

INTERNATIONAL BABY FOOD ACTION NETWORK (IBFAN) COMMENT

**PROPOSED DRAFT REVISED STANDARD FOR FOLLOW-UP FORMULA
(CXS 156-1987)**

(for comments at Step 3)

IBFAN thanks the chair and the co-chairs for their work on the revision of the proposed draft revised Standard for Follow-up Formula (CXS 156-187) at Step 3 and the report of the electronic working group. We are pleased to provide the following submission. Our specific **comments are in red.**

IBFAN's General Comments

1. STRUCTURE: IBFAN prefers one standard for all products, infant formula, formula for special medical purposes, formulas for older infants and products for young children. If one standard for all these products is not agreed to by the Committee, IBFAN's preference is to have one standard for the two age differentiated products – formulas for older infants and the product for young children.

The rationale for keeping these age differentiated products under one standard is to ensure that the safeguards needed for the marketing and use of these products cover both these products.

Follow-up formula were developed as a means to market infant formula and circumvent the requirements of the International Code of Marketing of Breastmilk Substitutes, claiming that follow-up formula were not covered by the Code. Hence in 1986 the 39th World Health Assembly (WHA) noted that *“to achieve full implementation of and compliance with the International Code as well as the cessation of the marketing of unsuitable products and the improper promotion of breastmilk substitutes;”* and endorsed the provision WHA39.28, 3.(b) *the practice being introduced in some countries of providing infants with specially formulated milks (so-called “follow-up milks” is NOT (our emphasis) necessary*”. Since both these products function as breastmilk substitutes and have been determined to be non-essential it is critical that mothers, parents, be fully informed in the labelling provisions of these products. Having both of the age differentiated products under one standard facilitates common labelling provisions that are in full compliance with the International Code and subsequent WHA resolutions.

To clarify and achieve “full implementation of and compliance with” the Code and resolutions, WHA69.9 (2016) endorsed by consensus the Guidance on Ending the Inappropriate Marketing of Foods for Infants and Young Children. The Guidance determined that all these products that are marketed to the age of 36 months are breastmilk substitutes. Hence having both products under one standard ensures that the Code and WHA safeguards needed to protect against the needless use of products are in place and incorporated into the preamble and scope of these products.

Whether a food is a breastmilk substitute is not dependent on whether that food is suitable for that purpose or its nutritional requirements. The Code defines a breastmilk substitute as “any food being marketed or otherwise presented as a partial or total replacement for breastmilk, whether or not suitable for that purpose”. It should also be noted that the use of any product reduces the amount of breastmilk consumed.

2. NAME OF THE PRODUCT FOR YOUNG CHILDREN. IBFAN notes that the manufacturers of products for young children are labelling these products to avoid the classification of breastmilk substitutes. Products are labelled as “growing up milks”, “nutrition supplements for young children”, or “complementary foods” while labelled and marketed to be used from the age of 12 months. Hence they are marketed to be used as breastmilk substitutes and therefore, as clarified by the WHA69.9 Guidance, must be classified as breastmilk substitutes and must comply with the provisions of the International Code and all the relevant WHA resolutions.

- Article 9 of the Code that products do not have any pictures or text that idealize their use;
- WHA 58.32 (2005) prohibits the use of nutrition and health claims,
- Recommendation 5 of the Guidance prohibits cross-promotion, (also called brand crossover promotion or brand stretching) through direct or indirect promotion through packaging and labelling.

Although the name of the product has not been fully discussed by the Committee, IBFAN is of the opinion that the WHA69.9 Guidance definition of *foods for infants and young children* applies to all these products: *“foods for infants and young children are defined as commercially produced food or beverage products that are specifically marketed as suitable for feeding children up to 36 months of age.”* .

Since formula products are not defined as milks from mammary glands, IBFAN rejects the use of the term “milks”. Also processed products designed for young children may be nutritionally risky when fed to infants, we hope that there will be a fruitful, comprehensive discussion during which the most appropriate name and terminology can be found that will reduce the risks of needless and inappropriate use of these products and any nutritionally dangerous spill-over to younger infants. The name of any product that functions as a breastmilk substitute must take into account these risks.

Specific comments:

Since the text for the Preamble and the Scope remains undecided, IBFAN has included the requirement for the provisions of the International Code, the relevant WHA resolutions and the WHA69.9 Guidance to Ending the Inappropriate Marketing of Foods for Infants and Young Children into both the preamble for the proposed standard and the scopes of both sections.

