



Scientific Dialogue is Essential

SNE's views on interactions between healthcare professionals and the infants and young children nutrition industry in Europe

1. Introduction and background

The infants and young children nutrition industry in Europe is represented by Specialised Nutrition Europe (SNE).¹ SNE strongly supports efforts to ensure that every infant and young child has access to and receives optimal nutrition. We emphasise that:

- Breast milk is the optimal source of nutrition in early life.
- Healthcare professionals have a very important role in safeguarding optimal health and development of infants and young children, which includes protection and support of breastfeeding.
- Information and advice by healthcare professionals are fundamental for adequate nutrition during infancy and early childhood, especially when an infant is not breastfed.
- Marketing practices are restricted inter alia by EU legislation² with the intention to avoid undermining breastfeeding. The manufacturers represented by SNE fully support this objective, are committed to the general principles and aims of the WHO Code³ and operate strictly in accordance with European and national legislation. Furthermore, our industry has agreed to comply with company and industry self-regulatory codes.⁴
- Interactions between industry and healthcare professionals are permitted under the relevant national/EU legislation as well as under the WHO Code.

- The innovation eco-system in market economies relies on exchanges of information between public research and industry, which is why partnerships with industry are explicitly encouraged in the EU, for example in Horizon Europe.⁵

2. Why dialogue is essential

Collaborative and inclusive dialogue between healthcare professionals and the manufacturers of specialised nutritional products is essential to ensure optimal nutrition for infants and young children, for the following reasons:

- Healthcare professionals play a vital role in communicating to formula manufacturers the needs of infants and young children.
- Manufacturers rely on this information to identify valuable opportunities for product improvement and to develop formula and baby food to the latest scientific knowledge.
- While SNE fully acknowledges that mothers' own milk is the best source of infant nutrition, there are certain situations when breastfeeding might not be possible or chosen by the mother. In these circumstances, infant formula is intended as an effective substitute. Although the production of an identical product to breast milk is not feasible, every effort has been taken to be the closest possible to the nutrition profile or nutritional effect of human breast milk for optimal growth and development.

1 Transparency register number: 33498019160-40

2 See in particular Regulation (EU) No 609/2013 ('Foods for Specific Groups' Regulation) and Commission Delegated Regulation (EU) 2016/127 on infant and follow-on formula.

3 World Health Organization. (1981). International Code of Marketing of Breast-Milk Substitutes. World Health Organization.

4 For example, industry Codes exist in the following countries:

- Ireland (in cooperation with FSA): [Guidance for Compliance with Food Law When Communicating with Health Professionals about Infant Formula Products](#), April 2020.

- Italy: <https://www.unioneitalianafood.it/data/UIF-Codice-deontologico.pdf>, 2021.

- Germany: [Leitlinie zu Inverkehrbringen von Säuglings- und Kleinkindernahrungen](#), 2014.

- United Kingdom: [Infant Nutrition Industry Code of Practice](#), 2018.

5 Regulation (EU) 2021/695 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination

Dialogue between healthcare professionals and manufactures of formula for infants and young children is therefore essential for further research and development of optimized nutritional solutions to ensure optimal growth and development for infants and young children.

