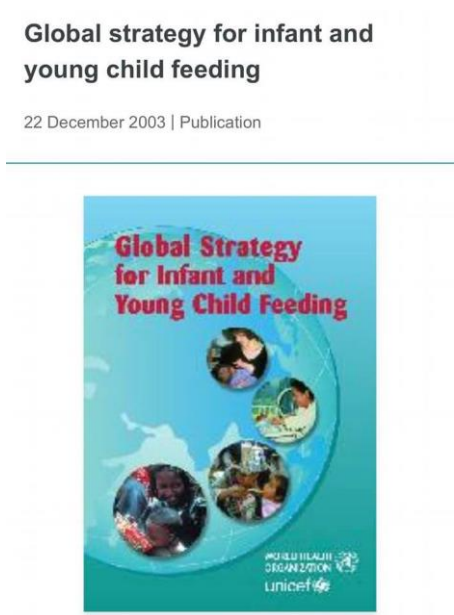


FSANZ LABELING REVIEW ULTRA PROCESSED FOOD POWDER (FORMULA)

The current labeling of Infant powder (formula) has been driven by industry for profit not health. Where is the truth? Hidden, that's where.

We have known since 2003 that infants who are not breastfed and use Infant powder (formula) are at risk and from Nova 2019 we know that the Ultra Processed Food powder itself is a risk, yet industry has been allowed to direct information parents receive through misleading labeling.

Risk awareness	Source
2003	Global Strategy for Infant and Young Child Feeding
2013	NHMRC Infant Feeding Guidelines
2019	Nova Classification System
2020	Ibfan Dangers of Ultra Processed Foods



From the above document –

'Infants who are not breastfed, for whatever reason, should receive special attention from the health and social welfare system since they constitute a risk group.'

<https://www.who.int/publications/i/item/9241562218>

There are multiple references to risk in the [NHMRC Infant & Young Child Feeding Guidelines for Health Workers](#) from risk to health and risk in preparation.

Advice for health workers

Breastfeeding

- Encourage, support and promote exclusive breastfeeding to around 6 months of age and explain that infants do not require fluids other than breast milk for the first 6 months.
- While breastfeeding is recommended for 6 to 12 months and beyond, any breastfeeding is beneficial to the infant and mother.
- Advise women to continue breastfeeding with appropriate complementary foods until 12 months of age and beyond, for as long as the mother and child desire.
- Inform parents of the benefits of breastfeeding and the risks of not breastfeeding when a change from breastfeeding is being considered.

2019 Infant powder is a Nova category 4 Ultra Processed Food.

<http://www.fao.org/3/ca5644en/ca5644en.pdf>

[GROUP 4] **Ultra-processed foods**

Formulations of ingredients, mostly of exclusive industrial use, made by a series of industrial processes, many requiring sophisticated equipment and technology (hence 'ultra-processed'). Processes used to make ultra-processed foods include the fractioning of whole foods into substances, chemical modifications of these substances, assembly of unmodified and modified food substances using industrial techniques such as extrusion, moulding and pre-frying; use of additives at various stages of manufacture whose functions include making the final product palatable or hyper-palatable; and sophisticated packaging, usually with plastic and other synthetic materials. Ingredients include sugar, oils or fats, or salt, generally in combination, and substances that are sources of energy and nutrients that are of no or rare culinary use such as high fructose corn syrup, hydrogenated or interesterified oils, and protein isolates; classes of additives whose function is to make the final product palatable or more appealing such as flavours, flavour enhancers, colours, emulsifiers, and sweeteners, thickeners, and anti-foaming, bulking, carbonating, foaming, gelling, and glazing agents; and additives that prolong product duration, protect original properties or prevent proliferation of microorganisms.

Processes and ingredients used to manufacture ultra-processed foods are designed to create highly profitable products (low-cost ingredients, long shelf-life, emphatic branding), convenient (ready-to-consume) hyper-palatable products liable to displace freshly prepared dishes and meals made from all other NOVA food groups.

