

SNE QUESTIONS & ANSWERS

Infants and Young children nutrition

1. Does SNE agree with the WHO recommendation for exclusive breastfeeding for up to 6 months of age, with continued breastfeeding along with appropriate complementary foods up to two years of age or beyond?

SNE members consider breast milk as the best start in life. Therefore our members are committed to supporting exclusive breastfeeding during the first months of life, and continued breastfeeding thereafter followed by the introduction of safe and suitable complementary food.

However, not all mothers are able to breastfeed and some make a personal choice not to do so. It is important that babies continue to receive the correct nutrition; infant formula is recognised as the only safe alternative to breast milk.

2. What is the difference between infant, follow-on, and young-child formula?

There are three separate products categories specially formulated for three separate developmental phases of infant and young child nutrition:

- ✓ ***Infant formula** is the only safe alternative to breast milk for babies under 6 months of age.*
- ✓ ***Follow-on formula** has been developed for the nutritional needs of older infants over 6 months of age and its nutritional composition has been adapted accordingly. Follow-on formula should only be used as part of a mixed weaning diet and not as a breast milk substitute before six months.*
- ✓ ***Young-child formula** is a term introduced by EFSA and is designed for young children aged 12-36 months. It is adapted for young childrens' nutritional needs as part of a mixed diet based on complementary foods (baby or family foods). Like follow-on formula, they should not be used as a breast milk substitute before six months. The composition of young-child formula products can vary as mixed diet is more important at this stage in life.*

In Europe, these three different concepts are well established and accepted by care givers as being aligned with the perception they have on the development of infants and young children.

3. How can European consumers be sure that these products are safe?

The food safety of products intended for infants and young children are strictly regulated at EU level, and additional restrictions beyond general food law already apply: contaminants levels, microbiological standards, use of additives, etc.

Examples:

- ***Contaminants levels:** Nitrate limits are stricter for these products than they are for common foods. For instance, while the maximum nitrate level for fresh spinach is 3500mg per kg (2000mg for deep frozen spinach), the level for baby foods containing spinach is 200mg per kg (according to Regulation (EC) 1881/2006 on contaminants in foods);*

- **Pesticide residue limits:** *These limits are stricter than those for common foods, and many pesticides are prohibited from use entirely in these products. For infant formula and follow-on formula, these limits are below 0,01mg/kg (and lower for specific pesticides). These limits are lower than for common foods and require infant and young children products' manufacturers to carefully select and to monitor all raw materials as well as formulas and foods manufactured with these raw materials. (Directive 2006/141/EC);*
- **Use of additives:** *In foods for infants and young children only a very limited number of additives at a low level are permitted compared to common foods. For instance, for infant formula only 18 additives are allowed compared to around 400 additives for common foods. Of these 18 additives many are nutritional substances such as forms of vitamin C and E and some mineral salts (Regulation (EC) 1129/2011).*

SNE members are committed to deliver the highest level of safety for infants and young children products.

Regions throughout the world look to Europe as a leader in the development of some of the strictest safety and quality standards for the baby foods industry. The rules established for infants and young children in Europe therefore matter not only for European consumers, but also for vulnerable consumers worldwide.

4. What impact will the new Foods for Special Groups Regulation have on these products?

The new Regulation (EU) 609/2013 on Food for Specific Groups (FSG) will apply from 20 July 2016 and will:

- *Set general compositional and labelling rules for infant and follow-on formulae, processed cereal-based foods and other baby foods;*
- *Require the Commission to adopt through delegated acts specific compositional and labelling rules for infant and follow-on formulae, processed cereal-based foods and other baby foods;*
- *Require the Commission to prepare a report on milk-based drinks (so called, growing-up milks) and similar products intended for young children in order to assess the need to establish special compositional and labelling rules for this kind of products. Ensuring harmonized standards for composition across the EU will provide additional assurance that all products in Europe are of the highest quality standards and suited specifically to the nutritional needs of young children aged 12-36 months.*

5. Why is it important that there is a legislative distinction between these categories?

It is crucial that there is a legislative distinction between infant formulae, follow-on formulae and young-child formulae, as these are three separate product categories specially formulated for the different targeted infant and young child populations.

The formulations for these populations should be adapted to the different use/role of the formula in the diet according to the age and to the specific nutrients needed per age category. As EFSA stated in their report in 2013¹, the nutrient requirements per day are different between infants from 0-6 months, 6-12 months and young children from 1 to 3 years for the majority of nutrients.

