



## **NOT the best start in life: Why the Government must act NOW to better regulate the baby food industry**

**April 28<sup>th</sup> 2025**

On Monday 28<sup>th</sup> April 2025 the BBC is airing a new documentary investigating ‘The Truth about Baby Food Pouches’, including new evidence that key nutritional needs of babies and toddlers are not being met despite many pouches being marketed as healthy and appropriate choices.

Poor diets in infancy and early childhood have life-long consequences, driving dental decay, obesity and other noncommunicable diseases. In England, 22% of children aged 4 to 5 years have a weight classified as overweight or obese<sup>i</sup>, and a similar proportion have tooth decay<sup>ii</sup>. The social and economic consequences are profound.

This briefing outlines our position on UK commercial baby and toddler foods and drinks, including pouches, and our recommendations to Government.

### ***What commercial baby and toddler foods and drinks are on offer?***

UK parents are exposed to a vast and growing array of foods and drinks marketed for babies and young children under 3 years of age, including fruit and vegetable pouches, ‘finger foods’ (i.e. snacks), ready meals, cereals, desserts and breakfasts, and formula milks (infant formula, follow on formula, and growing up or toddler milks)<sup>iii</sup>. The estimated market value was £774 million in 2023, 9% more than 2022<sup>iv</sup>.



### ***How popular are these products?***

Very. UK households from *all* socioeconomic groups use them<sup>v</sup>:

- 36% of 4 to 6 month olds are given commercial baby snacks
- 72% of 7 to 9 month olds have eaten a commercial baby or toddler meal as their main meal of the day, 23% *almost always*.
- Only 6% of parents with youngest child aged one year old did *not* buy any commercial baby foods or drinks.
- 36% of 12 to 18 month olds are given a formula milk<sup>vi</sup>.

Dietary inequalities mean that low income and food insecure families may be more likely to use these products, despite their high cost<sup>vii, viii</sup>.

### ***Is use of commercial baby and toddler foods and drinks a problem?***

Yes. The UK Scientific Advisory Committee on Nutrition (SACN) states that<sup>ix</sup>:

- “Home-prepared foods are generally recommended to help introduce infants and young children to a range of appropriate flavours and textures”.
- “Commercially manufactured foods and drinks marketed specifically for infants and young children are not needed to meet nutritional requirements”.
- “Formula milks (including infant formula, follow-on formula, ‘growing-up’ or other ‘toddler’ milks) are not required by children aged 1 to 5 years”, for whom breastfeeding, cows’ milk, or a plant-based milk alternative can be used.

In addition the NHS states that:

- “Babies under 12 months do not need snacks”<sup>x</sup>.

### ***What are the problems with commercial baby and toddler foods and drinks?***

As well as being informed by SACN’s analysis<sup>xi, xii</sup>, the above public health recommendations follow an extensive evidence review undertaken by Public Health England (PHE) in 2019<sup>xiii</sup> which exposed a range of problems with the commercial baby and toddler food and drink retail offer, including:

- Many products contain too much sugar and some, too much salt. This is especially the case for ‘finger foods’ (i.e. snacks) which have shown very high volume sales increases
- Too many sweet products on offer, and not enough vegetable-based products
- Many products are inappropriately labelled for use from 4 months + when public health advice is to introduce first foods at around 6 months
- Many products use misleading names which do not reflect the balance of ingredients
- Many pouches but a lack of labeling advice on these not to suck from the spout
- Widespread use of nutrition and implied health claims and health halo statements misleading parents into thinking the products are healthy and appropriate choices

The high sugar levels and other issues with formula milks and drinks marketed for use from 12 months of age are outlined in our briefing<sup>xiv</sup>.

It is clear from looking at the supermarket shelves on the baby aisle that many of these problems persist to date (see photos above and below). This is supported by recent research<sup>xv, xvi, xvii, xviii</sup>, which also indicates that a variable proportion of commercial baby and toddler foods are also ultra processed<sup>xix</sup>.



PHE made recommendations to Government in 2019 to improve the marketing, labelling, and the nutrient composition of products<sup>xx</sup>. And in 2022 the World Health Organization (WHO) published guidelines for commercial baby and toddler foods (the Nutrient & Promotion Profile Model, (NPPM)<sup>xxi</sup>), including recommendations for manufacturers on how to improve the quality of products they offer. However, these have not been acted on. The UK regulations governing commercial baby and toddler foods have not been updated since 2003<sup>xxii</sup>, and are woefully inadequate in scope and outdated.

