

Our Ref: OA

22 December 2004

Mr Akki Khan
Claims and Promotion Branch
Nutrition Division
Room 115C
Aviation House
125 Kingsway
London WC2B 6NH

Dear Mr Khan

The Community Practitioners' and Health Visitors' Association welcomes the opportunity to make the following points in response to *the Recast Commission Directive on Infant Formulae and Follow-on Formulae*.

The CPHVA is the UK professional body that represents registered nurses and health visitors who work in a primary or community health setting. The CPHVA is a professional section of Amicus trade union. With over 20,000 members, it is the third largest professional union and is the only one with public health as its foundation.

The points we make are as follows

European legislation should be brought into line with the requirements of the International Code and subsequent relevant WHA Resolutions and should not permit the promotion of any breastmilk substitute, bottles, teats and foods and drinks marketed as suitable for babies under 6 months.

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.

Ingredients shown by independently-funded research to be safe and essential for infant health should be mandatory.

Powdered formulas 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 labelled as suitable for infants under the age of 6 months.

The safety of soya should be questioned and, if permitted, its risks explicitly stated.

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.”

Should you have any questions or need further clarification on points raised, please contact Obi Amadi, Lead Professional Officer, Health Visiting. CPHVA. Tel: 020 7939 7000. email obi.amadi@amicustheunion.org.

Yours sincerely

Obi Amadi.
Lead Professional Officer.