



Report on the Monitoring of the Code in 11 Countries of Asia

INTERNATIONAL
CODE
DOCUMENTATION CENTRE

Inappropriate marketing of baby foods and feeding bottles

Bhutan, China, India, Indonesia, Republic of Korea, Maldives, Mongolia, Nepal, Philippines, Sri Lanka & Thailand

2018



INTRODUCTION

This report is a compilation of Code monitoring findings from 11 countries - **Bhutan, China, India, Indonesia, Republic of Korea, Maldives, Mongolia, Nepal, Philippines, Sri Lanka and Thailand**. A year-long project since its conception in October 2017, selected IBFAN country monitors took on the task of Code monitoring in two areas – labelling and online portals. IBFAN-ICDC provided technical support on the country monitoring exercise, developing of online monitoring forms and database, compilation of country monitoring reports, and the compilation of this report. See Annexure 1 for more information about the methodology used for this monitoring exercise. Although this monitoring exercise and report employed a theme-based approach with "snapshot" analysis, and only covered provisions relevant to labelling and online marketing portals - the aim is to identify the presence of violations and their predominant trends. IBFAN Asia in

There is increasing promotion of breastmilk substitutes for older infants and young children – those between 6 and 36 months of age – including follow-up formula and growing-up milks.

Marketing of breast-milk substitutes: National implementation of the international code Status Report 2018. WHO, UNICEF, IBFAN.

collaboration with ICDC trained IBFAN participants from 11 countries in two workshops, one in Jakarta in 2014 and another in New Delhi in 2016. These trained persons contributed in this monitoring exercise.

The International Code of Marketing of Breastmilk Substitutes ("the Code") was adopted by the World Health Assembly (WHA) in 1981. It aimed to control the inappropriate marketing of infant formula and related

products which was contributing to the decline in breastfeeding rates and increased child mortality and mortality around the world. It was a collective decision made by Member States at the WHA to improve the health of infants through breastfeeding.

The Code has been strengthened and clarified since by subsequent WHA resolutions. These resolutions were adopted to address evolving and ever more pervasive marketing practices which undermine breastfeeding and optimal infant and young child feeding; as well as to reflect new global health recommendations since the adoption of the Code.

The Asia Pacific market is one of the fastest growing markets for baby food among various regions due to population and economic growth.

By prohibiting all forms of promotion of products in the scope, the Code and subsequent relevant WHA resolutions (together known as the "International Code") aim to restrict marketing practices that influence parents' decision on infant and young child feeding. The Code is also included in a number of human rights documents and is understood to be a critical tool to protect human rights for breastfeeding.

Despite substantial evidence pointing to the benefits of exclusive and continued breastfeeding on the health of children and women, as well as other social and socioeconomic benefits¹, far too few children are breastfed as recommended. A major factor undermining efforts to improve breastfeeding rates is continued and aggressive marketing of breast-milk substitutes, as well as the promotion of feeding bottles and teats. In 2014, global sales of breastmilk substitutes totaled US\$ 44.8 billion, and this number is expected to rise to US\$ 70.6 billion by 2019².

The Asia Pacific market is one of the fastest growing markets for baby food among various regions due to population and economic growth. Asia Pacific baby food and formula market was valued to be at \$14.51 billion in 2017, and it is likely to reach \$26.41 billion by 2026³.

Although a number of countries in the region have adopted national legislation to give effect to the International Code, some of them were adopted in the early days of the Code when there was limited understanding about Code implementation and marketing in general. These laws need to be reviewed and updated in order to include relevant WHA resolutions. Where there are relatively comprehensive laws or regulations that cover a wide range of promotional practices and products, enforcement is usually inadequate.

Regardless of these challenges and limitations, the International Code remains an important tool in reducing and eliminating inappropriate marketing practices, and ensuring effective promotion and protection of breastfeeding and optimal infant and young child feeding.

State of Code Implementation

Law: India, Maldives, Nepal, Philippines, Sri Lanka

Many provisions law: Indonesia, Mongolia, Thailand

Few provisions law: Republic of Korea

Voluntary code or policy: Bhutan

Some provisions in other laws or guidelines: China

"Breastmilk substitutes are a multi-billion-dollar industry, the marketing of which undermines breastfeeding as the best feeding practice in early life. No new interventions are needed—the Code is an effective mechanism for action. However, much greater political commitment is needed to enact and enforce the relevant, comprehensive legislation and national investment to ensure implementation and accountability."

Rollins, N. et al. (2016). "Why invest, and what it will take to improve breastfeeding practices?"
Lancet; 387:491–504 at p.501

"If breastfeeding did not already exist, someone who invented it today would deserve a dual Nobel Prize in medicine and economics. For while "breast is best" for lifelong health, it is also excellent economics. Breastfeeding is a child's first inoculation against death, disease, and poverty, but also their most enduring investment in physical, cognitive, and social capacity."