**The baby food aisle is still packed with products with both inappropriate nutritional content and marketing.**

The first years of life are *the* most critical time for establishing healthy food preferences, dietary patterns and growth trajectories. We know that commercial baby and toddler foods and drinks form a substantial part of many young children's diets, and that typical diets in the early years in the UK are not in line with national recommendations. Notably solid foods are often introduced too early (before 6 months) and excess calorie and sugar intake is common. As outlined above, poor diets in infancy and early childhood have life-long consequences, and social and economic impacts which can and should be addressed.

### ***What do we want the Government to do to address the problems with commercial baby and toddler foods and drinks?***

It is vital that healthy early years' diets become a political priority, for the babies and toddlers themselves, for the adults they will become and their future families, and the society and economy they will participate in and contribute to. The Government has committed to raising **“the healthiest generation of children in our history”** and giving children **“the best start in life”**. This commitment requires the following actions:

1. **Revise, strengthen and independently monitor and enforce the UK baby food regulations** to set new legally binding standards for composition, labelling and marketing in line with WHO Europe's Nutrient and Promotion Profile Model and UK public health recommendations.
2. **Upgrade and independently monitor and enforce the UK formula milk regulations** in line with minimum international standards<sup>xxiii</sup>.  
 Nb. Accepting and acting on the recommendations of the Competition and Markets Authority in their recent final formula market study<sup>xxiv</sup> would contribute to this goal, especially if the recommendations on strengthening labelling and advertising rules were accepted. ***The Government is due to respond to these recommendations in May.***
3. **Better support parents/carers to feed their babies healthy home-prepared foods by:**
  - a. Enabling parents/carers in low-income households to better access healthy whole foods through **strengthening the national nutrition safety net, the Healthy Start scheme**<sup>xxv</sup>.
  - b. Ensuring easy access to independent information and practical guidance through **proper investment in the health visiting service and Family Hubs/Sure Start centres.**
  - c. **Supporting early years settings to apply Government guidelines on food provision**<sup>xxvi</sup>.

## Quotes

**Dr Vicky Sibson, Director, First Steps Nutrition Trust said:**

*"Parents naturally want what is best for their babies and young children, especially when it comes to what they're fed. We know that there is a high level of trust in the baby food industry and that shop-bought baby foods are widely used because parents believe they're strictly regulated and healthy choices. But unfortunately, this trust is totally misplaced. As a result of pervasive misleading marketing, parents are unwittingly buying products that are simply not good enough nutritionally. Stronger, mandatory baby food regulations are long overdue. The Government must act now to dramatically improve the commercial baby food offer and to ensure that parents can informed choices on what they're feeding their youngest children".*

**Dr Vicky Thomas, Consultant Gastroenterologist at Newcastle's Great North Children's Hospital said:**

*"Every day I meet parents who are desperate to do the best for their children but don't have confidence in their own ability to feed their family. Industry depends on that self-doubt to market their products, and baby food companies will always prioritise feeding their profit margins over the health of our children. The Government needs to put children's health first. Key to this is urgently strengthen the UK's outdated baby food regulations".*

**Ellen Dicicco, Health Visitor and Infant Feeding Practitioner (IBCLC) said:**

*“It is vital that the government takes action to better regulate the baby food industry. Every day I see the clear effect misleading industry marketing has, leading parents to choose substandard products when they are led to believe these are best for the health of their babies. It is so important that the health of our infants, children and young people is prioritised above business interests - to tackle the UK’s childhood obesity and dental health crises as well as to support children’s speech and language development and their mental health”.*

**Notes**

[First Steps Nutrition Trust](https://www.firststepsnutrition.org/) is an independent public health nutrition charity. We provide free, independent, evidence-based resources to support pregnant women, new mums and parents/carers of under 5s to eat well, as well as influencing policy. Our goal is for all children in the UK to eat well from the start of life. Our work on commercial baby and toddler foods and formula is available here: <https://www.firststepsnutrition.org/childrens-food/>.

Free, practical guidance on eating well in the first year, without the need for commercial baby and toddler foods and drinks is available from us here:

<https://www.firststepsnutrition.org/eating-well-infants-new-mums> and from the NHS here: <https://www.nhs.uk/start-for-life/>.

