

Akki Khan
Food Standards Agency
Aviation House
125 Kingsway
London
WC2B 6NH

6 January 2005

Dear Akki Khan,

European Commission Directive on Infant Formulae and Follow-on Formulae

On behalf of the National Heart Forum (NHF) I am writing to you to urge the Food Standards Agency to pursue a robust recast of this important Directive.

As an alliance of national organisations concerned with the prevention of avoidable chronic diseases including coronary heart disease, the NHF recognises the importance of breastfeeding for healthy growth in infancy and the likelihood that it may protect against high blood pressure and coronary heart disease in adulthood. There is accumulating evidence that the benefits of breastfeeding may be especially significant for low birthweight babies. Gradual weight gain (during infancy and early childhood) rather than rapid weight gain or 'catch up' in low birthweight babies is better in terms of long-term health outcomes (reducing the risk of hypertension and coronary heart disease in particular)¹.

In *young@heart* - our policy framework for a lifecourse approach to chronic disease prevention² we strongly endorse measures which are supportive of breastfeeding wherever possible, and which remove any commercially-motivated incentives which seek to encourage mothers to bottle-feed instead.

In summary, and in line with the International Baby Food Action Network, we recommend that:

- European legislation should be brought into line with the requirements of the International Code and subsequent relevant World Health Assembly resolutions;
- European legislation should not permit the promotion of any breastmilk substitute or foods and 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;
- Ingredients shown by independently funded research to be safe and essential for infant health should be mandatory;

¹ National Heart Forum. 2003. A lifecourse approach to coronary heart disease prevention: scientific and policy review. London: The Stationery Office

² National Heart Forum. 2002. Towards a generation free from coronary heart disease. NHF.

- 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 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 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, or promoted through any part of the health care system.

Yours sincerely,

Jane Landon
Associate director

Jl/y@h/8003