Hansen, K. (2016). Breastfeeding: a smart investment in people and in economies.
Retrieved from [http://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(16\)00012-X/abstract](http://www.thelancet.com/journals/lancet/article/PIIS0140-6736(16)00012-X/abstract)



Melliana, Indonesian breastfeeding mum staff
with baby Micha.

LABELLING

Due to the focus on labelling in this exercise, it became very obvious that health and nutritional claims have become a prime marketing tool. Many of these claims are presented as complex scientific formulations, which are then used as trademarked logos, mascots or benefit icons to create a “premium” market. These formulations enable companies to charge a premium for the products. While the high price renders the products unaffordable to a large section of the population, it enhances their desirability through the exclusivity of the products. Often, companies compare these additives with ingredients found in breastmilk in their promotional materials so as to mislead parents to believe that these products are closer, equivalent or better than breastfeeding or other products. The claims that accompany these formulations are often scientifically unsubstantiated. Some of the key examples of promotional labelling of baby foods and feeding bottles from various countries shown in this section are just a tip of the iceberg.

What does the International Code say about labelling?

- Article 9 of the Code requires labels to not discourage breastfeeding and to have clear information on the appropriate use of the product.
- For infant formula, the label should not have pictures of infants, or other idealising pictures or text. The terms ‘humanised’, ‘maternalised’ or similar terms should not be used. Containers should provide the following information in a clear, conspicuous, and easily-readable message, in an appropriate language:
 - The words important notice or their equivalent
 - The superiority of breastfeeding
 - The product should only be used on the advice of a health worker as to the need for its use and the proper method of use, and
 - Instructions for appropriate preparation, and a warning of the health hazards of inappropriate preparation.
- Resolution WHA 54.2 [2001] recommends exclusive breastfeeding for 6 months, which means the recommended age for use of complementary foods has to be 6 months or above.
- Resolution WHA 58.32 [2005] prohibits use of nutrition and health claims for breastmilk substitutes, unless specifically provided for in relevant Codex Alimentarius standards or national legislation. Resolution WHA 63.23 [2010] extends the recommendation to foods for infants and young children.
- Resolution WHA 58.32 [2005] and WHA 61.20 [2008] urge governments to take regulatory measures to ensure information on risks of intrinsic contamination by pathogenic microorganisms be conveyed through label warnings where applicable.
- The WHO Guidance on Ending Inappropriate Promotion of Foods for Infants and Young Children (A69/7 Add. 1) (the 2016 WHO Guidance) requires complementary foods to have labels that state the appropriate age of consumption as 6 months or above.

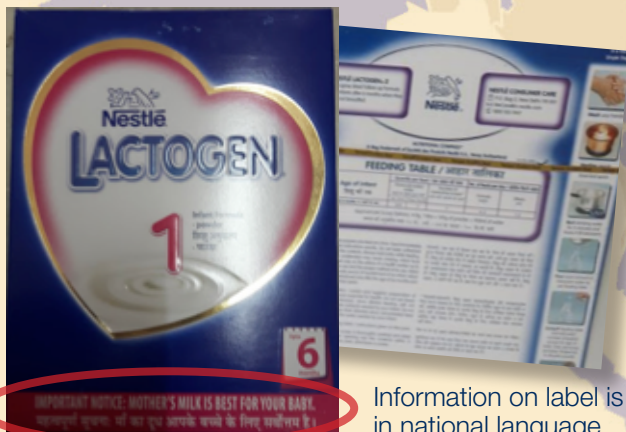
Bhutan



The Code itself is voluntary in Bhutan but steps have been taken place to incorporate some provisions of the Code in an upcoming health bill. Monitoring shows presence of companies is still minimal in Bhutan, and they are not yet marketing baby food as aggressively compared to other countries in the region. Even though there are no rampant violations yet, the government should not underestimate the risk of the absence of legal measures and the ever-imminent possibility of companies infiltrating the market.

Although not rampant, violations still exist

Nestlé: Lactogen 1



Information on label is not in national language.

Camera: Standard Silicone Nipples



Infant picture is used to idealise the product and bottle-feeding.

China



Growing disposable incomes have triggered high spending on formula products, especially on premium brands that portray ideas such as “intelligence”, “elite”, and “excellence”. It is the largest market for baby food products, gaining US\$15 billion in absolute retail value per year. Code legislation was already weak and outdated in China, and enforcement is hardly existent. In 2016, the Code measure adopted in 1995 on restricting promotion was repealed without any replacement, leaving only an inadequate ban on advertisement in the Law of Advertisement to regulate the market.

