

26 April 2023
238-23

Attachment 2 – Analysis of Current Stage Labelling and Proxy Advertising Practices of Infant Formula Products in Australia and New Zealand

Supporting Document 3

Labelling for Infant Formula Products

Proposal P1028 - Infant formula 2nd CFS

Executive Summary

Food Standards Australia New Zealand (FSANZ) is currently reviewing the regulation of Infant Formula Products (IFP) under Standard 2.9.1 – *Infant Formula* and Schedule 29 – *Special purpose foods* through Proposal P1028 – Infant Formula.

This report aims to evaluate current labelling practices of IFP on the Australia and New Zealand (ANZ) market. To date, there are no specific requirements or definitions concerning stage labelling or proxy advertising within the *Australia New Zealand Food Standards Code* (the Code). Stage labelling is considered as the labelling of infant formula (IF) as stage 1, follow-on formula (FOF) as stage 2 and toddler milk as stage 3. FSANZ describes proxy advertising as any reference (including names, numbers, images and claims) made about another product on the label of an infant formula or follow-on formula. Stage labelling, proxy advertising and branding consistency was assessed through a range of quantitative and qualitative measures. This involved statistical and categorical analysis of differing labelling practices. These results were used to inform an assessment against 8.6.4 and 8.6.5 of Section A of the revised Codex Draft Standard for Follow-up Formula for Older Infants (FuFOI).

This report found that the inclusion of stage labelling and proxy advertising on IFP are prevalent within the ANZ market. Stage labelling was present on 100% of IFP and proxy advertising was present on 52.4% of IFP. Manufacturers utilise a wide variety of strategies to present this information, ranging from the size and location of information, colours, images and the inclusion of additional text. Although a wide variety of strategies are used to differentiate between various IFP, similarities between product labels are prominent, making it difficult to compare Australian and New Zealand IFP labels against 8.6.4 of Section A of the revised Codex Draft Standard for FuFOI. Additionally, more than half of IFP included proxy advertising, indicating that 51.2% of Follow-on Formula (FOF) did not align with 8.6.5 of Section A of the revised Codex Draft Standard for FuFOI and would therefore require a substantial labelling change. Future research should investigate consumer perceptions on the helpfulness of stage labelling, and the impact proxy advertising has on consumer's purchasing decisions.

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Abbreviations and Glossary

Abbreviation or Term	Meaning
ANZ	Australia and New Zealand
BOP	Back of Pack
CCNFSDU	Codex Committee on Nutrition and Foods for Special Dietary Uses
Codex	Refers to Codex Alimentarius
Codex Draft Standard for FuFOI	Refers to the Proposed Draft Revised Standard for Follow-up Formula, Section A: Follow-up Formula for Older Infants
FSANZ	Food Standards Australia New Zealand
Follow-on formula (FOF)	An infant formula product that is represented as either a breast milk substitute or replacement for infant formula and is suitable to constitute the principal liquid source of nourishment in a progressively diversified diet for infants from the age of six months, as defined in Standard 1.1.1 of the Code.
FOP	Front of Pack
Follow-up formula (FUF)	Under CODEX CXS 156-1987, this is a food intended for use as a liquid part of the weaning diet for older infants (age 6-12 months) and for young children (age 12 -36 months).
FuFOI	Follow-up Formula for Older Infants
Infant	A person under the age of 12 months, as defined in Standard 2.9.1
Infant formula (IF)	An infant formula product represented as a breast milk substitute for infants and which satisfies the nutritional requirements of infants aged up to four to six months, as defined in Standard 1.1.1 of the Code
Infant formula products (IFP)	Products based on milk or other edible food constituents of animal or plant origin which is nutritionally adequate to serve as the principal liquid source of nourishment for infants; as defined in Standard 1.1.1 of the Code
INC	Infant Nutrition Council
MAIF Agreement	The Marketing in Australia of Infant Formula: Manufacturers and Importers Agreement
The Code	Australia New Zealand Food Standards Code

Introduction

Infant formula products (IFP) are regulated in Standard 2.9.1 – *Infant Formula* and Schedule 29 – *Special purpose foods* of the *Australia New Zealand Food Standards Code* (the Code) and contains the most prescriptive requirements of any food category in the Code.¹ Other standards in the Code also contain provisions for Infant Formula Products (IFP), such as those relating to food additives, contaminants, labelling and microbiological limits.¹ Food Standards Australia New Zealand (FSANZ) is currently reviewing the regulatory framework, composition, category definitions labelling and representation of IFP under Standard 2.9.1 and Schedule 29 through Proposal P1028 – Infant Formula.¹

To date, the Code does not include specific requirements or definitions concerning stage labelling or proxy advertising. Stage labelling is considered as the labelling of infant formula (IF) as stage 1, follow-on formula (FOF) as stage 2 and formulated supplementary food for young children (also referred to as 'toddler milk') as stage 3. FSANZ describes proxy advertising as any reference (including names, numbers, images and claims) made about another product on the label of an infant formula or follow-on formula.

