

European Commission  
Dietetic Food Consultation,  
Unit D.4 Food Law and  
Biotechnology  
Health and Consumer Protection  
DG  
Office: F101 8/76  
B-1049 Bruxelles

Brussels, 3<sup>rd</sup> February 2005  
REF: 5C-INFANT FORMULA-COM-EN

**SUBJECT: UGAL comments for consultation on the revision of Commission Directive 91/321/EEC on infant formula and follow-on formula**

Dear Sir / Madam,

Following your letter of 4<sup>th</sup> February 2005 for a consultation on the revision of Commission Directive 91/321/EEC on infant formulae and follow-on formulae, we hereby send you the comments of UGAL.

Regrettably, we must admit that we are not in a position to contribute to this consultation, as we have established that UGAL member organisations are actually not concerned.

Namely, after consultation with member organisations in various EU Member States, it was ascertained that **UGAL members do not have own-brand products of this type**. The reason is the complexity and specific requirements as regards the composition and labelling of infant formulae and follow-on formulae.

In particular, as regards **Finland**, the infant formulae and follow-on formulae are developed in a very close co-operation among authorities, specialists, industry and trade, as these products cannot be handled according to normal commercial principles and are linked to very specific scientific requirements. In this respect, our member organisation does not have the expertise needed and therefore specialists have a much more important role compared to normal food products. It must be noted that Finland is a bit exceptional because of the long duration of the legally foreseen maternity leave.

Please do not hesitate to contact us, should you need any clarifications on this matter.

Kind regards,

Denis LABATUT  
Secretary General