

RE: Proposal 274 – Minimum Age Labelling of Foods for Infants

I was very excited to read of the proposed change by Food Standards ANZ to food labelling guidelines for foods for infants. This proposed change which will reduce the inconsistent and confusing messages to parents about when to introduce solid foods, is long overdue.

Parents are confused by the current situation with baby foods in Australia labelled as suitable 'from 4 months'. This differs from the information they receive from their health care providers which is that babies should be introduced to solid foods at around six months.

The World Health Organization (WHO) recommendation is for exclusive breastfeeding until around 6 months of age. This has been adopted by the National Health and Medical Research Council (NHRMC) as their recommendation for Australian infants and is reflected in their recently adopted 2013 Infant Feeding Guidelines.

These guidelines are developed following a detailed review of all available literature to ensure the best health outcomes for Australian infants.

Human milk is the normal food for human babies. Breastmilk provides all the nutrition a baby needs for the first 6 months of life. Babies who are exclusively breastfed, that is receive no other foods or fluids, for 6 months will have optimal health outcomes.

The Australian National Breastfeeding Strategy 2010-2015 had as their objective: *To increase the percentage of babies who are fully breastfed from birth to six months of age, with continued breastfeeding and complementary foods to twelve months and beyond.*

To achieve this objective we need to find strategies that will increase exclusive breastfeeding rates, which currently fall well below the national targets. We can do this by reducing contradictory and confusing messages to parents.

Foods which are labelled as suitable 'from 4 months' jump off the shelf shouting FOUR months to parents. Parents read four months on the label and assume that these foods are safe for their babies. They **hear** about exclusive breastfeeding until six months but they **see** four months on the food labels.

Babies who are introduced to solid foods early face many health risks. Immature digestive systems cannot process solid foods. Fats laid down in infancy are carried for life. Early solids can impact on the mother's breastmilk supply and result in the baby being weaned before six months.

To protect babies from the risks associated with early introduction of solids we should be providing clear and consistent messages to parents.

What may seem like a simple policy change in labelling in infant foods has the potential to have a huge impact on breastfeeding rates and health outcomes for many babies in Australia.

I fully support the proposal P274 to change the Minimum Age Labelling of Foods for Infants to 'around 6 months'.

Yours sincerely,

Ros Fleetwood

Parents want to do what is best for their child to give them the best health outcomes

- risk to babies:
 - Greater risk of infection from pathogens in foods
 - Greater risk of allergies to foods (this risk is reduced by introducing solid foods between 4-7 months)
 - Can reduce maternal supply of breastmilk leading to premature weaning
 - Can lead to malnutrition in extreme cases as babies' guts are not mature enough to process solid foods.
- Food labels in Australia currently allow baby food to be labelled as suitable from '4 months plus'. Unfortunately, very few babies are exclusively breastfed to 6 months. Statistics from the *2010 Australian National Infant Feeding Survey* results indicate that less than one quarter (15%) of babies are exclusively breastfed to 5 months (less than 6 months). To help improve the rate of babies who are exclusively breastfed for around 6 months, food labels in Australia should be changed to 'around 6 months' in line with NHRMC and WHO guidelines.
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- The Australian general public is highly susceptible to aggressive food marketing and believe that baby food is highly regulated. This is evidenced by the large body of public health research demonstrating that parents are largely ill informed about food labelling and nutritional content and highly influenced by food marketing. If a product states it can be consumed at '4 months' consumers wrongly think this is safe to do and is based on a government-endorsed position, informed by peak bodies such as the NHMRC and WHO.
- Caregivers may interpret their child as being developmentally 'advanced' and introduce solids prior to the recommended age. Regardless of whether a child is behaviourally developmentally advanced or not, no child's gastrointestinal tract is developmentally advanced enough to receive solids at 4 months of age or younger. Making a recommendation to introduce solids at 4 months of age places these children at higher risk of receiving solids even earlier than 4 months putting them at higher risk of the adverse events associated with the introduction of solids too soon.