



putting child nutrition
at the forefront
of social change

**Breastfeeding
Promotion Network of India**
(Registered Under Societies Registration
Act XXI of 1860, Delhi R.No. S-23144)
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BPNI/IMS Act/2025/44

May 19, 2025

The Secretary
Ministry of Women and Child Development
Government of India,
Shastri Bhawan, New Delhi

The Chairperson
National Commission for Protection of Child Rights (NCPCR)
Government of India,
New Delhi

The Chief Executive Officer
Food Safety Standards Authority of India (FSSAI)
Government of India,
New Delhi

The Secretary,
Ministry of Health and Family Welfare
Government of India
Nirman Bhawan, New Delhi

Via email secy.wcd@nic.in, cp.ncpcr@nic.in, ceo@fssai.gov.in, secyhfw@nic.in

Subject: Complaint against Amul's Promotion of Liquid Ready-to-Feed 'Infant Milk Substitute' Amulspray Infant Formula and Violation of the IMS Act, 1992/2003

Dear Sir/Madam,

Greetings from Breastfeeding Promotion Network of India!

The Breastfeeding Promotion Network of India (BPNI) <https://www.bpni.org/> is a 33-year-old non-profit organization that works for protection, promotion and support of breastfeeding in India. BPNI works on policy analysis, skill training of health workers, and monitoring the compliance with the Infant Milk Substitutes Feeding Bottles, and Infant Foods (Regulation of Production, Supply and Distribution) Act 1992, and Amendment Act 2003 (IMS Act). India enacted the IMS Act, which came into force in August 1993. An offence committed under this law is cognizable. The Government of India notified "Breastfeeding Promotion Network of India (BPNI)" wide No G.S.R. 540 (E), dated the 27th June 1994, to monitor the compliance with the Act under clause (c) of the sub-section (1) of Section 21.

I am writing to bring to **your collective attention** a serious concern regarding the recent launch and media promotion by Amul of its new product, a liquid ready-to-feed infant formula under the brand Amulspray, which is an infant milk substitute.

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 conflicts of interest.

As per Section 2(g) of the IMS Act, 1992,
"infant milk substitute" means any food being marketed or otherwise represented as a partial or total replacement for mother's milk for infant up to the age of two years.

Further, Section 2(i) defines promotion as:
"promotion' means to employ directly or indirectly any method of encouraging any person to purchase or use infant milk substitute, feeding bottle or infant food."

It is clear from these provisions that Amul has violated the IMS Act .

Amul issued a press release for its promotion. Multiple outlets (e.g., The Tribune and Agrimoon.com) reported on May 17, 2025, that Amul has launched "India's first liquid ready-to-feed infant formula" in aseptic packs, highlighting and claim its "ideal to carry" and good for working mothers" and "ensures adequate nutrition". These appear to amount to **promotion of an infant milk substitute**. Further Amul is seen to in violation of yet another section of IMS Act, section 6, which explicitly prohibits use of any graphics or phrases to increase saleability. Amul uses a **teddy bear** which is **not a neutral symbol** and clearly aimed at invoking emotional appeal, which can **enhance saleability**, violating clause (6(2).6(2) says: No container or label referred to in sub-section (1) relating to 1 infant milk substitute or infant food shall--(b) have pictures or other graphic material or phrases designed to increase the saleability of infant milk substitute or infant food;

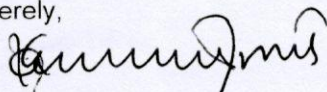
Having analysed this, **BPNI requests a thorough investigation into this alleged violation; it being a cognizable offence. In addition, we request you to**

- Issue directive to Amul to cease all promotional activity of infant milk substitutes
- Issue directives to Amul for immediate withdrawal of the Graphics of Teddy bear from the label.
- Set up a mechanism to monitor the compliance of IMS Act, BPNI is happy to partner.
- Advisory to media urging all NEWS outlets to vet such press releases for legal compliance before publication.

This will ensure safeguarding of infant feeding practices in India from commercial influence, the main objective of the IMS Act.

Thank you for your kind attention and commitment to child health and nutrition.

Sincerely,



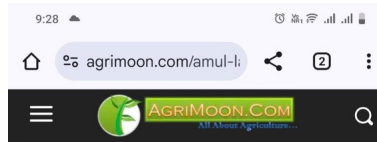
Dr. Arun Gupta MD, FIAP.
Chief Coordinator, BPNI

Encl: AA



Amul launches India's first liquid ready-to-feed infant formula - The Tribune

Agrimoon.com

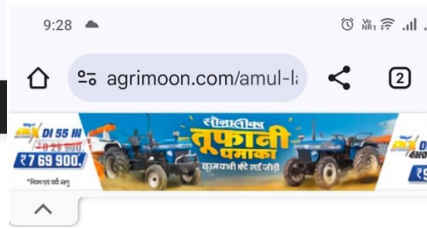
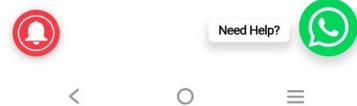


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Amul launches India's first liquid ready-to-feed infant formula

By Anil Mandal May 18, 2025 6 0

Amul has launched India's first infant formula in liquid ready-to-feed (RTF) aseptic pack. It is a ready-to-feed infant formula available in a convenient packaging designed for ease of pouring/ drinking, a press release said.



It added that it offers convenience by saving time to prepare feed multiple times during the day. It also ensures adequate nutrition to infants every time by eliminating chances of error in feed preparation that may lead to under/over feeding of babies. It is ideal to carry while traveling and also good for working mothers who depend on caregivers for feed preparation.