Marketing practices for infant formula and follow-on formula are controlled through the implementation of the World Health Organization's (WHO) International Code of Marketing of Breast-milk Substitutes.³ Labelling principles from this WHO Code are given effect as mandatory provisions in Standard 2.9.1 (for example, directions for preparation and use). The Marketing in Australia of Infant Formula: Manufacturers and Importers (MAIF) Agreement and the (New Zealand) Infant Nutrition Council (INC) restricts the advertisement and promotion of IFP for all members (including manufacturers, marketers and distributors of IFP) under voluntary industry codes of practice.⁴ Additionally, under the revised Codex Draft Standard for Follow-up Formula for Older Infants (FuFOI), the Codex Committee on Nutrition and Foods for Special Dietary Uses (CCNFSDU) has provisions to avoid consumer confusion through the clear differentiation in labelling between the different products, and to prevent references about toddler milks and IF on the labelling of FuFOI⁵. Draft text has been proposed by CCNFSDU in Section A (Follow-up Formula for Older Infants) and Section B (Drink for young children with added nutrients or Products for young children with added nutrients or Drink for young children or Product for young children) of the revised Codex Draft Standard for FuFOI, with Section A relevant to this report (see Appendix A).

This report is designed to inform the 2nd Call For Submissions (CFS) for Proposal – P1028 by providing insight into the current labelling practices of IFP on the Australia and New Zealand (ANZ) market. The implications to said products, if the revised Codex Draft Standard for FuFOI provisions were adopted, will then be discussed.

Methods

Sampling

A total of 82 IFP were analysed across 22 different manufacturers, including both IF (0-6 months) (n=41) and FOF (6-12 months) (n=41). Toddler milks (1-3 years) were out of scope for this report and therefore were not included within the sampling. Products intended for infants aged 0-12 months formulated to address a special medical purpose were also omitted from analysis. This was inclusive of products for conditions such as colic, reflux and constipation. Due to changes in formula composition and/or labels, from 51 eligible IFP products photographed in 2021, 8 were removed from analysis to total 43 products. Thirty-nine new and/or updated IFP from 2022 that were not included in the 2021 survey were added to the IFP analysed.

The analysis was not intended to be an exhaustive list of all available products, and instead, represented a sample of currently available IFP (February 2021 and June 2022) found in major retailers (Woolworths, Coles, Chemist Warehouse, Aldi, and Countdown) in ANZ. All IFP were sold in canisters and were in powdered form, rather than liquid concentrate or ready-to-use formulas.

Data Collation and Analysis

Information pertaining to stage labelling, proxy advertising and branding consistency of IFP surveyed was recorded in a spreadsheet, with data analysis including both qualitative and quantitative measures. To analyse stage labelling across IFP, information pertaining to the location, characteristics (i.e. whether the stage labelling was specific to the product only or if it made reference to other stages), prominence and descriptions of how food manufacturers market other stages within their product lines were recorded. Similar analysis was performed to assess proxy advertising, which included a breakdown of advertisements by location on pack, the prominence of information and characteristics/strategies of how IFP cross-promoted their range. Branding consistency across a product range was assessed by analysing the degree of change between products in relation to the colours, images and trademarks used. The findings were compared with sections 8.6.4 and 8.6.5 of the Codex Draft Standard for FuFOI. A qualitative analysis that drew pertinent information from the key findings section to inform general trends and common practices of IFP on the ANZ market was also undertaken.

Results

1. Stage Labelling

Table 1a. provides a breakdown by location of stage labelling across all IFP assessed (n=82), demonstrating that 100% of IFP included stage labelling in conjunction with the product’s intended age range, with two of these products (2.4%) only including stage information, without the inclusion of an intended age range. Stage labelling on the front of pack (FOP) was most common (62.2%), followed by the inclusion of stage labelling on both FOP + back of pack (BOP) (37.8%). No products included stage labelling on the BOP only.

