

Consultation on reformulation targets for commercially available complementary foods

Question Title

* 1. Which of the following best describes your sector of employment?

Food Industry

Retailer

Civil society organisation

Academia

Health Service Executive

Government institution

Other (please specify): NGO

Question Title

* 2. Do you agree or disagree with the reformulation target for added sugar in commercially available complimentary foods?

Agree

Disagree

Strongly agree. Added sugars in CACF and drinks marketed to infants and young children are unnecessary and harmful.

However, our opinion is that the overall focus should be on the amount of free sugars which means that total sugar targets are also needed.

In particular, the use of fruit purees requires stricter controls. The guidance given on lines 256-260 is subjective and therefore unlikely to be productive. We recommend aligning with the NPPM and capping total sugars in fruit-based products at 30% of kcal as well as not permitting the marketing of any products from 4 months of age, many of which are smooth fruit purees.

Question Title

* 3. Do you agree or disagree with the reformulation target for total sugar in savoury meals and snacks sold as commercially available complementary foods?

Agree

Disagree

Please provide an explanation for your answer

Agree, but the guidelines require amendment to address the many sweet - fruit-based - snacks which exist in the CACF category. The definition in footnote 5 states that "snacks and finger foods means any grain, starch, pulse/lentil, or root vegetable snack such as cracker, bread, rusk marketed to children under the age of three years. Snack products should be nutritious savoury and plain foods". We agree, but there are many unsuitable fruit-based snacks on the market which are not addressed by this target. See for example:

<https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/5c0e1111032be4548e793541/1544425759157/Dried+Fruit+Snacks+report+for+web.pdf>.

In addition, it is important given the acknowledgement that some CACF are inappropriate and cannot be made appropriate by reformulation, that steps should be taken so that commercial baby snacks cannot be marketed for use under 12 months of age. Snacks are not

required before 12 months of age and they may displace more nutritious foods, including breastmilk.

Question Title

*** 4. Do you agree or disagree with the reformulation target for added salt in commercially available complimentary foods?**

Agree

Disagree

Please provide an explanation for your answer

Although we would prefer that the targets are aligned with the NPPM, and which uses just one threshold: 50mg/100kcal.

Question Title

*** 5. Do you agree or disagree with the reformulation target for sodium salts in commercially available complimentary foods?**

Agree

Disagree

Please provide an explanation for your answer

Question Title

*** 6. Do you agree with the scope of commercially available complimentary food categories the sugar and salt targets apply to?**

Agree

Disagree

Please provide an explanation for your answer

Fruit-based CACF need to be included, by closing loopholes as highlighted above.

In addition, the exclusion of young child formula is inappropriate. These drinks are not essential in the diets of young children and yet are widely consumed. They also contain a lot of sugar. Drinks marketed for infants and young children should also be considered in scope. Not addressing the inappropriate, misleading marketing and labelling of the foods which are being reformulated at the same time as reformulating is a missed opportunity to improve the diets of infants and young children. If marketing and labelling cannot be addressed, we recommend that the evaluation of these guidelines is extended to examine the marketing and labelling of in-scope products and the retail offer more widely to be able to describe any persistent marketing issues, as well as any unintended consequences. These may include companies using reformulation as a basis of new health and nutrition claims on in-scope products, and the emergence of / proliferation of out-of-scope products.

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7. We invite you to provide any other feedback relevant to the draft reformulation targets for commercially available complementary foods here

We are pleased to see Ireland making progress on addressing some of the important issues with the commercial baby food offer and are hopeful it will inform action in the UK. We hope that the feedback you receive through this consultation will be used to further strengthen the guidelines to maximise their impact.

We were pleased to read that some inappropriate CACF cannot be made appropriate by reformulation but given that acknowledgement we would be keen to see recommendations on how such inappropriate products are being addressed to limit their consumption. It is our

opinion that this requires action on inappropriate marketing and labelling at the same time as reformulation, aligning with the approach used by the NPPM. Doing so would address the promotion of age inappropriate products, inappropriate portion sizing and ensure the use of warning labels where indicated.

Question Title

*** 8. Please indicate whether the views expressed are personal or are being made on behalf of an organisation? *If the views of an organisation are being submitted, it should be made clear what organisation is being represented.***

Views expressed are personal

Views expressed are on behalf of an organisation, indicate the organisation being represented in the comment box:

First Steps Nutrition Trust