



Infant Nutrition Council

Industry supporting both
Breastfeeding & Infant Formula

AUSTRALIA & NEW ZEALAND

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Dear Anna

The Infant Nutrition Council (INC) appreciates the opportunity to comment on the Ministry's resource '**Feeding your baby infant formula: how to prepare formula safely**'.

The INC believes that breastfeeding is the normal way to feed infants as it has numerous benefits for both mothers and babies. When an infant is not given breast milk the only suitable and safe alternative is a scientifically developed infant formula product. For these infants, infant formula is the sole source of nutrition for around the first 6 months.

Overarching comments

INC considers the revised format more inclusive and inviting to mothers and caregivers. The messages are generally clear and accessible and the pictograms are generally self-explanatory. The layout is a great improvement.

The key concern for INC is the inconsistency between the pamphlet and the regulations as reflected in the Australia New Zealand Food Standards Code. This is particularly evident in the instruction that must be 'on can' which directs the user to 'follow instructions exactly'. We are concerned that the pamphlet as drafted creates a mismatch between the advice in the pamphlet, a Health Care Professional's advice and the carer's need to follow the can's instructions exactly.

INC's other comments correct a few errors and suggest a few, more inclusive wording changes. Some of the suggestions are to clarify areas of key safety concern such as feeding infant formula to infants up to 12 months but only if the infant is also receiving supplementary feeding and the importance of using the scoop as supplied in the can.

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We also comment on the difference in storing prepared formula between Australia and New Zealand and suggest it is timely to review the 20 hour difference in light of ongoing evidence to suggest it is safe to store prepared formula for up to 24 hours.

Detailed comments

p2 Breast is Best

We suggest that the statement that “Giving infant formula to a breastfed baby, even just one or two feeds, will reduce your milk supply ...” is incorrect. One or two feeds *per day* might reduce breast milk supply but not one or two feeds in a six month period.

We understand this pamphlet is aimed at the mother/caregiver – the title refers to ‘your baby’ and the information on ‘breast is best’ is in the second person. The last paragraph on p1 therefore needs to be amended to state that:

“This resource is **also** to help health practitioners provide objective and consistent advice to mothers ...”.

p3 Feeding your baby infant formula

INC believes there needs to be a strong statement about NOT feeding babies from 0 - around 6 months other drinks. The text from the current pamphlet should be inserted as follows:

“Formula (or breast milk) is all your baby needs until they are around 6 months old – **other drinks are unnecessary, and some can even make them sick.**”

p4 Choosing infant formula

Cow’s milk-based formula

Given the growth of goat’s milk formula and the emergence of sheep milk formula, it is too narrow and anti-competitive to refer only to cows’ milk. The heading should read “Animal milk-based formula” or Cow or Goat milk-based formula. Alternatively, the second sentence under the heading could read:

“Most infant formula is made from cow’s milk **but there is also goats’ milk available. All milk used for formula** has been treated to make it suitable for babies.”

If the heading is retained, then the apostrophe needs to be moved to follow “**Cows**”.

Infant formula from birth

Stage 1 products can be used up to 12 months providing suitable complementary feeding is introduced from around 6 months to meet the older infants’ nutritional needs.. To do otherwise without medical advice is to risk negative and potentially serious developmental impacts. This is not clear in the text. We suggest the following:

“Your baby can stay on this same stage 1 formula until they are 12 months old (**so long as they are receiving some additional solid foods from around 6 months**), and then switch to standard (dark blue label) cows’ milk.”

INC believes that follow-on formula can play an important role in meeting the nutritional requirements of older infants from 6 months. In addition, the text as drafted could be interpreted as meaning that toddler and growing up milks could be given to infants from 6 months. We therefore suggest an amendment as follows:

“Follow-on formula can be safely given to infants from 6 months. Milks such as follow-on, toddler milk and growing-up milks should never be given to infants under 12 months of age..”

Avoid homemade infant formula

This is an excellent addition to the messaging. We suggest a statement about the dangers of the baby not being able to digest child or adult ingredients and therefore effectively being starved also be made.

We note there is no mention of soy formula in the draft pamphlet. Similar information about soy-based formula as is included in the current pamphlet would be helpful.

p4 Feed your baby safely

No comments.

p5 What you'll need for formula feeding

Icons – the fifth icon, the steriliser, is not the sterilisation option described on p5. A boiling pot would be more consistent.

p6-8 Cleaning and sterilising feeding equipment

No comments.

p8-9 Preparing a formula feed

INC does not consider an infant's immune system is fully developed until around 12 months and certainly not by 3 months. The pamphlet states, under the heading "If you live in a city or a town" that:

"From 3 months of age you can use water straight from the tap to make formula."

We strongly support always sterilizing equipment for infant formula and using cooled, previously boiled water. This is consistent with the labels of products on the New Zealand market. To do otherwise is contrary to the provisions in the Food Standards Code which mandate that directions must instruct that :

"potable, previously boiled water should be used" (Standard 2.9.1—19(3)(c)).

Again this raises confusion for health care professionals and carers about whether they should follow the instructions on the can or the Ministry's guidelines. It is important that the Ministry's guidance is consistent with the mandated legislative requirements and with the requirements that are reflected on labels on cans of infant formula. We are concerned that inconsistencies will lead to carers not trusting the instructions on cans and thereby risking severe health consequences for the infant.

p10-11 Step-by-step guide to preparing a formula feed

The text alongside the 5th step should have the first sentence emboldened to make it very clear that only the scoop accompanying the container of formula should be used.

The more common term to use is "**can**" not "tin".

Regarding step 4 on page 4: the recommendation that water used for preparation must be at room temperature and not any warmer is contrary to the mixing instructions provided on many existing cans of formula. The most common mixing instructions detailed on cans is the recommendation to cool boiled water to body temperature for use to prepare formula; and then to feed immediately, or if formula must be stored prior to feeding to refrigerate immediately. We see two potential issues with advising mixing instructions that differ from those on the cans:

1. This is potentially confusing for consumers, especially given that cans must carry a warning statement "follow instructions exactly."
2. The mixing properties of powder differ with the mixing temperature and consumers may experience poorer mixing performance with some products where they are designed for mixing at body temperature rather than at room temperature.

If formula is prepared using boiled and cooled to body temperature and fed immediately, the risk of microbial growth is no greater than formula prepared with boiled water cooled to room temperature and then warmed prior to feeding according to one of the options outlined in the pamphlet.

INC recommends that consideration is given to rewording this section and other text in the document that is aligned to this text such that it does not run counter to commonly used preparation instructions on infant formula cans.

We understand the basis for suggesting formula not be stored for more than 4 hours but scientific evidence suggests infant formula may be safely stored for up to 24 hours which is the advice from the NHMRC in Australia. The preference would be for both the guidelines and labelling to be consistent.

p12-16 Feeding your baby, Warming formula, Options for warming, Feeding your baby away from home

No Comments.

We trust you find these comments helpful and are able to consider them for inclusion before finalising the resource.

Yours sincerely

A handwritten signature in black ink that reads "Jan Carey". The signature is written in a cursive style with a large initial 'J' and 'C'.

Jan Carey
Chief Executive