Statement on the National Food Strategy Part 2: Recommendations for a National Food Strategy White Paper which is inclusive of infants and young children

September 2021

Summary

- The National Food Strategy sets out an ambitious plan for food system reform and many of its 14 recommendations could benefit the health and wellbeing of young families, should they be realised.
- However, only two recommendations are of direct relevance to the early years: the proposed extension of the Healthy Start Scheme to cover 4-5 year olds, and the recommendation for sensory food education with pre-school and reception children.
- The salt and sugar reformulation tax is important and relevant to young children given that they eat family foods, but this tax would not tackle the high free-sugar content of commercially produced, ultra-processed foods and drinks marketed for babies and toddlers.
- The strategy does not specify that babies are out of scope, but then fails to consider infants and first foods (i.e. breastmilk, infant formula, other infant milks and foods and drinks marketed to under 3 year olds) a part of our food system. It makes no mention of the problematic diets of young children despite the common place use of ultra-processed foods and drinks marketed specifically at this demographic, among all socioeconomic groups.
- As long as how, what and why we feed our infants and young children is considered outside of the scope of our food system, we will make little progress in tackling rising rates of overweight and obesity and other negative health impacts of suboptimal diets in the early years, including dental decay. We will also miss the opportunity to prevent environmental damage associated with the manufacture, distribution and sales of unhealthy, discretionary products marketed for use in the early years.
- We urge the White Paper team to consider our 15 additional recommendations below to ensure a White Paper and subsequent Food Bill which can improve the diets of infants and young children while protecting the environment.

Background

The National Food Strategy is the outcome of an independent review commissioned by the government in 2019, to set out a vision and a plan for a better food system. Part Two was published on the 15th of July, and calls for historic reform to the food system to enable more healthy, equitable and sustainable eating habits which protect the environment.
The strategy builds on the work underway in the Agriculture Bill, the Environment Bill, the Fisheries Bill, the Industrial Strategy and the Childhood Obesity Plan and is intended to create an overarching strategy for government, designed to ensure our food system:

- Delivers safe, healthy, affordable food; regardless of where people live or how much they earn;
- Is robust in the face of future shocks;
- Restores and enhances the natural environment for the next generation;
- Is built upon a resilient, sustainable and humane agriculture sector;
- Is a thriving contributor to our urban and rural economies, delivering well paid jobs and supporting innovative producers and manufacturers across the country;
- Does all of this in an efficient and cost-effective way.

Part Two lists four strategic objectives which frame 14 costed recommendations (see Annex 1).

The necessary scope of the National Food Strategy is daunting and its ambition is commendable. However, we judge it to be fundamentally flawed and incapable of meeting its objectives because it fails to acknowledge the specific food and nutrition requirements of babies and young children and the factors which mean eating well is a challenge for many young families.

The data we present and recommendations we make in this statement are drawn from our report: Enabling children to be a healthy weight: What we need to do better in the first 1,000 days. This report highlights concerning rates of overweight/obesity and poor diets among pregnant women, infants and young children in England and outlines what we know about the likely drivers. The analysis informs a set of recommendations which are relevant to the objectives of the National Food Strategy and the White Paper, and hence are repackaged and presented below.

What is the ‘first-food system’?

The food system definition used in the National Food Strategy is: “the combination of all of the elements – natural and man-made – that combine to produce, process, market and sell the food we eat and the connections between them. It can be said to include everything from the sun and the soil to the till at the corner shop”.
The UK population includes 3.5 million under 4 year olds (Office for National Statistics, 2020), and, all of us were babies and toddlers once. We believe that a truly national, National Food Strategy and the forthcoming Food Bill need to be inclusive of the early years, and the ‘first-food system’; i.e. the system that provisions foods for children aged 0-36 months of age, including breastmilk, infant milks, animal milks and home-prepared and commercially produced complementary foods (Baker et al, 2021).

What do infants and young children living in England eat?

