



National Assessment on the Compliance with the Code and the National Measures

Mexico Report

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Disclaimer

Westat and the IBERO/INSP, its local subcontractor in Mexico City, were responsible for the collection of data related to company compliance with the International Code of Marketing of Breast-milk Substitutes and any additional country-specific regulations related to marketing of these products. Westat is responsible for the analysis of the data related to compliance with those two standards and for the preparation of this report, on which the Access to Nutrition Foundation (ATNF) will (in part) base the scoring of breast-milk substitute (BMS)/complementary food (CF) companies' performance for the BMS/CF Marketing Index 2021, which in turn will inform those companies' scores in the Access to Nutrition Global Index 2021. Westat and IBERO/INSP engaged with retailers as part of the data collection and analysis process.

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Acronyms

ATNF	Access to Nutrition Foundation
ATNI	Access to Nutrition Initiative
BMS	Breast-milk Substitute
CF	Complementary Food
EFINFO	Eficiencia Informativa
FOF	Follow-on Formula
GUM	Growing-up Milk
HC	Health Center
HF	Health Facility
HP	Health Professional
IBERO	Universidad Iberoamericana
IBFAN	International Baby Food Action Network
IF	Infant Formula
IGBM	Interagency Group on Breastfeeding Monitoring
INSP	Instituto Nacional de Salud Publica
MF	Maternity Facility
NetCode	Network for Monitoring and Support for Adherence to the Code
PSU	Primary Sampling Unit
UNICEF	United Nations International Children's Emergency Fund
WHA	World Health Assembly
WHO	World Health Organization

Executive Summary

In the summer of 2019, the Access to Nutrition Initiative (ATNI) commissioned a study in Mexico City, Mexico to systematically assess baby food manufacturers' compliance with the International Code of Marketing of Breast-milk Substitutes and subsequent relevant World Health Assembly (WHA) Resolutions (referred to hereafter as the Code). Further, the ATNI study assessed the extent to which companies comply with the Mexico BMS legal framework, comprised of several legislative documents, where the measures go beyond the provisions of the Code. ATNI chose Mexico using a range of criteria, including, but not limited to, it being a higher risk country (defined based on levels of malnutrition and infant mortality), where: neither ATNI nor FTSE Russell had previously undertaken similar studies; as many as possible of the six key multinational baby food companies included in ATNI's Indexes were present (according to Euromonitor International data); and there were no significant political, safety, or operational challenges to undertaking the study.

The purpose of this seventh country study that Westat has carried out for ATNI is to determine whether those companies whose breast-milk substitute (BMS) products and/or complementary foods (CFs) were for sale in the study area conform fully with the Code and national regulations that go beyond the Code that control the marketing and labeling of these products, as inappropriate marketing of these products can undermine optimal breastfeeding, and infant and young child nutrition. Similar previous studies were carried out in Indonesia, Vietnam, India, Thailand, Nigeria, and the Philippines.

The data and analysis from this study will inform the fourth Global Access to Nutrition Index and the associated BMS/CF Marketing Index 2021, with anticipated publication in early summer 2021. The study derived the definition of the included products from both the Code and subsequent WHA resolutions. According to these documents, the Code applies to BMS products, including infant formula (IF – for infants from birth to 6 months of age); follow-on formula or follow-up formula (FOF – for infants from 6 months of age); growing-up milk (GUM – for children from 12 months of age up to 36 months); and complementary foods (CFs – marketed as suitable for infants less than 6 months of age). It is important to note that formulas for special medical purposes (FSMPs) are not treated as a distinct product type. Their marketing must also adhere to the recommendations of the Code and any associated local provisions. Therefore, they are included and assessed within the appropriate product type according to the age of infant for which they are intended (e.g., an FSMP for infants from birth to 6 months is treated as an infant formula).

WHA 69.9 makes a series of recommendations about how to market CFs for infants and young children from 6 to 36 months of age. The Code also applies to the marketing of bottles and teats, but they were not included in this study.

The definition of a BMS product used to guide data collection for this study differs from that of the three previous studies in Vietnam, Indonesia, and India. Following the World Health Organization (WHO) definition at the time, those studies defined a BMS product as IF, FOF, GUM for use from 12 to 24 months, and CFs recommended for infants less than 6 months of age. This study, as well as studies conducted in Bangkok, Thailand and Lagos, Nigeria during the summer and fall of 2017, collected data for all types of formula intended for infants up to 36 months of age and assessed whether baby food companies market CFs intended for children from 6 – 36 months of age in line with the BMS definition of BMS and recommendations of WHA 69.9, passed in 2016. While the Thailand and Nigeria studies collected data on the extent of companies' compliance with WHA 69.9,

ATNI made a decision to exclude these data from the main results tables. This was in line with ATNI's decision to exclude such findings from companies' scores in the 2018 Global Index in order to retain comparability with the results presented in the 2016 Global Index. The studies in Manila, Philippines and Mexico City, Mexico are therefore the first studies to include the results of marketing in compliance with WHA 69.9.

In 2014, WHO established a Global Network for Monitoring and Support for Adherence to the Code (referred to as NetCode). NetCode subsequently developed the Protocol for the Assessment and Monitoring of "The Code" and Relevant National Measures to meet their objectives and provide practical tools and guidance for effective monitoring. ATNI and Westat based the methodology of the Thailand and Nigeria studies on the first iteration of the NetCode protocol, published in 2015. NetCode released a subsequent Toolkit with an updated protocol in October 2017. While we based both the Philippines and Mexico studies on the updated 2017 NetCode protocol, the onset of the global SARS-CoV-2 pandemic in March 2020 disrupted the study plans. Given in-country restrictions for local travel and safety risks for data collectors, ATNI made the decision in August 2020 to conduct the Mexico study using a modified protocol. The following chapters provide specific details when the study deviated from the NetCode protocol and previous studies.

The 2017 NetCode protocol calls for data collection at multiple levels to examine different aspects of Code compliance. To capture information in assessing possible noncompliance with the Code, it was necessary to:

- Evaluate any marketing and promotions observed within selected large retail stores and on online retailers' websites;
- Evaluate product labels and inserts of available and relevant BMS and CF products; and
- Monitor selected media, including traditional and digital.

Due to the restrictions of the global SARS-CoV-2 pandemic, the Mexico data collection teams were unable to:

- Interview mothers of infants less than 24 months (2 years) in health centers (HCs);
- Interview health professionals (HPs) in health facilities (HFs), including HCs and maternity facilities (MFs);
- Evaluate promotional, and informational and educational materials and equipment found in those health facilities (HFs) visited for interviews; and
- Evaluate any marketing and promotions with small retail stores proximate to the HFs.

The 2017 NetCode protocol also requires the assessment of the compliance with any national measures relating to marketing relevant products (in the case of Mexico, national legislation), if they go beyond the requirements of the Code. Various forms of marketing and labelling were controlled through Mexico legislation at the time of the study. These include marketing restrictions and labelling requirements for formula for infants and young children intended from birth up to 36 months of age.

According to the 2020 WHO, United Nations Children's Fund (UNICEF), and International Baby Food Action Network (IBFAN) status report on national implementation of the Code, the Mexico

BMS Legal Framework is classified as “moderately aligned with the Code.” This study, therefore, provides a baseline against which to measure further the effectiveness of the current national legislation in curtailing BMS marketing as defined by the Code.

This report presents findings from the Mexico study, carried out in Mexico City in September 2020 through October 2020. ATNI selected this geographical location because NetCode recommends conducting the study in the capital or city with the largest population.

The methodology and procedures that we followed include:

- Conduct field-level training of one Coordinator and three Data Collectors via Skype in August 2020;
- Monitor advertising or product promotion in traditional media collected for six months from May 2020 through October 2020 and on various online media channels and sites, conducted for eight weeks from September through October, 2020;
- Monitor ten large retail outlets for observation of product promotion in October and November 2020; and
- Purchase and systematically analyze 120 labels of eligible (i.e., excluding 50 parallel import products) BMS and CF products from September and October 2020.

This report highlights particularly the six largest global baby food companies that will be included in ATNI’s BMS/CF Index 2021, specifically Abbott, Danone, Royal FrieslandCampina (FrieslandCampina), KraftHeinz, Nestlé, and RB. Hereafter, we refer to these six companies as ATNI-Index companies.

Once data collection in retailers was complete, ATNI requested lists of products for sale in Mexico from the six ATNI-Index companies. We refer to the products included in the lists from these six companies as “legitimate products.” This report includes observations made in relation to the marketing of 334 products made by the six ATNI-Index companies and 75 products made by other companies, and excludes from the analysis and results 50 parallel import products made by these six companies, as they are not responsible for the sale of these products in Mexico. The reason the total number of products for which findings are presented is much greater than the number of labels analyzed is that the searches by the study team and media monitoring identified many more products than the study team was able to purchase and assess at the time of the label assessment.

In addition to the products made by the ATNI-Index companies, products for sale in Mexico manufactured by 13 other companies are also included in this report. We collected label data for 14 companies in total. Ultimately, 120 products are included in the final label analysis results presented in this report (see Table ES-1).

Similarly, once data collection was complete, ATNI asked the six ATNI-Index companies to confirm with which of the five online retailers they had contracts in place during the study period. This was so as not to attribute to these companies any findings on the retailers’ sites where products were sold without any formal contract in place, and where, therefore, promotions had been initiated by those retailers and not by the manufacturers.

As in the Philippines, ATNI introduced a new element of quality control (QC) in the form of a review by the ATNI-Index companies of the initial findings of all observed incidents of noncompliance. ATNI uploaded to its online research platform images of all of the observed pieces of promotional materials, advertisements and promotions, and labels. The companies were given two weeks to review the findings and provide feedback. The intention was to identify any erroneous findings, (e.g., any related to parallel imports, on online retailers' sites with which the companies did not have a formal contract). Each of the six companies reviewed the findings and provided feedback to ATNI. ATNI evaluated their feedback and passed any points of disagreement on to Westat.

