

Unpacking Formula Choices in a Changing Marketplace

Label Terminology

Label	Description/Details
USDA Organic	Grown and processed, conforming to strict federal guidelines that address soil quality, animal raising practices, pest and weed control, and use of additives. The formula must contain at least 95% organically produced ingredients. ¹
European Union (EU) Organic	The product is in full conformity to the rules for production of processed food and at least 95% of the ingredients of agricultural origin are organic. The organic label must include the farm's location. ²
Natural	Nothing artificial or synthetic (including all color additives regardless of source) has been added. It does not address the use of pesticides and does not describe any nutritional or other health benefit. ³
Clean Label Project	A nonprofit organization that purchases products, tests them for purity, and compares the results to high-risk chemicals listed on the California Environmental Health Hazard Assessment Office's Proposition 65 List. There is a lack of transparency in methodology, and it is not peer-reviewed by outside agencies. ⁴
Grass-fed	<u>USDA certification:</u> Cows must be fed only grass and forage post-weaning and must have continuous access to pasture during the growing season (minimum 120 days). <u>UK has no formal certification:</u> To declare on UK labels, cows must feed on grass for more than half their lifetime (51%). Grass-fed includes grass out at pasture, grass stored in the form of silage (cut, fermented grass), and hay (cut, dried grass). "At-pasture" is not regulated. ⁵
Non-GMO (Genetically Modified Organism)	A product or its ingredients are not derived from genetic engineering. Most GMO crops were developed to resist insects, pests, and disease. Its certification indicates it complies with standards for testing, traceability, and separation. ⁶
Gluten-free	Gluten is a protein found in grains such as wheat, barley, and rye. Most infant formulas are gluten-free. ⁷
No antibiotics	Any milk purchased in the US follows strict government-related protocols to test and ensure that no antibiotics are present at the time of sale. Milk obtained from a cow using antibiotics must be discarded until it is cleared out of their system. ⁸
Palm oil or palm olein oil free	Human milk averages between 20% and 24% of the fatty acids as palmitic acid. Palm olein oil, fractionated from palm oil, contains palmitic acid, oleic acid, and linoleic acid. Palm olein oil is used in some infant formulas to achieve similar human milk palmitic acid levels. ESPGHAN concluded that there is insufficient evidence to suggest that palm oil or palm olein oil should be avoided as a source of fat in infant formulas. ⁹ It is important to verify that the palm oil has been sustainably sourced.



Unpacking Formula Choices in a Changing Marketplace

Label Terminology

References

1. U.S. Department of Agriculture. Organic 101: What the USDA Organic Label Means. March 12, 2022. Assessed September 25, 2023. <https://www.usda.gov/media/blog/2012/03/22/organic-101-what-usda-organic-label-means>
2. European Commission Directorate-General for Agriculture and Rural Development. 2023 Management Plan. Frequently Asked Questions on Organic Rules. 2023 Accessed September 29, 2023 https://commission.europa.eu/system/files/2023-02/agri_mp_2023_en.pdf
3. U.S. Department of Agriculture. Use of the term Natural on Food Labeling. Content as of October 22, 2023. Assessed September 25, 2023. <https://www.fda.gov/food/food-labeling-nutrition/useterm-natural-food-labeling>
4. Masterson D. Clean Label Project Goes into defense mode after business model questioned. *Nutraingredients*. August 12, 2020. Accessed October 13, 2023. <https://www.nutraingredientsusa.com/Article/2020/08/12/Clean-Label-Projectgoes-into-defense-mode-after-business-modelquestioned#>
5. The Courtyard Dairy. Grass fed cheese, meat and dairy – What is it and who does it? Updated October 24, 2017. Accessed September 29, 2023. <https://www.thecourtyrddairy.co.uk/blog/cheesemusings-and-tips/grass-fed-pasture-milk-cheese/>
6. U.S. Food & Drug Administration. FDA. GMO Crops, Animal Food, and Beyond. Current Content as of August 3, 2022. Accessed September 25, 2023. <https://www.fda.gov/food/agriculturalbiotechnology/gmo-crops-animal-food-and-beyond>
7. U.S. Food & Drug Administration. FDA. Gluten and Food Labeling. Current Content as of July 16, 2018. Accessed September 29, 2023. <https://www.fda.gov/food/nutrition-education-resources-materials/gluten-and-food-labeling>
8. Undeniably Dairy. Milk And Antibiotics: Making Sure Your Milk Is Safe. Published March 24, 2023. Accessed September 25, 2023. <https://www.usdairy.com/news-articles/milk-and-antibioticswhat-you-need-to-know>
9. Bronsky J, Campoy C, Embleton N, et al. Palm Oil and Beta-palmitate in Infant Formula: A Position Paper by the European Society for Paediatric Gastroenterology, Hepatology, and Nutrition (ESPGHAN) Committee on Nutrition. / *Pediatr Gastroenterol Nutr* 2019;68(5):742-760. doi:10.1097/MPG.0000000000002307