Most babies are formula-fed and dietary inequalities start from birth:

- Despite UK public health recommendations to breastfeed for the optimal health of the baby and mother (SACN, 2018), and the desire of the majority of women to do so (McAndrew et al, 2012), 23% of babies in England receive formula as their first feed, while 57% of new mothers breastfeed or give donor milk (NHS Digital, 2021).
- Breastfeeding initiation is lowest among younger, white women, women in routine and manual occupations, or those who have never worked (McAndrew et al, 2012).
- There is a steep drop off in breastfeeding, whereby less than half (48%) of babies still receive some breastmilk at 6-8 weeks (PHE, 2021), only a third of women breastfeed at 6 months, and only 1% breastfeed exclusively (McAndrew et al, 2012), as recommended (SACN, 2018).
- A third (34%) of mothers who stopped breastfeeding between 6 and 9 months wanted to breastfeed for longer, and 20% who stopped did so because they were returning to work or education (McAndrew et al, 2012).

Most babies are given their first solid foods too early, and the purchase of commercially produced, ultra-processed foods to feed babies and toddlers is commonplace across socioeconomic groups:

- In 2010, only a quarter of babies were given their first foods at the recommended 6 months of age, most having received much earlier (McAndrew et al, 2012).
- The proportion of mothers introducing solids at, or before 5 months of age was highest among young, white women, among those in routine and manual occupations and those who had never worked (McAndrew et al, 2012).
- In 2011 in the UK, three quarters (72%) of babies aged 4-6 months had been given a commercially prepared baby food, while for 35% this was the norm (Lennox et al, 2013). Despite snacks not being necessary for babies under 1 year of age, two thirds (62%) of 7-9 month olds were fed a commercial snack (Lennox et al, 2013).

1 It is important to note that the health and diet of women and men in the pre-conception period and for women during pregnancy also have important impacts on the health and wellbeing of babies and children in to their later lives, with implications for the scope of recommendations made below.

2 Much available data on infant and young child feeding is dated as the national Infant Feeding Survey was discontinued in 2010, however recent data from surveillance systems and from Scotland suggest that there has been little change in most feeding practices since 2010.
Households from all socioeconomic groups buy commercial baby foods (PHE, 2019).

In 2011, 44% of children aged 12-18 months were found to be consuming commercially prepared meals and 42% packaged snacks, and 32% had eaten an adult ready meal. Over a third of these children (34%) were also still being given a formula milk (Lennox et al, 2013) despite the NHS advising the suitability of cows’ milk from 1 year.

What are the implications of current suboptimal dietary practices of infants and young children?

- Formula fed babies (and their mothers) miss out on the protective effects of breastfeeding, for example, being more likely to be hospitalised as a consequence of gastrointestinal or respiratory illness (SACN, 2018) and to be overweight/obese in later life (Horta et al, 2015).
- Early introduction of solids may be linked to higher energy intakes, which promotes weight gain (English et al, 2019).
- Poor quality diets (low in fruits, vegetables and fish) in late infancy have been found to be associated with excess weight by school age (Okubo et al, 2015).
- Commercial, ultra-processed baby and toddler foods, drinks and infant milks are frequently high in sugar (Crawley and Westland, 2017; Westland and Crawley, 2018; Sparks and Crawley, 2018; PHE, 2019; First Steps Nutrition Trust, 2021), and pouch-based packaging may cause dental caries and encourage overeating (Koletzko et al, 2019).
- Ill health caused by suboptimal feeding not only has personal costs to the individual child, but a huge cost to the NHS (e.g. with respect to breastfeeding see Renfrew et al, 2012).
- In addition, there are important questions about the sustainability and environmental impact associated with the production, packaging and waste disposal, distribution and use of discretionary, commercially-produced foods, drinks and infant milks marketed for infants and young children (Joffe et al, 2019; Crawley and Westlands, 2017).

What actions are needed in our food system to improve the diets of infants and young children while protecting the environment?