IBFAN has retained the text of 1.4 in the scopes of both sections for formula for older infants and for name of the product for young children as it is written in the Standard for Infant Formula and Formulas for Special Medical Purposes, (Codex Stan 71-1981) with a slight modification of “shall conform to”.

IBFAN is also of the opinion that for legal clarity, the labelling provisions for all products labelled as follow-up formula must be aligned - whether for older infants or for young children.

PREAMBLE – Remove brackets as indicated.

*The Codex Alimentarius Commission acknowledges the need to **protect and support** ~~recognize~~ **exclusive breastfeeding for the first six months of life and sustained breastfeeding to two years or beyond** ~~breast-feeding~~ as an unequalled way of providing ~~ideal~~ **the normal/optimal** food for the healthy growth and development of infants. At the same time Codex acknowledges that numerous formulae have been produced, intended for use, where **necessary** ~~appropriate~~, as a substitute for human milk in meeting the ~~normal~~ nutritional requirements of infants provided they are prepared **as directed**, under hygienic conditions and given in adequate amounts. In addition, various products have also been produced intended specifically for young children as they progress to a more diversified diet of family foods and these products **are classified as breastmilk substitutes, are NOT necessary to meet the nutritional requirements of young children** and should not **undermine** ~~discourage~~ breastfeeding.*

*The production, distribution, sale and use of follow-up formula for older infants and [name of product] for young children should **be permitted only if it is** consistent with national health and nutrition policies and relevant national/~~regional~~ legislation, and **conform to** ~~take into account~~, ~~as appropriate,~~ the recommendations made in the International Code of Marketing of Breast-milk Substitute (1981) and the Global Strategy for Infant and Young Child Feeding. Relevant WHO guidelines and policies as well as relevant World Health Assembly (WHA) resolutions, **including the WHA resolution 69.9 (2016) and its accompanying WHO Guidance on Ending the Inappropriate Marketing of Foods for Infants and Young Children**, that ~~has~~ **have** been **endorsed and supported** by member states **shall also** ~~may also~~ provide guidance to countries in this context.*

This Standard is divided into two sections. Section A refers to Follow-up Formula for Older Infants (6 to 12 months of age), and Section B deals with [Name of Product] for Young Children (12 to 36 months of age). It does not apply to products covered by the Codex Standard for Infant Formula (CXS 72 – 1981).

SECTION A: FOLLOW-UP FORMULA FOR OLDER INFANTS

1 SCOPE Remove all brackets

- 1.1 *This section of the Standard applies to Follow-up Formula for Older Infants, as defined in Section 2.1, in liquid or powdered form.*
- 1.2 *This section of the Standard contains compositional, quality, safety, **use** labelling and analytical requirements for Follow-up Formula for Older Infants.*
- 1.3 *Only products that comply with the criteria laid down in the provisions of this section of this Standard **shall** be presented as Follow-up Formula for Older Infants.*
- 1.4 *The application of this section of the Standard shall conform to the recommendations made in the International Code of Marketing of Breast-milk Substitutes (1981), relevant WHO guidelines and policies as well as relevant World Health Assembly (WHA) resolutions, including the WHA resolution 69.9 (2016) and its accompanying WHO Guidance on Ending the Inappropriate Marketing of Foods for Infants and Young Children the Global Strategy for Infant and Young Child Feeding and World Health Assembly resolution WHA54.2 (2001).***

2 DESCRIPTION

2.1 Product Definition

- 2.1.1 *Follow-up formula for older infants means a product, ~~specifically~~ manufactured for use as a ~~substitute for breast-milk~~, **substitute** as a liquid part of a progressively diversified diet for older infants when complementary feeding is introduced.*
- 2.1.2 *Follow-up formula for older infants is so processed by physical means only and so packaged as to prevent spoilage and contamination under all ~~normal~~ **recommended** conditions of handling, **use** storage and distribution in the country where the product is sold.*

2.2 Other Definitions

- 2.2.1 *The term **infant** means a person of not more than 12 months of age.*
- 2.2.2 *The term **older infant** means a person from the age of 6 months and not more than 12 months of age.*

9. LABELLING Remove brackets

*The requirements of the ~~Codex~~ General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985), the Guidelines on Nutrition Labelling (CXG 2-1985) and the Guidelines for Use of Nutrition and Health Claims (CXG 23-1997) apply to follow-up formula for older infants. **These requirements include a prohibition on the use of nutrition and health claims for foods for infants and young children except where specifically provided for in relevant Codex Standards or national legislation.***

9.1 The Name of the Product

- 9.1.1 *The text of the label and all other information accompanying the product shall be written in the appropriate language(s).*

9.1.2 The name of the product shall be Follow-up Formula for Older Infants as defined in Section 2.1, or any appropriate designation indicating the true nature of the product, in accordance with national {or regional} usage.

