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SUBMISSION

TO FOOD STANDARDS AUSTRALIA & NEW ZEALAND (FSANZ)

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

ORGANISATION:

Lactation Consultants of Australia and New Zealand (hereafter LCANZ)

NAME:

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SUMMARY

Lactation Consultants of Australia & New Zealand (LCANZ) is the trans-Tasman professional organisation for International Board certified Lactation Consultants (IBCLCs) and an affiliate of the International Lactation Consultant Association (ILCA).

Our members consist predominantly of IBCLCs, many of whom also have credentials in nursing, midwifery, child health nursing or medicine. Thus our members work in a number of settings, as well as in private practice.

In regard to **Proposal P274 – Age Labelling of Foods for Infants** and supporting documents, we congratulate your organisation on your thoroughness in assessing the evidence and the strength of evidence. We agree with the proposal to apply “about 6 months” as the lower age limit for the labelling of complementary foods (formally known as “solids”).

Our reasons are:

- Alignment with the most recent revision of the NHMRC Infant Feeding Guidelines, http://www.nhmrc.gov.au/_files_nhmrc/publications/attachments/n56_infant_feeding_guidelines.pdf
- Alignment with the WHO guidelines, including in the WHO's *Global Strategy for infant and Young Child Feeding*¹
- Protection of public health and safety;
- Evidence that introducing complementary foods at “about 6 months” does not create risk
- Prevention of misleading or confusing information or deceptive conduct.

QUESTIONS TO SUBMITTERS, AND THE LCA NZ RESPONSE

4.1.1.2 Food intended as a first food

- A) Is the concept and definition of first food a useful way to apply certain labelling and formulation requirements? - No.** *As the term “complementary foods” is increasingly used in the international documents, including the World Health Organization (WHO’s) Global Strategy for Infant and Young Child Feeding, we believe this is a more appropriate term than “first food”. Indeed, “first food” is misleading, bearing in mind that the previously liquid diet (breastmilk or a substitute) is indeed food.*
- B) Is the definition of ‘first food’ enforceable? – See previous answer.**

4.1.1.3 Impact of labelling on other infant food:

- A) 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: -** *Since the World Health Organization recommends exclusive breastfeeding for the first 6 months (nothing but the breast), as do the NHMRC and New Zealand guidelines, the age/number 6 needs to be retained, irrespective of use of the words “around” or “about”. Lack of this number would undermine the recommendation by creating confusion. For optimal infant health, growth and development, the WHO recommends that infants should be exclusively breastfed for the first 6 months of life to achieve optimal growth, development and health. What is more, it is recommended that, after complementary foods are introduced, infants should receive nutritionally adequate and safe complementary foods while breastfeeding continues up to 2 years or beyond.*

4.1.2 Mandatory advisory statements

- A) Do the changes to the wording of the warning statements change the intent of these statements? If so, please explain why. No**
- B) Should the ‘not before 4 months of age’ statement apply to food represented for infants ‘around 6 months’ of age only? If not, please describe which foods should carry this warning statement and the reasons why. No.** *Consumers notice numbers and the use of “4 months” on labelling of complementary may confuse consumers, who may not notice it is a warning, or may assume the wording means the food is acceptable from 4 months.*

4.1.3 Location of mandatory statements on infant food labels

- A) 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? See previous comment.** *No number except “6” should appear on the label. It would be sensible to add a statement that beginning these foods early has possible risks and to talk to a child health nurse or the baby’s doctor. The wording should be at a Grade 5-6 reading level, as recommended in the United States for all health informational material.²*
- B) Will the removal of the association between the relevant minimum age statement and the 4-month warning statement reduce the risk of caregiver confusion on the age of introducing solid foods? Yes, we believe this is so.**

¹ World Health Organization/ UNICEF. *Global strategy for infant and young child feeding*. Geneva: WHO, 2003.

² Thorley V. Readability of selected breastfeeding information for mothers: early twenty-first century. *Birth Issues* 2006;15(2):47-53.