To get help to buy food and milk (the Healthy Start scheme) see:

<https://www.healthystart.nhs.uk/>

Contact: [Vicky@firststepsnutrition.org](mailto:Vicky@firststepsnutrition.org) tel: 07846 598793

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- <sup>i</sup><https://digital.nhs.uk/data-and-information/publications/statistical/national-child-measurement-programme/2023-24-school-year>
- <sup>ii</sup><https://www.gov.uk/government/statistics/oral-health-survey-of-5-year-old-schoolchildren-2024/national-dental-epidemiology-programme-ndep-for-england-oral-health-survey-of-5-year-old-schoolchildren-2024#:~:text=Among%20the%2022.4%25%20of%20children,dental%20decay%20by%20geographical%20area>
- <sup>iii</sup>[https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6481134fdf3b065bf460fe05/1686180705852/FSN\\_UPF+Report\\_Digital+for+web%2C+June+2023.pdf](https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6481134fdf3b065bf460fe05/1686180705852/FSN_UPF+Report_Digital+for+web%2C+June+2023.pdf)
- <sup>iv</sup><https://store.mintel.com/report/uk-baby-food-and-drink-market-report#:~:text=The%20UK%20Baby%20Food%20%26%20Drink%20Market%20Report,market%20size%2C%20stats%20%26%20expert%20analysis%20from%20Mintel>
- <sup>v</sup>[https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6481134fdf3b065bf460fe05/1686180705852/FSN\\_UPF+Report\\_Digital+for+web%2C+June+2023.pdf](https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6481134fdf3b065bf460fe05/1686180705852/FSN_UPF+Report_Digital+for+web%2C+June+2023.pdf)
- <sup>vi</sup><https://assets.publishing.service.gov.uk/media/662a4a4d690acb1c0ba7e616/SACN-Feeding-young-children-aged-1-to-5-full-report-revised.pdf>
- <sup>vii</sup><https://onlinelibrary.wiley.com/doi/10.1111/mcn.13715?msocid=211aae7ccc85609f0d0aba19cd90611e>
- <sup>viii</sup>[https://pmc.ncbi.nlm.nih.gov/articles/PMC9744586/pdf/12889\\_2022\\_Article\\_14637.pdf](https://pmc.ncbi.nlm.nih.gov/articles/PMC9744586/pdf/12889_2022_Article_14637.pdf)
- <sup>ix</sup><https://assets.publishing.service.gov.uk/media/662a4a4d690acb1c0ba7e616/SACN-Feeding-young-children-aged-1-to-5-full-report-revised.pdf>
- <sup>x</sup><https://www.nhs.uk/start-for-life/baby/weaning/what-to-feed-your-baby/7-to-9-months/>
- <sup>xi</sup>[https://assets.publishing.service.gov.uk/media/5b48c28aed915d481c04f1e2/SACN\\_report\\_on\\_Feeding\\_in\\_the\\_First\\_Year\\_of\\_Life.pdf](https://assets.publishing.service.gov.uk/media/5b48c28aed915d481c04f1e2/SACN_report_on_Feeding_in_the_First_Year_of_Life.pdf)
- <sup>xii</sup>[https://pmc.ncbi.nlm.nih.gov/articles/PMC9744586/pdf/12889\\_2022\\_Article\\_14637.pdf](https://pmc.ncbi.nlm.nih.gov/articles/PMC9744586/pdf/12889_2022_Article_14637.pdf)
- <sup>xiii</sup><https://assets.publishing.service.gov.uk/media/662a4a4d690acb1c0ba7e616/SACN-Feeding-young-children-aged-1-to-5-full-report-revised.pdf>
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- <sup>xv</sup><https://pubmed.ncbi.nlm.nih.gov/39797916/>
- <sup>xvi</sup><https://doi.org/10.3390/nu15071629>
- <sup>xvii</sup><https://doi.org/10.1111/mcn.13020>
- <sup>xviii</sup><https://onlinelibrary.wiley.com/doi/10.1111/cea.14589>
- <sup>xix</sup>[https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6481134fdf3b065bf460fe05/1686180705852/FSN\\_UPF+Report\\_Digital+for+web%2C+June+2023.pdf](https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/6481134fdf3b065bf460fe05/1686180705852/FSN_UPF+Report_Digital+for+web%2C+June+2023.pdf)
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- <sup>xxi</sup><https://www.who.int/europe/publications/i/item/WHO-EURO-2022-6681-46447-67287>
- <sup>xxii</sup><https://www.legislation.gov.uk/ukxi/2003/3207/contents>
- <sup>xxiii</sup><https://www.who.int/teams/nutrition-and-food-safety/food-and-nutrition-actions-in-health-systems/code-and-subsequent-resolutions>
- <sup>xxiv</sup><https://www.gov.uk/cma-cases/infant-formula-and-follow-on-formula-market-study>
- <sup>xxv</sup><https://foodfoundation.org.uk/publication/healthy-start-working-group-policy-positions>
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