

Submission on Proposal P274 – Minimum Age Labelling of Foods for Infants

Submitter:

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Introduction

The Southern Primary Health Organisation (PHO) is a charitable trust funded by the Southern District Health Board to provide primary health care services to residents enrolled with general practices in Otago and Southland. These services include first contact support to restore people's health when they are unwell and a range of programmes to improve access to health care services and to promote and maintain good health. One of these programmes is health promotion, which is the process of enabling people to increase control over, and to improve, their health. One aspect of health promotion is to advocate for healthy social, cultural and physical environments.

This submission was developed by the Health Promotion Team on behalf of the Southern PHO.

General Comment

The Southern PHO congratulates FSANZ on looking into the issue of food labelling and the inconsistent messages with national and international guidelines.

Optimal nutrition is of significant importance in the first two years of an infant's life, during which time there is a momentous shift in their diet, moving from a diet consisting of entirely milk (breast milk and/or infant formula) to one consisting of a variety of foods. Optimal nutrition has a greater importance during this stage of life than any other because of its effect on brain growth, the development of the nervous system, overall growth and development, and future health.¹

Before complementary foods are introduced, the infant must be physically and physiologically ready to chew, swallow and digest such foods. Once the infant is "around six months of age", these changes have occurred to make an infant ready for complementary foods. There are many documented risks associated with introducing complementary foods too early, including

¹ Ministry of Health. 2008. *Food and Nutrition Guidelines for Healthy Infants and Toddlers (Aged 0–2): A background paper (4th ed) – Partially Revised December 2012*. Wellington: Ministry of Health.

eczema, childhood asthma, food allergies, diarrhoea and dehydration. Ensuring infants are started on complementary foods at around six months will significantly reduce those risks.

The information on food labels needs to be consistent with current infant feeding guidelines. The Food and Nutrition Guidelines for Healthy Infants and Toddlers Aged 0-21¹ recommend for the total New Zealand population that infants be fed exclusively on breast milk to around six months of age, at which time complementary foods can be introduced with continued breastfeeding until the infant is at least one year of age, or beyond. This recommendation also takes account of the Global Strategy for Infant and Young Child Feeding.²

The Southern PHO supports the labelling requirements of 'around six months' with the inclusion of the warning statement 'not recommended for infants under the age of four months'. The Southern PHO also supports the recommendation around mandatory first stage labelling. We believe the statement 'around six months' be accompanied with wording to the effect that this is intended as a first complementary food for the infant. These changes will provide caregivers with consistent messages about when and what food to provide as a first complementary food.

² WHO. 2003. *Global Strategy for Infant and Young Child Feeding*. Geneva: World Health Organization.