

Response to the Draft London Food Strategy

First Steps Nutrition Trust is a small public health nutrition charity that supports good food and nutrition from pre-conception to five years. We are particularly keen to see the London Food Strategy support pregnant women, new mums and their infants and young children to eat well, and for it to recognise the importance of the best start in life for the future health and well-being of Londoners. How we support our pregnant mums and new families to eat well, and feed their children well, straddles a number of areas of well-being. Many new mums feel lonely and isolated, apprehensive about feeding their baby in public or on public transport. Ensuring everyone feels supported to feed their baby as they choose, wherever they are, is important to reduce health and social inequalities. Ensuring all young children are exposed to good food, experience food growing and food preparation, and are protected from inappropriate advertising are also essential to foster good dietary choices and to promote good nutrition during an important stage of development. How we look after our youngest members of society has implications for all of us as they will be the future Londoners supporting this city.

We believe the food strategy needs to address the importance of good nutrition for infants and young children more boldly and weave early year's issues into a number of aspects of the food strategy so we have a more coherent approach to supporting the whole population.

Here we suggest some changes and additions to the suggested strands of the food strategy that we hope you will consider:

1. Good Food at home

It is essential to highlight the current issues relating to food insecurity among London families, but it is disappointing that there is no mention of the importance of supporting breastfeeding for both infant and maternal health and well-being as this is a free, sustainable food resource. Using infant formula can be a burden on family finances as this is an expensive product: based on current prices, using one of the top 4 brands of infant formula in the UK would cost between £36.30 and £58.60 per month for a 2-3 month old baby¹. Ensuring families are given adequate support to breastfeed, should they choose to do so, is essential. We have high breastfeeding initiation rates in London with many women stopping before they would like to for a number of reasons including lack of support and

¹ http://www.firststepsnutrition.org/pdfs/Costs_of_Infant_Milks_Marketed%20in_the_UK_May_2018.pdf

concerns over feeding outside the home. All those who support families in crisis (via foodbanks or other food sharing systems) should know how to signpost families with support and advice on breastfeeding. We have prepared a simple guide for foodbanks to provide information on how they can support pregnant women and families with infants and young children http://www.firststepsnutrition.org/pdfs/Food_Banks_toolkit_Dec_2017.pdf

In this section you highlight that

'language about 'healthy choices' too often blames people for things that are not their fault'

This could not be more true when it comes to infant feeding, where despite 80% of women wanting to breastfeed, many are let down by lack of societal and practical support and sadly fail to meet their breastfeeding goals. It would be good to acknowledge this in this section to highlight that eating well starts from the first day, and that how we feed our infants should be part of all discussions on 'food at home'.

What the Mayor will do to support change

6. The strategy says:

Encourage London Boroughs to develop good food retail plans.

This should include as an additional example, *'by ensuring women can comfortably feed their babies wherever they wish to do so'*

2. Good food shopping and eating out

What the Mayor can do to deliver change

1. As part of his commitment to help tackle child obesity, consult industry and other stakeholders on a ban on advertising food and drink that is not healthy across the TfL estate (including brand only advertising).

We support this pledge, but would like it to be extended to include any food or drink marketed to children under 3 years of age. This is particularly important to protect families from inappropriate marketing of breastmilk substitutes but also foods that are cross-branded to breastmilk substitutes and those baby foods which contribute to poor diet in infants and young children. A World Health Assembly resolution in 2016 (WHA 69.9)²

² http://apps.who.int/gb/ebwha/pdf_files/WHA69/A69_R9-en.pdf

highlighted the importance of restricting inappropriate promotion of foods and drinks for infants and young children, and if the aim is to tackle childhood obesity there has to be an acknowledgement that the roots of this are often in the early years. It is important to note that many baby foods contain a high amount of free sugars that may contribute to oral health problems as well as to overweight and we hope that the Mayor will consider our youngest Londoners when moving ahead with this important public health commitment.

What the Mayor will do to support change

- 1. Continue to work in partnership with local authorities and the CIEH to deliver the Healthier Catering Commitment*

We would like to see any catering commitments include information to caterers that some of their customers may be breastfeeding women and that this should be supported as a normal way to feed babies in our communities.

- 4. Support local authorities and businesses to help staff eat healthy, sustainable food and improve food in the workplace.*

We would like to see acknowledgement that some female staff members may want to express breastmilk in the workplace and should be encouraged to do this, be given a comfortable place in which to do so, and safe storage facilities for expressed breastmilk.