9.1.3 The sources of protein in the product shall be clearly shown on the label.

- a) If [name of animal] milk is the only source of protein[*], the product may be labelled 'Follow-up Formula for Older Infants Based on [name of animal] milk [protein].
- b) If [name of plant] is the only source of protein[*], the product may be labelled 'Follow-up Formula for Older Infants Based on [name of plant] [protein].
- c) **If [name of animal] milk and [name of plant] are the sources of protein[*], the product may be labelled 'Follow-up Formula for Older Infants Based on [name of animal] milk protein and [name of plant] protein' or 'Follow-up Formula for Older Infants Based on [name of plant] protein and [name of animal] milk protein'.**

{* For clarity, addition of individual amino acids where needed to improve protein quality does not preclude use of the above labelling options.}

9.1.4 A product which contains neither milk nor any milk derivative **shall** ~~{may}~~ be labelled "contains no milk or milk products" or an equivalent phrase.

9.2 List of Ingredients

9.2.1 A complete list of ingredients shall be declared on the label in descending order of proportion except that in the case of added vitamins and minerals, these ingredients may be arranged as separate groups for vitamins and minerals. Within these groups the vitamins and minerals need not be listed in descending order of proportion.

9.2.2 The specific name shall be declared for ingredients of animal or plant origin and for food additives. **In addition, appropriate functional classes for these ingredients and additives may be included on the label.** ~~{The food additives **INS number** may also be optionally declared **the INS number**}.}~~

9.3 Declaration of Nutritive Value

The declaration of nutrition information {for follow-up formula for older infants} shall contain the following information, which should be in the following order:

- a) the amount of energy, expressed in kilocalories (kcal) and/or kilojoules (kJ), and the number of grams of protein, carbohydrate and fat per 100 grams or per 100 millilitres of the food as sold **as well as**-per 100 millilitres of the food ready for use, when prepared according to the instructions on the label.
- b) the total quantity of each vitamin, and mineral as listed in paragraph 3.1.3 of Section A and any other ingredient as listed in paragraph 3.2 of Section A per 100 grams or per 100 millilitres of the food as sold **as well as**-per 100 millilitres of the food ready for use, when prepared according to the instructions on the label.
- c) In addition, the declaration of nutrients in a) and b) per 100 kilocalories (or per 100 kilojoules) is permitted.

9.4 Date Marking and Storage Instructions

9.4.1 **(i) The "Best Before Date" or "Best Quality Before Date" shall be declared by the day, month and year except that for products with a shelf-life of more than three months, [at least] the month and year [shall be declared] [The day and year shall be declared by un-coded numbers with the year to be denoted by 2 or 4 digits, and the month shall be declared by letters or characters or numbers. Where only numbers are used to declare the date or where the year is expressed as only two digits, the competent authority should determine whether to require the sequence of the day, month, year, be given by appropriate abbreviations accompanying the date mark (e.g. DD/MM/YYYY or YYYY/DD/MM).**

(ii) In the case of products requiring a declaration of month and year only, the date shall be introduced by the words "Best before end <insert date>; or "Best Quality before end <insert date>].

- 9.4.2 In addition to the date, any special conditions for the storage of the food shall be indicated if [where they are required to support the integrity of the food and, where] the validity of the date depends thereon.

Where practicable, storage instructions shall be in close proximity to the date marking.

9.5 Information for use

- 9.5.1 ~~Ready to use~~ products in liquid form **shall** ~~may be used~~ ~~either~~ directly. Concentrated liquid products ~~and powdered products~~, must be prepared with potable water that is safe or has been rendered safe by previous boiling before feeding, according to directions for use. **Products in powdered form must contain a statement that the product is not sterile and preparation instructions must include that the product be reconstituted with safe water at 70 degrees centigrade. (WHO/FAO (2007) guidelines "the Safe preparation, storage and handling of powdered infant formula (http://apps.who.int/iris/bitstream/handle/10665/43659/9789241595414_eng.pdf?sequence=1) and WHA resolutions WHA 58.32 (2005) and 61.20 (2008) as well as the Codex Alimentarius 'Code of hygienic practice for powdered formulae for infants and young children' (2008) which provides relevant recommendations for the labeling of powdered infant formula and follow-up formula.**

Adequate directions for the appropriate preparation and handling should be in accordance with Good Hygienic Practice.