The principal results of this study are the following:

- **Article 4:** Informational and Educational Materials or Equipment (partially assessed)
 - Information to Mothers: The data collection team did not observe any informational or educational material related to IF, FOF, GUM, CFs less than 6 months, or CF 6-36 months in the 10 large retail outlets.
- **Article 5:** General Public and Mothers (partially assessed)
 - Advertising and Promotion: The traditional media monitoring found a total of 13 unique advertisements or promotions for 13 different products on television channels from August through October 2020. No promotions were documented on radio stations. The online media monitoring component of the study found 87 eligible observations. Seventy-six (76) of these observations appeared on company/brand associated websites or social media pages, while we observed 11 of these promotions on parenting websites and/or their social media pages.
 - Overall, there were 100 media promotions observed for 32 unique products in the traditional and online media monitoring. The company with the largest number of products observed was Nestlé with a total of 41 advertisements (~41%) for 14 products, followed by RB with a total of 28 advertisements (~28%) for 5 of its products. The most common product type included in the observed promotions was GUM with a total of 76 promotions (~76%) for 21 different GUM products, and to a lesser extent CF 6-36 month products (~5%) and IF products (~3%). While advertisements and promotions for CF 6-36 months are not a noncompliance per se, WHA 69.9 stipulates that certain messages must be included or excluded. Five (5) (5%) promotions for 6 products of this type did not do so. Sixteen (16) (~16%) of the media findings related to brand promotions where the advertisements were not for a particular product.
 - Point-of-Sale Promotions: Of the 124 promotions enumerated across the physical retailer and online retailer data collection, ~73% of them were found on online retailers' sites, while ~27% were found in physical retailers. A total of 91 online promotions for 24 BMS/CF products were identified in the five prominent online retailers. In addition, 33 promotions for 19 BMS/CF products were identified in the ten large retail outlets. Overall, the top four type of promotions were as follows: 80 price-related promotions (~65%); 31 promotions were incentives to purchase products (~25%), 7 promotions were free gifts (~6%), and 5 where companies sought contact through an invitation to visit the company website or Facebook pages (~4%).

More than half of promotions (~52%) observed in the physical retailers were incentives to purchase products. By company, 11 (~33%) of the 33 promotions documented were

related to products made by Nestlé, 8 for products made by RB (~24%), and 6 for products made by Abbott (~18%). Two thirds (~67%) of the promotions involved GUM products, ~24% IF products, and ~6% FOF products. One CF 6-36 month product from Nestlé explicitly invites the consumer to visit a website, a noncompliance as per Recommendation 5 of WHA 69.9.

Specifically among the 91 observed promotions referencing 24 products on online retail websites, the company with the most products observed in these promotions was Nestlé with a total of 8 (~33%). The most common product type found in the promotions observed on online retail websites was GUM with 19 (~79%) products, followed by IF with 3 (~13%) products and FOF with 2 (~8%).

- Company contact with Mothers: Observations in physical retailers documented 5 instances (2 IF products, 2 FOF products and 1 CF 6-36 month product) where the packaging of these products made by Nestlé include an invitation to make contact with the company through a website and/or Facebook page. Additionally, in the online monitoring of companies' own media, promotional e-mails received as part of digital company subscriptions reflect indirect contact initiated by the companies with mothers and caregivers; the e-mails from RB were primarily promoting its GUM products.
- **Article 6: Health Care Systems (not assessed)**
- **Article 7: Health Workers (not assessed)**
- **Article 9: Labeling**
 - *Summary BMS:* The label analysis included 86 BMS products. Sixty-seven (67) (~78%) of those products had 1 or more incidence of noncompliance on the label. Thirty-one (31) (~46%) of those BMS products were from ATNI-Index companies, while the remaining 36 (~54%) were from "other" companies. In total, 114 incidents of noncompliance were observed on the product labels for BMS products.
 - *Summary CF 6-36 months:* The label analysis included 34 CF 6-36 month products. All of the CF 6-36 month products (100%) had 1 or more incident of noncompliance on the label. All of the CF 6-36 month products with one or more incidents of noncompliance were from ATNI-Index companies, which included Nestlé and KraftHeinz. In total, 42 incidents of noncompliance were observed on the product labels for CF 6-36 month products.
 - *Most Common Incidence of Noncompliance Observed on BMS Product Labels:* Across the 86 BMS products analyzed, the most common incidence of label noncompliance included: 62(~72%) products missing one or more of the seven informational requirements for the preparation instructions; 20 (~23%) products that included health/nutrition claims on the label; 6 (~7%) products were missing a statement on the superiority of breastfeeding; 6 (~7%) products were missing a statement that the product should be used only on the advice of a health worker, in a font size that is easily visible, in bold and on a contrasting background; 6 (~7%); and 6 (~7%) products were missing instructions to indicate that the product should not be heated using a microwave oven in order to avoid the risk of causing serious burns. The BMS product type with the highest number of incidents of noncompliance was IF 0-6 months with 35 (~41%) total products. The

company with the most incidents of labeling noncompliance on BMS products was Nestlé with 33 (~38%) noncompliant product labels. Of the other ATNI-Index companies, Abbott had 10 (~12%), Danone had 7 (~8%), KraftHeinz had 5 (~6%), RB had 9 (~11%), and FrieslandCampina had 6 (~7%) noncompliant product labels.

- *Most Common Incidence of Noncompliance Observed on CF 6-36 Month Product Labels:* In respect to the 34 CF 6-36 month products, the only incident of noncompliance included 34 (100%) products missing a statement on the importance of continuing breastfeeding for at least 2 years. The company with the most incidence of noncompliance for CF 6-36 month products was Nestlé with a total of 29 (~85%) products followed by KraftHeinz with 5 (~15%) products.

Table ES-1 presents a summary of observed incidence of noncompliance for all producers of covered formula and CFs (Note that this table is identical to Table 6-1.). Because noncompliance varies by sub-article and their relative importance may differ, this data is presented for descriptive purposes only. This table provides the number of reported and observed incidence of noncompliance found in Mexico City during the study period for ATNI-Index companies and for the other companies.

Table ES-1. Summary of observations of incidence of noncompliance, by Code sub-article¹ and WHA 69.9, and company					
Company	Total number of products found²	Total number of incidence of noncompliance (sum of columns to the right)	Incidence of noncompliance by relevant Code sub-article and WHA 69.9		
			5.1, WHA 69.9 Media monitoring (traditional and online)^{3,4} Table 5-1	5.3, 5.5, WHA 69.9 Promotions at retail outlets (physical and online retailers) Table 5-9	9.2, 9.4, WHA 69.9 Noncompliant product labels⁵ Table 5-10
Abbott	15	42	12	20	10
Danone	14	3	1	0	2
FrieslandCampina	10	26	12	8	6
KraftHeinz	35	5	0	0	5
Nestlé	233	122	41	48	33
RB	27	66	28	29	9
Other ⁶	75	61	6	19	36
Total	409	325	100	124	101

Source: ATNI Mexico (2020)

¹ Observations for sub-article 4.2 are not shown in this table as there were no relevant findings in the retail outlets visited. Observations from health facilities (HFs) which relate to sub-articles 4.3, 6.3 and 6.8 are not presented in this table given that HF visits were not within the scope of this assessment.

² The count of products includes all the unique products found throughout course of the study, excluding 50 parallel imports. In total, 153 products were observed in the data collection. The labels of 120 products were assessed; the other 33 products were not able to be purchased but featured in marketing or advertising.

³ Note that the Media Monitoring component of the study (May - October 2020) includes observations of advertisements or promotions in traditional media (Television and Radio) and online (company and brand websites local to Mexico and their associated social media pages, along with 10 parenting websites and their associated social media pages).

⁴ The frequencies below include 84 observed promotions related to specific products in the media monitoring as well as 16 observed promotions that were not related to a specific product. The promotions that were not related to a specific product advertised a particular BMS/CF company or brand.

⁵ Counts of noncompliance include Sub-articles 9.2 and 9.4 of the Code, as well as WHA 58.32 and WHA 61.20, and relevant Mexican regulations (those which exceed the Code). Each label included in this analysis can have more than one noncompliance; however, this column shows the counts at the unique product level (i.e., number of eligible products with at least one [one or more] label noncompliance). Additionally, the 50 parallel imports were excluded from the label analysis results presented in this report and are therefore not counted in this column. Two-hundred and forty-eight (248) legitimate products and 39 products from “other” companies were not available for purchase in Mexico and are also excluded from the count in this column because they were not assessed in the label analysis.

⁶ “Other” companies from the data collection in Mexico included: Alpura, Ausnutria, Bayer, Holle, Lactalis, Migh International Distribution, Nucitec, Ordesa, Padsa, Perrigo, Siegfried Rhein, Similares, and Super Pharmacies Guadalajara. There were no observed findings for Ordesa, Padsa and Similares.

Table ES-2 presents a summary of observed incidence of noncompliance by product type, for the six ATNI-Index companies, and “other” companies in Mexico City. There were several observations of noncompliance that were not related to a formula or baby food product for children 0-36 months of age (16 from online media monitoring) but promoted a particular company or brand. These incidents were categorized in the “Not a specific product” column in the table below. This table is presented for descriptive purposes only because the number of incidents varies by sub-article and their relative importance may differ. The most common product type promoted was GUM with a total of 198 (~61%) incidents of noncompliance. In total, the ATNI-Index companies accounted for 264 (~81%) observed noncompliances, while the “other” companies accounted for 61 (~19%) noncompliances.

Company	Total no. of observed incidence of noncompliance by product type						Total
	Infant Formula (IF) <6 mos	Followon Formula (FOF) 6-11 mos	Growingup Milk (GUM) 12-36 mos	Complemen-tary Food (CF) <6 mos ²	Complemen-tary Food (CF) 6-36 mos ²	Not a specific product	
Abbott	9	1	32	NA	NA	0	42
Danone	1	1	1	0	0	0	3
FrieslandCampina	4	1	21	NA	NA	0	26
Kraft Heinz	0	0	0	0	5	0	5
Nestlé	4	2	70	0	35	11	122
RB	10	3	49	NA	NA	4	66
Total ATNI-Index companies	28	8	173	0	40	15	264
Other ¹	23	12	25	0	0	1	61
Total	51	20	198	0	40	16	325

Source: ATNI Mexico (2020)

¹ “Other” companies from the data collection in Mexico included: Alpura, Ausnutria, Bayer, Holle, Lactalis, Migh International Distribution, Nucitec, Ordesa, Padsa, Perrigo, Siegfried Rhein, Similares, and Super Pharmacies Guadalajara. There were no observed findings for Ordesa, Padsa and Similares.

² NA denotes findings of complementary food products as not being applicable to companies that do not produce and market these product types.

