

Subject: <no subject>
Date: Thursday, March 3, 2005 7:40 pm
From: tim@foodcomm.org.uk
To: <akki.khan@foodstandards.gsi.gov.uk>, <sanco.dietetic@cec.eu.int>
Cc: Patti Rundall <prundall@babymilkaction.org>

Dear Dietetics Dept (DG Sanco)
Dear Akki Khan (UK Food Standards Agency)

Re: Infant formula standards consultation

Please take this email message as a comment on the proposed changes to the infant formula standards currently under consultation.

This comment is being prepared by the Food Commission UK, which is an independent consumer organisation in the UK advocating on behalf of consumers with respect to food and public health policies. We are also the European co-ordinating partner of the International Association of Consumer Food Organizations, a federal body of consumer group in the USA, Canada, UK, Japan and Singapore, who together represent over a million individual subscribers and supporters.

We shall keep these comments brief by stating the following:

1. We believe that infant health must take priority over any possible commercial interest. There is no question of finding a balance or middle way between these two needs -- infants must take priority. Therefore we fully support the WHO Code of Marketing concerning infant formula and would like to see this Code fully implemented in European law.

2. We support the comments and recommendations made by the organisation IBFAN. In particular we urge the Commission to ensure

(i) that infant formula is only used with the advice of completely independent professionals;

(ii) that infant formula products are clearly labelled as not being sterile;
and

(iii) that no form of health claim or health-related marketing is permitted for these products on the label or at the point of sale or in any other way directed towards potential purchasers except through independent health professionals.

Yours sincerely,

Dr Tim Lobstein

Director, The Food Commission UK
and
European Co-ordinator for the International Association of Consumer Food Organizations,
94 White Lion Street,
London N1 9PF, UK.
tel +44 (0)207 837 2250
fax +44 (0)207 837 1141
email tim@foodcomm.org.uk
www.foodcomm.org.uk