Widespread unsubstantiated claims

Danone: Nutricia Aptamil



New premium ranges are developed targeting urban elite. **Aptamil's** Profutura line is deemed as the “platinum” version. The statement that the product should be used only on the advice of a health worker is missing. There are health claims that it was inspired by “*early-life nutritional programming*”, and can support specific nutritional needs of each critical stage during the early life of the baby. The product claims to help build the foundation for long-term health, with patented prebiotics.



Promoting other products that are also in the scope of the Code on the label.

China continued...

Wyeth: Illuma 1



As the key driver for **Wyeth's** business growth in China, **Illuma** is a premium product that brands itself as one that "*illuminates human affinity*".



Ingredients are affixed with human affinity accolade such as "*human affinity structure OPO*" and *human affinity proportion DHA:AA*".

Nestle: Gerber Nutritional Rice Cereal



Health and nutrition claims are also found on labels of complementary food. To start with, the product is identified as "*Nutritional Rice Cereal*". The infant picture, though claimed to be Gerber's logo, is nonetheless idealising. Consumers may also be confused and take that to indicate the product is suitable for infants



Straight-up promotional – Label contains text such as "*trusted by many of thousands of mothers*", "*inspired by the genuine love of the Gerber couple who made complementary food for their daughter*", and "*this will make your baby smile with content*".

India



The Infant Milk Substitutes, Feeding Bottles and Infant Foods (Regulation of Production, Supply and Distribution) Act (1992) as Amended in 2003 (IMS Act) prohibits all forms of promotion and advertisement of infant milk substitutes, feeding bottles, and infant foods. Despite the strict law, companies are still violating the law (and the International Code).

Claims as promotional tactics

Nestle: NAN ExcellaPRO 1



Here Nestle uses trademarks to disguise idealised phrase as part of their brand name. Although it is trademarked, NAN's EXCELLAPRO is nonetheless an idealisation of the product. The picture of three atomic molecules with ingredients DHA ARA, Iron and Iodine choline are idealised at the back of the label as "*DHA supports baby normal brain development*" and "*Proteins are primary structural and functional components of every living cell*".

Indonesia



Using one product to advertise all products in range

Abbott: Similac Advance 1



Not only does Similac Advance use promotional health claims such as *“Neuro-Nutrients such as Omega 3 and 6 Fatty Acids ... to support baby's brain development”*, *“Level and blend of nucleotides that is known to support baby's developing immune system”*; it is also using the label on the lid to advertise its entire product range from stages 1 to 3.

Undermining exclusive breastfeeding

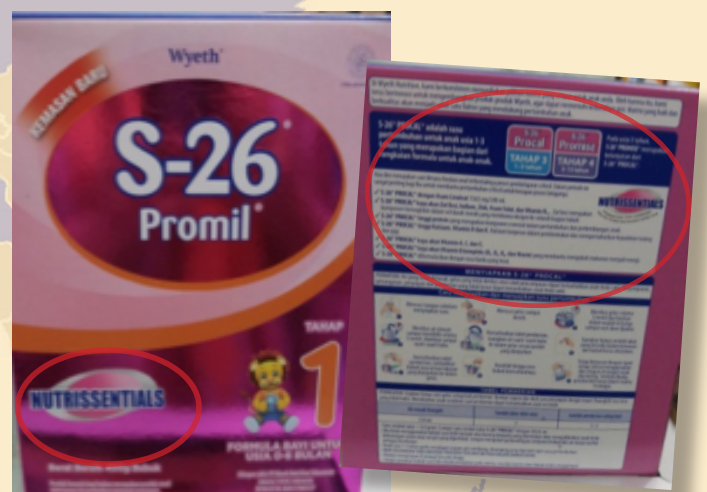
Danone: Cow & Gate Banana Porridge



The 2016 WHO Guidance stipulates that complementary foods should not be promoted as suitable for under the age of six months, a period when babies should be exclusively breastfed.

Word play as promotional health claims

Wyeth: S-26 Promil 1 & Procal 3



The S-26 line boasts itself with *“Nutrissententials”*, the word play suggests idealisation of *“nutritious essentials”*. The labels also state that the product is the only one that completes child's needs, and provides a foundation for learning.

Indonesia continued...

Maternalising bottles as real breasts

Tomme Tippee Ultra Bottle



The Tomme Tippee Ultra bottle claims to have breast-like shape for a natural latch and easy switching between breast and bottle – for “*a comfortable feed*” and “*the perfect feeding experience*”.