Important conclusions and recommendations by type of marketing include:

- Areas of High Level of Compliance
 - *Informational and Educational Materials* – No printed information or educational material distributed by manufacturers was observed at the retail outlets, demonstrating good compliance with the Code and local regulations.
 - *Promotions* – No promotions were documented on radio stations.
 - *Promotions* – Remarkably, no promotions incompatible with the recommendations of WHA 69.9 for CF <6 months were observed in ten physical retailers and five online retailers.
 - *Labeling. Standards required by the Code and relevant WHA resolutions* – The content of all labels assessed was in Spanish and all products were compliant with the requirement of stating the ingredients used, composition/analysis of the product, storage conditions required, and batch number and the date before which the product is to be consumed, as well as preservation, use, preparation, and consumption. Likewise, all products included information properly located about the appropriate age of introduction. No pictures of infants, or other pictures or text idealizing the use of infant formula, or suggesting use for infants under the age of 6 months were found. Importantly, all of the CF 6-36 month products state the importance of not introducing CFs before 6 months of age.
 - *Labeling. Requirements by the Mexican regulations* – The content of labels of all IF products do not undermine breastfeeding and include written and graphic instructions on the preservation of the product, before and after opening the container and once the product is prepared, and a statement indicating that prolonged storage and excessive temperatures should be avoided. None of the FSMP 0-6 month and FSMP 6-36 month products describe the disorder, disease or specific medical condition for which they are intended. All CF 6-36 month products include instructions for its preparation, use, storage and preservation and state that the decision on the precise time when to start weaning, including any exceptions to the 6 month age limit, should be made in consultation with a healthcare professional. Finally, all cereal CF 6-36 month products include a statement saying “Use milk or formula but not water”, (or equivalent) and that the added ingredients must be recommended by a health professional.
- Areas of Low Level of Compliance
 - *Advertising and Promotion* – The traditional and online media monitoring component of the study documented a number of unique advertisements or promotions that were repeated hundreds of times. Given the rapid rise in the use of social media and marketing spending on those platforms in recent years, contact with mothers is increasing across all countries through social media, including companies’ own websites, YouTube, Facebook, and others. Companies should institute additional measures to stop such advertising and promotion for BMS products, including GUMs. Government efforts should continue to focus on prevention of advertising or other forms of promotion of BMS to the general public on all forms of media, and on developing systems to monitor compliance with the Code and local regulations on an ongoing basis, for these media. Measures to ensure that CF 6-36 months are marketed in line with the recommendations of WHA 69.9 could also be considered.

Point-of-Sale Promotion – Promotions were found on online retailers as well as in brick and-mortar retail outlets. The extensive promotion of BMS and CF products is concerning. This study documents different forms of promotions that include attractive prices, incentives to purchase products, free gifts, and companies seeking contact through an invitation to visit company website or social media pages. Baby food companies should redouble their efforts to encourage online and physical retailers to uphold their responsibilities under the Code, and that to the extent possible under antitrust laws, their contracts with these retailers deter point-of-sale promotions. The Mexican government could also take steps to ensure that all types of retailers are aware of their responsibilities under the Code and national legislation and institute measures to monitor and prosecute them.

- *Company contact with Mothers* – Observations in physical retailers documented that the packaging of several products—including IF, FOF and CF 6 to 36 month—include an invitation to make contact with the company through a website and/or Facebook page. This is a noncompliance as per the sub-items under Sub-article 5.5 of the Code and Recommendation 5 of WHA 69.9. Further observed examples of noncompliance with sub-article 5.5 were found during online media monitoring where promotional e-mails were received after digital subscriptions with a company. The regulatory authorities in Mexico could take steps to enforce and monitor compliance with the Code.
- *Parallel Imports* – A considerable number of BMS and CF products available in Mexico City are parallel imports (>10%). Manufacturers of such products should step up their efforts to ensure that their products are sold only in the markets for which they are intended. The government could also consider measures to prevent such imports and/or ensure that their labeling and marketing are compliant with local regulations.
- *Labeling* – One hundred and one (101) of the 120 labels assessed were noncompliant with the Code. Two types of products, IF and CF 6-36 months seem particularly impacted by noncompliance with label requirements. Noncompliance regarding appropriate description of the recommended method of preparation and hygienic practices, the necessity of preparing powdered formula one feed at the time, and that none of the CF 6-36 month products assessed states the importance of continued breastfeeding for up to two years are particularly concerning. Were all companies that make BMS and CF to adopt labeling policies that fully adhere to the Code and/or WHA 69.9 as appropriate, this issue would not arise wherever their products were sold. The government could consider reviewing the alignment of its labeling regulations with the Code and all subsequent WHA resolutions.
- Limitations of this study include:
 - Comparability with findings from other countries will be limited. In Mexico, no data was collected with Form 1—Questionnaire for Mothers, Form 2—Health Professional Assessment, and Form 3—Health Facility Listing of Promotional and Informational or Educational Materials due to the restrictions of the global SARS-CoV-2 pandemic. Consequently, compliance with Articles 6 (Health Care System) and 7 (Health Workers) was not measured. However, important matters related to Information and Education (sub-article 4.2) and the General Public and Mothers (sub-articles 5.1, 5.3 and 5.5) were fully assessed and described in this Report in detail. Moreover, a far-reaching Label

assessment (Article 9) was conducted for 120 products, 86 BMS and 34 CF 6-36 month products.

- The selection of retail outlets to observe point-of-sale promotions was purposive, not representative. The objective was to select 10 large retailers that were deemed likely to sell commercially produced food/drink products for children from birth to 36 months. Because of this design, the study results cannot be generalized to the universe of stores in Mexico City. Further, each store was visited on only one day. On the positive side, we can say, however, that the selection only included major chains of large retail outlets and that none of the retail outlets was alerted prior to the visits or informed of the study objective, so the observations recorded very likely reflect an average day at least during the pandemic.
- Although the inclusion of the online monitoring adds strength to the study, the selection of participant websites was purposive, not representative, and findings cannot be generalized to the universe of online media available to mothers and caregivers in Mexico City or indeed the country. Certainly, findings from this study resulted from a systematic data collection by a trained data collector, but the screenshots that were saved only reflect the content that was visible on specific dates at the time of the observations. In addition, the study likely underestimates the level of promotion via text messages and other social media beyond the assessed platforms. Not only is it difficult to assess but also the NetCode protocol did not specify how to conduct such an assessment. However, anecdotal evidence and other reports indicate that mobile marketing is becoming pervasive.
- Although we believe that the promotion of BMS products is likely to be the highest in Mexico City compared to other areas of the country, at this time we have no empirical evidence from other urban or rural areas of Mexico to confirm this belief. This study is a one-time cross-sectional survey that provides quantitative indicators for the point in time that it was conducted. These indicators describe the sample, however, findings from this assessment are in agreement with results from a rather similar study conducted in 2016 in two different Mexican cities.¹

¹ Hernández-Cordero, S.L., Lozada-Tequeanes, A.L., Shamah-Levy, T., Lutter, C., González de Cosío, T., Saturno-Hernández, P., Rivera Dommarco, J., and Grummer-Strawn, J. (2019). Violations of the international code of marketing of breast-milk substitutes in Mexico. *Maternal and Child Nutrition*, 15, e12682. Available at: <https://doi.org/10.1111/mcn.12682>

1. Background

A. Rationale for Conducting the Mexico Study

The Access to Nutrition Foundation (ATNF) is a not-for-profit organization, based in the Netherlands, established in 2013. It operates as the Access to Nutrition Initiative (ATNI) and develops and publishes Access to Nutrition Indexes, as well as other related private sector monitoring and accountability tools and research. The first Global Index, launched in 2013, scored and rated 25 of the world's largest food and beverage companies on commitments, performance, and disclosure on addressing obesity and undernutrition. ATNI published the second and third editions of the Global Index in January 2016 and in May 2018 respectively and rated 22 companies similarly. It is for the 2021 ATNI Index that this study is undertaken. More information is available at www.accesstonutrition.org. The objectives of the Indexes are to: (1) enable companies to benchmark their own performance against international standards and best practice and compare themselves to their peers; and (2) provide an objective source of information for all stakeholders to use to evaluate companies' responses to three of the most pressing global nutrition-related public health challenges—the growth of overweight and obesity, the persistence of undernutrition, and micronutrient deficiencies. A particularly important component of ATNI's work is contributing to better infant and young child nutrition by holding baby food companies to account for implementing the International Code of Marketing of Breast-milk Substitutes and subsequent relevant World Health Assembly (WHA) resolutions (together referred to as the Code), and relevant local regulation where it goes beyond the Code.

In 2015, ATNI and Westat first piloted studies in Vietnam and Indonesia, similar to the Mexico study, to assess the marketing of breast-milk substitutes (BMS). ATNI and Westat collaborated again on the third pilot study in India in 2016. ATNI used the results to inform the first 2016 India Index in the same way that the studies in Vietnam and Indonesia fed into the 2016 Global Index. Westat conducted the fourth study in the summer of 2017 in Thailand and the fifth study in Nigeria in the fall of 2017. The results from the Thailand and Nigeria studies informed the 2018 Global Index. The sixth study which was conducted in the Philippines in the first half of 2020, and the Mexico study being the seventh, will both inform the Global Index and ATNI's BMS/CF Marketing Index 2021.

In 2014, the World Health Organization (WHO) established a Global Network for Monitoring and Support for Adherence to the Code (referred to as NetCode). NetCode's objectives were to assist Member States and civil society to:

1. Strengthen their capacity to monitor the Code and all relevant subsequent WHA resolutions; and
2. Effectively enforce and monitor national Code legislation and regulations.

NetCode subsequently developed the Protocol for the Assessment and Monitoring of "The Code" and Relevant National Measures in 2015 to meet their objectives and provide practical tools and guidance for effective monitoring.² ATNI and Westat based the methodology of the Thailand and Nigeria studies on this original version of the NetCode protocol. In October 2017, NetCode released

² <http://www.who.int/nutrition/netcode/en/>

a Toolkit that includes “Monitoring the Marketing of Breast-milk Substitutes: Protocol for Periodic Assessment,” and “Monitoring the Marketing of Breast-milk Substitutes: Protocol for Ongoing Monitoring Systems.”³ While we based both the Philippines and Mexico studies on the updated 2017 NetCode protocol, the onset of the global SARS-CoV-2 pandemic in March 2020 disrupted the study plans. Given in-country restrictions on local travel and safety risks for data collectors, ATNI made the decision in August 2020 to conduct the study using a modified protocol. The following chapters provide specific details about when the study deviated from the NetCode protocol and previous studies.

ATNI chose Mexico City as the geographical location for this seventh study because the NetCode protocol recommends conducting the study in the capital or largest city of the country. Additionally, marketing of BMS and complementary food (CF) products is more common in the major cities.

The protocol design enables an assessment of whether those companies whose BMS products and/or CFs were for sale in the study area conform fully with the provisions of the Code, including subsequent relevant WHA resolutions, and national legal measures controlling the marketing and labeling of these products where it goes beyond the Code. However given the necessity of modifying the protocol, this study only measured specific provisions of the Code and related national measures where they go beyond the Code.

B. The Importance of Breastfeeding for Infant and Child Health

A review of epidemiological studies over the past three decades estimate that 832,000 child deaths could be prevented in low- and middle-income countries if breastfeeding increased.⁴ Moreover, WHO advocates that to achieve optimal growth, development, and health,

- All children should be breastfed exclusively for the first 6 months;
- Breastfeeding should continue until the age of 2 or beyond; and
- At 6 months old, and not before, introduce safe and appropriate CFs to infants’ diets to meet the child’s evolving nutritional requirements.

BMS and CF products are a major contributor to undernutrition and infant mortality and undermine optimal infant and young child nutrition, while breastfeeding confers a range of health and other benefits, as extensive evidence has demonstrated.⁵ Infants who breastfeed are at a lower risk of:

- Gastroenteritis;
- Respiratory infections;
- Sudden infant death syndrome;
- Obesity;
- Type 1 and 2 diabetes; and
- Allergies (e.g., asthma, lactose intolerance).⁶

³ <https://apps.who.int/iris/bitstream/handle/10665/259695/9789241513494-eng.pdf;jsessionid=CD76D1C5A340E756FDA347EF9362D55A?sequence=1>

⁴ The Lancet Breastfeeding Series Group. (2016). Breastfeeding in the 21st century: Epidemiology, mechanisms, and lifelong effect. *The Lancet*, 387, pp. 475-490.

