



11 November 2013

Food Safety Australia and New Zealand  
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Tēnā koe

### **Proposal P274 Minimum Age Labelling of Foods for Infants**

The New Zealand Nurses Organisation welcomes the opportunity to comment on the above proposal. NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand representing over 46,000 nurses, midwives, students, kaimahi hauora and health workers. NZNO has consulted with members - well child/tamariki ora nurses, midwives and nurse practitioners - and nursing research, policy and advisory staff. This submission is informed and supported by the Nurses for Children and Young People Aotearoa (NZNO), and the New Zealand College of Primary Health Care Nurses.

NZNO appreciates the difficulty inherent in having labelling that is unambiguous and, at the same time, able to accommodate widely divergent developmental needs. We also appreciate the efforts made to align these standards with the recent New Zealand and Australian infant feeding guidelines, though we suggest that the language in the WHO recommendations for introducing solids is actually clearer. Though Australia and New Zealand enjoy relatively high standards of living, the needs of human infants are universal, and decisions governing their nutrition should be informed by evidence. Despite abundantly clear evidence, however (World Health Organisation, 2009), infant nutrition in Australasia is suboptimal according to that information: breastfeeding is not universal, exclusive breastfeeding for six months is not common; solid foods are often introduced too early and then rapidly become the primary source of nutrition, well before the recommended 12 months. Nurses and midwives see the consequences, though statistics rarely capture the misery or the long term implications of hospitalisation, allergies, respiratory and ear conditions, hearing loss, or speech problems, which occur more frequently in non-breastfed infants. The nutrition needs of the most vulnerable humans should not be reprioritised for any reason and policy decisions must support parents to make informed decisions.

The main issues for parents to be informed about with regard to infant feeding of solid foods are that:

- solid food is a supplementary, not primary, source of nutrition in the first year of life;
- solid foods are not introduced too early and particularly not before four months; and
- solid foods *are* introduced at "around six months" as indicated in the aforementioned guidelines.

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Accordingly NZNO supports the proposed amendment in Standard 2.9.2 that:

- the age (number) should always appear on the front of the label;
- a warning statement 'not before 4 months' of age should apply to *all* infant foods.

NZNO recommends that labels on all infant foods should

- include the information as per the WHO guidelines, that exclusive breastfeeding is recommended for the first six months; that breastfeeding should not be decreased when starting on solids; and to seek health professional advice prior to introducing solids before 6 months; and
- state 'not recommended before 6 months'.

These labels would deliver clear and unambiguous messages to parents that are consistent with evidence-informed international and Australasian infant feeding guidelines for healthy infant nutrition. i.e. that:

- exclusive breastfeeding is recommended for the first six months
- solid foods should not be introduced before four months;
- that professional advice should be sought before introducing solid foods to infants under six months of age; and
- it is safe and necessary to introduce foods to infants after six months.

Changes in infant feeding practices have occurred over the past three generations and are connected with other social, employment and commercial pressures. NZNO advises that it will be particularly important to widely disseminate the changes to all health professionals involved in providing a service to families and infants, to avoid any confusion in relation to the professional advice given about infant nutrition.

Nāku noa, nā

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## REFERENCES

World Health Organisation. (2009). *Infant and Young child Feeding: model textbook for medical and allied health professionals*. Retrieved November 11, 2013, from World Health Organisation Infant Feeding: [http://whqlibdoc.who.int/publications/2009/9789241597494\\_eng.pdf](http://whqlibdoc.who.int/publications/2009/9789241597494_eng.pdf)

## **NEW ZEALAND NURSES ORGANISATION**

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 46,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces Te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and social policy development enabling quality nursing care provision. NZNO's vision is *Freed to care, Proud to nurse*.