

Submission:

Certification of ‘all-cause mortality’ artificial formula ultra-processed food powder (Formula UPF) and proposed ingredients (Lactoferrin) need to pause. Under the 1992 Codex evaluation formula was considered benign. Following the 2019 Nova food classification by Food and Agriculture Organization of the United Nations (FAO), the Codex evaluation is incorrect.

The whole concept that Formula UPF may be safely used as a ‘breastmilk substitute’ is inaccurate. Formula UPF is a basic harmful food, known to have adverse effects on health. The philosophy of creating a product ‘closer to breastmilk’ from an ultra-processed food via artificial and/or genetically engineered ingredients is a second mistake.

Food Standards Australia New Zealand (FSANZ) acceptance of industry research and ideology has allowed the current destruction of breastfeeding rates in Australia. This was part of the recorded intent of the ‘industry mommy wars’ publicity campaign. The acceptance of industry ‘evidence’ alone must stop. The existing and proposed artificial ‘bioactive’ ingredients (DHA, ARA, probiotics etc) are not ‘living’, they are in fact dead artificial components, showing harmful outcomes. Breastfeeding is dynamic and responds to a multitude of variations. Breastfeeding is the biological norm. Tinkering with chemicals does not produce the same outcome, rather produces potentially harmful outcomes and many marketing opportunities.

There are areas of harm to be considered:

1. The additive lactoferrin itself in suppressing appetite.
2. The impact on health, side effects and unknown outcomes.
3. The impact on the living breastmilk components – human lactoferrin, known as the ‘guardian of the genome’.
4. Conflict of temperature needs and safety measures.

Do we have enough independent research available to be experimenting with infant genomes, general population level impact?

The artificial dead substitute bioactive ingredients come at considerable cost to temperature safety recommendations and integrity. The National Health and Medical Research Council (NHMRC) chose to preserve the needs of industry (outside Code of Conduct) over World Health Organization (WHO) safe temperature recommendations. Artificial ingredients are destroyed at the recommended 70°C preparation level which is required to avoid *Cronobacter* harm. Unproven ‘specialised artificial substitutes’ should not take precedence over safety measures.

FSANZ and NHMRC you need to step up, stop being a rubber stamp of industry and take your role of protecting infant health in the serious manner intended in your Code of Conduct.

<https://www.fao.org/3/ca5644en/ca5644en.pdf>

<https://internationalbreastfeedingjournal.biomedcentral.com/articles/10.1186/1746-4358-9-2>

<https://www.who.int/news-room/commentaries/detail/it-s-time-to-stop-infant-formula-marketing-practices-that-endanger-our-children>

<https://www.unicef.org/media/115916/file/Multi-country-study-examining-the-impact-of-BMS-marketing-on-infant-feeding-decisions-and-practices,-UNICEF,-WHO-2022.pdf>