⁵ https://www.who.int/maternal_child_adolescent/topics/child/nutrition/breastfeeding/en

⁶ *ibid*

Breastfeeding also reduces the need for antibiotics and other medicines.⁷

Several benefits to mothers include greater protection against breast and ovarian cancer, and Type 2 diabetes.⁸ Recent evidence has also demonstrated an association between prolonged breastfeeding and postmenopausal risk factors for cardiovascular disease.⁹ These illnesses all represent the greatest threats to women's health across all ages. Extensive breastfeeding, therefore, can also contribute to health service cost savings.

Nutrition and health specialists encourage as many women as possible to breastfeed. In the poorest countries particularly, breastfeeding can prevent hundreds of thousands of infant deaths and protect children throughout their lives. While a small number of women cannot breastfeed, and some infants with rare metabolic diseases cannot be breastfed, the vast majority of mothers can breastfeed their babies.

Compared to other countries, the breastfeeding rate in Mexico is one of the lowest worldwide.¹⁰ UNICEF reports that 30% of infants in Mexico were exclusively breastfed at 6 months. Fifty-one percent (51%) of the mothers initiated early breastfeeding within the first hour of birth and 24% continued to breastfeed to 2 years.¹¹

As infants grow older, their energy and nutrient requirements increase, making breastmilk insufficient to supply their increasing needs. As such, infants should be gradually introduced to complementary food starting at 6 months of age. Approximately 91% of 6 to 8-month-old children were introduced to complementary food in Mexico. Only about 71% of 6 to 23-month-old children met the Minimum Dietary Diversity, a measure of diet quality, with the proportion increasing as the age of the child increases. Fifty-five percent (55%) of breastfed and non-breastfed 6 to 23-month-old children were given complementary foods the minimum number of times per day.¹² These figures suggest that the majority of young children in Mexico suffer from poor complementary feeding practices, as shown by the poor diversity of diet and frequency of consumption.

C. The Code on Marketing of Breast-milk Substitutes and Related Local Regulations

The WHO first released the Code in 1981.¹³ From 1982 through 2016, WHA adopted 22 additional resolutions that expand on and clarify the Code. For compliance purposes, WHO considers the additional resolutions part of the Code.¹⁴

⁷ [ibid](#)

⁸ The Lancet Breastfeeding Series Group. (2016). Breastfeeding in the 21st century: epidemiology, mechanisms, and lifelong effect. *The Lancet*, 387, pp. 475-490.

⁹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2714700/>

¹⁰ https://www.unicef.org/nutrition/files/IYCF_Indicators_part_III_country_profiles.pdf

¹¹ https://www.unicef.org/nutrition/index_100585.html

¹² https://ensanut.insp.mx/encuestas/ensanut2018/doctos/informes/ensanut_2018_informe_final.pdf

¹³ https://www.who.int/nutrition/publications/code_english.pdf

¹⁴ <https://www.who.int/nutrition/netcode/resolutions/en/>

WHO developed the Code as a tool to protect and promote the practice of breastfeeding and to ensure the appropriate marketing of baby food products, bottles, and teats. The Code is a recommendation from the WHA calling on Governments to implement its provisions through appropriate national legislation or regulations. The Code directs many of the recommendations toward baby food companies that manufacture BMS and/or CF.

The Mexico BMS Legal Framework includes six separate legal documents described in detail in Chapter 3, Section A. The current legal framework relating to marketing addresses formulas for children aged ≤ 36 months, and includes some criteria on the labeling of complementary foods. Moreover, the provisions of the Code included in the national legislation do not include effective mechanisms for monitoring, reporting, and sanctioning noncompliance.¹⁵

D. Aspects Covered by the Code and This Study

As interpreted for this study in Mexico, we derived the definition of products included in the study from the original Code, subsequent WHA resolutions, and subsequent guidance issued by WHO in May 2016 (WHA 69.9).¹⁶ According to these documents, the Code applies to BMS products marketed as suitable for infants and young children for children up to 36 months of age, including:

- Infant formula (IF – for infants from birth to 6 months of age);
- Follow-on formula or follow-up formula (FOF – for infants from 6 months of age);
- Growing-up milk (GUM – for children from 12 months of age up to 36 months);
- Any other milk for children 0 to <36 months; and
- CFs marketed as suitable for infants less than 6 months of age.

CFs marketed as suitable for infants and young children 6 to 36 months of age are also included in this study because WHA 69.9 established specific provisions regarding the marketing of complementary foods. WHA 69.9 calls upon manufacturers and distributors of foods for infants and young children to end all forms of inappropriate promotions, as set forth in the associated guidance recommendations.

We used the youngest age in the range to determine the product type when the product recommended age range spanned more than one product type, (e.g., we classified a product listed from birth to 12 months as an IF). The Code also applies to the marketing of bottles, pacifiers, and teats, but this study did not include information for these products.

¹⁵ http://www.dof.gob.mx/nota_detalle.php?codigo=5432289&fecha=07/04/2016&print=true

¹⁶ http://apps.who.int/gb/ebwha/pdf_files/WHA69/A69_R9-en.pdf?ua=1. This report notes that WHA 69/7 was an addendum to the Report by the Secretariat on the maternal, infant, and young child nutrition and provided “Guidance on ending the inappropriate promotion of foods for infants and young children” on May 13, 2016. The WHA accepted that guidance and adopted Resolution WHA 69.9 on May 28, 2016, on “Ending inappropriate promotion of foods for infants and young children.”

The Code sets out its recommendations on marketing of these products in the following articles:

- Article 1. Aim of the Code;
- Article 2. Scope of the Code;
- Article 3. Definitions;
- Article 4. Information and education;
- Article 5. The general public and mothers;
- Article 6. Health care systems;
- Article 7. Health workers;
- Article 8. Persons employed by manufacturers and distributors;
- Article 9. Labeling;
- Article 10. Quality; and
- Article 11. Implementation and monitoring.

This study focused on assessing compliance with those elements of Articles 4-9 covered by the 2017 NetCode protocol, described in Chapter 2, Section B, with the specific recommendations to be addressed, also taking into account all relevant WHA resolutions. Articles 1-3 of the Code provide the context for the study but are not monitored per se. Article 10 requires special inspection of manufacturing processes, which is not covered by the NetCode protocol and, therefore, not within the scope of this study. Similarly, Article 11 primarily targets governmental responsibilities which the NetCode protocol did not address, and is also therefore not within the scope of this study. Our approach also took into consideration the Mexico national legislation. ATNI hired a legal consultant to undertake the comparison of the local laws, regulations, and rules with the Code and all subsequent relevant resolutions. Chapter 3 provides a summary of the legal analysis in Section A and describes the methodology to adapt the forms in Section B.

E. Process of Selecting Westat

ATNI initiated a competitive bid process in March 2015 to conduct pilot studies in two preselected countries, Vietnam and Indonesia, and awarded the contract to Westat. Westat conducted the two studies following the Interagency Group on Breastfeeding Monitoring (IGBM) Protocol.¹⁷ Because of that successful collaboration, ATNI asked Westat to conduct the subsequent pilot study in India in 2016, the studies in Thailand and Nigeria in 2017, as well as the study in the Philippines and the current study in Mexico in 2020.

F. Westat Description

Westat is an employee-owned health and social sciences research organization based in Rockville, Maryland. Established in 1963, it now has more than 1,700 full-time staff members. Westat is one of the leading survey implementation organizations in the United States, and the company has extended its expertise to the design and conduct of surveys in developing countries. Westat's professional staff includes senior statisticians with international reputations in survey sample design and statistical analysis; senior scientists in fields such as nutrition, epidemiology, and health; international survey experts; and global health evaluators.

¹⁷ https://www.who.int/nutrition/netcode/protocol_summary.pdf?ua=1

Westat has not carried out studies for the infant food industry (manufacturers or business associations), nor does it have any such companies or bodies on its roster of clients. Westat has no conflict of interest in conducting and reporting on this study.

Westat has supported many national surveys for the U.S. Federal Government. Relevant examples include the National Health and Nutrition Examination Survey (NHANES), the leading source of national statistics on health conditions and nutritional status of the U.S. population. Westat has conducted this survey for the National Center for Health Statistics (NCHS) for more than 30 years. The U.S. Department of Agriculture (USDA) Food and Nutrition Service's Infant and Toddler Feeding Practices Study examines breastfeeding practices in a low-income population (the Special Supplemental Nutrition Program for Women, Infants, and Children [WIC] nutrition-assistance program) and is another relevant example of Westat's nutrition survey research experience.

Westat has supported health and social science research in developing countries since 1982. Westat has worked in more than 50 countries, including several in Latin America. For these global studies, Westat has established strong management controls to ensure the quality and timeliness of in country work. Westat has also developed substantial experience in identifying qualified local partner organizations to collaborate with that can perform the fieldwork.

G. In-Country Partner Description

Westat selected the in-country data collection partner for this study in response to a Request for Proposals (RFP) entitled *Mexico Assessment of Marketing of Breast-milk Substitutes*. Westat selected the Health Department, Universidad Iberoamericana, CDMX (IBERO) in collaboration with the Instituto Nacional de Salud Pública (INSP).

IBERO is one of Mexico's top private educational institutions, widely known both in Mexico and abroad for the high quality of its study programs. The mission of the IBERO Health Department is to contribute knowledge and evidence, and the training of professionals and researchers in the area of nutrition, aimed at achieving a more fair, inclusive, productive and peaceful society. One of its main goals is to generate and disseminate knowledge relevant to pressing malnutrition problems of the Mexican population. INSP has six research centers and houses the National School of Public Health. INSP is a national and international reference for rigorous evaluation of health and development programs.

The IBERO/INSP researchers have extensive experience in maternal and child health. They have conducted similar household surveys on breastfeeding and other infant and young child feeding practices. The researchers at these institutions have led research funded by the Mexico Ministry of Health, UNICEF, the Pan American Health Organization, and the WHO.

IBERO/INSP contracted with Eficiencia Informativa (EFINFO), an independent media monitoring company in Mexico City that has the capability to monitor all media platforms. For this study, EFINFO monitored traditional media platforms (television, radio, and print).

Prior to selecting IBERO/INSP as an in-country data collection partner, Westat verified that they had no commercial links to the baby food companies assessed. IBERO/INSP also confirmed that the staff of the professional media monitoring service, EFINFO, had no personal links to representatives of baby food companies.

