Position Note
Infant and Young Child Nutrition (IYCN)

GAIN’s Position regarding Infant and Young Child Feeding and the use of nutrition and health claims on the packaging of complementary foods and complementary food supplements for children aged 6 to 24 months.

SUMMARY:

GAIN’s policies and programs are consistent with WHO’s Global Strategy for Infant and Young Child Feeding (IYCF). GAIN supports early initiation of breastfeeding, exclusive breastfeeding through age 6 months and continued breastfeeding through age 24 months with the introduction of appropriate, adequately nutritious complementary foods from 6 months of age. GAIN also supports the Code of Marketing of Breastmilk Substitutes and the importance of its articulation in national legislation to promote and protect optimal infant and young child nutrition.

GAIN’s position on complementary foods is that good quality local foods, and commercially produced complementary foods and complementary food supplements should be options for caregivers. GAIN further believes that caregivers should have information on optimal feeding practices, understand the increased nutrient needs during pregnancy, lactation and for children through age 2, and that factual nutrition and health claims related to commercially produced complementary foods and complementary food supplements should be provided on product packaging to allow consumers to identify good quality products.

GAIN’s view is that national standards need to be aligned with the most recent evidence and normative guidance on optimal infant feeding practices. Guidelines and associated policies and legislation should allow national governments to harness all segments of society to prevent and address malnutrition, and not narrow the options of the poor to access good quality products and services, nor let them only be beneficiaries of a public delivery system.

GAIN believes that this is consistent with the spirit and objectives of the Codex Alimentarius and the Code of Marketing of Breastmilk Substitutes and that both can provide sensible, balanced and evidence-based guidance to this end in a way that considers the needs of the growing number of those at risk of malnutrition.

The goal of GAIN’s IYCN work is to support optimal infant and young child feeding through age 24 months. It recognises the crucial importance of early initiation of breastfeeding, breastfeeding exclusively up to age 6 months, and from age 6 months onwards the protection of continued breastfeeding, while working to increase low-income families’ access to and consumption of good-quality fortified complementary foods and complementary food supplements, including good-quality locally produced foods.

GAIN believes that a more comprehensive approach to optimal infant and young child feeding is important and that it is possible to harmonize efforts to improve both breastfeeding and appropriate complementary feeding. Quite often, support for breastfeeding and support for complementary feeding are at odds, leading to policies that are sub-optimal for ensuring best practices in supporting children’s nutrition.

GAIN fully supports the implementation of the International Code of Marketing of Breastmilk Substitutes (the Code) and the subsequent World Health Assembly (WHA) resolutions. GAIN believes non-compliance with the Code needs to be addressed, and new strategies should be
found to engage the private sector more actively to drive compliance. In addition, as products to improve feeding of children 6-24 months are increasingly marketed, normative guidelines and national standards are required that define the appropriate composition, format, labelling and marketing of these products.

GAIN has collaborated with the interagency Maternal Infant and Young Child Nutrition (MIYCN) working group to prepare a Working Paper illustrating how the Code applies to the marketing of complementary foods.

GAIN believes that the appropriate promotion of foods for infants aged from 6-24 months - as well as health and nutrition claims for all foods and home fortificants - can and should be addressed through regulation.

GAIN believes that caregivers at all income levels have a right to information on the content of the foods made commercially available and through public channels to their children. Foods low in nutrients or high in trans-fats are commonly available to the general public, and ethnographic studies show that these foods are commonly consumed by young children. GAIN therefore supports the view that caregivers need to be given truthful information about healthy options versus unhealthy options and need to be able to identify the good-quality products that are specifically formulated for their children aged 6-24 months.

In the light of the above, GAIN’s position on the use of nutrition and health claims on complementary foods is:

• GAIN follows the Code and subsequent WHA resolutions related to marketing of breast-milk substitutes;
  63.23 regarding the inappropriate promotion and use of nutrition and health claims for foods for infants and young children.

• For projects supported by GAIN, GAIN will permit a product’s brand name to imply that it is related to good nutrition and a positive choice (and in so doing to make an implied nutrition/health claim) on condition that the brand name:
  - Does not imply a claim that is false, misleading or deceptive or is likely to create an erroneous impression regarding the product’s character in any respect;
  - Does not misinform consumers in a manner that will lead them to harmful behaviour;
  - Reflects an evidence based approach;
  - Is not opposed by relevant national authorities or in contravention of national legislation.

This allowance is made in order to ensure that consumers are able to identify the products that are specially formulated to be beneficial for their children and have public health impact. GAIN believes that this is in line with the precedent set by the WHO in its support of products such as Nutributter.

For projects receiving GAIN support, GAIN will allow nutrient content claims AND nutrient function claims on condition that:

- The product qualifies for such claims under THE CODEX GUIDELINES FOR THE USE OF NUTRITION AND HEALTH CLAIMS - CAC/GL 23-1997; and
- Provision for such claims is written into the national legislation of the country where the product will be sold or approved in writing by a relevant authority in the country where the product will be sold.

- GAIN does not support products that make any other nutrition claims (comparative claims) or health claims (other function or reduction of disease risk claims), even if allowed by national legislation.

GAIN believes that managed and supported appropriately, its position will not negatively impact breastfeeding, while it will improve complementary feeding. GAIN believes that market-based approaches can serve to protect both exclusive and continued breastfeeding on a sustained basis, thereby reducing the burden on the public sector to serve the poor.

GAIN believes that its support of responsible market-based approaches will not negatively impact the use of locally available foods. GAIN encourages the use of locally available foods. In most cases in the developing world, intake of nutrients from animal-source foods is inadequate and it is extremely difficult to meet some vitamin and mineral needs through the local diet, particularly for infants. For this reason, specially formulated products have been developed for this age group and are recommended to be used together with the local diet to fill nutrient gaps (WHO Guiding Principles for Complementary Feeding of the Breastfed Child). Most consumers, even in developing countries, access their food through markets rather than the public health sector. Support for market-based approaches is needed to strengthen delivery through all channels to reach large populations, rather than limiting access to good quality information, services and products to a single channel.

GAIN believes the private sector can play an important role in support of optimal IYCF. The private sector is an important source of innovation, expertise and resources that are an essential component of the success and sustainability of both public distribution and market-based approaches to addressing malnutrition. GAIN encourages the establishment of regulatory environments that both curb unethical practices that could undermine optimal IYCF, and enable public-private partnerships and private sector involvement to improve and cost-effectively sustain access by the poor to good quality, nutritious complementary foods. In this regard, GAIN is committed to constructive engagement with the private sector as a key partner in preventing malnutrition.