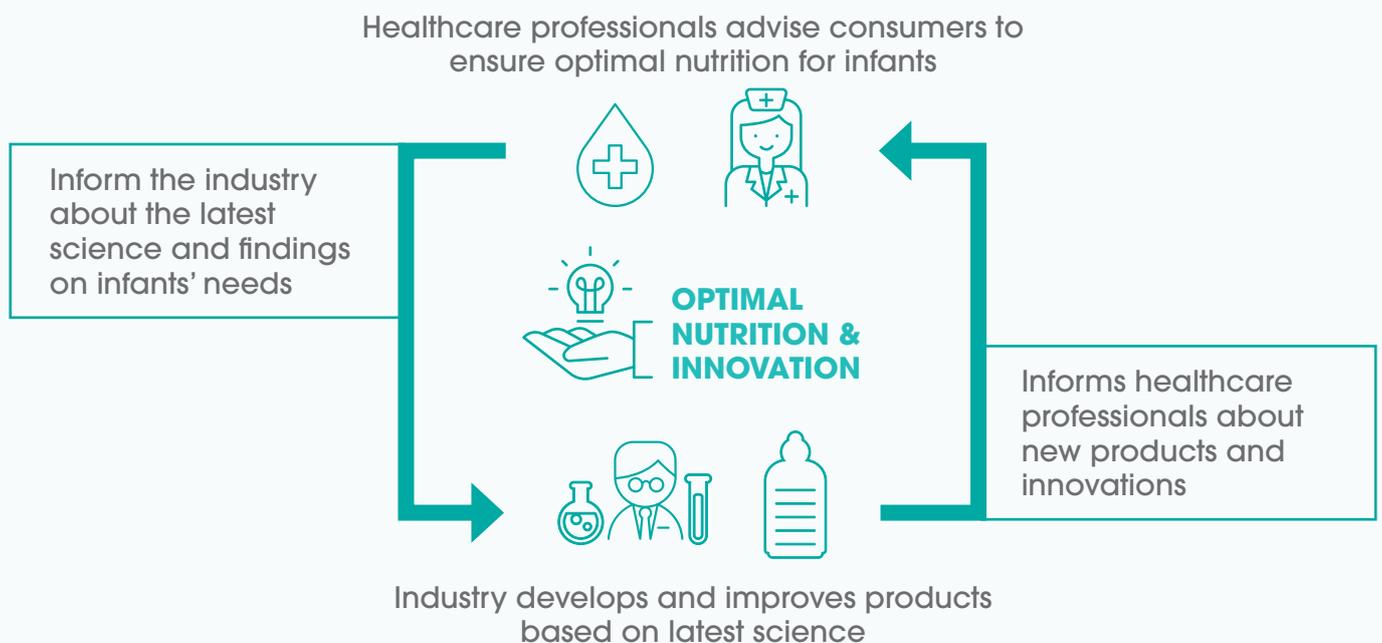
- Healthcare professionals, in turn, need unrestricted access to information on latest innovations, formulations and products to support parents, clinicians and other healthcare professionals in making appropriate choices for nutrition and food/ diet. This helps secure safe and effective use of the manufacturers’ products for healthy infants and young children and for those with special needs. The sharing of science-based and factual information between industry and healthcare professionals helps to ensure that they can deliver optimal nutritional advice.
- The need to provide adequate information to healthcare professionals to support safe and appropriate use of products for infants is recognized by Regulation (EU) 609/2013 (‘Foods for Specific Groups’ Regulation).

- SNE fully agrees with the pediatric associations that “With consistently restricted marketing of BMSs (breast milk substitutes – bracket added for ease of reference), families need counselling on infant feeding choices by well-informed pediatricians.”⁶

For these reasons, the provision and dissemination of scientific and factual information to healthcare professionals and the sponsorship of healthcare professionals and/or scientific meetings should continue, and our industry should not be treated differently from other industries such as the pharmaceutical or medical devices industries.

Reducing the dialogue between healthcare professionals and the manufacturers of specialised nutritional products threatens to reduce the quality of nutritional advice, resulting in possible negative consequences for growth and development for infants and young children, including for example the misuse of products for infants and young children or not choosing the appropriate products.

Circle of dialogue between healthcare professionals and industry



6 Bogнар Z, De Luca D, Domellőf M, Hadjipanayis A, Haffner D, Johnson M, Kolacek S, Koletzko B, Saenz de Pipaon M, Shingadia D, Tissieres P, Titomanlio L, Topaloglu R and Trück J (2020) Promoting Breastfeeding and Interaction of Pediatric Associations With Providers of Nutritional Products. *Front. Pediatr.* 8:562870. doi: 10.3389/fped.2020.562870

3. SNE calls for transparent and ethical scientific dialogue

We share the common goal with healthcare professionals to ensure that all babies have access to optimal nutrition. SNE believes that healthcare professionals can make good judgements about their relationship with industry of any type, within the framework of their own professional code of ethics.

