Infant and follow-on formula changes

Question 1. Do you agree with the approach proposed to amend the Infant Formula and Follow-on Formula (Wales) Regulations 2020?

We understand that it is important to bring the legislation in line with that of England, Scotland and Northern Ireland. However we do not understand whether this consultation will have any effect given the information provided as background: “This is purely a technical amendment which corrects a reference which is now obsolete”.

Question 2. Do you agree with the impacts that have been identified in this consultation?

Yes, if the impacts stated are: “The SI will not impose any new requirement on businesses or enforcement bodies nor will it impose any new costs”.

Question 3. Are you aware of any impacts that have not been identified in this consultation?

Yes. The delay in bringing this legislation in to force may open the door for infant formula and follow on formula based on partially hydrolysed proteins to be marketed with an approved claim related to reduced allergy risk, circumventing the new tighter regulations described in the 2020 FSG SI. This is despite the lack of robust, conflict of interest-free evidence to support this long standing claim. This recently published case study describes how the breastmilk substitute industry have been making this claim for over 30 years based on a combination of fraudulent science sponsored by industry, selective reporting and conflictive relationships, see here: https://scanmail.trustwave.com/?c=261&d=I_234JHV9Noki1oMJpUF6M7eUawGsOmYEnu_16zLZw&u=https%3a%2f%2fonlinelibrary%2ewiley%2ecom%2fdoi%2ffull%2f10%2e1111%2fpai%2e13470%3fsaml%5freferrer

Question 4. Do you have any other comments to make on this matter?

This post-BREXIT period gives the UK and its devolved nations the opportunity to strengthen their regulations independently of what is decided in Europe, where there are clear benefits to the British public. This piece of legislation is an example where the UK should be wary of taking the lead of Europe, and where its own agencies should conduct independent assessments of industry-provided evidence to support their claims, before approving their use.

Submit your response

You are about to submit your response. Please ensure you are satisfied with the answers you have provided before sending.

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If you want to receive a receipt of your response, please provide an email address. Email address

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