H. Support from the Mexico Government Bodies and Local Associations

The Research Ethics Committee of Universidad Iberoamericana reviewed and approved the study proposal. Additionally, the team received the corresponding approval and authorizations from the Secretary of Health as well as from local authorities from each of the HFs and MCs, when first submitted in October 2020. (However, as noted on page 1-2, the scope of the study was later modified to exclude visits to HFs and MCs, due to the global SARS-CoV-2 pandemic, and therefore, these permissions were not utilized.)

Westat and IBERO/INSP submitted the study objectives, the methodology, data collection forms, and study requirements to their respective ethical review boards. Both Westat and IBERO/INSP secured approval from their respective review boards to conduct the survey as required for surveys addressing health issues in Mexico.

I. Project Management

The Westat management team consisted of a Project Director and a Senior Epidemiologist, who have significant experience working and establishing international collaborations. Other experienced members of Westat's team included a Task Manager, to oversee the media monitoring and label analysis; and a Survey Statistician, to consult on survey sample design and sampling. A Project Assistant worked closely with the senior managers.

The IBERO/INSP team investigators provided in-country insights and oversight to institutional relationships and resources. INSP provided a Coordinator who had responsibility for oversight of the data collection team deployed in the selected sample areas within Mexico City. IBERO provided a Project Manager who led the efforts to obtain ethical approval and coordinate online media monitoring.

Westat allocated responsibilities for the survey work to maximize in-country knowledge and resources, while using Westat's expertise for management, development, quality control (QC), and data analysis. Westat personnel, in collaboration with ATNI, finalized the survey instruments; selected the sample; reviewed and approved the training agenda; programmed and tested the tablets for data collection; cleaned and analyzed data; and prepared the final report. ATNI translated the data collection forms into the Spanish language with input from IBERO/INSP. The local team coordinated the training logistics for the data collection that remained in the study, for the Coordinator and data collectors, collected and completed all data entry, and performed field QC. IBERO/INSP was also responsible for all media monitoring, including traditional and online, and label assessment. Westat and IBERO/INSP held weekly calls during development and data collection, Westat consulted them as needed during analysis and drafting the report.

ATNI provided project management support to Westat via status updates and guidance during various stages of the Mexico study. During all phases of the process, ATNI participated in weekly calls with Westat. Appendix A provides an overview of the study timeline.

2. Research Objectives

A. Primary Objective

The primary objective of this study was to monitor compliance with the provisions of the Code (including all subsequent relevant World Health Assembly resolutions) and national legislation and regulations where they go beyond the Code, by all manufacturers selling Breast-milk Substitute (BMS) and/or Complementary Food (CF) products (as defined for this study) in Mexico City, Mexico. However as noted previously, because of the global SARS-CoV-2 pandemic, this study did not assess companies' compliance with all aspects of the Code. Westat achieved the more limited objective by measuring the type and scale of apparent noncompliance with provisions that could be monitored through observation, and attributing them to individual baby food companies. A listing of all baby food companies that were identified as selling BMS and/or CF products in Mexico City, as well as the products found by the study team, is included as Appendix B.

B. Study Tool

The Network for Monitoring and Support for Adherence to the Code (NetCode) developed the survey design and protocol titled "Monitoring the Marketing of Breast-milk Substitutes: Protocol for Periodic Assessments."¹⁸ NetCode began developing the protocol in 2015 and released an updated version in 2017. Its ownership rests with the World Health Organization (WHO) and we used it with permission.¹⁹ Westat measured compliance with the provisions of the Code (including all subsequent relevant WHA resolutions), and national measures that go beyond the Code using this protocol. As noted on their website, *"WHO, in consultation with UNICEF, has created NetCode, the Network for Global Monitoring and Support for Implementation of the International Code of Marketing of Breast-milk Substitutes and Subsequent relevant World Health Assembly Resolutions. NetCode is a partnership with UN system organizations, WHO Collaborating Centers, NGOs, and selected Member States dedicated to protecting all sectors of society from the inappropriate and unethical marketing of breast-milk substitutes and other products covered by the scope of the International Code and relevant WHA resolutions."*²⁰

The 2017 version of the NetCode protocol includes WHA resolution 69.9 recommendations. This is a notable inclusion since the 2017 studies in Thailand and Nigeria.

ATNI selected and adapted the 2017 NetCode protocol following recommendations in consultation with expert stakeholders. The NetCode protocol and associated data collection forms were adapted to the Mexico context and took into consideration the national legislation where appropriate and language, as described in Chapter 3, Sections A and B. We also made some sampling changes noted in Chapter 3, Section D.

¹⁸ <https://apps.who.int/iris/bitstream/handle/10665/259695/9789241513494-eng.pdf;jsessionid=CD76D1C5A340E756FDA347EF9362D55A?sequence=1>

¹⁹ Permission to base the survey on the NetCode protocol does not imply any endorsement of the resulting report by WHO.

²⁰ <https://www.who.int/nutrition/netcode/members/en/>

The NetCode approach to monitoring compliance uses a scientific research methodology with specified sampling. NetCode based the protocol on sound research techniques. The protocol is particularly appropriate for establishing a baseline indication of levels of noncompliance with the Code and/or local regulations if the latter exceed the provisions of the Code. Future research can compare findings using this same/similar protocol to the baseline, as a means of assessing the success of implementation of the Code and/or local regulations. Governments can also use the findings to augment their monitoring activities, and potentially to strengthen, if necessary, regulations and enforcement.

Due to the global SARS-CoV-2 pandemic and national restrictions, the Mexico study did not include interviews with mothers of young children up to 24 months, interviews with health professionals, observations at HFs and MCs, or observations at 33 small retailers to assess the compliance with specific Articles of the Code as the NetCode protocol recommends.

C. The Code Articles and WHA Resolutions Addressed in the Mexico Study

Using the sample design and the data collection forms in the 2017 NetCode protocol, adapted to the Spanish language, we were able to assess indicators of noncompliance for selected requirements of the Code. (Chapter 3 describes how the study addressed national legislation.)

We used the specific guidance from the Code and subsequent WHA provisions to inform any adaptations to the NetCode forms.

Article 4. Information and Education (partially assessed)

4.2. Informational and educational materials, whether written, audio, or visual, dealing with the feeding of infants, and intended to reach pregnant women and mothers of infants and young children should include clear information on all the following points:

- The benefits and superiority of breast-feeding;
- Maternal nutrition, and the preparation for and maintenance of breast-feeding;
- The negative effect on breast-feeding of introducing partial bottle-feeding;
- The difficulty of reversing the decision not to breast-feed; and
- Where needed, the proper use of infant formula, whether manufactured industrially or home-prepared.

When such materials contain information about the use of infant formula, they should include:

- The social and financial implications of its use;
- The health hazards of inappropriate foods or feeding methods; and
- Such materials should not use any pictures or text which may idealize the use of breast-milk substitutes.

4.3. Donation of informational or education equipment or materials by manufactures or distributors should be made only at the request and with the written approval of the appropriate government authority or within guidelines given by the government for this purpose. Such equipment or materials may bear the donating company's name or logo, but should not refer to a proprietary product that is within the scope of this Code and should be distributed only through the health care system.

WHA 69.9 (not assessed)

Recommendation 6. Companies that market foods for infants and young children should not create conflicts of interest in health facilities or throughout health systems. Health workers, health systems, health professional associations and nongovernmental organizations should likewise avoid such conflicts of interest. Such companies, or their representatives, should not:

- Donate or distribute equipment or services to health facilities.

Article 5. The General Public and Mothers (partially assessed)

5.1. There should be no advertising or other form of promotion to the general public of products within the scope of this Code.

Augmented for CF 6-36 months by:

WHA 69.9

Recommendation 4. The messages used to promote foods for infants and young children should support optimal feeding and inappropriate messages should not be included. Messages about commercial products are conveyed in multiple forms, through advertisements, promotion and sponsorship, including brochures, online information and package labels. Irrespective of the form, messages should always:

- include a statement on the importance of continued breastfeeding for up to two years or beyond and the importance of not introducing complementary feeding before 6 months of age;
- include the appropriate age of introduction of the food (this must not be less than 6 months); and
- be easily understood by parents and other caregivers, with all required label information being visible and legible.

Messages should not:

- include any image, text or other representation that might suggest use for infants under the age of 6 months (including references to milestones and stages);
- include any image, text or other representation that is likely to undermine or discourage breastfeeding, that makes a comparison to breast-milk, or that suggests that the product is nearly equivalent or superior to breast-milk;
- recommend or promote bottle-feeding; and

- convey an endorsement or anything that may be construed as an endorsement by a professional or other body, unless this has been specifically approved by relevant national, regional or international regulatory authorities.

5.2. Manufacturers and distributors should not provide, directly or indirectly, to pregnant women, mothers or members of their families, samples of products within the scope of this Code.

5.3. In conformity with paragraphs 1 and 2 of this Article, for products within the scope of this Code, there should be no point-of-sale advertising, giving of samples, or any other promotion device to induce sales directly to the consumer at the retail level, such as:

- Special displays;
- Discount coupons;
- Premiums;
- Special sales;
- Loss-leaders; and
- Tie-in sales.

5.4. (assessed for online retail stores) Manufacturers and distributors should not distribute to pregnant women or mothers of infants and young children any gifts of articles or utensils which may promote the use of breast-milk substitutes or bottle-feeding.

Superseded by:

WHA 69.9 (not assessed)

Recommendation 6. Such companies (that market foods for infants and young children), or their representatives, should not:

- Give any gifts or coupons to parents, caregivers and families.

5.5. Marketing personnel, in their business capacity, should not seek direct or indirect contact of any kind with pregnant women or with mothers of infants and young children.

Article 6. Health Care Systems (not assessed)

6.2. No facility of a health care system should be used for the purpose of promoting infant formula or other products within the scope of this Code. This Code does not, however, preclude the dissemination of information to health professionals as provided in Article 7.2.

6.3. Facilities of health care systems should not be used for:

- The display of products within the scope of this Code;
- For placards or posters concerning such products; or

For the distribution of material provided by a manufacturer or distributor other than that specific to Article 4.3.

6.8. Equipment and materials, in addition to those referred to in Article 4.3, donated to a health care system may bear a company's name or logo, but should not refer to any proprietary product within the scope of this Code.

Superseded by:

WHA 69.9 (not assessed)

Recommendation 6. Such companies (that market foods for infants and young children), or their representatives, should not:

- Donate or distribute equipment or services to health facilities.

Article 7. Health Workers (not assessed)

7.2. Information provided by manufacturers and distributors to health professionals regarding products within the scope of this Code should be restricted to scientific and factual matters, and such information should not imply or create a belief that bottle-feeding is equivalent or superior to breast-feeding. It should also include the information specified in Article 4.2.

7.3. No financial or material inducements to promote products within the scope of this Code should be offered by manufacturers or distributors to health workers or members of their families, nor should these be accepted by health workers or members of their families.

7.4. Samples of infant formula or other products within the scope of this Code, or of equipment or utensils for their preparation or use should not be provided to health workers except when necessary for the purpose of professional evaluation or research at the institutional level. Health workers should not give samples of infant formula to pregnant women, mothers of infants and young children, or members of their families.

