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Changes to the regulation of PARNUTs: what Ireland wants

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Foodstuffs for particular nutritional uses (PARNUTs) are foods used by special population groups and include Infant and Follow-on Formula, Baby Foods, Foods for Special Medical Purposes (FSMPs), Gluten-Free Foods, Toddler Milks, and Very Low Calorie Diets (VLCDs). The PARNUTs framework Directive (2009/39/EC) sets general rules for all PARNUTs as well as specific rules for some PARNUTs (via 5 specific Directives and 1 Regulation). To simplify the rules the European Commission proposed to discard the PARNUTs Framework; combine the rules within 3 specific directives^(1–3) into a new Regulation called *Food Intended for Infants and Young Children and Food for Special Medical Purposes* and to regulate other PARNUTs under either Nutrition and Health Claims⁽⁴⁾ or the new Food Information to Consumers Regulation⁽⁵⁾. The purpose of this study was to determine, through national consultation, views in Ireland on the proposed changes.

Submissions from stakeholders (in industry and healthcare) and consumers via a short on-line survey, accessible for 4 weeks on the Food Safety Authority of Ireland website, were invited by press release. Quantitative and qualitative information were collected.

A total of 75 submissions were received from consumers (55%), industry (17%) and health professionals (28%). As shown in the table, many submissions chose the ‘don’t know’ option for questions posed. Many submissions from consumers and health professionals reported concerns that the rules restricting marketing of infant formula would be maintained and confusion on the implications of the proposed changes. The main reasons cited for wanting VLCDs categorised as FSMPs and regulated in the new Regulation were lack of compositional criteria under Nutrition and Health claims and general safety concerns. Many submissions on ‘toddler milks’ reported beliefs these products are unnecessary and concerns about promotional marketing. Most submissions on ‘gluten free’ labelling indicated this would be most appropriately regulated under the new Food Information Regulation.

Questions	(n)	Yes	No	Don't Know
Should the PARNUTs framework be discarded?	(71)	32% (23)	28% (20)	39% (28)
Should Very Low Calorie Diets be regulated under Nutrition and Health Claims?	(46)	30% (14)	33% (15)	37% (17)
or Should Very Low Calorie Diets be categorised as FSMP and regulated in the new draft proposal?	(46)	39% (18)	30% (14)	30% (14)
Should Toddler Milks be regulated under Nutrition and Health Claims?	(67)	42% (28)	37% (25)	21% (14)
Should ‘Gluten Free’ Foods be regulated under the New Food Information Regulation?	(47)	77% (36)	4% (2)	19% (9)
or Should ‘Gluten Free’ Foods be regulated under Nutrition and Health Claims?	(45)	24% (11)	60% (27)	16% (7)

Submissions to this consultation show there are many concerns among stakeholders and consumers in Ireland about proposed changes to the regulation of PARNUTs. The high proportions of ‘don’t know’ options selected reflects a lack of clarity on the implications of the proposed changes to this complex legislation.

1. Directive 2006/141/EC Infant formulae and follow-on formulae.
2. Directive 2006/125/EC Processed cereal-based foods and baby foods for infants and young children.
3. Directive 1999/21/EC Dietary foods for special medical purposes.
4. Regulation (EC) No. 1924/2009 Nutrition and Health Claims.
5. Regulation (EC) No. 1169/2011 Food Information to Consumers.