- 9.5.2 Adequate directions for the appropriate preparations and use of the product, including its storage and disposal after preparation, i.e. that {product} remaining after feeding should be discarded, shall appear on the label.
- 9.5.3 The label shall carry clear graphic instructions illustrating the method of preparation of the product.
- 9.5.4 The directions should be accompanied by a warning and about the health hazards of inappropriate preparation, storage and use.
- 9.5.5 Adequate directions regarding the storage of the product after the container has been opened, shall appear on the label.
- 9.5.6 The label of follow-up formula for older infants shall include a statement that the product shall not be introduced before 6 months of age, is not to be used as a sole source of nutrition and that older infants should receive complementary foods in addition to the product. **Remove brackets.**

9.6 Additional Labelling Requirements **Remove brackets**

9.6.1 **Labels should not discourage breastfeeding,**

Each container label shall have a clear, conspicuous and easily readable message which includes the following points:

a) the words "important notice" or their equivalent;

b) the statement "Breast-milk is the best food for your baby" or a similar statement as to the superiority of breastfeeding or breast-milk;

*c) a statement that the product should only be used on advice of an **independent** health worker as to the need for its use **including that the product is not suitable for infants under the age of six months** and the proper method of use.*

(d) the statement; 'The use of this product must not replace breast-milk and lead to cessation of continued breastfeeding'.

9.6.2 **Remove brackets.** *The label shall have no image, text or representation, including pictures of feeding bottles, that could undermine or discourage breastfeeding or which idealises the use of follow-up formula for older infants.*

which idealizes the use of follow-up formula. The label shall have no pictures images, text or other representation that might:

9.6.2.1 *idealize the used of follow-up formula for older infants;*

9.6.2.2 *suggest use for infants under the age of 6 months (including references to milestones and stages);*

9.6.2.3 *recommend or promote bottle feeding;*

9.6.2.4 *undermine or discourage breastfeeding, ~~that makes a comparison to breast-milk,~~ or suggests that the product is ~~nearly~~ equivalent to or superior to breast-milk;*

9.6.2.5 *convey an endorsement or anything that may be construed as an endorsement by a professional or any other body, unless this has been specifically approved by relevant national, ~~regional or international~~ regulatory authorities. **Delete regional or international.***

9.6.3 *The terms "humanized", "maternalized" or other similar terms **that compare the product to breastmilk** shall not be used. ~~In addition, the product should not be compared to breast-milk.~~*

9.6.4 *Products shall be labelled in such a way as to avoid any risk of confusion between infant formula, follow-up formula for older infants, (name of product) for young children, and formula for special medical purposes, **and to enable consumers to make a clear distinction between them, in particular as to the text, images, names, slogans, colours and mascots used.***

SECTION B: [NAME OF PRODUCT] FOR YOUNG CHILDREN

1 SCOPE Remove brackets

1.1 *This section of the Standard applies to [name of product] for young children, as defined in Section 2.1, in liquid or powdered form.*

1.2 *This section of the Standard contains compositional, quality, safety, ~~use~~-labelling and analytical requirements for [name of product] for young children.*

1.3 *Only products that comply with the criteria lay down in the provisions of this section of this Standard ~~shall~~-be presented as} [name of product] for young children.*

1.4 ***The application of this section of the Standard shall conform to the recommendations made in the International Code of Marketing of Breast-milk Substitutes (1981), relevant WHO guidelines and policies as well as relevant World Health Assembly (WHA) resolutions, including the WHA resolution 69.9 (2016) and its accompanying WHO Guidance on Ending the Inappropriate Marketing of Foods for Infants and Young Children the Global Strategy for Infant and Young Child Feeding and World Health Assembly resolution WHA54.2 (2001).***

2 DESCRIPTION

2.1 Product Definition

2.1.1 *[Name of product] for young children* means a product ~~specially formulated and~~ manufactured for use **as a breast-milk substitute**, as a liquid part of the ~~progressively~~ diversified diet of young children **and is not necessary to meet the nutritional needs of young children. ~~in order to contribute to the nutritional needs of young children~~ ~~when nutrient intakes may not be adequate to meet nutritional requirements~~.**

2.1.2 **[Name of product] for young children** ~~[Follow-up formula]~~ is so processed by physical means only and so packaged as to prevent spoilage and contamination under all ~~normal~~ **recommended** conditions of handling, storage, **use** and distribution in the country where the product is sold.