WHA 69.9 (not assessed)

Recommendation 6. Companies that market foods for infants and young children should not create conflicts of interest in health facilities or throughout health systems. Health workers, health systems, health professional associations and nongovernmental organizations should likewise avoid such conflicts of interest. Such companies, or their representatives, should not:

- Provide free products, samples or reduced-price foods for infants or young children to families through health workers or health facilities, except:
 - As supplies distributed through officially sanctioned health programmes. Products distributed in such programmes should not display company brands;
- Donate or distribute equipment or services to health facilities;
- Give gifts or incentives to health care staff;
- Use health facilities to host events, contests or campaigns;
- Give any gifts or coupons to parents, caregivers and families;

- Directly or indirectly provide education to parents and other caregivers on infant and young child feeding in health facilities;
- Provide any information for health workers other than that which is scientific and factual; and
- Sponsor meetings or health professionals and scientific meetings.

Likewise, health workers, health systems, health professional associations and nongovernmental organizations should not:

- Accept free products, samples or reduced-price foods for infants or young children from companies, except
 - As supplies distributed through officially sanctioned health programmes. Products distributed in such programmes should not display company brands;
- Accept equipment or services from companies that market foods for infants and young children;
- Accept gifts or incentives from such companies;
- Allow companies that market foods for infants and young children to distribute any gifts or coupons to parents, caregivers and families through health facilities;
- Allow such companies to directly or indirectly provide education in health facilities to parents and other caregivers; and
- Allow such companies to sponsor meetings of health professionals and scientific meetings.

Article 9. Labeling (assessed)

9.2. Manufacturers and distributors of infant formula should ensure that each container has a clear, conspicuous, and easily readable and understandable message printed on it, or on a label which cannot readily become separated from it, in an appropriate language, which includes all the following points:

- The words “Important Notice” or their equivalent;
- Statement of the superiority of breast-feeding;
- A statement that the product should be used only on the advice of a health worker as to the need for its use and the proper method of use;
- Instructions for appropriate preparation, and a warning against the health hazards of inappropriate preparation;
- Neither the container nor the label should have pictures of infants, nor should they have other pictures or text which may idealize the use of infant formula. They may, however, have

graphics for easy identification of the product as a breast-milk substitute and for illustrating methods of preparation;

- The terms “humanized,” “materialized” or similar terms should not be used;
- Inserts giving additional information about the product and its proper use, subject to the above conditions, may be included in the package or retail unit. See “type of material” code; and
- When labels give instructions for modifying a product into infant formula, the above should apply.

9.3. Food products within the scope of this Code, marketed for infant feeding, which do not meet all the requirements of an infant formula, but which can be modified to do so, should carry on the label a warning that the unmodified product should not be the sole source of nourishment of an infant.

9.4. The label of food products within the scope of this Code should also state all the following points:

- The ingredients used;
- The composition/analysis of the product;
- The storage conditions required;
- The batch number; and
- The date before which the product is to be consumed, taking into account the climatic and storage conditions of the country concerned.

Augmented by:

WHA Resolution 58.32 (assessed)

1.(2) to ensure that nutrition and health claims are not permitted for breast-milk substitutes, except where specifically provided for in national legislation;

1.(3) To ensure that clinicians and other health-care personnel, community health workers and families, parents and other caregivers, particularly of infants at high risk, are provided with enough information and training by health-care providers, in a timely manner on the preparation, use and handling of powdered infant formula in order to minimize health hazards; are informed that powdered infant formula may contain pathogenic microorganisms and must be prepared and used appropriately; and where applicable, that this information is conveyed through an explicit warning on packaging.²¹

²¹ http://www.who.int/nutrition/topics/WHA58.32_itycn_en.pdf

WHA 61.20 (assessed)

1. (3) Calls for implementation of the WHO/FAO guidelines on safe preparation, storage and handling of powdered infant formula. All formula in powdered form must include the following information:

- the label shows clear graphic instructions illustrating the method of preparation;
- instructions show the use of hygienic practices, e.g., clean hands, preparation surfaces;
- instructions show the need to boil water and sterilize utensils;
- instructions show necessity for powdered formula to be prepared one feed at a time;
- instructions show necessity of using water at or above 70°C in order to minimize microorganisms contamination during preparation; and
- instructions show the need to cool the formula before feeding if using hot water for reconstitution; instructions show that left-overs of the product need to be discarded immediately.

WHA 69.9 (assessed)

Recommendation 4. The messages used to promote foods for infants and young children should support optimal feeding and inappropriate messages should not be included. Messages about commercial products are conveyed in multiple forms, through advertisements, promotion and sponsorship, including brochures, online information and package labels. Irrespective of the form, messages should always:

- include a statement on the importance of continued breastfeeding for up to two years or beyond and the importance of not introducing complementary feeding before 6 months of age;
- include the appropriate age of introduction of the food (this must not be less than 6 months); and
- be easily understood by parents and other caregivers, with all required label information being visible and legible.

Messages should not:

- include any image, text or other representation that might suggest use for infants under the age of 6 months (including references to milestones and stages);
- include any image, text or other representation that is likely to undermine or discourage breastfeeding, that makes a comparison to breast-milk, or that suggests that the product is nearly equivalent or superior to breast-milk;
- recommend or promote bottle-feeding; and

- convey an endorsement or anything that may be construed as an endorsement by a professional or other body, unless this has been specifically approved by relevant national, regional or international regulatory authorities.

ATNI and Westat developed specifications of noncompliance by Code article and WHA resolution. We used these specifications to identify potential measures of noncompliance on the data collected on the study's data collection forms.²²

²² Westat will provide a copy of the specifications for noncompliance upon request.

3. Methodology: NetCode Protocol

Westat followed the 2017 Network for Monitoring and Support for Adherence to the Code (NetCode) protocol closely to conduct this study, adapted in a few minor ways as necessary in line with the context of Mexico and the global SARS-CoV-2 pandemic. The adaptations are described in the following sections.

A. Comparison of the Code to Prevailing National Legislation

ATNI and Westat identified all relevant legislation and regulations relating to marketing and labeling products assessed by this study. ATNI hired a legal consultant to undertake the comparison of the local laws, regulations, and rules with the Code and all subsequent relevant resolutions and provided the following summary of that analysis to Westat.

According to the 2020 World Health Organization, United Nations International Children's Emergency Fund (UNICEF), and International Baby Food Action Network (IBFAN) Status Report on National Implementation of the International Code, the Mexico's Code law is classified as "moderately aligned with the Code" (score of 50 - <75). This designation is conferred when countries have enacted legislation or adopted regulations, decrees or other legally binding measures encompassing a majority of provisions of the International Code of Marketing of Breast-milk Substitutes (the Code).²³ Mexico was awarded a score of 60 out of 100 possible total points for the strength of their Code law, which is generally considered good within the healthcare system and much weaker at retail points of sale.

Specifically, products covered by Mexico's BMS Legal Framework are as follows:

- Infant formula (IF): <6 months
- Follow-on formula (FOF): 6-36 months
- Formulas for Special Medical Purposes (FSMP): <6 months
 - Includes breastmilk fortifiers that can be added to breastmilk to provide additional nutrients to low-birth-weight and pre-term infants
- Formulas for Special Medical Purposes (FSMP): 6-36 months

Mexico's Code law

is comprised of numerous documents.

Mexico's BMS Legal Framework is spread out among multiple legal instruments, making it difficult to interpret and complex to implement. In fact, it is necessary to review six separate legal documents (enumerated in the following section) to have a full understanding of the extent and scope of the country's Code law.

²³ WHO, UNICEF, and IBFAN. (Eds.). (2020). *Marketing of breast-milk substitutes: National implementation of the international code, status report 2020*. Geneva: World Health Organization.

BMS Legal and Policy Framework: Key Documents

1. **General Health Law** (issued in 1984, amended 2009);
 - Mandates health worker training on breastfeeding promotion, including encouraging exclusive breastfeeding for six months and continued breastfeeding until the second year of life and, where appropriate, provides for direct food aid aimed at improving maternal-child nutrition.
2. **Official Mexican Standard on care for women during pregnancy, childbirth and postpartum and of the newborn** (issued in 1995, amended 2016);
 - Section 5.8 covers the protection and promotion of exclusive breastfeeding.
3. **Regulations for the Sanitary Control of Products and Services** (issued in 1999, amended 2016);
 - Established food safety and preparation requirements for infant formulas, packaged foods and cereal-based foods for infants and young children.
4. **Regulations of the General Health Law on Advertising Matters** (issued in 2000, amended 2014);
 - Established rules relating to the promotion and advertising of infant formula.
5. **Official Mexican Standard on Infant formula, follow-on-formula and formula for special medical purposes. Foods and non-alcoholic beverages for infants and young children. Provisions and sanitary and nutritional specifications. Labeling and Test Methods** (2012); and
 - Established specifications for information disclosure and labeling of IF, FOF, FSMP and foods and non-alcoholic beverages for infants and young children.
6. **General Health Council Agreement Issuing Provisions for Strengthening Public Policy on Breastfeeding in Relation to Breast-milk Substitutes** (2013).
 - Agreement that governs the regulation of the BMS industry and its representatives within the health system in Mexico.

Areas where Mexico's law goes beyond the standard required by the Code and relevant WHA resolutions:

Labeling

- **Art. 140 (II) of the Regulations for the Sanitary Control of Products and Services** requires that in the case of non-dairy formula, when the product does not contain milk or any of its derivatives, the label must expressly indicate: "Does not contain milk", "Does not contain dairy derivatives", or an equivalent legend." (APPLIES TO IF and FOF)
- **Art. 140 (I) of the Regulations for the Sanitary Control of Products and Services** goes beyond the minimum standards required by the Code and establishes requirements different from those contained in the Codex Standard on Infant Formula when it states: "For the purposes of this Regulation, the following are included within infant formulas: (I) milk formula, when at least 90% of the proteins come from milk or whey and (II) non-dairy formula, when the product does not contain milk or any of its derivatives."