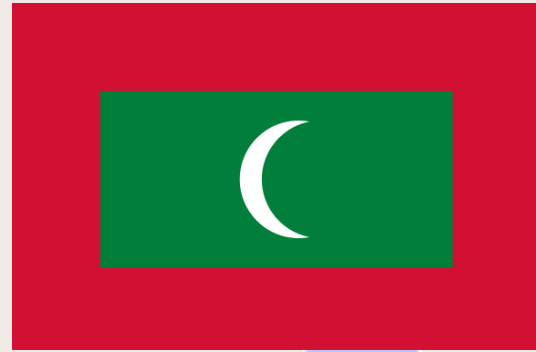
Not comparing product with breast – but creating products with heart and eyes

Como Tomo Baby Bottle



Claims to challenge the status quo in which most baby bottles are “*the same old unflattering tools*”. Here, Como Tomo has learnt that “*inspiring products are born only when we think with a mother's heart and experience through a baby's eyes*”.

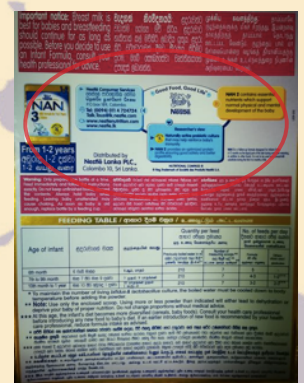
Maldives



Maldives adopted its law “Regulation on Import, Produce and Sale of Breastmilk Substitutes in the Maldives” that gives effect to many provisions of the International Code in 2008. Though the scope of the law is comprehensive (covers all breastmilk substitutes up to 36 months and complementary foods up to 12 months), because of various obstacles, it was never fully implemented. The law was revised in 2017, one of the main amendments was to require product labels to be in Dhivehi or English. Although Parliament has approved the amendments, the revised law has not been gazetted yet. Due to the delay, enforcement did not take form until very recently, and progress is slow.

Fat birds, cradling hands and claims: promotional trio

Nestle: NAN Follow Up Formula



The image of a fat mother bird feeding its babies is idealising (as compared to the “skinny” birds in the Nestle logo) – as it conveys ideas of nurturance, feeding, care and love. On the back, the health claim “*naturally active probiotic culture that may help reinforce body's immunity*” is a blatant reference to the Probiotic Culture bifidus icon on the front label, which shows a pair of cradling hands just like a mother protecting a baby. It also states that NAN 2 contains nutrients that support “*normal physical and mental development*”. The label is not in Dhivehi, the Maldivian official language, as it is imported from Sri Lanka.

Maldives continued...

Hands that cradle a heart

Nestle: Cerelac



Claims are also found on labels of complementary food. The cradling hands are carrying a heart that says "nutritious" Bifidus and iron. On the back, a corresponding statement says, "*Bifidobacterium lactis (bifidus)* helps improve a beneficial intestinal microflora".

Blatant claims

Danone: Nutricia Nutrilon Pronutra



Health claim found on the label of this Nutricia Nutrilon follow-up milk states it can help immunity and intellectual development of a child.

Blatant claims

Danone: Nutricia Nutrilon Pronutra



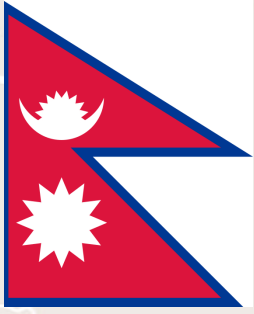
The recommended age for this cereal is 4 months, which violates recommendations set forth in the 2016 WHO Guidance that prohibits complementary foods to be represented to be suitable for consumption for babies below 6 months of age.

Mongolia



As a response to the recommendation of the Committee on the Rights of the Child, Mongolia adopted the National Law on Marketing of Breastmilk Substitutes (BMS) to give effect to the Code in 2005. In 2017, based on findings and recommendations of a 2015 survey conducted by the Ministry of Health with support of UNICEF, the "Law on Food for Infant and Young Children" was adopted. The new and improved Law includes all provisions of the Code and is stronger than the previous one. Because of its recent adoption, enforcement of the Law is not yet in full force, and there is a need to build capacity within the government to take on effective enforcement.

Nepal



Nepal adopted the Breastmilk Substitutes Act (BMS Act) in 1992, and it does not include many WHA resolutions that address marketing strategies and global public health recommendations that have emerged subsequent to its adoption. There has been a vacuum of a “nodal” department or official to take ownership of monitoring and enforcement, including the coordination of different intersecting relevant departments. This results in persistent violations of the International Code and national law.

