

**The Royal College of Midwives UK Board for Scotland
37 Frederick Street, Edinburgh EH2 1EP**

**The Food Standards Agency Scotland
Nutrition and Functional Claims.**

The RCM UK Board for Scotland appreciated the opportunity to read and comment on the above document.

Definition

The Board agreed with the broad definition as outlined on page 4, paragraph 13. It also agreed that there should be agreement across the European Community about nutrition claims.

The UK Board for Scotland's primary concern must be with women who are pregnant, in labour, in the postnatal period and those who are breastfeeding. Thus, it must state a particular interest and argue for clear, non-misleading nutritional and functional claims on labels. Women in these categories are particularly vulnerable, as are their babies.

The Board wished to further add for the need for honesty when it comes to making nutritional and functional claims about proprietary formula milk for babies. Breastmilk is uniquely formulated for human babies. However, extravagant claims about the wonders of a formula milk in large print can easily distract attention from the tiny print which acknowledges that breastmilk is best for the baby.