- **Art. 10.3.10.1 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** specifies that the label must include written and graphic instructions on how to prepare and use the product in such a way that it does not undermine breastfeeding. [Note: In the case of liquid formulas: the graphic instructions may be included in the collective packaging only] (APPLIES TO IF and FSMPs 0-6 MOS).
- **Art. 10.3. and 10.4 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** specifies that the label must contain “Instructions indicating that the product should not be heated using a microwave oven in order to avoid the risk of causing serious burns”. (APPLIES TO IF, FOF, GUM, CF 0-6, and FSMPs).
- **Art. 10.3.10.1 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** says that product labels must include written and graphic instructions on the preservation of the product, before and after opening the container and once the product is prepared, and a statement indicating that prolonged storage and excessive temperatures should be avoided. [Note: In the case of liquid formulas: the graphic instructions may be included in the collective packaging only] (APPLIES TO IF and FSMPs 0-6 MOS).
- **Art. 10.3.15 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that the product label contain a statement that, “in addition to the consumption of this product, infants should also be fed weaning foods from an age that is appropriate for their specific growth and development needs according to the guidance of the health professional (doctor or nutritionist), and in any case from six months onward” (APPLIES ONLY TO IF and FSMPs 0-6 MOS).
- **Art. 10.3.16 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that the product label contain a statement that the product is part of the weaning process and should not be given to infants under 6 months (APPLIES ONLY TO FOF, GUM, and FSMP 6-36 MOS).
- **Art. 10.3.18 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for FSMPs contain a prominent statement in bold that says “USE UNDER MEDICAL SUPERVISION”, separate from any other written, printed or graphical information (APPLIES ONLY TO FSMP 0-6 and FSMP 6-36 MOS).
- **Art. 10.3.5 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for FSMPs indicate in suitable descriptive terms as part of the name, the essential characteristic of the product, but not the disorder, disease or specific medical condition for which they are intended (APPLIES ONLY TO FSMP 0-6 and FSMP 6-36 MOS).
- **Art. 10.4.4 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for CF include instructions for its preparation and use, as well as for its storage and preservation before and after the container has been opened (ADDITIONAL CRITERIA FOR COMPLEMENTARY FOODS 6-36 MOS).

- **Art. 10.4.5 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for CF include a statement that the decision on the precise time when to start weaning, including any exceptions to the six-month age limit, should be made in consultation with a healthcare professional (doctor or nutritionist), based on the specific growth and development needs of the infant (ADDITIONAL CRITERIA FOR COMPLEMENTARY FOODS 6-36 MOS).
- **Arts. 10.4.8 & 10.4.9 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** require that product labels for cereals that must be prepared by adding milk or other suitable nutritious liquids, the label/insert contains the following (ADDITIONAL CRITERIA FOR COMPLEMENTARY FOODS 6-36 MOS):
 - A statement saying “Use milk or formula but not water”, or an equivalent indication and
 - A statement that the added ingredients (milk or other suitable nutritious liquids) must be recommended by a health professional (doctor or nutritionist).

Areas Where Mexico’s Law Falls Below the Standard Required by the Code and Relevant WHA Resolutions:

Scope

- Mexico’s BMS Legal Framework does not cover complementary foods or bottles and teats.

Required information for infant formula

- Mexico’s BMS Legal Framework does not require a warning that powdered formula may contain pathogens.

Required information for follow-up formula

- Mexico’s BMS Legal Framework does not require that the importance of continued breastfeeding for 2+ years is stated on product labels
- Mexico’s BMS Legal Framework does not require that the Importance of no complementary foods <6 months is stated on product labels.

Required content for follow-up formula

- Mexico’s BMS Legal Framework permits image/text suggesting use at <6 months on product labels.
- Mexico’s BMS Legal Framework permits professional endorsements on product labels.
- Mexico’s BMS Legal Framework permits messages that recommend or promote bottle feeding.

Gifts and incentives

- Mexico's BMS Legal Framework permits certain gifts and incentives from milk companies, including:
 - Fellowships, study tours, research grants, attendance at professional conferences;
 - Provision of free or low-cost supplies in the health care system in certain circumstances;
 - Donations of equipment or services;
 - Sponsorship of meetings of health professionals or scientific meetings; and
 - Product samples for health professionals.

Advertising and promotion

- Mexico's BMS Legal Framework permits advertising and promotion of BMS when the following criteria for advertising are met:
 - It encourages breastfeeding and clearly indicates its benefits and
 - Expressly indicates that infant formula is recommended only in the following cases due to:
 1. A child's intolerance of breastmilk;
 2. The absence of the mother; and
 3. The mother's inability to give milk or for any other well-founded health reason.
- Furthermore, any advertising of BMS must include information on the correct handling of formulas, their preparation and the specific care to which bottles must be subjected before offering them to infants²⁴ (this is not aligned with Article 5.1 of the Code).

B. Adaptations of Forms

As the Mexico legislation exceeded the Code regarding aspects of labeling, there were specific adaptations or changes to Form 7—Desk Review of Labels related to the legislation. A country-specific question (Q.37) was added to Form 4—Desk Review of Promotional and Informational or Educational Materials Collected at Health Facilities or Retailers to take into consideration the additional criteria for materials found in the selected retailers only, regarding IF. The new question explored whether any material found regarding IF conveyed any of the following messages:

- Encourages breastfeeding, and indicates its benefits;
- Clearly indicates that the use of IF is specifically recommended only where the child is intolerant to breastmilk;

²⁴ Article 25, *Regulations of the General Health Law on Advertising Matters*

- Clearly indicates that the use of IF is specifically recommended only when the mother is absent;
- Clearly indicates that the use of IF is specifically recommended only when the mother is unable to give milk, or for any other established health reason; and
- Includes information on the correct handling of the formulas, their preparation and the specific preparation of bottles before being offered to infants.

Westat amended the NetCode data collection forms to enable data on all types of BMS and CF noted previously in Chapter 2 to collect and differentiate all companies selling products in Mexico City.

Since Spanish is the official languages in Mexico City, ATNI translated the following study forms to the Spanish language:

- Form 4 – Desk Review of Promotional and Informational or Educational Materials Collected at Health Facilities or Retailers (not used)
- Form 6 – Promotions at Retail Outlets and Pharmacies
- Form 7 – Desk Review of Product Labels
- Form 8 – Desk Review of Promotions on the Media

The IBERO/INSP project team compared the translation with the original study forms for consistency. Inconsistencies were resolved within the project team, and the final translated forms were transmitted to Westat.

General study definitions and definitions specific to each form are included in Appendix C. The final version of the data collection forms are available from Westat upon request.

C. Data Collected

To capture information in assessing possible noncompliance with the Code, it was necessary to:

- Evaluate any marketing and promotions observed within selected retail stores and on online retailers' websites;
- Evaluate product labels and inserts of available and relevant BMS and CF products; and
- Monitor selected media, including traditional and digital.

Due to the restrictions of the global SARS-CoV-2 pandemic, the Mexico data collection teams were unable to:

- Interview mothers;
- Interview health professionals (HPs);

- Evaluate promotional, and informational and educational materials and equipment found in those health facilities (HFs) visited for interviews; and
- Evaluate any marketing and promotions with small retail stores proximate to the HFs.

The 2017 NetCode protocol contains six data collection forms, each designed to capture objective information from each of the unique sources and relevant to specific Articles of the Code. Those forms that were used for this study were as follow:

Form 6. Designed to assess the extent of promotions related to relevant products observed in selected small and large retail outlets, and to assess the nature and number of the promotions.

Form 7. Designed to assess the compliance of product labels and inserts with the Code and national laws related to relevant products.²⁵

Form 8. Designed to assess information on the selected media, including online and traditional, and online retailers.

All information collected from the large and online retail shops, labels and on all media related to the period of the study, reflecting the products and information available at the time of data collection.

D. Sampling of Districts in Mexico City

The Westat statistician used a two-stage sample design for this study. The statistician selected 10 of the 16 total subdivisions that comprise Mexico City, referred to as primary sampling units (PSUs), in the first stage, using probability proportional to size systematic sampling. Within the sampled subdivisions, initially selected based on the number of HFs, the study randomly selected ten large retailers (five supermarkets and five pharmacies), one within each sampled subdivision.

Selection of Districts

The initial work consisted of an evaluation of the subdivisions as the PSUs. Figure 3-1 shows the sixteen subdivisions (*alcaldías*) that comprise Mexico City. The shaded areas denote the ten participant subdivisions. Ibero/INSP provided the number of HFs within each subdivision and the source of population data was the most recent census available (2015).²⁶ (Appendix D).

Although the study in Mexico could not include the component of data collection in HFs due to restrictions related to the global SARS-CoV-2 pandemic, we retained the initial subdivisions selected systematically with probability proportional to the number of females aged 15-49 to execute the component requiring direct observation in ten large retailers. Table 3-1 lists the participant subdivisions within Mexico City.

²⁵ Note: Form 5 is used to compile the list of products to be bought, analysed, and managed. Westat adapted an Excel spreadsheet based on information included in the form.

²⁶ Instituto Nacional de Estadística y Geografía (INEGI). (2015). *Encuesta intercensal*. Available at: <http://www.inegi.org.mx>.

