



Brussels, 14 June, 2016

**Subject: WHO Guidance on ending the inappropriate promotion of foods for infants and young children, A69/7 Add.1<sup>1</sup>**

Dear Madam/Sir,

The International Dairy Federation (IDF) represents the global dairy sector covering over 75% of global milk production and engages all stakeholders of the dairy chain in primary production, milk processing and related research and innovation. For more information see <http://www.fil-idf.org>.

At the sixty-ninth WHA the WHO released a Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children which was welcomed with appreciation by the Members States<sup>2</sup>. The IDF recognizes the important role of global standards and guidance in ensuring that infants and young children have access to safe, nutritious and age appropriate foods. We therefore welcome the ongoing work to develop standards and guidance on nutritious products for this age group.

However, we have concerns with the WHO guidance document. This relates most specifically with recommendation 7 as it could prevent the promotion of some nutrient-rich foods that are widely recognized as being good for young children during the complementary feeding and post-breastfeeding stages of early life, such as certain milks, yogurts and cheeses. The interpretation of the recommendation is somewhat ambiguous<sup>3</sup>, and could lead to unintended consequences that compromise the nutritional intakes of young children. WHO and national guidelines for the feeding of infants and young children recommend dairy products as useful sources of calcium, protein, energy, B vitamins and fats amongst others. These foods are important complementary foods that make a significant nutritional contribution. Therefore it would be inappropriate for both the non-profit and profit sectors not to be able to promote these nutritious products considering that good eating practices are learned from a young age.

We note the recognition of the importance of Codex as the principal body for establishing the international standards on food products. Therefore we urge for the continuous support of Codex work and for allowing a thorough, deliberate and consensus-based process to take place.

Finally we call upon Members States to make sure that upcoming WHO guidance documents are being developed in a clear and transparent, evidence-based engagement process. As such process will assist in identifying potential inadvertent consequences in the future.

**Yours Faithfully,**

**Nico van Belzen, PhD**

**Director General, International Dairy Federation**

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<sup>1</sup> [http://apps.who.int/gb/ebwha/pdf\\_files/WHA69/A69\\_7Add1-en.pdf](http://apps.who.int/gb/ebwha/pdf_files/WHA69/A69_7Add1-en.pdf)

<sup>2</sup> Draft resolution A69/A/CONF./7/REV.1 [http://apps.who.int/gb/ebwha/pdf\\_files/WHA69/A69\\_ACONF7Rev1-en.pdf](http://apps.who.int/gb/ebwha/pdf_files/WHA69/A69_ACONF7Rev1-en.pdf)

<sup>3</sup> WHO acknowledges this ambiguity with the following clarification statement in a media release "Milk that is marketed as a general family food is not covered by the guidance, since it is not marketed specifically for feeding of infants and young children." <http://www.who.int/mediacentre/news/releases/2016/wha69-28-may-2016/en/>