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Royal New Zealand Plunket Society (Inc.)

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

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Introduction

Plunket is New Zealand's largest provider of Well Child Services and delivers the Well Child/Tamariki Ora service to families with children aged from birth to 5 years. Plunket enrolls around 92% of all babies born in New Zealand, provides community services, and operates PlunketLine, a 24/7 0800 free telephone support and advice service for all New Zealand families. Plunket nurses are registered nurses with additional post graduate qualifications in Primary Healthcare Nursing (Well Child/Tamariki Ora). They provide quality support and information on parenting issues and children's health and wellbeing including complementary feeding.

Plunket endorses the Ministry Of Health NZ guidelines in regard to complementary feeding. Complementary feeding is defined as the gradual introduction of solid food and fluids along with the usual milk feed (breast milk or formula) to an infant's diet.¹ Plunket endorses the Ministry of Health recommendation for the New Zealand population that infants be exclusively breast fed until around six months of age, at which time complementary foods should be introduced with continued breastfeeding until the infant is at least one year of age, or beyond.

It is important to be aware that before complementary foods can be introduced, the infant must be physically and physiologically able to cope with such foods and that there are well documented risks associated with early or late introduction of complementary foods.

The *Growing Up in New Zealand* study (2012)² states that "...most families received information about infant feeding and nutrition from Plunket (93%), family and friends (77%), books (44%), and the internet(40%)..."

Overview of the submission – Proposal 274 Minimum age labelling of infants foods

FSANZ is proposing to mandate that the label on a package of infant food must include:

1. The minimum age, expressed in numbers, of the infants for whom the food is recommended
2. The age (number) must be on the front of the package

¹ New Zealand Ministry of Health.2008. *Food and Nutrition Guidelines for Healthy Infants and Toddlers (Aged 0-2)*(A background paper). Wellington: Author. Ministry of Health

² Morton,S.M.B., Atatoa Carr, P.E., Grant, C.C., Lee, A.C., Bandara, D.K., Kinloch, J.M. et al. 2012. *Growing Up in New Zealand: A longitudinal study of New Zealand children and their families. Report 2: Now we are born*. Auckland: Growing Up in New Zealand.pp43-45

3. The youngest minimum age permitted is 'around 6 months' and is to be applied to 'first foods' as defined in Standard 2.9.2
4. 'around 6 months' is prescribed wording
5. Shortened wording for warning statements relating to product use below 4 or 6 months of age respectively
6. The 'before 4 months of age' warning statement applies only to infant foods represented for use at the youngest minimum age of 'around 6 months'.

Plunket believes that the labelling messages need to be consistent and supported by the whole industry to reduce variability in food labelling. Plunket believes that physiological readiness rather than ages and stages remains a key indicator for the introduction of complementary foods and that labelling that states around/approximate ages supports this. Plunket believes that the proposed changes will significantly reduce the risk of confusion for parents and carers.

Plunket submits the following recommendations for the minimum age labelling of infant foods on the P247 proposal by FSANZ

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

Plunket supports the concept of a first food as a useful way to apply labelling.

The word weaning is used in the definition and this needs to be consistent with the Ministry of Health NZ and the Australian National Health and Medical Council terminology of complementary or solids as opposed to weaning.

Plunket supports the notion that all information on food labels be consistent with current infant feeding recommendations and guidelines. Parents and health professionals require consistency when seeking nutrition advice messages.

Plunket supports that both age and consistency information are included so parents and carers are able to make appropriate product choices dependant on the child's development.

Is the definition of 'first food' enforceable?

For this to be enforceable there would need to be clearly defined criteria for first foods. This would then enable standards to be set for enforcement.

Plunket recommends that these standards be consistent for all products sold within the New Zealand market to ensure that enforcement is consistent across the sector.

Plunket recommends that FSANZ consider that parents and carers do purchase of complementary foods online and from countries other than Australia and New Zealand. Guidelines need to be considered for parents and carers to support them to make informed decisions.

Should the use of the age/number 6 on labels of infant food be prohibited, other than in conjunction with the word 'around'?

It is important to ensure that the age/number 6 is not used in isolation. It would be better used in conjunction with wording so it is less ambiguous for parents.

Labelling that indicates the consistency/texture and recommended age for which the food is suitable will support parents and carers understanding of texture changes. Labelling also needs to take into account individual variation among infants.

It is important that labelling does not contribute to discouraging continued breast feeding after six months through actual or implied messages that emphasise the introduction of complementary foods and drinks.

Plunket recommends that FSANZ give consideration to also extending labelling to juices and bottled water.

Plunket anecdotal evidence is consistent with the findings from the *Growing Up in New Zealand* study (2012) that the decision to introduce complementary foods or solids is complex and made by parents in consultation with Well Child/Tamariki Ora providers, PlunketLine, friends and family/Whanau, peers, the internet, health education material, mums, and parent groups.

It is important to be mindful of the range of interpretations of the term "around 6 months" that exist between health professionals, parents and carers, friends and family/Whanau.

Therefore the labelling information needs to be consistent to reduce possible confusion. This was supported by the FSANZ study.³

Plunket believes that it is important to be aware that before complementary foods can be introduced the infant must be physically and physiologically able to cope with such foods, and that there are well documented risks associated with early or late introduction of complementary foods.

Parents and carers are entitled to labelling that is consistent and contains clear information based on the best evidence available in order to make an informed choice for their infant.

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

Plunket supports the use of mandatory advisory statements and the proposed word changing from '*not recommended for infants under the age of 4 months*' and '*not suitable for infants under the age of 6 months*' to '*not before 4 months*' and '*not before 6 months*'.

Plunket also supports a mandatory statement that encourages parents or carers to seek assistance from health professionals...for example....'*Please seek assistance from your health professional if contemplating the introduction of complementary foods/solids before 6 months of age*'

Should the 'not before 4 months of age' statement apply only to first food represented for infants 'around 6 months' of age? If not, please describe which foods should carry this warning statement and the reasons why.

Plunket supports this proposal.

³ A Qualitative Consumer Study Related to Food Labelling of Infant Foods
<http://www.foodstandards.gov.au/code/proposals/Pages/proposalp274reviewofminimumagelabellingoffoodsforinfants/Default.aspx>

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?

Plunket supports the minimum age to be located on the front of the product which is consistent with the research findings from the FSANZ 2004 Consumer research. This study revealed that people look mainly at the front label to make an initial choice to purchase.

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?

Plunket supports the proposal of the warning statement being placed on the rear of the jar/tin/packet as co-locating warning statement and minimum age on the front reducing confusion for parents and carers as identified in the 2013 industry and health professionals consultation findings.⁴

Plunket believes that the proposed changes will significantly reduce the risk of confusion for parent/caregivers on the age of introduction of solids foods. Therefore this is an important recommendation in reducing early and inappropriate introduction of solid foods.

Conclusion

Plunket believes that the labelling messages need to be consistent and supported by the whole industry to achieve consistency of food labelling. Plunket believes that physiological readiness rather than ages and stages remains a key indicator for the introduction of complementary foods and that labelling that states around/approximate ages supports this. Plunket believes that the proposed changes will significantly reduce the risk of confusion for parents and carers.

⁴ <http://www.foodstandards.govt.nz/code/proposals/Documents/P274-SD3-Issues-PFAR.pdf>