



July 15, 2022

Re: CCFL-Session 47-CL 2022/12-FL - Request for information on sustainability labelling

Inter-session work on sustainability labelling. c/o Codex Committee on Food Labelling, Ottawa, Canada

For the Attention: Philippa Hawthorne and Kay Laitinen, Coordinators
Philippa.Hawthorne@mpi.govt.nz; Kati.Laitinen@mpi.govt.nz; and codexnz@mpi.govt.nz

CC Secretariat, Codex Alimentarius Commission,
Joint FAO/WHO Food Standards Programme, Rome, Italy.
c/o Ministry for Primary Industries, Wellington, New Zealand

Dear Philippa Hawthorne and Kati Laitinen,

IBFAN, the global network that has been working to improve Codex standards and guidelines since 1995, submits the following comments in relation to your request for information on sustainability labelling on foods.

We recognise the urgent need to address the environmental impact of the global trade in foods and in particular ultra-processed foods targeting children, so we welcome this initiative to conduct a stocktake of sustainability labelling. However, we do so with caution, aware that a meaningful Codex guideline that prioritises human and ecosystem health *over* the facilitation of global trade will be a challenge.

Although we have not compiled a specific report, IBFAN's regular monitoring reveals that sustainability claims alongside health claims are now commonly used to promote foods for infants and young children.¹ At the same time numerous industry-inspired certification schemes and multi-stakeholder initiatives are adding to parental and general public confusion. The sustainability claims are misleading, unsubstantiated and little more than 'greenwashing' but they *are* alluring. Such claims not only violate the International Code of Marketing of Breastmilk Substitutes and subsequent relevant WHA resolutionsⁱⁱ but obscure the fact that breastfeeding alongside minimally processed family foods, is the most

environmentally friendly way to feed an infant, resulting in zero waste, minimal greenhouse gases, and negligible water footprint.ⁱⁱⁱ

In the light of these important considerations we hope the following points can be included in the discussion paper:

- The need for effective conflicts of interest safeguards in all national and international policy arenas. This would help ensure that policy-setting processes are protected from commercial influence and increase the likelihood that sustainability labelling is transparent, uniform, accurate and does not mislead consumers or undermine its purpose.
- Prioritisation of mandatory warnings that are independently-monitored and enforced.
- Exclusion of all products targeting infants and children under 5 years in sustainability labelling schemes.

IBFAN is happy to provide more detailed input as the inter-session work continues and at the CCFL47 session in Ottawa

ⁱ [Beingmate Green Love - Chinese Baby Formula](https://www.youtube.com/watch?v=I0IRgPTNAgo). sold widely in China, especially on e-shopping portals. (skip to 1.00) <https://www.youtube.com/watch?v=I0IRgPTNAgo>
<https://kendamil.com/blogs/blog/brand-new-kendamil-organic-the-world-s-first-organic-formula-to-contain-hmos>
<https://www.leafscore.com/eco-friendly-kids-products/the-5-best-plant-based-baby-formulas-dairy-free-organic/>

ⁱⁱ Breastfeeding has a crucial role in child survival, providing food, care, immune support while protecting children from malnutrition in all its forms.

ⁱⁱⁱ IBFAN Health and Environmental impacts <https://www.ibfan.org/infant-and-young-child-feeding-health-and-environmental-impacts/>
'Greenhouse gases from baby milk formula': Dadhich JP, Smith JP, Iellamo A, Suleiman A. Climate change and infant nutrition: Estimates of greenhouse gas emissions from milk formula sold in selected Asia Pacific Countries: Asia Pacific Journal of Human Lactation 2012. May;37(2):314--22. <https://pubmed.ncbi.nlm.nih.gov/33586512/> <https://www.bpni.org/wp-content/uploads/2018/11/Green-Feeding-RC-Carbon-Footprint-10-Asian-Countries.pdf>