solid foods?**

At the present time, DOHWA does not have any evidence regarding whether the removal of the association of the relevant minimum age statement and the 4-month warning statement will impact on the level of consumer understanding. Based on the evidence from the FSANZ consumer research (Supporting Document 2: Risk Management Considerations), however, DOHWA **considers** the removal of the

association between the statements is a beneficial change as it may improve the caregivers understanding of timing for introduction of solids.

### **Concluding comments**

In summation, DOHWA **supports** the proposed amendment to Standard 2.9.2 as described in the 1 Oct 2013 consultation paper.

### **Justification**

In Western Australia, there are a high number of caregivers feeding solids to infants before the Australian Infant Feeding Guideline recommended 'around six months'; along with a lack of knowledge and understanding regarding the importance of breast feeding to around six months of age. There is a need to clearly indicate to caregivers the appropriate timing for the introduction of solids to into an infant's diet that aligns with the Australian and New Zealand infant feeding guidelines. This labelling approach may assist in decision making for caregivers who have not received education from health professionals, and/or have received conflicting advice from those they trust in the community including family and friends. This amendment to Standard 2.9.2 of the Code contributes to protecting health and safety of infants, and the provision of consistent information for consumers to make informed choices on timing and consistency for the introduction of solid foods

Additionally, DOHWA would like to highlight the following

- this approach of aligning label information with the Australian and New Zealand infant feeding guidelines positively reinforces public health guidance
- a national promotion and education strategy should be developed to provide information for consumers and health professionals on the introduction of solid foods into an infant's diet that covers this change to labels. It is suggested that this be developed on a national basis to prevent duplication of resources.

Thank you for considering the above comments. Should you wish to discuss any of these comments please do not hesitate to contact Ms Catrina McStay on (08) 9388 4908 or e-mail [Catrina.Mcstay@health.wa.gov.au](mailto:Catrina.Mcstay@health.wa.gov.au).

Yours sincerely



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