



Kids are sweet enough.

REFORMS TO IMPROVE THE LABELLING OF READY-MADE FOODS FOR EARLY CHILDHOOD (6 TO 36 MONTHS)

Key Messages

- Ready-made available baby and toddler foods should be accurately labelled to ensure caregivers are aware of the main ingredients and can easily identify products that best promote good health and good dietary habits.
- Product names on many ready-made baby and toddler products do not accurately reflect ingredients.
- Government must protect the health of our youngest Australians by introducing comprehensive regulation to ensure that all foods marketed for babies and toddlers are accurately labelled.

Ready-made baby and toddler foods should be accurately labelled

The first three years of life are a critical opportunity to support and encourage healthy dietary habits and good nutritionⁱ and to prevent overweight and obesity and other diet related non-communicable diseasesⁱⁱ. It is also a period in which the palate is developed, and lifelong tastes, habits and food preferences are establishedⁱⁱⁱ.

Despite consensus on the importance of good nutrition in the first years of life, less than one in five 2-3-year-old children eat the recommended daily vegetable intake,^{iv} and over half consume free sugars above the recommended intake,^v free sugars are those which are harmful to health. A [Royal Children's Hospital National Child Health Poll](#) run in July 2021 (RCH Poll) found that 45% of children between 4 to <36 months of age are eating ready-made baby and toddler foods at least two to three times a week. For two in five children, ready-made baby and toddler foods make up at least half or more of their meals and snacks, and for 15% of children these foods make up most or all of their dietary intake.

Given the high levels of consumption of these foods and the importance of this period for the future health of babies and toddlers, consideration must be given to packaged foods for this vulnerable group. Product names should accurately reflect ingredients and quantities of key ingredients should be specified to enable caregivers to easily identify products that promote good health and good dietary habits.

Names of baby and toddler products often do not accurately represent the ingredients in those foods

There is a growing concern that the labelling of some ready-made baby and toddler foods is undermining work to promote optimal nutrition.^{vi}

Recent research shows that many ready-made foods for babies and toddlers in Australian supermarkets have misleading product names^{vii}. In a survey of ready-made baby and toddler foods we conducted in late 2019, one in four products surveyed had names that did not accurately reflect the ingredients. Names of products often highlighted vegetable, legume and or grain content, despite the product being predominantly fruit, or used vegetables or fruits in the name but only contained flavouring or powder and no beneficial vegetable or fruit

ingredients. This plays into caregivers' high motivation to attend to the health and nutritional needs of their child and can mislead or confuse caregivers about the actual health and nutritional benefits of the product.^{viii}

A Royal Children's Hospital National Child Health Poll run in July 2021 highlighted this potential issue, finding that just over two in three parents say the name of a product guides their choices.

Comprehensive regulation of the labelling of baby and toddler foods will protect our youngest Australians

Babies and toddlers are among the most vulnerable Australians, and we adopt mandatory regulation to protect them in many areas of public policy, including in existing food regulations. The food regulatory system must ensure that all foods marketed for babies and toddlers meet strong standards on labelling.

Labelling standards already exist in some areas, for example the requirement that the word 'sweetened' is added to the packaging if specified sugar thresholds are exceeded in foods for babies. Mandatory protections like this can, and should, be expanded to protect both babies and toddlers and to ensure that the labelling of baby and toddler foods accurately reflects ingredients and does not mislead or confuse caregivers.

The government must take responsibility for protecting babies and toddlers from ready-made foods that do not promote good health and good dietary habits and must ensure that the labelling of these foods is accurate.

Recommendations

Reforms must be led and developed by government, and not voluntary bodies dominated by industry representatives, like the Healthy Food Partnership.

Labelling regulation should ensure that:

- front-of-pack product names reflect ingredients in descending order of content;
- key ingredients (fruit, vegetables, water, sources of protein) are specified with the percentage of that ingredient in the ingredient list; and
- free sugars (all sugars that are harmful to health) are easily identified.

ⁱ World Health Organization (WHO). *Guidance on Ending the inappropriate promotion of foods for babies and young children: implementation manual*. Geneva WHO, 2017. Licence CC BY-NC-SA 3.0 IGO.

ⁱⁱ United Nation's Children's Fund (UNICEF). *Improving Young Children's Diets During the Complementary Feeding Period. UNICEF Programming Guidance*. New York: UNICEF, 2020.

ⁱⁱⁱ United Nation's Children's Fund (UNICEF). *Improving Young Children's Diets During the Complementary Feeding Period. UNICEF Programming Guidance*. New York: UNICEF, 2020.

^{iv} Australian Bureau of Statistics. 4364.0.55.001 - National Health Survey: First Results, 2017-18. 2018. Table 17.3.

^v Australian Institute of Health and Welfare. Nutrition across the life stages. Canberra, Australia 2018. Supplementary table 19.

^{vi} World Health Organization (WHO). *Guidance on Ending the inappropriate promotion of foods for babies and young children: implementation manual*. Geneva WHO, 2017. Licence CC BY-NC-SA 3.0 IGO.

^{vii} See OPC Media Release 24 September 2020, Food industry marketing sugary baby foods as healthy, misleading consumers - Obesity Policy Coalition (opc.org.au).

^{viii} Smith JP, Sargent GM, Mehta K, James J, Berry N, Koh C et al. A rapid evidence assessment. Does marketing of ready-made available complementary foods affect infant and young child feeding? Canberra: Australian National University; 2015 (http://www.who.int/nutrition/topics/CF_anu_effects_marketingready-made.pdf).