3. Good food in public institutions and community settings

Throughout this section we would like to see some acknowledgement of supporting families with infant feeding. In the preamble on p23 there is discussion that all settings need to buy and serve better food; that food brings communities together and reduces social isolation among vulnerable groups; that inclusive communities lead, educate and inspire people and that everyone needs to work together to create a healthy and sustainable food environment.

We would like to see an additional sentence in this summary section that acknowledges that families should feel comfortable to feed their babies in all settings, however they wish to feed them. This is essential in preventing new and vulnerable families from becoming isolated. The health and well-being of babies is everyone's business as they are our future Londoners. Families (and in particular mums with babies and young children) should not feel that they have to hide away because their infant feeding choice may be frowned upon,

www.firststepsnutrition.org

66 Hammersmith Road, London W14 8UD. E: Helen@firststepsnutrition.org T: 07590 289182

Trustees: Professor Amy Brown, Rob Percival, Professor Siân Robinson, Anna Rosier, Marjon Willers.

Director: Dr Helen Crawley RD, RNutr

but should be encouraged to be an essential part of the community. This is particularly important if mums are breastfeeding so we can normalise this in our communities and ensure that we do not have future generations of young men and women who have never seen a baby being breastfed as we have now.

What the Mayor will do to deliver change

2. Promote healthy sustainable food in the GLA group

We would like to see this acknowledge that the GLA group should be specifically breastfeeding friendly to all staff and visitors.

What the Mayor will do to support change

3. Create an environment where those who wish to breastfeed in public institutions and community settings for staff and visitors can do so

We fully support this recommendation but feel the wording could be improved to be more inclusive, and that it is important that everyone knows women are protected by the Equality Act to breastfeed wherever they wish to do so. We would like to suggest the wording below:

Ensure that every setting (public, community and private) is aware that supporting mothers to breastfeed wherever they choose to do so protects their rights under the Equality Act. A welcoming environment for breastfeeding women should be normal everywhere in our society.

A new initiative on TfL

We would also like to highlight another set of achievable measures that we feel the Mayor has in his gift to support new mums in London. At the moment pregnant women can obtain a 'Baby on board' badge to alert others that they might need additional support when travelling. Many new mums have to leave the house with their babies to attend appointments and may feel anxious and worried should their baby need a feed on public transport. This is particularly true for those families who rely on public transport to travel around London, and who may be more vulnerable or on lower incomes. We have heard that some women abandon breastfeeding because they are anxious about not being able to comfortably feed their baby on TfL buses and trains, and this seems incredibly sad.

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Normalising breastfeeding across London is needed and TfL is in a unique position to do this. We would like to suggest that the Mayor considers the following:

When women apply for a Baby on Board badge send information making it clear that TfL will also support them when their baby is born, that they fully support breastfeeding in any TfL setting and that all staff will be trained to ensure that women who may need help (to find a seat or to wait on a platform if necessary) are given kind and helpful words of encouragement. Badges could be made saying 'I'm feeding a future Londoner' that TfL sends out with the 'Baby on Board' badge.

To support this, all buses and trains should have a 'breastfeed comfortably here' sign to highlight that TfL policy is to support breastfeeding. This will alert parents and other passengers that they do not have to be worried that breastfeeding will be seen as unacceptable.

4. Good Food for Maternity, Early Years, Education and Health

We are pleased to see these issues highlighted as a separate chapter in the report and would like to suggest some additions.

In the preamble on page 27, in paragraph 1 We would also like to see a statement that London should be seen as a breastfeeding friendly city for people who both live here, and visit here.

In paragraph 4, it is suggested that the Mayor will promote the benefits of free school meals. It would be useful here to also highlight the importance of supporting Healthy Start for younger children in low income families in London.

What the Mayor will do

1. Convene a Child Obesity Taskforce

We would like to express our dismay that the Mayor has appointed someone from the baby food industry as the chair of this taskforce. This sends out a message that the diets of babies are not important in the obesity debate and that expensive, high sugar fruit and vegetable purees in pouches are an appropriate way to feed a baby. The Mayor's endorsing of a particular baby food company through the press release was extremely

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disappointing and we hope that there will be a clear statement from the Child Obesity Taskforce that they acknowledge the importance of infant feeding, abiding by the WHO Code of marketing of breastmilk substitutes and subsequent WHA resolutions and that the Taskforce recognises that expensive, processed commercial baby food are not needed in the diet of infants and young children and contribute to environmental damage related to excessive packaging.

