

Response to the Public Health England draft proposals: Commercial baby food and drink guidelines

Thank you for the opportunity to respond to the draft commercial baby food and drink guidelines. We are really pleased that this work has been done and congratulate Public Health England on their bold commitments to reduce the sugar and salt content of commercially available baby food marketed in the UK. We do have some comments which we hope will be considered to ensure that this work is as effective as possible in protecting the health of future generations of children in the UK. We will answer the specific questions posed but also have some general comments.

1. We note that DHSC will consult separately on the marketing and labelling of commercial food and drink products for children under the age of 3 years. **We strongly recommend however that composition, marketing and labelling are all considered together with the same timelines for change in place.** If compositional changes are made before restrictions on the use of health claims or honest labelling there is a danger that reformulated products will make claims on the packaging which continue to mislead families as to the healthiness of commercial baby foods. This is also particularly important as companies reformulate as **it is not compatible with global or national public health guidance that any foods are marketed for infants under 6 months of age.**
2. On page 4 it states that the guidelines will apply to commercial foods and drinks aimed at children aged up to 3 years. No criteria are given for how this will be determined. Not all foods and drinks obviously aimed at young children will specify this on their label, and this may particularly be the case when cartoon characters and graphics are used which families perceive as relevant to the very young, but where no clarity on use of the food by young children is specified. **We recommend that clarity is given to how foods and drinks aimed at children under 3 years of age will be determined since manufactures may simply choose to remove age related information if this is considered the main determinant.**
3. On page 28 in your summary of current guidance for the feeding of infants you clearly state that *'Babies under 12 months don't need snacks'*. As a charity that has spent considerable time modelling the diets of infants and young children to show how Government agreed guidance on energy and nutrient intakes can be met, we believe that snack foods in the first year simply add additional energy and/or displace important nutrients. **We would strongly recommend that manufacturers are not permitted to market snack foods for children under 12 months of age.**
4. We are concerned that the proposed guidance does not tackle the issue of pureed fruit products that are a high source of free sugars. Firstly, whilst the guideline (Table 1) states that all sugar naturally present in fruit and vegetable purees is free sugar, the guidance then ignores this and only gives a limit for fruit ingredients in main meals or dry cereals. Whilst we appreciate that unprocessed and minimally processed fruits and vegetables are

encouraged in the diet of infants and young children, and that a very high proportion of products marketed are based on pureed fruit and vegetables, there needs to be some consideration of how the high free sugar content of these can be made clear to parents and caregivers. Currently products that have added fruit juice, but which may be lower in total free sugar than solely pureed fruit products are penalised by the guidance, despite the fact that PHE considers the source of sugars in both to be equivalent.

We recommend that a clear label on any fruit or vegetable puree product as a front of pack flag should be made mandatory where free sugars represent >30% energy in a product (again this is why it is important to work with DHSC on marketing and labelling guidance simultaneously).

Secondly, fruit and vegetable purees are considered here as 'baby meals'. We would challenge the use of these products as meals. Some manufacturers themselves consider fruit purees as 'a smoothie fruit snack', even though they market them from 6m of age when snacks are not needed. There is a need for guidance on portion sizes: is 90g-120g of a fruit puree suitable as a 'baby meal' when it contains none of the nutrients that we want babies to obtain when the diet is diversified from breastmilk? If these are in fact first tastes, desserts or cereal toppers for infants then the portion sizes need to be proportionate to this; if they are snacks for children from 1 year of age then consideration is needed as to their impact on oral health where they are a source of free sugars.

We recommend that fruit and vegetable foods are not included in 'baby meals' but considered as a separate category of foods with clear guidance on their use, portion size and how they can be marketed.

5. We commend the removal of fruit juice as an ingredient in any food or drink product. However, it is not clear if a manufacturer could swap fruit juice or fruit juice concentrate in a sweetened baby drink for fruit puree or paste and this be permissible, or where fruit smoothies and jelly type drinks fit into this guidance. **Clarity is needed that no sweetened baby or young child drinks can be marketed** as these are wholly unnecessary and can contribute to poor oral health, development of a sweet taste preference and add unnecessary energy to the diet.
6. The scope of these guidelines does not include infant milks marketed for children over 1 year of age as growing up milks or toddler milks but does include sweetened milks and milk alternatives. The differentiation of so called growing up or toddler milks from sweetened milks and milk alternatives has no scientific basis since there are no regulations that control the composition of milks for children over 1 year of age, despite the fact that many are currently marketed with the same branding as infant formula. These are simply sweetened dried milk powders or liquids (using primarily lactose and maltodextrins as sweeteners) with added nutrients. It is not clear how milk or milk alternative drinks marketed for children over 1 year will be allocated to either a formula milk/growing up milk or a sweetened milk drink category. If this is based simply on whether the same brand of infant formula or follow on formula exists then this is unfair on brands of sweetened milk or milk alternative that

may also be fortified, but that are only marketed for children after infancy. UK Government guidance says that growing up and toddler milks are not necessary and therefore there is no need for these to be given any special consideration.

We strongly recommend that any sweetened milk or milk alternative marketed for children over 1 year of age is included in the scope for these guidelines regardless of whether they claim to be an unnecessary growing up or toddler ‘formula type’ milk.

