

4th November 2013

To Food Standards of Australia and New Zealand (FSANZ)

RE: Support of Proposal P274 - Minimum Age Labelling of Foods for Infants

As a parent of small children I **strongly support** the proposal to change the labelling of infant foods to reflect the current National Health and Medical Research Council (NHMRC) guidelines of introducing solid foods “from 6 months”. I think that existing food labelling guidelines have led to confusion amongst parents about when to introduce solids, with many parents choosing to replace breastmilk (or artificial baby milk) with solids substantially earlier than recommended.

I am a member of a local parents’ closed Facebook group with 3300 members. Confusion around the appropriate age to introduce solids is commonly seen in this facebook group with food labelling and marketing inconsistency contributing to this confusion. An example of a post illustrating this confusion follows with names removed for confidentiality and spelling and grammar modified for clarity. The few comments supportive of introducing solids from around 6 months as well as off-topic comments have also been omitted.

4th October 2013 Original post: “When can I start my boy on solids??? He’s 10 weeks.”

Responses included:

- 3 months
- I started [my baby] on baby rice at 10 weeks old to fill him up more
- [Baby] is 15wks and watches me eat like a hawk! I am thinking of starting in the next few weeks as he will be 4 months soon
- Queensland Health recommend 4 to 6 months.
- My boy is 4 and a half months and I just started
- 4-6 months is what’s recommended by Qld health.
- 4 months unless stated by your doctor
- I started our son at 4 months but his little belly wasn't ready for it. I stopped and waited until 5 months and he loved it.
- Anywhere from 4 months.
- Started my son at 3 months and he wasn't interested. Started my daughter at 4 1/2 months and she loves it.
- My boy benefited from starting solids at 10 weeks he was fine and thrived off it
- I started my eldest (now 2.5yo) when he was about 5 months and I tried my newbie he's 4 months
- I started [baby] on solids the day after she turned 4 months old. She loved it
- I started both my girls at 10 weeks... just tasting and maybe having 1 or 2 tea spoons every few days... they both were not settling with just bottles and when they started solids they were so much happier
- I did the same as you [mother’s name] [referring to 10 weeks]
- If there’s no nutritional value why do doctors recommend it??
- I agree maybe 10 weeks is a little bit too early for his tiny tummy. In my opinion 4 months but up to the mum and dad

- I started my bub round 3.5 months and she loves it and cries for more
- I don't give my son the farrex for nutritional value I give it to him so he's fuller for longer.
- 4 mths. I started and at about 8 weeks with my bottle fed bubs I put farex in there night bottle to fill them up
- I started giving bits of puréed fruit every day at about 3 months. At 4mths he started on solids 2x a day & at 6 mths went too 3x times a day.
- My son is nearly 5months and he started at about 3.5months..now he has 3meals of solids a day plus 4-5bottles
- I started my boys at 3 months.
- I think you're supposed to wait until they are at least 4mths so their stomachs and digestive system are ready
- I have a big hungry 14 week old and I have just started him on rice cereal made with some of his formula. I felt he was getting hungry between bottles and didn't want to go backwards in giving him another so I decided to start.
- The small amount a day or every second day is getting their digestive system customized to something other than milk...
- I did the whole mush thing for my eldest two both fed around 3 and a bit months

It is clear from reading these posts that not only are parents confused by the inconsistent information they receive about the appropriate time to start solids, but also that many parents start their baby's on solid food at a very young age (less than 4 months) with the intention of spacing out their baby's milk feeds. This places babies at risk of malnutrition as it replaces breastmilk (or artificial baby milk) with a less energy and nutrient dense form of food. Using solid food to space out breastfeeds (or artificial baby milk feeds) also increases exposure to pathogens and the risk of infections as well as reducing maternal breastmilk supply.

Parents need to receive a consistent message about the timing of introducing solid food. The National Health and Medical Research Council has reviewed the evidence and determined that from "around 6 months" is an appropriate developmental period. Health professionals and baby food labellers need to reflect this determination. If a product states it can be consumed at 4 months consumers wrongly think this is safe to do and that the labelling is based on a government-endorsed position, informed by peak bodies such as the NHMRC and WHO.

I request that you amend the guidelines for labelling on infant foods to clearly reflect the NHMRC's evidence based recommendation of "from six months"

Yours sincerely

Daniele Day

[Redacted signature block]

References:

<https://www.facebook.com/groups/springfieldlakesmummies/>

Anderson J, Malley K, Snell R, 2009, Is 6 months still the best for exclusive breastfeeding and introduction of solids? A literature review with consideration to the risk of the development of allergies, *Breastfeeding Review* 17(2): 23-31