

COMMENTS OF ENCA

European Network of Childbirth Associations

Consultation on the public draft of the Clarification and guidance on inappropriate promotion of foods for infants and young children

Background point 5: to specify if a promotion is declared inappropriate if it meets one of the points or only if all the points are covered.

Scope

Regarding the content, I have no suggestions. However, I would like to emphasize the following important points:

8.d. critical to keep the extension for up to 36 months of child's age in line with the Codex Alimentarius.

9. to be kept as it is including also the non-profit sector.

Rec1

No suggestion, please keep as is.

Rec 2

This should be also linked to 8d as cross promotion is an important strategy of manufacturers in this sector.

Rec 3

it would be useful to repeat here the sentence from 4.3.5 of the report (Ensuring that international instruments, including Codex Alimentarius standards and guidelines, are robust and coherent with the Code and WHA resolutions ..) as some Codex standards are still under revision and WHO knows how difficult it is even for a sister agency of Codex to insist on policy coherence between standards and WHO resolutions.

Rec 4 under 'messaging and labelling should not....'

add in point 2, after "or superior to breastmilk" the following text "nearby equivalent or second best"

add in point 4 after "use of bottle feeding" the following text " or any other feeding device with a tailored mouthpiece or intended to remove liquids by sucking"

Rec 6

Point 1: We fully support and want to emphasize its importance.

Point 5: The word “employ” has to be wider to cover all sorts of payments for a service done! For example: Pay or give financial or other incentives to anyone.....

Other comments:

This suggestion should then be also changed in the draft report to ensure consistency and coherence.

It would enhance the message if on page one of the draft STAG report ,in the last para the word “all” were added before ‘ Member states’.

We specially support the idea of pre-vetting of advertising campaigns mentioned on page 9 and the fact that in 4.3.2. manufacturers and distributors have to follow the recommendations everywhere, irrespective of whether the guidance has been transposed or not in national legislation.

In the first para on page 11 we would suggest to include, after the first sentence, the following: “and inform on relactation and support for it.” This suggestion would link the document to the WHO paper on relactation.