7. In Table 7 under commercial product type in column one you use the term ‘baby finger food’ – this term is being heavily used by manufacturers to promote the idea that inappropriate ultra-processed snack foods are suitable when encouraging infants to self-feed as per public health guidance. **We recommend the term ‘finger food’ is not used here, but these foods are simply considered snack foods. The use of terminology related to ultra-processed food definitions should be considered for clarity.**
8. We would like to see a clear statement that **products marketed for infants and young children under 3 years of age should not contain maltodextrins.**
9. We would like to see a clear statement added to the guidance that **no artificial or non-nutritive sweetener is used in any foods or drinks marketed to children under 3 years of age.**
10. We would like to see a clear statement added to the guidance **that no artificial colourings are used in any foods or drinks marketed to children under 3 years of age.**
11. In the ‘Additional considerations’ it says ‘Food producers may wish to consider the following...’. We would like to see this wording strengthened to **‘Food producers should ...’.**
12. In the ‘Additional considerations’ there is mention of appropriate portion sizes but no guidance is given for any product. Whilst this may be seen to fit into labelling requirements, where clarity is needed to reduce high energy or free sugar intakes, we would like to see that included in this guidance in relation to the recommended intakes of free sugars or salt in UK public health guidance.
13. The timeline given for manufacturers to achieve these changes is 2023. The industry have known about many of these recommendations and/or been involved in discussions with PHE for the past 2 years and therefore have had considerable preparation time. Giving them a further 3 years means an entire generation of pre-school children has once again not been protected from inappropriate commercial baby foods. **Considering the target to halve childhood obesity by 2030, we strongly recommend that manufacturers are asked to meet the proposed guidance by the end of 2021, and that it stipulates that guidelines will become mandatory if voluntary guidance fails.**

In answer to the specific questions posed:

1. Do you agree with the draft proposed commercial baby food and drink guidelines in tables 1 and 2?

Table 1:

Whilst two of our comments relate to labelling we do not believe that it is practical to produce guidance on composition separately to that for labelling and marketing if the aim is to protect children from foods high in free sugars.

We would like to see added in the third row of the table:

Where free sugars in fruit and vegetable based pureed products exceed 30% of energy, the product should have a clear front of pack flag highlighting they are high in sugar.

Where dried fruit products are made from pureed fruit or vegetables or fruit and vegetable pastes those containing free sugars greater than 30g/100g should require a front of pack flag highlighting they are high in sugar.

Currently it is proposed that not more than 30% of energy in finger foods and snacks comes from total sugars. **We believe this should be no more than 15% of energy from total sugars in finger foods and snacks.**

This brings the guidance in line with that proposed by WHO Europe.

Table 2:

Currently it is proposed that no more than 75mg/100kcal of sodium is permitted (or 125mg/100kcal if cheese is mentioned in the front of pack product name). We would like to see these figures in line with WHO Europe guidance at:

No more than 50mg sodium/100kcal (or 100mg/100kcal where cheese is mentioned in the front of pack product name).

This brings the guidance in line with that proposed by WHO Europe.

2. Do you agree with the draft proposed commercial baby food and drink product categorisation (table 3)?

We broadly agree with this with the following exceptions:

- In 'Baby meals', fruit and vegetable foods are included as a category despite the fact that they are not clearly meals, snacks or additions to meals. We think these should be a separate category of foods with clarity then given on use, appropriate portion sizes and how they can be marketed.

- In 'Desserts and breakfasts' we would like to see the named inclusion of any frozen products or jelly like products marketed as either desserts or drinks, and clarity over yoghurt/fruit products marketed as drinks or slurpies (with cross-reference to baby drinks).
- In 'Desserts and breakfasts' it currently excludes chilled yoghurts, but we believe that chilled yoghurts and fromage frais, which are frequently marketed to very young children based on their serving size and use of cartoons and graphics on the labels, should be included in these baby food guidelines.
- 'Soups, cooking sauces and stocks' should include savoury dips, spreads or pate type foods.
- In 'Baby finger foods and snacks'; fruit and vegetable based finger foods and snacks we would like to see clearer categorisation of dried fruit snacks. At the moment it says that 100% dried fruit or vegetables are excluded, but does not clarify that if these have been made from a fruit or vegetable puree or paste where all the free sugars are liberated from the cell walls, that regardless of whether they are '100% fruit or vegetable based' these will count as products high in free sugars and should be included in any guidance. Examples of 100% dried fruit or vegetables needs to be given here clarifying what is and isn't included in this category.
- In 'Baby finger foods and snacks'; sweet finger foods and snacks should include the words cake and pastry alongside cereal/oat bars.
- In 'Baby drinks': any sweetened milk drink whether sold as a dried powder or a liquid drink, regardless of whether it claims to be a growing up or toddler milk related to an infant formula brand should be treated equally to a sweetened milk or milk alternative in these guidelines.
- In 'Baby drinks': smoothies should be included alongside fruit drinks and juices with clarity given on the definition of a smoothie compared to a pureed fruit product; frozen or jelly like 'drinks' or slurpies should be named in this category with cross-reference to desserts and breakfasts.

Helen Crawley, December 2020

About Us:

First Steps Nutrition Trust is a public health nutrition charity that supports good nutrition from pre-conception to five years.

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