Table 1a. Breakdown of Stage Labelling by location on all IFP (n=82)

Location of stage labelling	Quantity of IFP	
	Number (n)	Percentage (%)
FOP Only	51	62.2
BOP Only	0	0.0
FOP + BOP	31	37.8
No stage labelling	0	0.0
Only stage label (no age range provided)	2	2.4

As demonstrated in Table 1b., the majority of IFP (n=74, 90.2%), included stage labelling that was specific to the product only. Only eight IFP (11.3%) made reference to other stages on their FOP (See Appendix B for a description of how these products made reference to other stages).

Table 1b. Characteristics of FOP stage labelling across IFP (n=82)

Category	Quantity of IFP	
	Number (n)	Percentage (%)
Stage labelling specific to product only	74	90.2
Stage labelling makes reference to other stages	8	11.3

Table 1c. includes an assessment of the prominence of FOP stage labelling and age information, indicating that most IFP fall into categories A(n = 38, 46.3%), B(n=18, 22.0%) and C(n = 16, 19.5%), with each category sharing the commonality of stage being larger than age information. Nearly half of all IFP (n=38, 46.3%), included stage information that was both larger and more prominent than age information. The second most common category (n=18, 22.0%) included IFP with stage and age information both being prominent, despite the stage information occupying more space than the age information (Category B). Comparatively, only two products (2.4%) included age information that was both larger and more prominent than stage labelling (Category E) and two products (2.4%) included age information that occupied approximately the same amount of space as stage labelling, with both being prominent.

Table 1c. Prominence of FOP stage labelling and age information across IFP (n=82)

Category	Quantity of IFP	
	Number (n)	Percentage (%)
A: Stage is both larger and more prominent than age information	38	46.3
B: Stage is larger than age information but both are prominent	18	22.0
C: Stage is larger than age information but neither are overtly prominent	16	19.5
D: Stage is larger than age information, with both prominent. However, imaging, branding and/or other writing is most prominent	6	7.3
E: Age information is both larger and more prominent than stage labelling	2	2.4
F: Age information occupies approximately same amount of space as stage label, both are prominent	2	2.4

2. Proxy Advertising

As shown in Table 2a. nearly half (n=39, 47.6%) of IFP did not include proxy advertising on the label. Of the IFP that did include proxy advertising, 35 placed it on the BOP only (42.7%), four placed it on the FOP only (4.9%) and four included it on the FOP and BOP (4.9%).

Table 2a. Breakdown of proxy advertising by location across IFP (n=82)*

Location of Proxy Advertising	Overview of all IFP		Specific Product			
	Number (n)	Percentage (%)	IF (n= 41)		FOF (n= 41)	
			(n)	(%)	(n)	(%)
FOP Only	4	4.9	2	4.9	2	4.9
BOP Only	35	42.7	18	43.9	17	41.5
FOP + BOP	4	4.9	2	4.9	2	4.9
None Present	39	47.6	19	46.3	20	48.8

As illustrated in Table 2b., across products that included proxy advertising on their BOP, in conjunction with the name and reference to other IFP in the product line, 64.1% (n=25) of IFP presented an additional text description with their advertisement (see Appendix C for specific text in proxy advertisements). Most IFP with BOP proxy advertising (n=29, 74.4%) only included advertisement of products that were next in the product line and did not mention the preceding IFP stage, with 25.7% (n=10) of products including an advertisement of their entire product range. The most common strategy of BOP proxy advertisement included referencing colours present on other products in their line (n=16, 41.0%), followed by the inclusion of images present on other products in their line (n=8, 20.5%).

Table 2b. Characteristics and strategies of BOP cross-promotion methods (n=39)

Category	Quantity of IFP	
	Number (n)	Percentage (%)
1. Characteristic of proxy advertisement		
1A: Only name and reference to other products in product line is presented - no additional text	14	35.9
1B: Text description is presented alongside name and reference to other products in product line	25	64.1
2. Extension of proxy advertisement		
2A: Product includes advertisement of entire range	10	25.6
2B: Product only includes advertisement of products that come next in the line and does not mention preceding IFP	29	74.4
3. Strategy of proxy advertisement		
3A: Advertisement includes reference to colours of other products in product line	16	41.0
3B: Advertisement includes reference to images present on other products in product line	8	20.5

Note: IFP with BOP advertising are not exclusive to any one category. All IFP with BOP advertising are captured in category 1 and 2, and if relevant are included in category 3

Table 2c. includes an assessment of the prominence of BOP proxy advertising, demonstrating that the highest proportion of products (n=25, 64.1%) fell into Category A, followed by Category B (n=8, 20.5%), then Category C (n=6, 15.4%). Most IFP included prominent proxy advertising (Category A and B), regardless of how large the advertisement was. Comparatively, only six products (15.4%) included proxy advertising that was both not very prominent and occupied a small portion of space on the product.