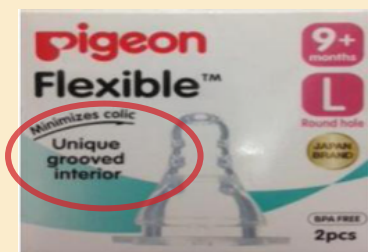
Change to Nutrition from the heart

Danone: Nutricia Farex Stage 1



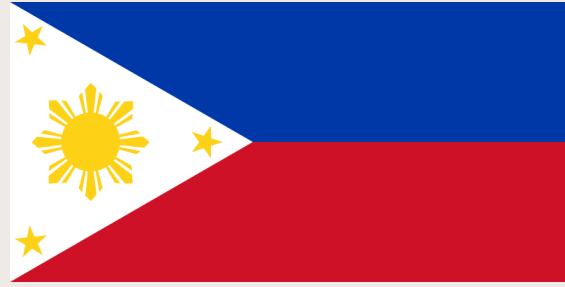
Farex’s double-heart logo idealises the idea of love and care. Its trademarked PreciNutri formulation boasts that it contains **“tailored nutrition that supports growth, development and immunity at all stages”**. Supposedly it also helps “immunity”, “digestion + immunity”, “brain growth + development + immunity”. Labels are not in Nepali language.

Pigeon Flexible



The Pigeon Flexible feeding-bottle claims its unique groove interior **“minimises colic”**

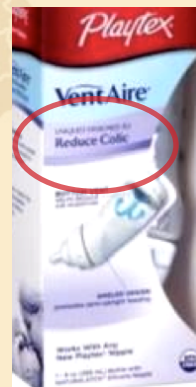
Philippines



Philippines adopted its “Milk Code” in 1986, since then has issued many Executive Orders, Administrative Orders, and Departmental Circulars to update the Milk Code and to give instructions for implementation, monitoring and enforcement. In 2006, the Department of Health issued a set of revised rules and regulations (RIRR) to introduce the latest global recommendations. The RIRR was challenged by industry but many of its provisions were upheld by the Supreme Court. It has brought positive changes especially in relation to labelling. However, monitoring and enforcement remain challenging as different agencies are involved at different levels of government. Based on findings from monitoring - while labelling of formula products is in general compliance with national measures, violations of labelling of bottle and teats are rampant.

Comparing bottle with breast

Playtex VentAire



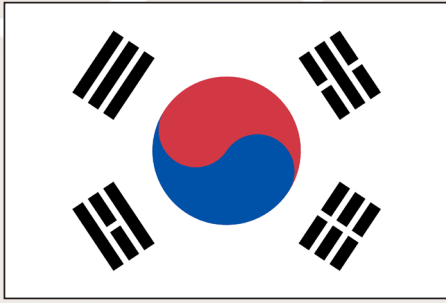
The label states that its natural latch nipple mimics a baby's latch-on like the breast, and it reduces colic.

Pigeon SofTouch Peristaltic Plus



The label blatantly states the product provides **“natural feeding motion”**, which allows baby to use natural motion that is **“learned at the breast”**.

Republic of Korea



The existing legal measures cover only few of the provisions of the International Code. In relation to promotion, only advertising and supply of low-cost or free formulas are covered. As for provisions regarding labelling, only pictures/ text idealising infant formula are banned. WHA resolutions are ignored.

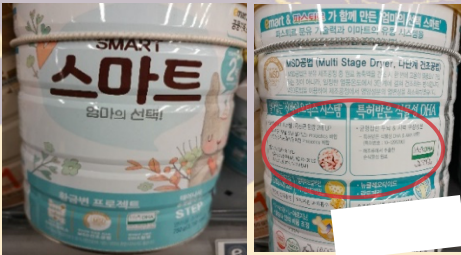
UPIS Feeding-bottle



"Supporting mixed feeding with a teat attached which is similar to mother's breast".

New age marketing - All about stool and intestine

Pasteur New WithMom Stage 1 – Infant Formula



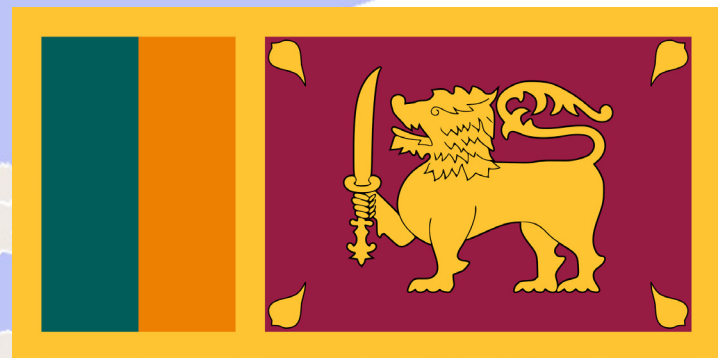
The brand "*WithMom*" in itself is an idealisation. Label has promotional text "*Mother's choice*". Together with the pictures of the intestine, representing bowel health benefits that results in healthy "*golden coloured stool*".

Pasteur New WithMom Stage 2 & 3 – follow-up formula and growing-up milk



There is text that mentions benefits of lactic acid bacteria - an ingredient in the product, with an illustration of the intestine, which represents claims on digestive health. There is also text that explicitly encourages the use of this formula.

