



Mr Wes Streeting,  
Shadow Secretary of State for Health and Social Care of the United Kingdom,  
House of Commons,  
London,  
SW1A 0AA

09/11/2023

Dear Mr Streeting,

**RE: Labour pledges reform on baby formula**

We are writing to express our appreciation for your calls for actions to support struggling families to feed their babies, and commitments of the Labour party to the same, as shared through various media<sup>1,2</sup> and social media content<sup>3</sup> in the past two weeks. However, we have some concerns about the actions being prioritised and would welcome a meeting with you at your earliest convenience to discuss.

First Steps Nutrition Trust<sup>4</sup> is an independent public health nutrition charity. We aim to influence policies to better enable the safe, appropriate, and optimal feeding of all babies and young children in the UK. Part of this involves protecting infants and young children from harmful commercial activities. Recognising that the majority of babies in the UK are formula fed, we have been concerned about and monitoring the rising cost of infant formulas and advocating for actions to make them more affordable since leading an inquiry into this matter on behalf of the All-Party Parliamentary Group (APPG) on Infant Feeding and Inequalities in 2018<sup>5</sup>. It is good to hear that you share these concerns.

We are writing to you in our capacity as the current Secretariat for the Baby Feeding Law Group (BFLG)-UK<sup>6</sup>. For 26 years, this group, which now comprises 36 key organisations and independent expert

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<sup>1</sup> Metro. Labour vows to change 'outdated and damaging' restrictions on baby formula. 25 October 2023. <https://metro.co.uk/2023/10/25/labour-vow-to-change-outdated-and-damaging-baby-formula-restrictions-19713021/>

<sup>2</sup> Sky News. Labour pledges reform on baby formula. 25 October 2023. <https://news.sky.com/video/labour-pledges-reform-on-baby-formula-12992688#:~:text=A%20Labour%20Government%20would%20intervene,rising%20costs%20of%20infant%20milk.>

<sup>3</sup> <https://twitter.com/wesstreeting/status/1717459855441613062?s=20>

<sup>4</sup> First Steps Nutrition Trust. <https://www.firststepsnutrition.org/>

<sup>5</sup> APPG-IFI. 2018. Inquiry into the cost of infant formula in the United Kingdom. <http://www.infantfeedingappg.uk/wp-content/uploads/2018/11/APPGIFI-Inquiry-Report-cost-of-infant-formula.pdf>

<sup>6</sup> Baby Feeding Law Group (BFLG) UK. <https://www.bflg-uk.org/about-us/#who-we-are>

members, has been advocating for government and policy-makers to take action to prevent inappropriate marketing of infant formula and other breastmilk substitutes.

We share your grave concerns regarding the challenges that families are facing in feeding their babies during the ongoing cost of living crisis, and strongly believe that these issues need urgent and serious consideration. There has been a growing number of parents/carers turning to food banks for support to feed their babies, not because of difficulty using store gift cards or loyalty points to purchase formula, but because they do not have enough money. Strategies to address infant food insecurity need to be equitable and avoid reliance on commercial marketing strategies or charitable donations. Our recommendations are:

1. Put more money into people's pockets with a **cash first approach** (by ensuring wages and benefit payments are in line with the cost of living and making crisis cash payments available in every local authority).
2. Improving the **Healthy Start** scheme (by improving the coverage of the scheme and increasing the monetary allowance given in line with food inflation)<sup>7</sup>.
3. Ensuring **emergency pathways** for infant feeding support<sup>8</sup>.
4. Investigating and controlling **infant formula prices**<sup>9</sup>.
5. Raising awareness of the **nutritional equivalence** of all infant formulas<sup>10</sup>.
6. Preventing **inappropriate marketing** of infant formula and other breastmilk substitutes which undermines breastfeeding *and* safe and appropriate formula feeding, as well as pushing up infant formula prices.

It is important that there is no suggestion to weaken current legislation which governs both the composition and marketing of infant formula and follow on formula. **Inappropriate marketing of formula milks and other breastmilk substitutes not only undermines breastfeeding but *also* safe and appropriate formula feeding, *and* it also pushes up infant formula prices<sup>11, 12, 13</sup>.** For these reasons controlling the marketing of these products is crucial to protect the health of infants and young

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<sup>7</sup> Healthy Start Working Group Policy Positions. March 2023.

