

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

To: Food Standards Australia New Zealand

Details of Submitter: Southland Breastfeeding Advocacy Group

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Introduction

The Southland Breastfeeding Advocacy Group was established in 2002 and is made up of community and health professionals. Its membership includes the Southern District Health Board, La Leche League, Plunket, Nga Kete Matauranga Pounamu Charitable Trust, Awarua Health and Social Services, Southern Primary Health Organisation, Pacific Island Advisory and Cultural Trust and Invercargill Parents Centre.

The focus of the group is to promote breastfeeding and work toward dispelling misconceptions around breastfeeding. The group is involved in co-ordinating health promotion and professional development initiatives for health professionals and community alike. Its mission statement is to protect, promote and support breastfeeding in the Southland Community through an interagency forum.

This submission was collated in consultation with group members of the Southland Breastfeeding Advocacy Group.

General Comment

The Southland Breastfeeding Advocacy Group congratulates Food Standards Australia New Zealand (FSANZ) on calling for submissions on a proposal to amend minimum age labelling requirements for infant foods from "four months" to "around six months" to be consistent 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 entirely of 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 eczema, childhood asthma and food allergies, respiratory disease, diarrhoea and dehydration.² 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 0-21 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.³ This recommendation also takes account of the Global Strategy for Infant and Young Child Feeding.⁴

Specific Comment

The Southland Breastfeeding Advocacy Group supports the labelling requirements of 'around six months' with the inclusion of a separate warning statement 'not recommended for infants under the age of four months'. We recommend that any mention of four months should be in smaller letters (this would be consistent with the 'breast is best' message size on tins of infant formula). Furthermore we are supportive of the fact that the warning statement is no longer required to be placed 'in association with' the age statement as we see a potential risk that parents will consider that complementary feeding after the age of four months is acceptable. The requirement to place the minimum age on the front of the infant food could provide a mechanism to separate these messages.

We also support the recommendation around mandatory first stage labelling. We believe the statement 'around six months' should be accompanied with wording to the effect that

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.

² *ibid*

³ *ibid*

⁴ WHO. 2003. *Global Strategy for Infant and Young Child Feeding*. Geneva: World Health Organization.

this is intended as a first complementary food for the infant. We endorse the proposed consequential amendment relating to the requirement that a 'first food' has a soft and smooth consistency.

Summary

The Southland Breastfeeding Advocacy Group considers it important that these changes will provide consistency between the respective infant feeding recommendations in New Zealand and Australia which will be supportive of breastfeeding and infant health promotion. Caregivers will have consistent messages about when to introduce a first complementary food and greater clarity about what recommended first foods should be.

On behalf of the Southland Breastfeeding Advocacy Group