Sri Lanka



Sri Lanka was one of the first countries to implement the International Code of Marketing of Breastmilk Substitutes following its adoption in 1981. The Sri Lankan Code for the Promotion, Protection & Support of Breastfeeding and Marketing of Designated Products was first adopted in 1983 and was amended in 2004. It is currently being reviewed by the Ministry of Health. On the marketing front, Sri Lanka also faces new challenges as new products and marketing tactics have surfaced. As a result of its economic growth, Sri Lanka's steadily-expanding market is targeted by manufacturers.

Sri Lanka continued...

Promotional text in small print on the back of label

Morison's Baby Feeding-bottle



The product is idealised with the image of a blonde-haired and blue-eyed baby and descriptions about the uniqueness of the product.

Nestle NAN 1 Starter Infant Formula



The fat bird mother feeding its babies is idealising as it conveys ideas on feeding that is maternalised and nurturing. The cradling hands carrying the Bifidus sign on the front corresponds with the statement "*naturally active probiotic culture that may help reinforce body's immunity*" on the back. Other promotional claims include "Nan 1 contains the right amount of protein for growth without overloading the immature organs" and "NAN 1 contains essential nutrients which support normal physical and mental development of the body".

Thailand



In April 2017, the National Legislative Assembly of Thailand passed the Control of Marketing of Infant and Young Child Food Act. This Law gives effect to the International Code of Marketing of Breastmilk Substitutes and subsequent WHA resolutions and was a process that took almost 20 years to culminate. Thailand has the necessary infrastructures for the Thai Law to be implemented, monitored and enforced. However, political will and policy cohesiveness are key. Enforcement for the labelling provisions will commence next year.

Premium products with scientific formulations, Different companies, same tactic.

Danone Dumex Gold Plus Advanced Komplete Stage 2 Follow-up Formula



On front of pack, there are graphic icons that illustrate nutrients such as Calcium and vitamin D, DHA+ARA, GOS/FOS, Selenium, Vitamin C and Vitamin E. On the back of pack, the same icons are health linked to corresponding claims, such as "*Calcium and Vitamin D are vital in strengthening bone and teeth*". There are also a number of many smaller icons (e.g. Carnitine, Zinc, and Vitamin A) with associated claims.

Wyeth S-26 SMA Gold Stage 1 Infant Formula



Graphic icons on the front of the package lay down the groundwork – a book icon that suggests intelligence and mental development, and a shield representing immune system. On the back, there is a brain-shaped picture dotted with a number of fancy-named nutrients such as alpha-lactalbumin, Lutein, Omega3, and Omega 6. At the bottom of the box, there are more icons with explicit claims such as Iron is a crucial substance in Haemoglobin and vitamin A is good for vision.

ONLINE MARKETING PORTALS

New means of technology such as internet, social media and phone apps have become more convenient and effective marketing tools than the traditional avenues. These new platforms allow companies to contact parents, collect information and carry out promotional activities in more seamless ways. While the International Code aims to prohibit all kinds of promotion to protect breastfeeding, selling and buying through normal channels is allowed. However, because of the nature of the internet and social media, online portals are hotbeds for promotional activities. Information on lifestyle, socioeconomic status, and the age and needs of babies can be accessible through different avenues on the internet, which allows companies to tailor their marketing approach to make it ever more dynamic. As a result, interactions with parents have become much more personalised. Oftentimes, the line between providing information about products is blurred with promotion. Built-in features on social media platform such as hash-tagging, reposting, sharing, and liking all serve the same end-goal to ‘transport’ parents to promotional activities that encourage purchasing and consumption of these commercialised baby food products.

This report focused on internet storefronts, and findings showed that promotional activities are rampant. It is an undeniable fact that commercial promotion is increasingly subtle and insidious, but no less effective. Only enforceable laws, properly monitored and effectively enforced, can curb the aggressive marketing practices that seek to influence parents’ decision on how to best feed their infants and young children.

PROMOTION TO PUBLIC AND IN SHOPS - PROHIBITED BY THE CODE

- Article 5.1 of the Code prohibits advertising and all other forms of promotion of products under the scope of the Code.
- Articles 5.2 and 5.4 prohibit companies from giving samples and gifts to mothers.
- Article 5.3 bans promotional devices at retail level.
- Article 5.5 prohibits marketing personnel from seeking direct or indirect contact with pregnant women and mothers.
- The WHO Guidance on Ending Inappropriate Promotion of Foods for Infants and Young Children (A69/7 Add. 1) (the 2016 WHO Guidance) clarifies that follow-up formula and growing-up milk are breastmilk substitutes, thus promotion of these products, like infant formula, is not allowed.

China - Multiple shopping incentives all for Women's Day on Tmall



Danone Nutricia Aptamil

On the Tmall online shopping app, Aptamil formula products are already at a lower price of 185RMB. Shopping "allowance" of 30RMB is given once the purchase reaches 600RMB while Disneyland chess set is used as gift to entice sales. Coupons are given for accumulated points from purchase to exchange for gifts and lucky draw prizes.