[https://www.foodfoundation.org.uk/sites/default/files/2023-04/Healthy%20Start%20Working%20Group%20Policy%20Positions\\_2023.pdf](https://www.foodfoundation.org.uk/sites/default/files/2023-04/Healthy%20Start%20Working%20Group%20Policy%20Positions_2023.pdf)

<sup>8</sup> UNICEF UK Baby Friendly Initiative (BFI), First Steps Nutrition Trust (FSNT) and the National Infant Feeding Network (NIFN). October 2023. A Guide for Local Authorities and Health Boards: Supporting families with infants under 12 months experiencing food insecurity. <https://www.unicef.org.uk/babyfriendly/wp-content/uploads/sites/2/2022/10/A-Guide-for-Local-Authorities-UNICEF-UK-Baby-Friendly-Initiative.pdf>

<sup>9</sup> We await the results from the ongoing investigation from the Competition and Markets Authority due in December 2023.

<sup>10</sup> First Steps Nutrition Trust. January 2021. Infant milks: A simple guide to infant formula, follow-on formula, and other infant milks.

[https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6011867a17a3582de4282ee9/1611761274701/Infant+milks\\_+a+simple+guide\\_Jan21.pdf](https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6011867a17a3582de4282ee9/1611761274701/Infant+milks_+a+simple+guide_Jan21.pdf)

<sup>11</sup> APPG-IFI. 2018. Inquiry into the cost of infant formula in the United Kingdom.

<http://www.infantfeedingappg.uk/wp-content/uploads/2018/11/APPGIFI-Inquiry-Report-cost-of-infant-formula.pdf>

<sup>12</sup> Mintel. 2016. Baby Food and Drink.

<sup>13</sup> Rollins N, Piwoz E, Baker P, et al. 2023. Marketing of commercial milk formula: a system to capture parents, communities, science, and policy. *Lancet*. 401; 10375: Pg 486-502. [https://doi.org/10.1016/S0140-6736\(22\)01931-6](https://doi.org/10.1016/S0140-6736(22)01931-6)

children, however they are fed, and especially given the current cost of living crisis<sup>14</sup>. Global guidance on how to do this has been provided by the World Health Organization since 1981, in the form of the International Code of Marketing of Breastmilk Substitutes (the Code) and subsequent World Health Assembly resolutions<sup>15</sup>. The Code informs current UK law.

Given that your party is currently so carefully considering how best to support families struggling to feed their babies, we would like to request a meeting with you to discuss the actions we recommend above. We would be grateful if you could let us know at your earliest convenience if you would be able to meet with us, either online or in person, to discuss these important issues.

Yours sincerely,



Dr Catherine (Katie) Pereira-Kotze on behalf of First Steps Nutrition Trust and the Baby Feeding Law Group UK and the following co-signatories:

Anna Taylor, CEO of the Food Foundation

Barbara Crowther, Children's Food Campaign Manager, Sustain

Sabine Goodwin, Director of the Independent Food Aid Network-UK

**Baby Feeding Law Group UK Members:**

Association of Breastfeeding Mothers (ABM), Association for Improvements in the Maternity Services (AIMS), Baby Milk Action, Best Beginnings, the Breastfeeding Network (BfN), Breastival, Code Monitoring Northern Ireland, the Community Practitioners' and Health Visitors' Association (CPHVA), Doula UK, The Fatherhood Institute, First Steps Nutrition Trust, GP Infant Feeding Network (GPIFN), HENRY, Hospital Infant Feeding Network (HIFN), the Human Milk Foundation, Institute of Health Visiting, Lactation Consultants of Great Britain (LCGB), La Leche League GB (LLLGB), Leicester Mamas, Centre for Lactation, Infant Feeding and Translational research (LIFT), Local Infant Feeding Information Board (LIFIB), Midwives Information and Resource Service (MIDIRS), National Breastfeeding Helpline, NCT (National Childbirth Trust), Royal College of Midwives (RCM), Save the Children, UK Association of Milk Banking (UKAMB), Unicef UK Baby Friendly Initiative, Unison, Women's Environmental Network (WEN), World Breastfeeding Trends Initiative (WBTi) UK.  
Independent members: Dr Robert Boyle, Natasha Day, Dr Clare Patton, Dr Ernestine Gheyoh Ndzi.

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<sup>14</sup> BFLG-UK Position Statement: The marketing of commercial milk formulas. November 2023. <https://www.bflg-uk.org/s/BFLG-UK-statement-Legal-restrictions-on-marketing-of-CMF-in-COL-crisis-revised-8Nov2023-lgi6.pdf>

<sup>15</sup> World Health Organization. Code and subsequent resolutions. <https://www.who.int/teams/nutrition-and-food-safety/food-and-nutrition-actions-in-health-systems/code-and-subsequent-resolutions>