

## **IBFAN Comment:**

### **Step 3 on the Review of the Standard for follow-up formula: proposed draft standard for follow-up formula for older infants and [product] for young children as presented in CX/NSFDU 19/41/5**

Firstly, IBFAN wishes to reiterate that these products are not necessary and may contribute to negative health conditions for older infants and young children. These include obesity, diabetes, dental caries and other non-communicable diseases. Another important factor is the impact on climate change that these unnecessary products will have. They are very often marketed in single use/single portion plastic containers, and their global trade will increase greenhouse gases and other effects harmful to the environment.

#### **Recommendation 1:**

IBFAN agrees that the sentence in [ ] should be retained.

#### **Recommendation 2:**

IBFAN wishes to retain the sentence in [ ] Substances shall not be added with the purpose of imparting or enhancing a sweet taste of [name of the product].

Rationale: The development of a preference for sweet foods. The replacement of lactose with sucrose, glucose polymers, intense artificial sweeteners or other sweet tasting flavourings, increases the risk of obesity. It also undermines health promotion messages that encourage culturally appropriate, bio-diverse and leads to increased use of ultra-processed foods.

#### **Recommendation 3:**

Delete the brackets and retain the text within the brackets.

Add the following text marked in red to both drafts: All ingredients shall be clean, of good quality, safe from **microbiological contaminants** and **free from industrial contaminants** and suitable for

IBFAN has concerns about the addition of Palm oil from an environmental and food safety perspective..

#### **Recommendation 4**

IBFAN agrees with text in a)

b) keep text: The amounts of sodium derived from vitamin and mineral ingredients shall be within the limit for sodium in Section 3.1.

#### **Recommendation 5 and 6**

IBFAN Agrees

#### **Recommendation 7 and 8**

IBFAN considers that the product should have the smallest possible amounts of food additives and parents should be informed that in case of not breastfeeding unadulterated animal milk is to be recommended for young children

IBFAN agrees with recommendation 7 and 8 that provide safeguards from certain additives however this needs to be carefully monitored in the light of increasing pressure from the food industry to add novel, untested ingredients . (Remember this is NOT settled and there is a Physical working group on the Saturday) ~~development of the GSFA that no new additives are added there.~~

### **Recommendation 9**

IBFAN prefers option 2

### **3.6 Flavourings**

#### **Recommendation 10**

IBFAN does NOT support the use of flavourings for follow-up formula and for [product] for young children. The addition of flavourings in these products which function as breastmilk substitutes should not be permitted. The sweet taste intrinsic in these products, plus the use of flavouring agents not only increases the chemical burden faced by infants and young children who are artificially formula fed, but is yet another way to promote and facilitate the dietary preferences for commercially flavoured and sweetened foods with the consequences of risking long term dietary food habits partial to ultra-processed foods.

### **3.6 Contaminants**

#### **Recommendation 11**

Formulas for older infants and [products] for young children function as breastmilk substitutes and may be fed not only to older infants and young children (and also to babies under 6 months if not marketed appropriately) several times daily, the permitted levels of pesticides and other chemicals poses a far greater body burden that those risked by adults. The levels of contaminants must be kept to a far greater minimum than those toxins permitted for food and feed (CXS 193-1995).

IBFAN proposes greater rigorous criteria be required for these products than those permitted for in CXS 193-1995.

Not all contaminants listed in CXS 193-1995 specify a special reduced limit for infants or young children to protect them of a higher exposure due to higher food intake related to their bodyweight and a limited variety of food. We noted that for radionuclides a special section recommends lower content by a factor 10 for infant foods, this would protect older infants but not young children! This lower level must also be applied to products for young children if the standard is split.

### **3.8 Hygiene**

#### **Recommendation 12**

We agree with recommendation 12 but IBFAN is concerned that the important provision of the water temperature for the reconstitution of powdered formula products will not be discussed. This important life and health saving measure must be included on the labels of all powdered follow-up formula and [product] for young children. These products are unique in their roles as breastmilk

substitutes and safeguarding the health of infants and young children must take preference over all other criteria.

**Recommendation 13, 14 and 15**

Agree