Dialogue and exchange of information between manufacturers and healthcare professionals can be achieved via research publications, discussions with academia, discussions with and presentations to professional societies, publication of articles in journals, attendance and presentations by manufacturers of specialised nutritional products at conferences and discussions with individual healthcare professionals. In order to enable meetings to occur, industry may sponsor meetings of healthcare professionals and scientific meetings.

Transparency

To maintain trust and foster public-private collaboration, SNE's members adhere to the following principles:

SNE's members shall:

- In their relations with Medical Societies and healthcare professionals, always identify themselves by name and by the entity they work for or represent.
- Clearly state the objectives they intend to communicate.
- All interactions must be ethical, appropriate, and professional and should not create any conflict of interest.
- Sponsorship to attend an event must not be a reward to a favored health worker or institution, or an inducement to recommend, prescribe or purchase breast milk substitutes.
- Financial or material contributions to the organization of a third-party conference must be disclosed, as required.
- Refrain from using the medical associations logos without express authorization.

Scientific and factual information

Information provided shall be factual, science-based, accurate, objective and not misleading. All information provided must be rooted in current high-quality science.

Healthcare professionals will use it along with their specialized knowledge to determine which product best meets the nutritional and/or clinical needs of a particular infant or young child. This information may include:

- Information on nutrients, including energy content
- Information on the scientific basis for the product
- Information on the target population of the product
- Information on directions for use
- A description of the properties and characteristics of the product
- Information on new scientific developments supported by evidence published in non-commercial communication

4. Position on Medical Education and Lifelong Learning Activities in Specialised Nutrition & Healthcare

Context

It is important to distinguish between the different categories of medical education and lifelong learning activities:

- **Continuing Medical Education ("CME")** provided by accredited, independent providers led by professional societies, Healthcare Organisations, educational providers, or other independent stakeholders.
- **Lifelong Learning in Specialised Nutrition & Healthcare** provided through collaborations or partnerships between the private and public sectors.
- **Lifelong Learning in Specialised Nutrition & Healthcare** provided solely by the private sector.

SNE position on Lifelong learning activities in specialised nutrition and healthcare

Our members are committed to enhance the skills and knowledge of healthcare professionals by organising events for lifelong learning in specialised nutrition and healthcare through educational initiatives/activities and are committed to follow the highest ethical standards. SNE's members are convinced of the importance of providing healthcare professionals with unrestricted access to information on scientific innovations and availability of new products.

- By adhering to sponsorship approvals and policies, as well as local laws, companies can transparently support conferences and congresses focused on professional development, education, and training for healthcare professionals.
- Lifelong learning activities should follow agreed standards, and transparency should be ensured.
- SNE aims to develop a collection of ethical and transparent rules agreed by SNE members for their interactions with healthcare professionals.

SNE position on Continuous Medical Education (CME)

"CME educational events" must be offered via a certified, external partner. This can include Medical Societies or agencies which carry a certification in this area. Our industry is supporting Medical Societies and other CME providers registered in Europe under the European Union of Medical Specialists (UEMS) with unrestricted grants and other activities, to increase knowledge and skills in the field of nutrition for infants and young children. The intention of SNE's members is to continue to support CME initiatives.

- Where necessary, the industry can support CME initiatives in collaboration with certified providers, which includes the review of the content / program and its validation by a third party. The industry's role is to update and facilitate the exchange of knowledge among healthcare professionals and experts in the most objective way.
- All accredited education by industry is done through certified providers, certified health professional, institutions, or Medical Societies.

About SNE

Specialised Nutrition Europe (SNE) is the trade association representing the interests of the specialised nutrition industry across the European Union. SNE members are the national associations of 19 European countries, whose members are companies producing tailor made dietary solutions for populations with very specific nutritional needs. These include infants and young children, patients under medical supervision, sportspeople, overweight and obese consumers, and those suffering from coeliac disease.

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