BPN/2021/073

December 22, 2021

Shri Rajesh Bhushan
Secretary
Ministry of Health and Family Welfare
Government of India
Nirman Bhawan, Delhi -110011

Subject: Request for making 2 health services mandatory to improve early breastfeeding rates in the hospitals

Dear Shri Bhushan,

Greetings from BPNI!

The Breastfeeding Promotion Network of India (BPNI) is a 30 years old independent, non-profit, national organization, working towards protecting, promoting and supporting breastfeeding and appropriate complementary feeding of infants & young children. In 1995, GOI notified BPNI in the Gazette of India to monitor the compliance of Infant Milk Substitutes Feeding Bottles, and Infant Foods (Regulation of Production, Supply and Distribution) Act 1992, and Amendment Act 2003 (IMS Act) in the country to monitor the compliance with the IMS Act. BPNI keeps a check on the baby food industry's manipulative promotional tactics to undermine breastfeeding in the hospitals in particular through sponsorships etc. BPNI reports to MOHFW and MOWCD on a regular basis.

BPNI is also a technical partner in the MAA Programme of MOHFW GOI, which aims at promoting breastfeeding in health facilities.

I am sure you are aware that according to NFHS-5, India has 88.6% institutional births but only 41.8 % mothers are enabled to practice breastfeeding within an hour of birth and this figure was 41.6% in the last NFHS-4, not shown any rise. Reasons could be many including rise in cesarean section and unnecessary use of infant formula in the hospitals. BPNI recently celebrated its 30 years and lots of professional organisations spoke and raised these concerns and provided suggestions. (https://youtu.be/WPh4ODEpTvI)

BPNI submits as under and request you to make the 2 services mandatory to improve early breastfeeding rates in the health facilities. These services can make an impact on the health and survival of newborns and mothers.

Proposal of two services to be mandatory in all public and private hospitals.

1. **Preparation of mothers while pregnant:** Helping them to make a decision about feeding their babies and recording the decision. It should include consent if they like to give formula feeding. (People are also demandng it through this petition: https://www.change.org/p/stop-feeding-formula-milk-to-newborns-without-the-parent-s-consent-mybabymydecision)

2. **Provide practical support and skilled support to women at the time of birth** to have immediate skin- to -skin contact with their babies after birth and begin breastfeeding within an hour of birth. This information should also be recorded and monitored

As a policy, BPNI does not accept funds of any kind from the companies manufacturing baby foods, feeding bottles etc. and from organization/industry having conflict of interest.
for your kind information section 7 and rule 9 of the infant milk substitutes feeding bottles, and infant foods (regulation of production, supply and distribution) act 1992, and amendment act 2003 mandates these services under operative section 7 and rules framed thereof. (attached the relevant section and rules)

bpni request you to initiate steps in this direction, bpni would be happy to assist.

we seek an appointment with you for 30 minutes to explain. we hope to hear a positive response from you,

with regards,

yours sincerely,

[signature]

dr. arun gupta
central coordinator, bpni