

NUTRICIA

Australia

12 November 2013

Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610
AUSTRALIA

Re: Proposal P274: Minimum Age Labelling of Foods for Infants

Nutricia Australia wishes to provide comments on Proposal (P274) – Minimum Age Labelling of Foods for Infants.

Nutricia is the manufacturer of the Aptamil and Karicare brands of Infant Formula Products, Toddler Supplements and Karinatal Supplements for Conception and Pregnancy and for Lactation support.

As a company with a focus on infant and child nutrition and expertise in early life nutrition, Nutricia has a keen interest in proposals for regulatory change that may impact on infant feeding.

Nutricia supports breast feeding as the preferred and optimum method of feeding an infant. If, however, breast feeding or breastmilk is not available for the infant, the only suitable alternative method of feeding is an infant formula product.

Nutricia supports the continued development of nutritional foods that support the specialised needs of infants.

Nutricia understands that the key matters to be addressed in this consultation are as follows:

- Concept and definition of “first food”;
- Compositional requirements for “*first food*” relating to texture;
- Labelling requirements for “*first food*” mandating –
 - mandating a front of pack “*around 6 months*” age suitability statement; and
 - modifying the mandatory statement recommending against solid foods for infants under 4 months; and
- Limiting vitamin and mineral fortification for cereal-based foods for infants to those suitable for infants **over** the age of around 6 months (6+ months).

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Nutricia Position

Nutricia **supports** Regulatory Option 1 to maintain the status quo in Standard 2.9.2.

Nutricia **does not support** Regulatory Option 2 - *amend the youngest minimum age labelling requirements in Standard 2.9.2 so that the minimum reference age permitted on infant food is 'around 6 months'* for the following reasons:

- Lack of adequate rationale for the proposed changes;
- Inconsistent with current recommendations for the appropriate age for the introduction of solids, for the management of food allergy risk;
- Potential for risk of nutritional deficiencies in infants for key nutrients – iron and zinc; and
- Potential to create confusion with consumers and carers.

Nutricia believes that FSANZ has not presented clear evidence of market failure, the rationale for the change has not been substantiated and the cost benefit analysis provided is incomplete.

Nutricia wishes to comment specifically on the implications for the management of food allergy risk and nutritional deficiencies.

Food Allergy Risk Management

The safe and desirable time of development for an infant in which to introduce solid foods is the subject of some debate.

The European Food Safety Authority (EFSA) has recommended that solid foods can be safely introduced from 4 months of age. This is approximately 17 weeks of age. The Australian Society for Clinical Immunology and Allergy (ASCIA) recommends 4-6 months of age. This particular recommendation is linked to a reduction in the expression of allergy shown by infants and young children.

It is acknowledged that the WHO recommendation is from 6 months; however this must be seen in the context of the need for the WHO to cover all potential conditions for a developing infant around the world.

The recommendations of the Australian Society of Clinical Immunology and Allergy (ASCIA) support the introduction of solids from the age of 4-6 months, with subsequent reduction of risk of allergy. This recommendation is most appropriate for Australia and for Australian and New Zealand food regulations.

Management of Nutritional Deficiency

Whilst the iron in breastmilk is bioavailable and readily absorbed, breastmilk cannot be regarded as an excellent source of iron, particularly for an infant over the age of six months, with an increasing body weight. An infant is typically born with good iron stores and does not require significant levels of iron from the diet for the first 4 – 6 months. During this time, breast feeding will confer many benefits; however the supply of high levels of iron is not one of them. The infant's iron stores then become depleted, however and a dietary source of iron becomes critical. If iron deficiency is common then suitable sources of iron must be found in the diet and these are typically found in meat based infant foods, fortified cereal infant foods and infant formula products.

A delay in the introduction of solids to '*around 6 months*' may compromise the iron status of some infants as carers will not have access to fortified infant cereal products currently available for infants in the 4-6 months age group. This would also be a major concern should a parent or carer interpret this recommendation in a manner such that foods were not introduced until beyond 6 months.

In Summary

For the reasons outlined in this submission, Nutricia supports regulatory option 1 – STATUS QUO, as the only appropriate outcome for this consultation.

Nutricia is a member company of the Australia Food and Grocery Council (AFGC). We have had the opportunity to review the AFGC submission and are supportive of the issues raised by AFGC and their position.

Nutricia would welcome the opportunity to engage in further consultation on this matter should the opportunity arise.



Head of Government & Regulatory Affairs, ANZ
Nutricia Australia Pty Ltd