2.2 Other Definitions

2.2.1 The term **young child** means a person from the age of more than 12 months up to the age of three years (36 months).

9. LABELLING

*The requirements of the ~~Codex~~ General Standard for the Labelling of Pre-packaged Foods (CXS 1-1985), the Guidelines on Nutrition Labelling (CXG 2-1985) and the Guidelines for Use of Nutrition and Health Claims (CXG 23-1997) apply to [Name of Product] for young children. **These requirements include a prohibition on the use of nutrition and health claims for foods for infants and young children except where specifically provided for in relevant Codex Standards or national legislation.***

9.1 The Name of the Product

9.1.1 *The text of the label and all other information accompanying the product shall be written in the appropriate language(s).*

9.1.2 *The name of the product shall be [Name of Product] for Young Children as defined in Section 2.1, or any appropriate designation indicating the true nature of the product, in accordance with national ~~for regional~~ usage.*

9.1.3 *The sources of protein in the product shall be clearly shown on the label.*

a) *If [name of animal] milk is the only source of protein{*}, the product may be labelled '[Name of Product] for Young Children Based on [name of animal] milk {protein}'.*

b) *If [name of plant] is the only source of protein{*}, the product may be labelled '[Name of Product] for Young Children Based on [name of plant] {protein}'.*

c) *if [name of animal] milk and [name of plant] are the sources of proteins*, the product may be labelled '[Name of Product] for Young Children Based on [name of animal] milk protein and [name of plant] protein' or '[Name of Product] for Young Children Based on [name of plant] protein and [name of animal] milk protein'.*

{ For clarity, addition of individual amino acids where needed to improve protein quality does not preclude use of the above labelling options.}*

9.1.45 *A product which contains neither milk nor any milk derivative **shall** ~~may~~ be labelled "contains no milk or milk products" or an equivalent phrase.*

9.2 List of Ingredients

9.2.1 *A complete list of ingredients shall be declared on the label in descending order of proportion except that in the case of added vitamins and minerals, these ingredients may be arranged as separate groups for vitamins and minerals. Within these groups the vitamins and minerals need not be listed in descending order of proportion.*

9.2.2 The specific name shall be declared for ingredients of animal or plant origin and for food additives. **In addition, appropriate functional classes names for these ingredients and additives may be included on the label.** ~~{The food additives INS number may also be optionally declared the INS number.}~~

9.3 Declaration of Nutritive Value

The declaration of nutrition information for [name of product] for young children shall contain the following information which should be in the following order:

- a) the amount of energy, expressed in kilocalories (kcal) and/or kilojoules (kJ), and the number of grams of protein, carbohydrate and fat per 100 grams or per 100 millilitres of the food as sold **as well as** ~~{ø}~~ per 100 millilitres of the food ready for use, when prepared according to the instructions on the label.
- b) the total quantity of each vitamin, and mineral as listed in paragraph 3.1.3 of Section B and any other ingredient as listed in paragraph 3.2 of Section B per 100 grams or per 100 millilitres of the food as sold **as well as** ~~{ø}~~ per 100 millilitres of the food ready for use, when prepared according to the instructions on the label.
- c) In addition, the declaration of nutrients in a) and b) per [serving size and/or per] 100 kilocalories (or per 100 kilojoules) is permitted.

9.4 Date Marking and Storage Instructions

9.4.1 (i) The “Best Before Date” or “Best Quality Before Date” shall be declared by the day, month and year except that for products with a shelf-life of more than three months, ~~{at least}~~ the month and year ~~{shall be declared}~~. ~~{The day and year shall be declared by uncoded numbers with the year to be denoted by 2 or 4 digits, and the month shall be declared by letters or characters or numbers. Where only numbers are used to declare the date or where the year is expressed as only two digits, the competent authority should determine whether to require the sequence of the day, month, year, be given by appropriate abbreviations accompanying the date mark (e.g. DD/MM/YYYY or YYYY/DD/MM).}~~

(ii) In the case of products requiring a declaration of month and year only, the ~~{date shall be introduced by the words “Best before end <insert date>; or “Best Quality Before end <insert date>}~~.