India – Cashback offers



Nutrimea Medolac

On Flipkart.com, cash back offers are given to those who use specific credit cards to purchase their Wheat & Milk baby food products. Promotional activities of any kind are prohibited on all levels of marketing activities.

Indonesia - Free iPhone giveaway



Wyeth S-26 Promil

On the Wyeth Indonesia website, those who purchase the follow-up formula can join the "iPhone rally" to get the prize of a free iPhone.

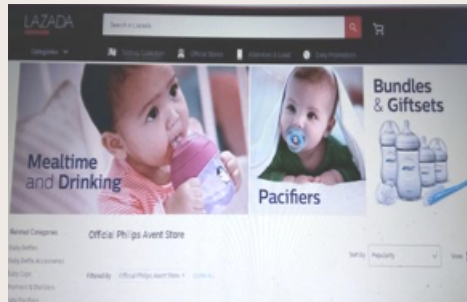
Mongolia – Free shipping as promotional rewards to shoppers



Nestle NAN Optipro

Online shop offering free shipping as promotion to purchasers of NAN Optipro.

Philippines – Full blown advertising on shopping website storefront



Philips Avent

On Lazada.com in the Philippines, a major shopping website, Philips Avent is waging full-blown advertising campaigns at the storefront. Selling and promoting mixed into one.

Republic of Korea – Appealing to shoppers’ “mother instinct”



Namyang “I am Mother” Stage 3 formula

On Namyang’s website, an advertisement pops up at the storefront describing the formula as similar to breast milk, and with promotional phrases such as “Namyang I am Mother, in the moment of shining mother instinct”.

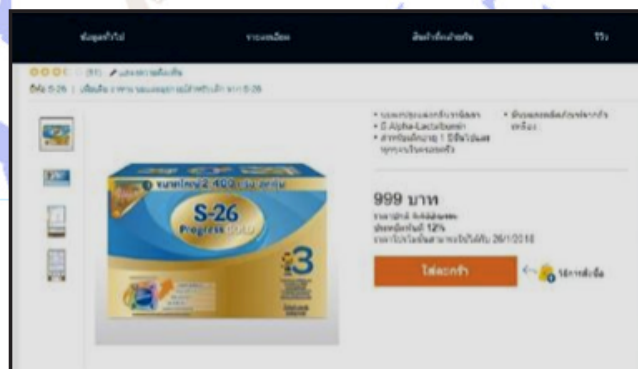
Sri Lanka – Discounts offered at online store



Mead Johnson - Enfagrow

Online store offering discounts on multiple Enfagrow products as sales enticement.

Thailand - Discounts offered at online store



Wyeth S-26

On Lazada.com Thailand, shoppers who buy S-26 Progress Gold products receive a 12% discount.

THE WAY FORWARD & RECOMMENDATIONS

Although Code implementation alone cannot improve falling breastfeeding rates or the nutritional status of children, it is important to note that the International Code is the foundation for effectively building an integrated cross-sectional approach that includes protection, promotion, and support of breastfeeding and optimal infant and young child feeding. Periodically reviewing national measures with a view to strengthen them is important but do bear in mind that it may be a lengthy process fraught with challenges from industry to try to undermine it or even put it to halt. However, countries should enlist necessary support (e.g. UNICEF) on how to deal with industry with the aim of protecting public health, and take active steps to implement, monitor and enforce the existing measures, whether strong or weak is crucial.

Advocacy should include actions to ensure legislators and policy-makers understand and recognise their obligations under the International Code and relevant WHA resolutions, as well as national Code-related or other relevant laws, to promote and protect breastfeeding, and to eliminate inappropriate marketing practices. Governments must ensure ongoing robust and sustainable monitoring and enforcement mechanisms. Such mechanisms need to involve all relevant government agencies authorised to monitor and enforce national measures that give effect to the International Code. Sanctions or warnings are effective means to let businesses must know that governments mean “business” when it comes to protection of breastfeeding. Experience elsewhere shows that where national measures are enforced, companies behave better.

Civil society can provide the needed support where governmental resources are limited or where their hands are tied, such as community-based monitoring, naming and shaming companies. They can also act as advisories to ensure monitoring is free from commercial influence. Independent monitoring such as this report brings violations into public scrutiny and holds companies to account. Protecting the health of infants and young children requires a concerted effort that is ever ongoing – thirty-seven years on after the Code was adopted, the old battle goes on in the new world.

