

The National Childbirth Trust

The National Childbirth Trust welcomes the opportunity to comment on the Discussion paper on Nutrition Claims and Functional Claims. We are concerned that claims may be misleading to consumers in spite of the provisions of Directive 2000/13/EC.

We agree with point 8, that there are many ways in which claims can be misunderstood and that it is important to limit this as far as possible.

Infants are particularly at risk as they often rely on a sole source of food - infant formula. Manufacturers have been creative in implying that formula milks are roughly equivalent to breastmilk, although they contain none of the protective factors found in breastmilk and are not individually tailored to the baby's needs.

For this reason we would not support the use of functional or nutrition claims for infant formula or follow-on formula. The information required by parents should be available from the ingredients list which should be clear and detailed. Parents may wish to know the source of fats and fatty acids used for instance, whether the formula is suitable for vegetarians or vegans.

Claims can easily be worded to provide only part of the information needed to help make decisions. Whether the wording is highly specific such as, 'with added DHA' or vague eg 'for an unsettled baby' they do not provide the information a parent needs. Labels should already state that the product should only be used on the advice of a health worker as to the need for its use and the proper method of use.

We believe that there is a limited use of specific information such as 'contains folic acid' or 'a natural source of folates' is appropriate to inform women planning a pregnancy of which foods are good sources of this vitamin.

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