



THE ASSOCIATION OF RADICAL MIDWIVES

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Reg.Charity 1060525



Re: **The Recast Commission Directive on Infant Formulae and Follow-on Formulae.**

My organization which has 1,400 midwife members, are pleased that the EU Commission is reviewing the 1991 EU Directive and wish to make the following points:

- European legislation should be brought into line with the requirements of the *International Code of Marketing Breast Milk Substitutes, Bottles & Teats* and relevant *WHA Resolutions* ;
- European Legislation should not permit the promotion of any breastmilk substitute , foods or drinks marketed as suitable for babies under 6 months or any promotion of bottles and teats.
- HEALTH and NUTRITION claims violate the International Code and should NOT be permitted for ANY products for infants and young children. Breast milk substitutes have NO health advantage over breastfeeding and none of the health benefits.
- Ingredients shown by independently funded research to be safe and essential for infant health should be mandatory and should be carried out BEFORE being added to infant formulae for use by the public.
- Powdered infant formulas (including breastmilk fortifiers) MUST carry explicit warnings that the product is NOT sterile and may be contaminated by *Enterobacter sakazakii* and other pathogens.
- No food other than infant formula (or formulas for special medical purposes) should be labeled as suitable for infants under the age of 6 months.
- The safety of soya milk should be questioned and, if permitted, its risks explicitly stated on the label.
- Follow-on milks are not necessary. If permitted they should not be promoted.
- Free and low-cost supplies of breastmilk substitutes should not be allowed in any part of health care system.

Penelope Samuel. ARM representative on Breastfeeding Law Group.