

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

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Comments of IBFAN

IBFAN welcomes the Chair and Secretariat's clarification that the adoption of this standard at step 5 should not prevent the submission of additional comments as Step 6. However, we would still like to put on record our concern that the standard exists at all because it hands the baby food industry a dangerous tool. The standard itself is a testament to the power of marketing. Formulas targeting babies 6-36 months (and beyond) are not only *not necessary* but they come with many risks. Indeed, the products were invented to get round the global consensus on what is best for child health. It is therefore vital that the standard contains a preamble and text that will help governments control marketing and if considered necessary, stop their import.

The ban on cross promotion is clearly necessary, especially in relation to products that affect child health and survival so fundamentally. Cross promotion - stealing the branding/image from infant formulas (products that *are* necessary) - is a deceptive tactic that misleads parents. As a result of industry lobbying, many laws do not cover the marketing of products over 6 months, so this standard should recommend as many marketing and labelling constraints as possible¹. The market for follow-up and young child formulas is growing fast, in parallel with child obesity levels.

Since it is accepted that follow-up formulas are used as breastmilk substitutes, and that the standard should be aligned as far as possible with the WHO Guidance, the standard should repeat the warning that appears in 9.6.c of the Codex standard for infant formula: "*.. a statement that the product should only be used on advice of a independent health worker as to the need for its use and the proper method of use.*" This point has never been fully discussed at Codex, even though at its heart is the important principle that advice on infant and young child feeding should be free from commercial influence.

Lastly, one major concern is that increasingly these products are being promoted as single-serve in single use plastic, adding to their [already substantial burden on the environment](#)².

¹ [IBFAN 2018 FUF COMMENT](#). WHO paper on Cross Promotion.

² <http://www.babymilkaction.org/archives/21987>