Table 2c. Prominence of BOP proxy advertisement, including cross-promotion product range (n=39)

Category	Quantity of IFP	
	Number (n)	Percentage (%)
A: Clearly visible but does not occupy large portion of space on product	25	64.1
B: Very prominent, occupies a large portion of space on product	8	20.5
C: Not very prominent, occupies a small portion of space on product	6	15.4

3. Branding Analysis

As demonstrated in Table 3a., the most common change manufacturers made across product lines was a change in colour on the pack (n=60, 73.2%). For IFP that included images on their products (n=38), 52.6% (n=20) changed the images across their product lines. All IFP (n=82) kept consistent trademarks across the product range.

Table 3a. Characteristics of branding consistency across product ranges

Category	Quantity IFP	
	Number (n)	Percentage (%)
A: Colour changes across product range (n=82)	60	73.2
B: Images change across product range (n=38)	20	52.6
C: Trademark changes across product range (n=82)	0	0.0

Note: Percentages do not add to 100%, as some products utilized both colour and image changes.

Discussion

When assessing IFP on the ANZ market against 8.6.4 in Section A of the Codex Draft Standard for FuFOI, it is difficult to make definitive comparisons due to the high degree of subjectivity associated with being able to 'clearly distinguish' between various IFP. Accordingly, some general trends observed have been discussed instead. Given that all IFP included stage labelling on their products (Table 1a.), with 90.2% including stage labelling specific to the product itself (Table 1b.) and, 80.5% (n=66) of these products including stage labelling and/or age information that was considered as 'prominent', it could be argued that most IFP align with the first portion of 8.6.4, which states that 'follow-up formula for older infants shall be distinctly labelled in such a way as to avoid any risk of confusion' with other IFP. FSANZ's literature review⁵ indicated that caregivers use age information, stage labelling and the product name to differentiate between formula products. Voluntary stage labelling is a common practice within the market of infant products and it commonly seen on other non-food products such as diapers.

In conjunction with prominent stage labelling and/or age information presented on various IFP, a large portion of IFP also changed their colours (73.2%) and images (52.6%) across their product lines to enable consumers to make a clear distinction between them (Table 3a.) However, a change in images and/or colours was often also associated with proxy advertisement of other IFP and toddler milks (Table 2b.) as the images and colours presented within a product range were inter-linked, directly conflicting with section 8.6.5 of the Codex Draft Standard FuFOI. For example, a product range included teddy bears 'growing up' and getting bigger as the stages progressed. The 'stage 1' IF included a small teddy bear crawling, the 'stage 2' FOF depicted a slightly bigger bear that was sitting and playing with blocks, the 'stage 3' product included a bear that was standing up and reading a book, and the 'stage 4' product included a bear on a scooter. This practice was observed on three different product lines. Other examples of this practice included a dinosaur just beginning to hatch on the 'stage 1' IF, where it then hatched and is playing with a butterfly on the 'stage 2' FOF, signifying an age progression. A similar strategy was employed using colours, with the colours of various elements on a can (e.g., the lid, text, age information, stage labelling etc.) differing across a product line. For example, within one product range, the 'stage 1' IF had a white can with aqua coloured stage labelling, age information, instructions and headings. These labelling elements were presented in purple on the 'stage 2' FOF and in orange on the 'stage 3' toddler milk. Additionally, within the proxy advertising on the BOP, each stage was listed in a tear drop that was the colour of the corresponding can.