Adapted from Monteiro *et al.*, 2017a.

Many ready-to-consume products such as carbonated soft drinks; sweet or savoury packaged snacks; chocolate, candies (confectionery); ice-cream; mass-produced packaged breads and buns; margarine and other spreads; cookies (biscuits), pastries, cakes, and cake mixes; breakfast 'cereals', 'cereal' and 'energy' bars; 'energy' drinks; milk drinks, 'fruit' yoghurts and 'fruit' drinks; 'cocoa' drinks; 'instant' sauces.

Many pre-prepared ready-to-heat products including pies and pasta and pizza dishes; poultry and fish 'nuggets' and 'sticks', sausages, burgers, hot dogs, and other reconstituted meat products; and powdered and packaged 'instant' soups, noodles and desserts.

Infant **formulas**, follow-on milks, other baby products; 'health' and 'slimming' products such as meal replacement shakes and powders.

The consequences of UPF are increased risks of NCD <https://www.bpni.org/ultra-processed-foods/>

Ultra-Processed Foods (UPFs)

Advocacy Document :

- Statement and Call to Action on Consumption of Ultra-Processed Foods
- Letter to Health Minister/ State Health Ministers
- Media Brief 1, September 2020
- Press Release, NPM Webinar, 4th June 2021

"The Unseen Dangers of Ultra-Processed Food"



Translations Available:

English, Hindi, Gujarati, Punjabi, Assamese, Bangla, Kannada, Marathi, Telugu, Manipuri (Meitei mayek), Manipuri (Bengali Script), Odia, Malayalam, Tamil

Until Human Milk Banks are established we will continue to have UPF powder as the source of food in their place. However, our total reliance and the iconic status of the inferior UPF powder to Breastfeeding must change, its use needs to be reduced. To achieve this goal, plain package, risk language and warnings are required. The WHO CODE of Marketing of Breast milk Substitutes is another. This is an integrated package of health outcomes.

“ ‘Big Tobacco’ is often used as a collective term for the world’s largest tobacco manufacturers. Similarly, we used ‘Big Formula’ to refer to the corporations that manufacture and distribute BMS on an industrial scale, most but not all, being transnational corporations with a market presence in two or more country markets.” And “ The ‘baby food industry’ comprises Big Formula at its core, but also the dairy industry and other input suppliers, retailers, advertising agencies, and various other commercial entities who profit from BMS [21, 23].”

https://globalizationandhealth.biomedcentral.com/articles/10.1186/s12992-021-00708-1?fbclid=IwAR3DA-5B2jQsvoj4NHcXKr5GE8uQ8-n_M0teCeh2TJ_aIng0zsSo_7Qhc0o

Drawing on the knowledge from the introduction of plain packaging and warning labels (no graphics for UPF powder) within the tobacco industry we suggest the following changes be made to the labelling of Ultra Processed Food Powder Nova category 4 (formula)

<https://www.health.gov.au/health-topics/smoking-and-tobacco/tobacco-control/tobacco-plain-packaging>

“Under plain packaging laws, all tobacco products must:

- *be packaged in a certain colour*
- *display brand names in certain ways*
- *display the required text and graphic health warnings*
- ***not** display logos, brand images or promotional text”*

Standard packaging

See example bellow

Risk warnings/visuals

Plain Khaki packaging, white text and risk warning box

Ingredients only
No use of word formula, should be Ultras Processed Food Powder
Preparation
Plain brand name
No reference to breastfeeding
No cute animals
Consistent under 12 months
Toddler drink shown as a flavouring

Reference

<https://www.health.gov.au/health-topics/smoking-and-tobacco/tobacco-control/tobacco-plain-packaging>

Example of khaki can:



INGREDIENTS: Milk Solids, vegetable oils (contains soy), minerals (calcium citrate, magnesium chloride, potassium citrate, potassium chloride, sodium phosphate, sodium chloride, ferrous sulphate, zinc sulphate, copper sulphate, calcium carbonate, potassium iodide, manganese sulphate, sodium selenate), maltodextrin, omega LCPUFAs (DHA from fish oil, AA), acidity regulator (citric acid, calcium hydroxide), emulsifier (soy lecithin), vitamins (sodium ascorbate (vit C), dl-alpha-tocopheryl (vit E), niacinamide (niacin), calcium pantothenate (vit B5), retinyl acetate (vit A), thiamin mononitrate (vit B1), pyridoxine hydrochloride (vit B6), cholecalciferol (vit D3), phyloquinone (vit K1), riboflavin (vit B2), folic acid, cyanocobalamin (vit B12), biotin), taurine, L-histidine, inositol, nucleotides (cytidine 5' monophosphate, uridine 5' monophosphate, adenosine 5' monophosphate, guanosine 5' monophosphate), antioxidant (ascorbyl palmitate, mixed tocopherols concentrate), culture (Bifidus), L-carnitine.

Change to standard size small white text

Why the current packaging needs to be replaced with plain packaging to reduce the false attractiveness of an ultra processed food powder



Colour attraction
Brand allegiance
Numbering needs to go
Enticing words circled

Misleading use of words and clear safety issue regarding preparation temperatures

FEEDING TABLE

Age of infant	Quantity per feed		No. of feeds per day	
	Previously boiled water (mL)*	Level measuring scoops**	Formula	Others
Up to 2 weeks	90	3	6	-
2 - 4 weeks	120	4	5	-
1 - 2 months	150	5	5	-
2 - 4 months	180	6	5	-
4 - 6 months	210	7	5	-
6 - 9 months	210	7	4-3	1-2***

* To maintain the number of live cultures, the boiled water must be cooled down to about body temperature before adding the powder.

** Never use only the enclosed scoop as a measure of powder. Powder measured in this way will either lead to dehydration or deprive your baby of proper nutrition.

*** At this age, the infant's diet becomes more diversified (infant cereals, baby foods). Consult your health care professional before introducing any new food to baby's diet. If an earlier introduction of new foods is recommended by your health care professional, reduce formula intake as advised.

The use of the word live is misleading and false. This powder is dead unless Cronobacter is present. There needs to be a warning about Cronobacter and never to purchase a dented can. More safety less marketing on cans

The WHO advocates the use of water at 70°C for preparing formula as this temperature will destroy bacteria.⁴⁶⁰ However, vitamins and nutrients will also be destroyed⁴⁶¹ and use of water at this temperature brings the risk of serious burns. Infants are not at risk from *C. sakazakii* when formula is prepared with lukewarm (body temperature), previously boiled water and fed within 1 hour.⁴⁶⁵ As the risk of infection from *C. sakazakii* is negligible in Australia if correct preparation techniques are followed, the Infant Nutrition Council (INC)¹ advocates the use of water at body temperature (i.e. not hotter than 37°C), which poses no risk of nutrient deficiency or scalding.⁴⁶⁴

1 The Infant Nutrition Council Ltd was established in 2009 and is an amalgamation of the Infant Formula Manufacturers' Association of Australia (IFMAA) and the New Zealand Infant Formula Marketers' Association (NZIFMA).

INFANT FORMULA

National Health and Medical Research Council

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WHO not INC should drive product safety. INC responsibility is to shareholders. WHO responsibility is to global health. We shouldn't have to state this, but obviously we do.

Every can is used to mine data and spread false information



Product promotion
Brand identification
Consumer data mining – Careline
Colour attraction
Use of the industry word formula (UPF powder)



Risk statement required rather than
“Breast is Best”
Nutrition information false validation
Colour attraction
Colour standard to branding

THIS TRUTHFUL KHAKI CONTAINER



NOT THIS GLAMORISED MARKETING



This product has been allowed to flourish to the detriment of the health of Australia. Using this product costs lives. Plain labels are known to be effective in reducing sales. It is the responsibility of FSANZ, Department of Health and ACCC to work together to protect infants and young children.

Reviewing Standard 2.9.1 - Infant Formula

6 July 2021