



Food Standards Australia New Zealand (FSANZ)

Proposal P274

Minimum age labelling of food for infants

Thank you for providing the opportunity to give feedback on the minimum age labelling of food for infants.

We have read the document with great interest and would like to provide the following comments.

The New Zealand College of Midwives (The College) is the professional organisation of midwifery in New Zealand. The College represents approximately 90% of the practising midwifery workforce in this country. Its members are both self employed and employed. The structure and processes of the College uphold the principle of partnership between the profession and the public. There has been consumer representation as of right in the College's committees since its foundation. This right exists at every level of governance, nationally within the National Committee and regionally within professional review and complaints committees. There are ten regional committees, and five sub committees in the smaller provincial centres.

The College has an interest in the messages provided to parents in the area of infant feeding and welcomes any changes that align with the optimal infant and young child feeding recommendations. The World Health Organisation's global optimal infant and young child guidelines are still based on the current best available evidence and these guidelines inform the New Zealand Ministry of Health's recommendations. The global public health recommendations are for infants to be exclusively breastfed for the first six months of life to achieve optimal growth, development and health. Thereafter, infants should be given

nutritious, appropriate and safe complementary foods and continue breastfeeding up to the age of two years or beyond.

The labelling of baby foods on the market for the 'four to six months' age range has encouraged the introduction of solid foods before the majority of babies are developmentally ready to eat family foods. It has also compromised both exclusive breastfeeding and breastfeeding continuance.

The protection, promotion and support of breastfeeding both in the community, and at policy level, are key concerns for the College. We have always taken a special interest in the World Health Organisation's International Code of Marketing Breast-milk Substitutes and subsequent, relevant World Health Assembly resolutions with the view that the Code should be effectively enforced and monitored. The infant formula/baby food industry should also act responsibly, abide by the Code and avoid undermining breastfeeding or the optimal infant feeding guidelines. We consider that the change to the minimum age labelling of food for infants is now overdue and this change will support infant consumer health and safety, align with the International Code and protect, promote and support breastfeeding.

The use of the 4-6 months labelling, represents a marketing tool with the aim of persuading parents and others to purchase these products. These misleading messages make no contribution to health but instead they undermine the health of vulnerable infants because they are part of the reason why mothers reduce or cease their breastfeeding and introduce other foods too early

The College has provided comments on the proposal questions below:

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

Complementary food is the term used globally and aligning with this will reduce some of the ongoing confusion. The College considers that reaching agreement on common definitions and indicators for appropriate complementary feeding is essential. Complementary feeding describes the gradual shift from breast milk (or in some cases a breast-milk substitute) to solid foods/family meals and it is a transition period that begins when an infant reaches around six months of age and continues until the age of two years or beyond.

Q: Is the definition of first food enforceable?

The definition should be changed to complementary foods as previously stated. Adhering to the provisions of the International Code of Marketing of Breastmilk Substitutes and subsequent, relevant World Health Assembly resolutions would assist with the enforcing of new optimal definitions. Governments do have a responsibility to monitor and enforce the Code, to provide education about optimal infant feeding and to produce up to date and evidence based guidelines for health workers and parents.

Q: 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.

The College do not consider it necessary to prohibit the use of the number six to describe appropriate complementary foods for infants. The global guidelines for infant feeding state infants should be exclusively breastfed for the first six months of life to achieve optimal growth, development and health, and should then receive nutritionally adequate and safe complementary foods while breastfeeding continues up to two years or beyond. Appropriate labelling will assist with the protection and support of breastfeeding, alongside a reduction in the numbers of infants introduced to complementary foods too early.

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

The College does not consider the changes will affect the intent of the statement.

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

The statement ‘not before 4 months of age’ should be removed from any commercial infant foods. It represents a misleading statement that will confuse parents, undermine the optimal infant feeding guidelines and reduce breastfeeding.

Q: 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 College considers that the statement ‘not before 4 months of age’ should no longer be permitted. Alerting parents to the risks of early introduction of complementary foods with a suggestion that information may be accessed from a Well Child Nurse is suggested.

Q: 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 College considers that this change will reduce the confusion for parents and other caregivers.

Summary

The College strongly support the FSANZ changes proposed for the minimum age infant food labelling. Public health messages about optimal infant feeding and the New Zealand Ministry of Health infant nutrition guidelines need to be reflected in the products available in the market place. The College considers these changes are necessary and timely to ensure consumer safety and confidence. We hope that this feedback is of assistance and thank you for the opportunity to comment.

Correspondence to 