The forthcoming Food Bill should be inclusive of our youngest citizens and acknowledge and address their specific nutritional needs and vulnerabilities. For this to happen DEFRA need to recognise and make recommendations in their White Paper which address current challenges in the first-food system, i.e. those that are necessary to ensure our food system delivers safe, affordable and healthy food for babies and young children, as well everyone else. In addition to being of benefit to child health, enabling the diets of more infants and young children to include more breastmilk (via breastfeeding) and more unprocessed and minimally processed foods, would contribute to restoring and enhancing the natural environment, in contrast to diets reliant on infant milks and commercially produced, ultra-processed foods and drinks marketed for infants and young children.

Below we highlight which recommendations of the National Food Strategy we perceive as important to support eating better in the early years. We then list 15 additional recommendations (in the
context of the objectives and recommendations of the National Food Strategy where this is possible) which we believe could create an environment which would enable the next generation to eat better and more sustainably, and to maintain a healthy weight as they grow.

**Objective 1 is to “Escape the ‘junk food’ cycle to protect the NHS”.

We endorse recommendation 1, for a proposed sugar and salt reformulation tax on sugar and salt purchased by manufacturers for addition to foods and drinks during processing, and hypothecation to improve access to fruits and vegetables among low-income families.

We also strongly endorse recommendation 3, to improve the food environment at school and food-related education, including for pre-school children, in order that children learn how to make good food choices, cook and eat well.

However, to be inclusive of infants and young children, the following additional recommendations encompass actions to enable reduced consumption of infant formula among mothers who want to breastfeed, as well as commercial foods, snacks, drinks and unnecessary infant milks marketed for babies and toddlers, the vast majority of which are ultra-processed\(^3\). The recommendations are intended to improve the protection of parents from misleading marketing practices of companies selling these products (marketing being an important driver of eating habits, and ignored in the National Food Strategy recommendations), as well as to increase the support provided to young families to ensure optimal feeding practices. We also make recommendations to address the nutritional composition of commercial baby foods given that the proposed sugar and salt tax is inadequate to do so.

1. **Fund and support all neonatal, maternity and health visiting services, Children’s Centres (and similar) and relevant university courses to become **Unicef UK Baby Friendly Initiative** accredited. This recommendation seeks to build on and expand the NHS long term plans to accredit maternity settings. The initiative seeks to protect and promote breastfeeding, to support informed decision making by families on how feed their babies, and to enable public services to better support families with infant feeding.

2. **Provide sufficient, ring-fenced funding to local authorities so that they can invest in universal breastfeeding support programmes, delivered by suitably qualified specialists and peer supporters, to enable more women to achieve their breastfeeding goals.**

3. **Strengthen England’s legislation in line with **Scotland’s Breastfeeding etc. (Scotland) Act 2005**, which makes it an offence to stop someone in a public place from feeding their children, if under 2 years, with milk.

---

\(^3\) We find the term ‘junk food’ imprecise and unhelpful, and repeat it here only in the context of repeating the objective in the National Food Strategy. We do not infer that infant formula is a ‘junk food’ by recommending its consideration under this objective. We recommend a focus on ultra-processed foods given the availability of an objective definition and mounting evidence that diets high in such foods are associated with poor health.
4. Enact and enforce stronger regulations to better protect parents from misleading commercial influence on when, what and how they feed their babies by putting an end to the inappropriate marketing of infant milks. The International Code of Marketing of Breastmilk Substitutes provides the most relevant policy framework.

5. Make the ACAS guidance on accommodating breastfeeding employees in the workplace statutory to protect breastfeeding mothers on their return to work.

6. Regulate the composition, labelling and marketing of foods, snacks and drinks marketed for infants and young children, many of which are ultra-processed and contain high amounts of free-sugars. We recommend that guidance and a nutrient profile model from WHO Europe are used as the basis of UK regulation, and in addition that the use of cartoon characters on foods marketed for pre-school children are banned.

