



australasian society of clinical immunology and allergy inc.

5 November 2013

Food Standards Australia New Zealand (FSANZ)
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To whom it may concern,

Re: Submission regarding FSANZ Proposal P274 – Review of Minimum Age Labelling of Foods for Infants

Thank you for the opportunity to provide a submission in response to the FSANZ Proposal 274 for the review of minimum age labelling of foods for infants.

The Australasian Society of Clinical Immunology and Allergy (ASCIA) is the peak medical society for allergy and immunology in Australia and New Zealand. Many of the researchers at the forefront of Australian research into introduction of complementary foods and allergy prevention are ASCIA members.

We have some concerns regarding the proposed amendment to standard 2.9.2 resulting in the “youngest minimum age declaration required on a label of an infant food is ‘around 6 months’ and for this wording to be displayed on first stage weaning foods.”

In relation to the introduction of solids to infants at risk of developing food allergy, and for the general community, current ASCIA infant feeding advice states:

- It is considered that breastfeeding during the period that foods are first introduced may help prevent the development of allergy to those foods.
- Breastfeeding is recommended for at least 6 months and is encouraged for as long as the mother and infant wish to continue.
- Based on the currently available evidence, many experts across Europe, Australia and North America recommend introducing complementary solid foods from around 4-6 months.
- There is little evidence that delaying the introduction of complementary solid foods beyond 6 months reduces the risk of allergy.

ASCIA is the peak professional body of clinical immunology and allergy specialists in Australia and New Zealand
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Whilst we can understand the desire to have consistency of information, it is important that decisions are made using information that is evidence based.

The NH&MRC guidelines for infant feeding state that “exclusive breastfeeding for at least 6 months reduces food allergies (section 1.2.1)”.

We contend that there is no good evidence to support this statement.

Furthermore, the NH&MRC guidelines also state, in contradiction to this, that there is some epidemiological evidence to suggest late introduction of solids/complementary foods in the diet of children at risk of subsequent atopic disease, may increase the risk of subsequent food allergy (section 9.3.4).

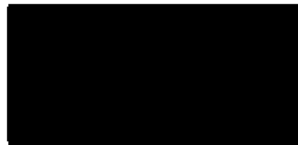
There are currently a number of active randomized control trials examining the role of early introduction of complementary foods in primary prevention of food allergy and allergic disease, which will help to inform future guidelines. Until further research suggests otherwise, ASCIA believes there is insufficient evidence to support the proposed amendment to change the wording on infant food to ‘around 6 months’.

We look forward to your response to this submission.

Yours sincerely,



Professor Dianne Campbell
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Chair, ASCIA Paediatric Committee



Ms Ingrid Roche
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Chair, ASCIA Dietitian Subcommittee

Copy: ASCIA Executive, ASCIA Paediatric, Education and Anaphylaxis Committees