



Kids are sweet enough.

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

Key Messages

- The promotion of foods that are developed for babies and toddlers should ensure good health and eating habits, setting the foundation for a healthy future, and should not undermine optimal feeding practices.
- The processed food industry promotes baby and toddler foods with numerous on pack claims that can mask less favourable qualities or risks in consuming the products and can mislead or confuse caregivers about the actual health and nutrition of the product.
- Government must protect the health of our youngest Australians by regulating to ensure that all ready-made baby and toddler foods meet strong standards on promotion.

Ready-made baby and toddler foods should be free from claims

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 common 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- <36 months of age are eating ready-made baby and toddler foods at least two to three times a week. For around 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 and specifically to the promotion of these products to ensure that claims are not undermining optimal feeding practices.

The processed food industry promotes baby and toddler foods with vast numbers of claims

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

In a survey of ready-made baby and toddler foods we conducted in late 2019, all products were found to carry claims, up to 17 different claims on a single product. The use of many claims on the packaging of a single baby or toddler food, even if individual claims are true, can take away from its less favourable qualities or risks, imply that the product is better than family foods and create an overall impression that a product is beneficial for the health of a child. This plays into caregivers' high motivation to attend to the health and nutritional needs

of their child and can mislead or confuse them about the actual health and nutrition of the product.^{vii}

The RCH Poll highlighted this finding that the vast majority of parents use these promotional claims to guide their choices when purchasing these foods. Over 90% of parents reported that they use claims like 'natural/natural ingredients', 'made with real fruit', free from preservatives, colours, flavours, additives or thickeners' or 'contains more than one serve of fruit or vegetables' to guide their choices and 'no added sugar' and 'natural sweetness' claims are used by at least 85% of parents.

Comprehensive regulation of the promotion 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 for promotion.

Promotional standards already exist for claims about vitamins and minerals in baby foods. Mandatory protections like these can, and should, be expanded to protect both babies and toddlers and to ensure that the promotion of baby and toddler foods does not mislead or confuse caregivers. Parents agree. The RCH Poll found that nine in ten parents agree that there should be laws about words, images and claims can be used on the packaging of baby and toddler foods, as well as what nutritional claims can be made about these foods.

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 marketing of these foods is not unconstrained.

Recommendations

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

Promotional regulation should ensure that claims cannot be made on baby and toddler foods.

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

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