7. Provide information and practical support to families to practise age-appropriate introduction of cost-effective, nutritious solid foods at around six months of age, and to feed responsively following their child’s hunger and satiety cues. Families should also be informed of the disadvantages of commercially produced foods and drinks marketed for infants and young children.

In addition, we believe the following additional recommendations are necessary to more comprehensively address the school-related food environment and food-related education, from the early years onwards:

8. All young people should be taught the importance of health and eating well, before and during pregnancy, and breastfeeding as a normal human activity, as a part of their personal, social, health and economic education.

9. The voluntary food and drink standards for early years settings should be made mandatory so that what children are given to eat and drink in their earliest years provides a good example of what eating well looks like as well as being healthy and nutritious.

Objective 2 is to ‘Reduce diet-related inequality’.

We endorse the four recommendations made under this objective, particularly recommendation 6 which is relevant to the early years, as it involves expanding the Healthy Start scheme so that families with children between 4 and 5 years of age are eligible (leaving no gap before eligibility for Free School Meals).

However, because dietary-inequality starts at birth, and breastfeeding rates are lowest among those who are less well off, we recommend that additional changes to the Healthy Start scheme are needed as follows:

10. To achieve the Healthy Start scheme’s original objectives which included the promotion of breastfeeding and preventing obesity, the following changes are required: extended eligibility by raising the threshold for receipt; an enhanced offer for breastfeeding women;
increased visibility, accessibility and uptake of the scheme and integration with other benefits and services for young families.

Objective 3 is to “Make the best use of our land, in order to meet the UK’s legal commitments on carbon emissions and nature restoration”.

We endorse the recommendation to define minimum standards for trade and to protect these standards, particularly with respect to the composition and content of infant milks and baby foods where UK standards are more stringent than many other countries (First Steps Nutrition Trust, 2020).

We acknowledge and agree that there is a need to do what we can to reduce carbon emissions and restore nature. We defer to experts in this area to appraise the three recommendations made with regard to this objective.

We make the following additional recommendation to address important questions about the sustainability and environmental impact associated with the production, packaging and waste disposal, distribution and use of discretionary, commercially-produced foods and drinks marketed for infants and young children:

11. Consideration should be given to the contribution to carbon emissions made by UK-based manufacture and distribution of unnecessary infant milks (i.e. all commercial formula milks with the exception of infant formulas and specialised infant milks) as well as discretionary and often unnecessary commercial foods, snacks and drinks in unrecyclable packaging.

Objective 4 is to “create a long-term shift in our food culture”.

We support this objective, but urge the White Paper team to consider the following recommendation which would ensure that the food culture of young families does not get ignored:

12. The lead of the National Food Plan should appoint a specific person with expertise on and to champion maternal, infant and young child nutrition. This person should lead the development by a multi-sector group, of a strategy to improve mothers diets and infant and young child feeding practices, and data should be collected to take stock of current practices and to assess change over time. More specifically, the 5-yearly national Infant Feeding Survey needs to be reinstated and children’s height and weight data collected at the 2-2.5 year health visitor review should be collated centrally for surveillance.

Make statutory family support services fit for purpose:

Most of our additional recommendations will not be possible without improvements in statutory services and the infrastructure and staff which support young families. Along with the
recommendations made around the Healthy Start scheme and the food and drinks standards for early years settings made above, our recommendations are as follows:

13. Ensure local authorities are given sufficient funding to deliver universal health visiting services, delivering a minimum of seven face to face contacts with a health visitor as set out in the 2021 Healthy Child Programme.

14. Ring fence funding for the establishment/re-establishment of universal Children’s Centres or Family Hubs which can offer a range of services to support pregnant women and young families to eat well.

15. Include nutrition training in core curricula for all health professionals who have contact with pregnant women and young families in order that they have the knowledge and skills to support them to eat well.

