Comments on Recommendation 3: Products

The comment about limiting foods with added sugars, saturated or trans-fat and salt should be within the context of energy-dense, nutrient-poor foods and it should be made clear that this does not apply to nutrient-rich, healthy foods (some of which naturally contain saturated fat and trans fats).

Rather than assuming that the presence of one or two nutrients means that a food is unhealthy, food and disease/health relationships (as opposed to nutrient and disease/health relationships) should be considered when defining healthy and unhealthy foods. This is because people do not consume nutrients in isolation, they consume foods which contain different combinations of nutrients.

As currently written, this guidance could prevent the promotion of some nutrient-rich foods that are highly suitable for young children, such as regular-fat cheese and whole milk. Both provide essential nutrients, are beneficial for teeth and are not associated with excessive weight gain (1,2). Also cheese has been recognized by WHO as a complementary food that may be fed to infants more than six months old (3).

Importantly, many countries do not recommend reduced-fat dairy foods until after the age of 2 years as the fat is a useful source of energy. For this reason in populations with a very low fat intake animal milk can play an important role in the diets of infants and young children (4).

To prevent these problems, we suggest that the wording be changed to:

‘...National nutrition standards should be developed to define which products are appropriate for this age group, with a particular focus on limiting added sugars, and/or saturated fat and/or trans-fat, and/or salt in nutrient-poor foods while promoting healthy, naturally nutrient-rich foods...’

Comments on Recommendation 7: Marketing foods to children

The problem with the current definitions used in the document (where unhealthy foods are defined as foods high in saturated fats, trans-fatty acids, free sugars or salt) is that foods such as cheese are mis-classified as unhealthy foods, despite the fact that they are NOT energy-dense, nutrient-poor foods. To prevent this, a food-based rather than nutrient-based classification is needed to determine which foods are and are not healthy for young children (1). Nutrition science has moved on since the 2010 recommendations were written.


Additional Comments

IDF welcomes the WHO’s recognition, through the guidelines, of the valuable role that complementary foods can play in providing essential nutrients, when properly formulated and appropriately marketed. The guidelines also recognise the important role of global standards in ensuring that infants and young children have access to consistently high quality, safe, age appropriate, and science-based nutrition throughout the world. The ongoing work of the Codex Alimentarius Commission to develop global standards for nutrition products for this age group is both welcome and important in this regard.