2. Restriction of hot food takeaways near primary of secondary schools

We would also like to see this restriction extended to the surroundings of early year's settings. We have suggested this in the London Plan consultation.

What the Mayor will do to support change

1. We fully endorse the Mayor's support for the Healthy Start scheme and the need for a commitment for Boroughs to increase uptake to 80% of eligible families.
2. We fully endorse the Mayor's support for increasing the prevalence of breastfeeding and to encourage all Boroughs to become BFI accredited.

The support to increase the prevalence of breastfeeding on its own without any mechanism to do so however has little meaning, and it is unclear from this statement if that intention is only through supporting BFI, or through other methods. The statement could be turned around to say:

Encourage all London Boroughs to become Unicef UK Baby Friendly Initiative accredited in maternity and community settings and support an increase in the prevalence of breastfeeding in London through actively supporting women to breastfeed in all settings, including throughout TfL.

(see earlier comments on involving TfL by expanding the 'Baby on board' scheme to new mums).

Priorities to be led by external partners

2. Could you please insert the word early years settings into the second sentence of this point so that it reads:

This will help ensure that all early years settings and schools are incentivised to provide healthy food

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6. Good Food for the Environment

In the preamble on page 35, in paragraph 5, there is a statement about Londoner's food choices impacting on their carbon footprint. Please could you insert something to acknowledge that breastmilk is the most sustainable foodstuff on the planet. This statement should also explicitly mention meat reduction as a major contributor to GHG emissions (plant based meals are highlighted later on). The paragraph could be amended as below:

As Londoners we can help reduce the impact of food by making changes to what we eat. Huge reductions in our carbon footprint could be achieved through encouraging a food system based on local, seasonal, sustainably sourced food, through reducing meat consumption and by breastfeeding infants in the early years.

What the Mayor will do to support change

You could also add this in here:

2. Tackle the contribution of food to climate change by encouraging all London public sector institutions to promote more plant based, seasonal and locally sourced foods and to promote breastfeeding, to produce measurable reductions in GHG emissions.

In response to the specific questions:

1. Are the six priority areas the right ones? Are there other priorities that should be considered?

Yes, we believe that these 6 areas capture the important elements of the London food system and are pleased to see environmental considerations and those related to food growing given prominence.

2. Are the most effective actions the Mayor, external stakeholders and individuals can take set out? Are there other actions that should be included?

We believe bold action is needed now if London is to reverse the trends on childhood obesity and to improve the health and wellbeing of London's youngest citizens. Removing advertising from TfL for any foods and drinks marketed to children under 3 years of age is important alongside any ban on HFSS foods already suggested. Many people miss out

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infants and young children in their thinking on childhood obesity, as demonstrated by the inappropriate choice of chair for the Childhood Obesity Taskforce. About 1 in 4 children arrive at reception class overweight or obese and bold measures are needed to support breastfeeding, make sure measures on appropriate feeding in the first year are not undermined by marketing messages and that Early Year's settings are included wherever you talk about schools (e.g. in restricting the location of venues for hot takeaways).

3. What are your views on the proposed ban of advertising of food and drink that is not healthy across the Transport for London estate?

We fully endorse this proposal and ask that it be extended to all food and drink marketed for children under 3 years of age as previously explained.

4. What are you or your organization doing to support good food in London? What best practice already exists in the priority areas?

We provide open access free resources to support health workers and families to eat well from pregnancy to five years of age which are used widely in London Boroughs. We also provide information for all those who work in Unicef UK Baby Friendly Initiative settings on infant milks marketed in the UK and safe infant feeding. We lobby organisations and parliamentary groups to ensure that infant and young child feeding, and the importance of good diet in pregnancy are not overlooked in public health campaigns.

5. How could you or your organization support the Mayor to do more to achieve good food for London and pledge to support the final strategy?

We will promote and support the London Food Strategy through all our networks and links across London and support the work of Healthy Early Years London.

6. Is the strategy inclusive and does it consider the needs and priorities of all Londoners?

We would like to see further inclusion of early year's issues as we have outlined above. We hope that organisations who support older people and people with physical and learning disabilities will make comment to ensure that the strategy is suitably inclusive for all Londoners.

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