Conclusions

The National Food Strategy is the first comprehensive review of the food system in 75 years, and yet babies and what babies eat are invisible, and few recommendations address the specific challenges faced by parents and carers of infants and toddlers. As long as how, what and why we feed our infants and young children is considered outside of the scope of our food system, we will make little progress in tackling rising rates of overweight and obesity and other negative health impacts of suboptimal diets in the early years, including dental decay. We urge the White Paper team to consider our 15 additional recommendations to ensure a White Paper and subsequent Food Bill which can improve the diets of infants and young children while protecting the environment.
References


First Steps Nutrition Trust (2021). Drinks marketed as toddler and growing up milk. Available at https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6113b3b1b37b5c491720e83a/1628681138268/Drinks+marketed+as+toddler+and+growing+up+milks+in+the+dietsof+1-4+year+olds_0508-final.pdf


Office for National Statistics (2020). *UK population by ethnicity: Age groups.* Available at: https://www.ethnicity-facts-figures.service.gov.uk/uk-population-by-ethnicity/demographics/age-groups/latest

Public Health England (2021). *Breastfeeding at 6 to 8 weeks after birth: 2019 to 2020 annual data.* Number and proportion of infants who have been fully, partially or not at all breastfed at 6 to 8 weeks after birth. Available at https://www.gov.uk/government/statistics/breastfeeding-at-6-to-8-weeks-after-birth-annual-data


Annex 1: The National Food Strategy Part 2 Objectives and recommendations

• **Objective 1: Escape the ‘junk food’ cycle to protect the NHS**
  - *Recommendation 1*: A novel sugar and salt reformulation tax on sugar and salt purchased by manufacturers for addition to foods and drinks during processing. The use of some of the revenue generated to fund fresh fruit and veg provision to low-income families.
  - *Recommendation 2*: Mandatory reporting on sales of certain food types (including HFSS foods and fruit and veg), major nutrients and food waste, to look at nutrition and environmental impacts of foods sold by companies.
  - *Recommendation 3*: A new ‘eat and learn’ initiative for schools to impact culinary skills and knowledge to enable children to be able to cook; including sensory education for young children in nursery and reception class. Accreditation of schools.

• **Objective 2: Reduce diet-related inequality**
  - *Recommendation 4*: Raise the income threshold for qualifying for Free School Meals so more children benefit
  - *Recommendation 5*: Fund the Holiday Activities and Food programme for the next 3 years so that children eligibly for FSM do not go hungry during the school holidays
  - *Recommendation 6*: Expand the Healthy Start scheme so that families with children between 4 and 5 years of age are eligible (leaving no gap before eligibility for FSM), providing them vouchers exchangeable for milk, fruit and veg and pulses
  - *Recommendation 7*: Trial a ‘Community Eatwell’ Programme supporting those on low-incomes to improve their diets by e.g. receiving prescriptions for fruit and veg, food education and social support

• **Objective 3: Make the best use of our land, in order to meet the UK’s legal commitments on carbon emissions and nature restoration**
  - *Recommendation 8*: Guarantee the budget for agricultural payments until at least 2029 to help farmers transition to more sustainable agricultural land use
  - *Recommendation 9*: Create a Rural Land Use Framework based on the 3 compartment model (repurposing/adapting some farm land for environment projects, farming some land at lower yields to enable nature to thrive, and using new technologies on some higher-yielding, low-carbon farms, to increase productivity without polluting the Earth).
  - *Recommendation 10*: Define minimum standards for trade (safeguarding high environmental protection, animal welfare and food standards) and a mechanism for protecting them
Objective 4: Create a long-term shift in our food culture (including: innovating and changing the way we use our land, supporting businesses in new product development and reformulation, and rethinking how public policy works in order to find more effective ways to improve our national eating habits. This objective is about ideas, evidence, laws and targets to help change the food system on the ground).

- Recommendation 11: Invest £1 billion in innovation to create a better food system
- Recommendation 12: Create a National Food System Data programme
- Recommendation 13: Strengthen Government procurement rules to ensure that taxpayer money is spent on healthy and sustainable food
- Recommendation 14: Set clear targets and bring in legislation for long-term change