This report was prepared by Ms. Constance Ching, International Code Documentation Centre (IBFAN-ICDC), and Dr. JP Dadhich, Breastfeeding Promotion Network of India (BPNI)/ International Baby Food Action Network (IBFAN) Asia, under the supervision of Ms. Yeong Joo Kean, Director, IBFAN-ICDC and Dr. Arun Gupta, Regional Coordinator, IBFAN Asia. The monitoring data for this report was provided by Mr. Laigden Dzed and Mr Loday Zangpo from Bhutan; Ms. Lijuan Hu and Ms. Wenhui Ji from China; Dr. Neelima Thakur and Ms. Vibharika Chandola from India; Ms. Nia Umar and Ms. Mia Sutanto from Indonesia; Ms. Asifa Luthfee and Mr. Mohd. Saeed from Maldives; Dr. Soyolgrel Gochoo, Odgerel Davharbayar and Ms. Enkhjin Jargalsaikhan from Mongolia; Dr. Merina Shreshtha and Dr. Prakash Shreshtha from Nepal; Ms. Ines Fernandez and Mr. Jaime S. de Guzman from Philippines; Ms. Sun-Hee Kim, Ms. GuGyung Lee and Kim JaiOk from Republic of Korea; Ms. Wimala Ranatunga and Dr. Mrs. R.D.F Kanthi from Sri Lanka; and Ms. Nisachol Cetthakrikul, Dr.Chompoonut Topothai and Dr. Yupayong Hangchaovanich from Thailand.

We are thankful to all those who contributed in developing this report.

Annexure 1

Methodology for monitoring and sharing the information with IBFAN-Asia RCO IBFAN-ICDC in each country using the Code monitoring toolkit for IBFAN-Asia regional monitoring

Country monitors undertook the Code monitoring task using following methodology.

1. Code Monitoring Tool Kit

Detailed monitoring process was provided in the IBFAN-ICDC Code monitoring toolkit for IBFAN-Asia regional monitoring. Each country monitor was requested to read the document carefully to add to the general understanding of monitoring.

2. Monitoring of Labelling of the products will be done as follows

- Country monitors identified all the manufacturers marketing in their respective countries
 - Infant formula (0-6 months)
 - Follow-up milks/ Growing up milks (> 6 months – 36 months)
 - Complementary foods (< 6 months or marketed as suitable for bottle feeding)
 - Complementary foods (> 6 months – 36 months)
 - Feeding bottles and teats
- For each manufacturer of baby foods, at least one product from the abovementioned categories 'a' to 'd' was analysed for labelling. Minimum of 4 labels from each manufacturer were monitored. Hence, if a country was having 4 manufacturers, 16 labels were monitored and likewise. For the feeding bottles and teats, a total of 4 labels from different manufacturers were monitored.
- Following online forms from the toolkit were used to analyse the labels:
 - Form 4A for the labels of Infant Formulas
 - Form 4B for the labels of follow-up formulas, growing up milks, complementary foods and other breastmilk substitutes)
 - Form 4C for the labels of bottles and teats
- The monitor utilized information generated by filling the specified forms as suggested above to identify violations of the Code.
- Code violations thus identified were sent to ICDC using an online **Quick and Easy Code monitoring form** provided in the Code monitoring toolkit.

3. Monitoring of marketing practices on E-marketing portals

Monitors looked for violations of other provisions of the Code on E-marketing portals using following process.

- Scrutinizing 4 different E-marketing portals popular in the respective countries like Amazon, e-bay etc. for advertisements and other promotional activities like providing rebates, free samples and gifts with the purchases, and looking for attempt by the company to make contact with parents (like providing contact details of the company on the portal and asking the mothers to contact the company in case of any question/query or seek help).
- The monitor sent information thus generated to ICDC using the Online Quick and Easy Code Monitoring Form.

4. Online submission of information

To facilitate submission of the monitoring information using the online Quick and Easy Monitoring Form, IBFAN-ICDC created a password for persons working as monitor (s) in the country (maximum of 2).

5. Submitting supporting documents

Along with reporting in the designated form, monitors submitted photograph/screen shots of the reported violation as a supportive materia

6. Developing a Country report

The ICDC vetted all the monitoring information submitted to it. Using the vetted information, monitors composed a short monitoring report of the country using the report template provided to them.

7. Developing a Regional report

With the available information from countries, a regional report of the Code violations on **Labeling and Online promotion** of baby foods and feeding bottles has been developed.

This monitoring activity and report is a part of **Swedish International Development Cooperation Agency (SIDA)** supported IBFAN-WABA project "**Protecting, Promoting and Supporting Breastfeeding through Human Rights and Gender Equality.**"

The map used in this document has been sourced from www.un.org. The designations employed and the presentation of the material in this work do not imply the expression on any opinion whatsoever on the part of IBFAN Asia, IBFAN ICDC and BPNI concerning the legal status of any country, territory, city or area of its authorities, or concerning the delimitation of its frontiers and boundaries.



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