9.4.2 In addition to the date, any special conditions for the storage of the food shall be indicated ~~if~~ ~~{where they are required to support the integrity of the food and, where}~~ the validity of the date depends thereon.

Where practicable, storage instructions shall be in close proximity to the date marking.

9.5 Information for use

9.5.1 ~~{Ready to use}~~ products in liquid form ~~should~~ ~~may be used~~ ~~{either}~~ directly. ~~or in the ease of~~ ~~€~~ Concentrated liquid products ~~{and powdered products}~~, must be prepared with potable water that is safe or has been rendered safe by previous boiling before feeding, according to directions for use. **Products in powdered form must contain a statement that the product is not sterile and preparation instructions must include that the product be reconstituted with safe water at 70 degrees centigrade. (WHO/FAO (2007) guidelines “the Safe preparation, storage and handling of powdered infant formula (http://apps.who.int/iris/bitstream/handle/10665/43659/9789241595414_eng.pdf?sequence=1) and WHA resolutions WHA 58.32 (2005) and 61.20 (2008) as well as the Codex Alimentarius 'Code of hygienic practice for powdered formulae for infants and young children' (2008) which provides relevant recommendations for the labeling of powdered infant formula and follow-up formula.**

~~[Products in powder form should be reconstituted with water that is safe or has been rendered safe by previous boiling for preparation.] Adequate directions for the appropriate preparation and handling should be in accordance with Good Hygienic Practice.~~

9.5.2 Adequate directions for the appropriate preparations and use of the product, including its storage and disposal after preparation, i.e. that ~~formula~~ ~~[product]~~ remaining after feeding should be discarded, shall appear on the label.

9.5.3 The label shall carry clear graphic instructions illustrating the method of preparation of the product. ~~[Pictures of feeding bottles are not permitted on labels of (name of product) for young children.]~~

9.5.4 The directions should be accompanied by a warning and about the health hazards of inappropriate preparation, storage and use. **Remove brackets**

9.5.5 Adequate directions regarding the storage of the product after the container has been opened, shall appear on the label.

9.5.6 The label of [name of product] for young children shall include a statement that the product shall not be introduced before 12 months of age and should be used as part of a **diversified** ~~[balanced]~~ diet.]

The label of [name of product] for young children shall have no image, text or representation, **including pictures of feeding bottles**,—that could undermine or discourage breastfeeding or which idealises the use of [name of product] for young children. The terms 'humanized', 'maternalized' or other similar terms must not be used on the label. **Remove brackets.**

9.6 **Additional Labelling Requirements – These should be aligned to those for follow-up formula for older infants**

9.6.1 **Labels should not discourage breastfeeding,**

Each container label shall have a clear, conspicuous and easily readable message which includes the following points:

a) the words "important notice" or their equivalent;

b) the statement "Breast-milk is the best food for your baby" or a similar statement as to the superiority of breastfeeding or breast-milk;

c) a statement that the product should only be used on advice of an **independent** health worker as to the need for its use **including that the product is not suitable for infants under the age of twelve months** and the proper method of use.

(d) the statement; 'The use of this product must not replace breast-milk and lead to cessation of continued breastfeeding'.

9.6.2 **Remove brackets. The label shall have no image, text or representation, including pictures of feeding bottles, that could undermine or discourage breastfeeding or which idealises the use of name of the product for young children.**

~~which idealizes the use of follow up formula. The label shall have no pictures images, text or other representation that might:~~

9.6.2.1 ~~idealize the use of~~ **name of the product for young children;**

- 9.6.2.2 suggest use for infants under the age of **12** months (including references to milestones and stages);
- 9.6.2.3 recommend or promote bottle feeding;
- 9.6.2.4 undermine or discourage breastfeeding, ~~that makes a comparison to breast-milk, or suggests that the product is nearly~~ equivalent to or superior to breast-milk;
- 9.6.2.5 convey an endorsement or anything that may be construed as an endorsement by a professional or any other body, unless this has been specifically approved by relevant national, ~~regional or international~~ regulatory authorities. **Delete regional or international.**
- 9.6.3 The terms "humanized", "maternalized" or other similar terms **that compare the product to breastmilk** shall not be used. ~~In addition, the product should not be compared to breast-milk.~~
- 9.6.4 Products shall be labelled in such a way as to avoid any risk of confusion between infant formula, follow-up formula for older infants, (name of product) for young children, and formula for special medical purposes, **and to enable consumers to make a clear distinction between them, in particular as to the text, images, names, slogans, colours and mascots used.**