¹ EFSA NDA Panel (EFSA Panel on Dietetic Products, Nutrition and Allergies), 2013. Scientific Opinion on nutrient requirements and dietary intakes of infants and young children in the European Union. EFSA Journal 2013;11(10):3408, 103 pp. doi:10.2903/j.efsa.2013.3408

With regards to the different place in the diet for the formulations:

- **Sole source of nutrients:** *Infant formula satisfies, by itself, the nutritional requirements of infants aged 0-6 months of age; If a baby is formula fed, 780ml (500kcal) of infant formula covers all of the nutrients a baby requires per day;*
- **Principle source of nutrients:** *Follow-on formula for infants 6-12 months of age is intended as the principal drink for infants over 6 months, whilst complementary feeding is established; Follow-on formula serves as the principle source of nutrients for infants gradually changing from a liquid diet to a progressively diversified diet.*
- **Important source of specific nutrients:** *Young-child formula is intended for young children aged 12-36 months as a supplementary drink in addition to a mixed diet based on complementary foods (baby or family foods). Although young children will eat a diversified diet, young-child formula can serve as an important source of nutrients.*

SNE believes that it is important that the legislative framework is tailored to the very specific dietary requirements of infants and young children at different ages and to the different role of the formulations in the diet of infants and young children. Furthermore it is not necessary for young-child formula to provide all the nutrients in the diet of young children since young children eat a diversified diet.

6. Why is it so important that industry can innovate?

SNE considers that continued research is crucial to meet the needs of babies and toddlers now and in the future. Innovation usually encompasses the addition of new ingredients, the modification of a level of established ingredients, or the modification of processing for example.

The importance of innovation is stated in Regulation (EU) 609/2013 on Foods for Specific Groups. Innovation enables consumers to benefit rapidly from technical and scientific progress.

SNE is committed to supporting scientific research and development and the application of evidence-based findings to innovate and develop products that are more closely designed to meet the specific dietary needs of infants and young children.

SNE members collaborate on a daily basis with expert scientists and nutritionists working across the EU and beyond in research and nutrition.

SNE believes in the development of EU legislation that stimulates innovation and that creates a competitive environment for innovative technologies and processes and fruitful collaborations between academia and industry (including SMEs). This would enable the EU to remain a key player on the global innovation market in the infant food category.

Concrete examples:

- **Choline and inositol:** *both were considered unnecessary nutrients before 2006 and are now regarded as essential in infant formulae.*
- **DHA:** *EFSA recognized in its last opinion (July 2014) the fact that DHA is now a key ingredient to be added in infant formulae and follow-on formulae while in the past the benefits were questioned – this recognition would not have been possible without industry innovation.*
- **ARA:** *EFSA stated in its 2013 report on the requirements and intakes of infants and young children that infants of 0-6 months require 140mg ARA per day. The requirement of ARA for*

infants (especially if DHA is added) is corroborated by Pediatric Nutrition experts from the Early Nutrition Academy (EFSA technical report 2014²).

7. Why do we need specific rules for young-child formulae at EU level?

Young-child formulae are specifically designed for the specific needs of children aged one to three years as part of a mixed diet complementary foods (baby or family foods). They are produced under strict controls and meet very high standards of safety and quality.

In its recent scientific opinion – July 2014³, EFSA recognised that young children have specific needs, and that they require – inter alia – more Vitamin D, iron, polyunsaturated fatty acids (PUFA) and sometimes iodine. While these nutritional requirements can be met with a balanced diet, EFSA noted that the reality demonstrates that many families in Europe are not meeting these nutritional needs. EFSA also concluded that fortified formulae, including young-child formulae, represents one way to increase essential nutrient intakes in infants and young children with, or at risk of, inadequate status of these nutrients (i.e. n-3 PUFA, iron, vitamin D and iodine).

SNE considers that young-child formulae, notified to competent authorities under Article 11 of Directive 2009/39/EC⁴, are the only products on the EU market which are specifically developed to provide a combined source of nutrients in amounts which are suitable and appropriate for young children, and to deliver the high standards of food safety and quality that are necessary for this special group of population.

It is critical that parents, caregivers and healthcare professionals have access to adequate information about young-child formula, in order to make the decision that is appropriate for the nutritional needs of the young child.

A concrete legal framework at EU level would provide industry with legal clarity for the manufacture and marketing of young-child formula. Specific legislation would also support the EU as a global manufacturer and exporter of young child formula – where possible compatible with Codex standards.

8. Where can I find more information about the infant and young child nutrition industry in Europe?

Further information is available on the SNE website (<https://www.specialisednutritioneurope.eu/>).

² European Food Safety Authority, 2014; Outcome of a public consultation on the draft Scientific Opinion of the EFSA Panel on Dietetic Products, Nutrition and Allergies (NDA) on the essential composition of infant and follow-on formulae. EFSA supporting publication 2014:EN-633. 146 pp.

³ EFSA NDA Panel (EFSA Panel on Dietetic Products, Nutrition and Allergies), 2014. Scientific Opinion on the essential composition of infant and follow-on formulae. EFSA Journal 2014;12(7):3760, 106 pp. doi:10.2903/j.efsa.2014.3760

⁴ Directive 2009/39/EC of the European Parliament and of the Council of 6 May 2009 on foodstuffs for particular nutritional uses