Despite the prominent stage/age information and changes in colours and/or images across products, all IFP maintained evident similarities within a product line. This was achieved by maintaining consistent trademarks and text font, and by retaining the positioning of any associated text, colours or images across their entire product range. Although it is a requirement under Standard 2.9.1 to include age information on an IFP to aid in differentiation between formula products, products that did not change colours and/or images were very difficult to distinguish between, regardless of how prominent the stage and/or age information was. In some instances, when the only change in labelling was the stage and age information, IF and FOF from the same product range were nearly indistinguishable from one another. This is problematic as consumers who are quickly purchasing formula products, or may not be attentive to labelling differences, could be confused by the similar colours, text and images present within a product line. The similarity of IFP assessed made it challenging to definitively assess whether an IFP aligned with section 8.6.4 of the Codex Draft Standard FuFOI and instead, highlights the individuality associated with being able to make a 'clear distinction' between various IFP.

It is worth noting that the strategies and extensiveness of the proxy advertisements also varied substantially between product ranges. Only 20.5% (n=8) of IFP that included BOP proxy advertising, were both prominent and occupied a large portion of space on the product (Table 2c.). However, of the 31 proxy advertisements that occupied a small portion of space on the product label, 25 were clearly visible and were still considered prominent (Table 2c.). Advertisements that referenced other colours (n=16, 41.0%) present in their product range, tended to be much more prominent when compared to those that just referenced other images (n=8, 20.5%) or did not change the colour and/or image in their advertisements, regardless of the size of the advertisement (Table 2b.). This demonstrates that current IFP on the ANZ market utilise a variety of strategies to cross-promote their product line, including the proxy advertisement size, colour, text and images, with each having varying degrees of effectiveness.

Determining the number of IFP that did not align with section 8.6.5 of Section A of the revised Codex Draft Standard for FuFOI was more straightforward than assessing the IFP against section 8.6.4. In accordance with section 8.6.5, which states "*the labelling of follow-up formula for older infants shall not refer to Infant formula, Drink for young children with added nutrients or Product for young children with added nutrients or Drink for young children or Product for*

young children, or Formula for special medical purposes intended for infants", all FOF that included proxy advertising (n=21, Table 2a.) would not align. Accordingly, if a similar requirement was to be adopted in the Code, 51.2% of all FOF assessed would require a substantial labelling change. Additionally, if the Code was to extend these labelling requirements to IF too, 52.4% of all IFP assessed (IF + FOF) would require a labelling change. Section 1.2.1—23 of the Code states that if the Code prohibits a label on or relating to food from including a statement, information, a design or a representation, an advertisement for that food must not include that statement, information, design or representation². This applies to Division 3 of Standard 1.2.7 (subsection 1.2.7—4(1)) which states that a nutrition content or health claim must not be made about an IFP).² Despite this, within the 64.1% of IFP that included a text description alongside the name and reference to other products in their line (Table 2b.), there was considerable ambiguity associated with potential nutrition content and health claims (see Appendix C for full text). Whilst some products outright included nutrition content and health claims in their proxy advertisements like "*Designed with Calcium and Vitamin D to contribute to normal growth and development*" and "*iron to contribute to normal cognitive development*", many IFP also included vague phrases like "*specially formulated with age appropriate ingredients*", "*blend of important ingredients*", "*added nutrition*" and "*nutritious milk drink containing vitamins and minerals*". Although this text may not necessarily constitute a claim, these are still representations intended to influence and drive consumer decisions to purchase one product over another. Accordingly, adopting a requirement within the Code similar to section 8.6.5 of Section A of the Codex Draft Standard for FuFOI would further limit any reference to other products within a product range.

It is important to recognise the limitations associated with these findings. Labelling interpretation, categorisation, and a comparison against Section A of the Codex Draft Standard for FuFOI was highly subjective and determinant upon individual interpretation. Additionally, although some information and categorisation was cross-checked to form a consensus, most of the analysis was completed by one person and accordingly, definitive statements regarding the qualitative analyses cannot be made. Given this was a student project governed by timing and resourcing constraints, all aspects related to labelling information of IFP, particularly consumer perceptions, could not be covered. Furthermore, given this market survey was limited to stores in the ACT only and associated online retailers, these results may not necessarily be generalizable to the entirety of IFP on the ANZ market and even less so to IFP in NZ.

