

**Submission to the
Food Standards Australia New Zealand
Proposal P274 – Minimum Age Labelling of Foods for Infants**

Submitted by email: submissions@foodstandards.gov.au

The Justice and International Mission Unit (JIM Unit) of the Synod of Victoria and Tasmania, Uniting Church in Australia welcomes the opportunity to make a submission to the Food Standards Australia New Zealand Proposal P274 – Minimum Age Labelling of Foods for Infants.

The Unit is concerned about the sophisticated marketing of breast milk substitutes and the threat this poses to a woman's right to an informed choice about breastfeeding and the rights of the infant to the best food and nutrition possible.

The Uniting Church has consistently argued for the Australian Government:

to fully comply with the World Health Organisation International Code of Marketing of Breast-milk Substitutes (WHO Code) and subsequent World Health Assembly (WHA) Resolutions relating to breastmilk substitutes¹

WHA resolution 47.5 urges Member States to foster 'appropriate complementary feeding practices from the age of about six months'. Comments provided by Nutrition Cluster, UNICEF, New York June 1994 makes clear the intention of this recommendation that, "About six months of exclusive breastfeeding is encouraged, not four to six months as previously recommended."

The Unit therefore strongly supports the proposal to amend the labelling requirement in Standard 2.9.2 from 4 months to 'around 6 months' of age to be consistent with other respective Health Infant Feeding Guidelines.

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¹ Uniting Church in Australia, Assembly standing committee resolution, March 2004, <http://www.unitingjustice.org.au/just-and-sustainable-economy/uca-statements/item/470-unethical-marketing-of-breast-milk-substitutes>, accessed 11-11-13.