Conclusion

Through analysing a sample of currently available IFP on the ANZ market, several trends relating to labelling and marketing practices were evident. Whilst every IFP included stage labelling, most only included the stage specific to the product itself. The majority of IFP also included stage labelling that was either both larger and more prominent, or larger and just as prominent as the associated age information. More than half of the IFP included proxy advertising, each utilising a wide variety of advertisement techniques with varying degrees of effectiveness, including altering the advertisement size and location, text descriptions, and referencing other colours and images of other products in their range. A key finding of the report was that 64.1% of products that included proxy advertising, included additional text to promote their lines. Regardless of technique, the majority of advertisements were still considered prominent. More than half of the IFP altered the colours and/or images across their products, with all keeping consistent trademarking. Due to the varied nature of stage labelling and proxy advertising strategies, it was difficult to quantitatively assess the IFP in a comparison against section 8.6.4 of Section A of the Codex Draft Standard for FuFOI, highlighting the individuality and subjectivity associated with being able to make a 'clear distinction' between various IFP. Comparatively, if a similar requirement to section 8.6.5 of Section A of the Codex Draft Standard for FuFOI was adopted within the Code, 51.2% of all FOF assessed would

require a substantial labelling change and 52.4% of all IFP assessed (IF + FOF) would require a labelling change if this standard was extended to IF too.

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Appendix

Appendix A:

Section A – The revised Codex Draft Standard for Follow-up Formula for Older Infants

8.6.4 - Follow-up formula for older infants shall be distinctly labelled in such a way as to avoid any risk of confusion with Infant formula, Drink for young children with added nutrients or Product for young children with added nutrients or Drink for young children or Product for young children, and Formula for special medical purposes intended for infants, in particular as to the text, images and colours used, to enable consumers to make a clear distinction between them.

8.6.5 - The labelling of follow-up formula for older infants shall not refer to Infant formula, Drink for young children with added nutrients or Product for young children with added nutrients or Drink for young children or Product for young children, or Formula for special medical purposes intended for infants, including numbers, text, statements, or images of these products

Appendix B:

Product	Description
IFP A	Has 1, 2, 3,4 on side of big number 1, with smaller 1 highlighted in orange to match large number 1, indicating which product in the range it is
IFP B	Has 1, 2, 3,4 on side of big number 2, with smaller 2 highlighted in green to match large number 2, indicating which product in the range it is
IFP C	Through number, stage 1 highlighted in blue and 2-3 remain grey
IFP D	Through number, stage 2 highlighted red and 1,3 remain grey
IFP E	In addition to large '1", there is a through number banner (1-4) present with 1 highlighted in purple to match colour accent of can and to indicate which stage product is
IFP F	In addition to large '2", there is a through number banner (1-4) present with 2 highlighted in purple to match colour accent of can and to indicate which stage product is
IFP G	In addition to large 1, there is a through number (1-3) block with 1 larger than other 2 numbers, highlighted in blue to match colour accents of can
IFP H	In addition to large 2, there is a through number (1-3) block with 2 larger than other 2 numbers, highlighted in red to match colour accents of can

Appendix C:

Table 2. Text presented in proxy advertisement across IFP

Product	Text Description
IFP A	<p>"2 - Follow On - From 6 Months: [REDACTED] Follow On Formula is a formulation for your baby during the early stages of life. [REDACTED] Follow on is a blend of nutrients suitable for children from 6 months of age. As your Baby becomes more active a balanced diet is essential to support their dietary requirements [REDACTED] Follow On can be used as solids are introduced. [REDACTED] Follow on should always be prepared as directed." --> "3 Toddler - From 12 months: [REDACTED] Toddler Milk is a formulation of nutrients created for your child. [REDACTED] Toddler Milk is a nutritious milk drink containing vitamins and minerals to help support the dietary requirements of your growing toddler. As your toddler becomes more active [REDACTED] Toddler can help supplement your child's diet when regular foods are inadequate. [REDACTED] Toddler should always be prepared as directed"</p>
IFP B	<p>"1 Newborn - From Birth: [REDACTED] Newborn is a formulation for your baby during their early stages of life. [REDACTED] supports and recommends feeding your infant breast milk. If this is not the best option for you, [REDACTED] Newborn is a blend of nutrients suitable for newborns. [REDACTED] Newborn should always be prepared as directed. When you feel it is time to progress to Step 2 Formula you should consult with your healthcare professional for advice" ... "3 Toddler - From 12 months: [REDACTED] Toddler Milk is a formulation of nutrients created for your child. [REDACTED] Toddler Milk is a nutritious milk drink containing vitamins and minerals to help support the dietary requirements of your growing toddler. As your toddler becomes more active [REDACTED] Toddler can help supplement your child's diet when regular foods are inadequate. [REDACTED] Toddler should always be prepared as directed"</p>
IFP C	<p>"Also available" ... "[REDACTED] - From 6 months: [REDACTED] is a follow-on formula designed to meet the nutritional needs of growing infants from 6 months of age" ... "[REDACTED] - From 1 year: [REDACTED] is a milk drink for toddlers, specially formulated with age appropriate ingredients to help supplement your toddler's diet when energy and nutrient intakes may not be adequate"</p>
IFP D	<p>"Also available"... "[REDACTED] - From 1 year: [REDACTED] is a milk drink for toddlers, specially formulated with age appropriate ingredients to help supplement your toddler's diet when energy and nutrient intakes may not be adequate"</p>
IFP E	<p>"Also available" ... "[REDACTED] - from 6 months: [REDACTED] is a premium follow-on formula designed to meet the nutritional needs of growing infants from 6 months of age" ... "[REDACTED] - from 1 year: [REDACTED] is a premium milk drink for toddlers, specially formulated with age appropriate ingredients to help supplement your toddler's diet when energy and nutrient intakes may not be adequate"</p>
IFP F	<p>"Also available" ... "[REDACTED] - from 1 year: [REDACTED] is a premium milk drink for toddlers, specially formulated with age appropriate ingredients to help supplement your toddler's diet when energy and nutrient intakes may not be adequate"</p>
IFP G	<p>"Also available" ... "[REDACTED] - from 6months: [REDACTED] is a premium follow-on formula designed to meet the nutritional needs of growing formula fed infants" ... "[REDACTED] - From 1 year: [REDACTED] is a premium milk drink for toddlers, specially designed to help support to supplement your child's diet when energy and nutrient intakes may not be adequate" ... "[REDACTED] - From 2 years:</p>

	<p>██████████ is a premium milk drink for toddlers, specially designed to help supplement your child's diet when energy and nutrient intakes may not be adequate"</p>
IFP H	<p>"Also available" ... "██████████ - From 1 year: ██████████ is a premium milk drink for toddlers, specially designed to help support to supplement your child's diet when energy ad nutrient intakes may not be adequate" ... "██████████ - From 2 years: ██████████ is a premium milk drink for toddlers, specially designed to help supplement your child's diet when energy and nutrient intakes may not be adequate"</p>
IFP I	<p>"There is a product designed specifically for each stage" ... "1 from birth: Complete nutrition for young babies, with a blend of important ingredients designed to meet your baby's needs. Complete Nutrition" ... "2 from six months: Balanced nutrition for babies from 6 months, in conjunction with a changing diet including solid foods. Balanced nutrition" ... "3 from twelve months: Nutritional supplement for toddlers who may require additional energy and nutrients. Added Nutrition"</p>
IFP J	<p>"There is a product designed specifically for each stage" ... "2 from six months: Balanced nutrition for babies from 6 months, in conjunction with a changing diet including solid foods. Balanced nutrition" ... "3 from twelve months: Nutritional supplement for toddlers who may require additional energy and nutrients. Added Nutrition"</p>
IFP K	<p>"When it's time to progress" ... "6-12 months: ██████████: A Follow-on formula for older babies from 6 months who are being introduced to solids"</p>
IFP L	<p>"When it's time to progress" ... "1 year+ ██████████: Carefully formulated as a premium supplementary drink for toddlers"</p>
IFP M	<p>"When it's time to progress: Stage 2, 6-12 months: ██████████: A follow on formula for older babies from 6 months who are being introduced to solids"</p>
IFP N	<p>"When it's time to progress: 6-12 months: ██████████ Follow-on Formula for older babies from 6 months who are being introduced to solids"</p>
IFP O	<p>"When it's time to progress: ██████████ Carefully formulated as a premium supplementary drink for toddlers"</p>
IFP P	<p>"1 stage 1 0-6 months - Infant Formula, From Birth: ██████████ Infant formula is scientifically formulated for infants from birth to 6 months of age." ... "2 Stage 2 6-12 months Follow-on formula: ██████████ Follow-on Formula is scientifically formulated for infants from 6-12 months of age" ... "Stage 3 12+ months Formulated Supplementary Food for Young Children: ██████████ Drink is a scientifically formulated supplementary food for young children from 12 months of age. Designed with Calcium and Vitamin D to contribute to normal growth and development, and iron to contribute to normal cognitive development in children; when used as part of a varied and a balanced diet and healthy lifestyle"</p>