Figure 3-1. Mexico City and participant subdivisions

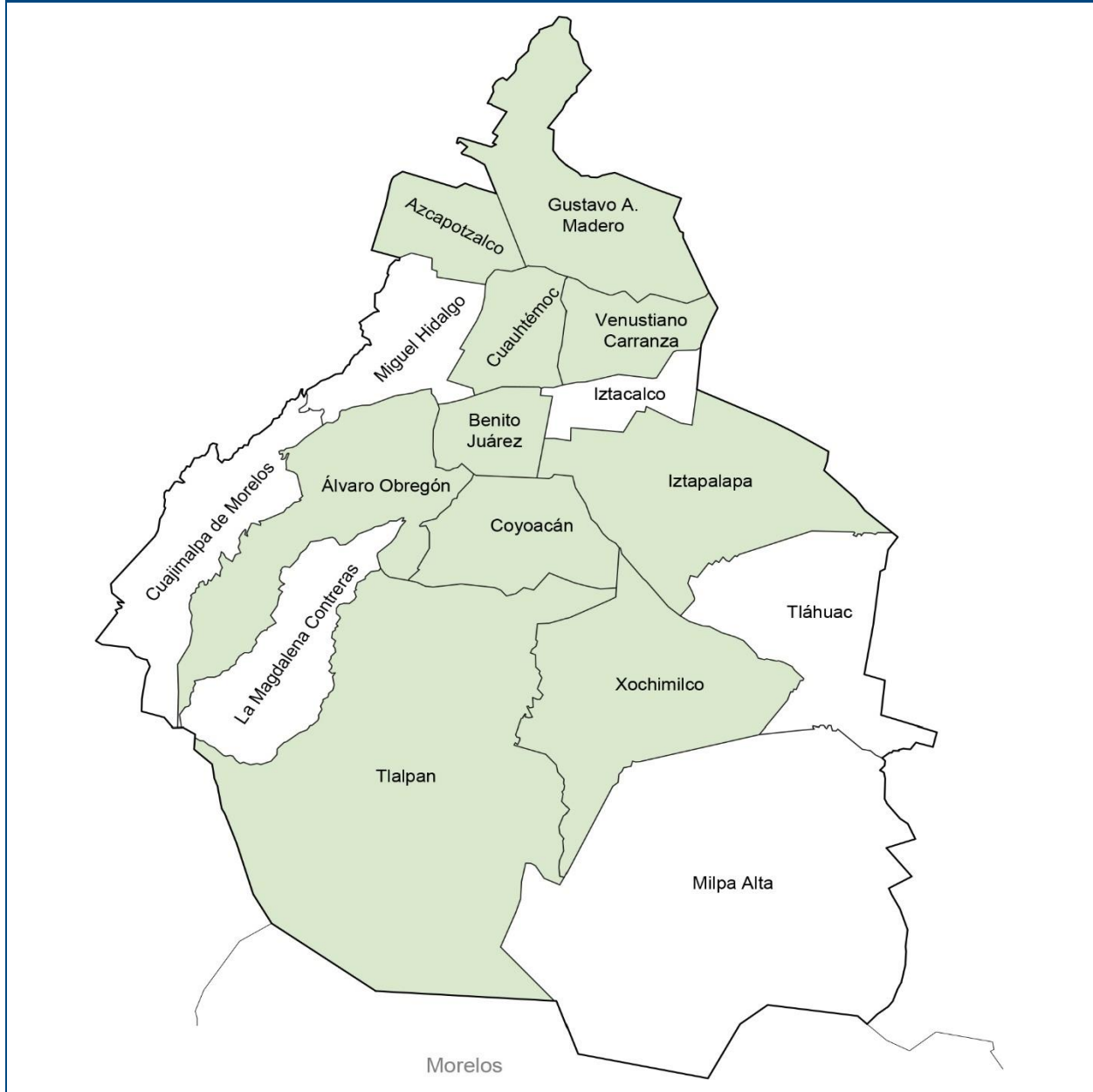


Table 3-1. Participant subdivisions					
	Subdivisions (Alcaldía)	Total population*	Female age 15-49*	Type of large retailer	
				Pharmacy	Supermarket
1	Álvaro Obregón	749,982	209,543	x	
2	Azcapotzalco	400,161	109,251		x
3	Benito Juárez	417,416	119,944	x	
4	Coyoacán	608,479	167,449		x
5	Cuauhtémoc	532,553	150,391		x
6	Gustavo A. Madero	1,164,477	316,051	x	
7	Iztapalapa	1,827,868	517,212	x	
8	Tlalpan	677,104	190,953		x
9	Venustiano Carranza	427,263	114,327		x
10	Xochimilco	415,933	117,286	x	
Total		7,221,236	2,012,407	5	5

* Source: Mexico, National Institute of Statistics and Geography (INEGI) Encuesta Intercensal 2015.

E. Selecting and Visiting Retailers

As part of the model for assessing compliance with the Code and local regulations, the 2017 NetCode protocol includes the assessment of the extent of promotions related to relevant products. The protocol recommends a sample of 33 small retailers in proximity to each HC and ten large retail stores that sell a high volume and variety of products covered by the Code. Due to restrictions related to the global SARS-CoV-2 pandemic, ATNI modified the protocol and requested that Westat and IBERO/INSP select only the ten large retailers based on local knowledge that they market the majority of the relevant products available for sale nationally, and were located in the selected subdivisions, as shown in Table 3-1. The study therefore included observations at ten large retailers that included five pharmacies and five supermarkets, as well as the five largest online retailers in Mexico.

The data collection teams conducted observations at ten large retail outlets. In addition, Westat trained IBERO/INSP staff to monitor the websites of five popular online retailers in Mexico. Data collectors searched these websites for products within the scope of this study to identify eligible promotions. The Westat Project Assistant conducted 100% review of each advertisement, promotion data, and accompanying image for completeness and quality.

F. Identifying and Evaluating BMS and CF Products

Westat staff performed a detailed internet search and review to assemble a preliminary list of all known products sold in Mexico City that are BMS and CFs according to the study definition and, therefore, subject to the Code and Mexico legislation. Products included those of major international manufacturers, other manufacturers from outside of Mexico, and in-country manufacturers. Westat provided an initial list to IBERO/INSP staff who further refined the list by

confirming those products that were available in Mexico and adding others found in local retailers. Westat combined the lists and prepared a preliminary product list.

During data collection at the retail outlets and media monitoring, additional products were identified and added to the overall BMS/CF list. In total, Westat and IBERO/INSP found or identified 459 products made by 19 companies in Mexico, by far the largest number of products assessed in any ATNI/Westat study to date.

After data collection was complete, ATNI asked the six ATNI-Index companies to identify products that are officially marketed in Mexico (legitimate products). The six ATNI-Index companies, confirmed that 334 (73%) of the 459 products originally identified were legitimate products. We categorized the remaining products from the ATNI-Index companies as parallel imports (i.e., not intended for sale in Mexico) and excluded them from the label analysis and did not include in the results any other types of marketing identified for these products.

Additionally, there were 75 products (~16%) included made by the 13 “other” companies found in Mexico. ATNI was not able to confirm with the companies beyond the scope of its Indexes whether their products found in the market were legitimate or parallel imports. The findings presented in this report therefore only relate to the 334 legitimate products made by ATNI-Index companies and the 75 products made by ‘other’ companies, excluding in the results any findings for the confirmed parallel import products.

The 2017 NetCode protocol required the purchase of a single item of every relevant product included in the study. For products sold in different package sizes, the intent was to choose a medium-size or the most commonly purchased size available in an effort to maximize the amount of information included on the label while minimizing costs.

Once ATNI and Westat determined the final BMS/CF list, IBERO/INSP purchased as many BMS and CF products on the list that were available in brick and mortar stores in Mexico City as well as online. IBERO/INSP staff photographed each side of every product for analysis of each label and available insert. The protocol did not require IBERO/INSP to purchase these products at a location near one of the sampled large retailers, since the labels and inserts for products should be the same no matter the location in the city of the product sale. For this study, the global SARS-CoV-2 pandemic in-country restrictions delayed the purchase of the BMS/CF products for approximately eight weeks. However, IBERO/INSP eventually was able to purchase and analyze 120 legitimate BMS/CF products.

G. Media Monitoring

Television is the dominant medium in Mexico and advertising spending was expected to amount to \$4.15 billion in 2020.²⁷ Digital advertising spending has grown to \$1.98 billion while traditional media forms of advertising have decreased to \$330 million.²⁸ In 2020, television was expected to receive 49% of total advertising dollars, followed by the internet at 27.8% and traditional media (radio, newspapers and magazines) at 10.4%.²⁹

²⁷ [Advertising industry in Mexico - Statistics & Facts | Statista](#)

²⁸ [Ibid](#)

²⁹ [Distribution of ad spend in Mexico by medium 2020 | Statista](#)

Mexico is one of the largest markets in Latin America. Sales of formula are higher than any other country in the region despite the declining birth rate. In 2017, retail sales were \$843 million and are expected to exceed \$1 billion by 2021.³⁰ This is largely due to more mothers joining the workforce and substituting milk formula for breastfeeding.³¹

The 2017 NetCode protocol for media monitoring includes the assessment of both traditional and online marketing, of all forms, of relevant BMS and CF products. The protocol recommends monitoring three channels each from government, private, and cable for 24 hours per day to identify the number and frequency of advertisements. The protocol also includes online monitoring and recommends monitoring websites of baby food manufacturers, mothers' magazines/online forums, and online retailers.

Prior to conducting media monitoring in Mexico, Westat developed the Protocol for Media Monitoring based on the 2017 NetCode protocol. For traditional media, IBERO/INSP entered directly into an agreement with Eficiencia Informativa (EFINFO), a local independent media monitoring organization, to monitor and select the television and radio stations using the selection criteria from the NetCode protocol. EFINFO generated most of the information from these sources in an automated fashion. EFINFO obtained data for six months, four retrospective months from May 2020 through August 2020, and two prospective months from September 2020 through October 2020. In total, EFINFO monitored 31 television channels and 44 radio channels. These channels represented more than 70% of the respective markets.

For online media monitoring, Westat identified all company and brand websites as well as the available social media platforms associated with each of those websites (Facebook page, Instagram, YouTube channel, and/or Twitter feed). Only websites and social media pages that appeared to originate from Mexico or targeted the Mexico audience were included in the monitoring. We did not monitor global company and brand websites or their social media pages. Westat trained IBERO/INSP staff to monitor the selected websites weekly for eight weeks (September through October, 2020). IBERO/INSP staff followed this process once a week over the eight-week period for online media monitoring. The data collectors visited the following types of websites and scanned them for promotions, capturing screenshots and entering data using the Excel data entry form each week:

- Company and Brand Websites. Five (5) company websites and 7 brand websites as well as 6 YouTube pages, 9 Facebook pages, 5 Twitter pages, and 5 Instagram pages associated with the company and brand websites.
- Parent and Child Websites. Ten (10) parenting and child websites and 4 YouTube pages, 9 Facebook pages, 3 Twitter pages, and 6 Instagram pages associated with the parenting and child websites.

Data collectors searched these websites for products within the scope of this study to identify eligible promotions. The Westat Project Assistant conducted 100% review of each advertisement and promotion data and accompanying image for completeness and quality.

³⁰ [Sector Trend Analysis – Baby food in Mexico - Agriculture and Agri-Food Canada \(AAFC\)](#)

³¹ Ibid

H. Representativeness of Results

The design of the 2017 NetCode protocol does not allow us to extrapolate the estimates for promotions observed in retail outlets to the overall catchment area of the study, since the selection was a convenience sample. For product labels and media advertising, this study conducted a census. Therefore, the prevalence estimates apply to the sampled area of Mexico City, although as previously noted, we excluded parallel import products identified by the global baby food companies from these results.

J. Defining Potential Noncompliance

The study team used the 2017 NetCode protocol to collate definitions of noncompliance for each Article of the Code. These definitions were organized by sub-article of the Code and corresponded to the specific questions and syntax used to define possible noncompliance.³² As described in Section A, additional definitions of noncompliance were added as a result of the specific provisions of any national legislation that went beyond the Articles of the Code.

Chapter 7 presents a further discussion of this limitation. For any items directly observed by the data collection team, such as promotions and product labels, the team saw the actual items, and therefore, we have called these “observations.”

³² Westat will provide a copy of the definitions of noncompliance upon request.

4. Fieldwork Preparation and Training

A. Organization of Field Work

The field data collection team in Mexico City included one Coordinator and three Data Collectors. These data collection teams were responsible for conducting observations at the large retail outlets. The Coordinator was responsible for coordination of the data collection staff. The Coordinator conducted quality control (QC) of observations at the large retailers and responded to data queries from the Westat Senior Epidemiologist.

After Westat finalized the BMS/CF list and ATNI confirmed the legitimate products with the six ATNI-Index companies, IBERO/INSP staff purchased each relevant BMS and CF product and analyzed each product label. There were no inserts.

B. Selection and Training of Data Collectors

IBERO/INSP had a pool of experienced local data collectors in Mexico City, who have worked with IBERO/INSP for similar studies. IBERO/INSP recruited three data collectors to train for this study. These data collectors were recent graduates or experienced data collectors who had received study training. IBERO/INSP selected data collectors who were experienced and familiar with local culture.

Prior to the scheduled training in Mexico City, the SARS-CoV-2 pandemic restrictions were implemented restricting travel to and from the US and Mexico as well as within Mexico City. After a delay of five months, ATNI and Westat decided to conduct the training sessions via Skype with the Coordinator and Data Collectors. Westat conducted a question-by-question review of NetCode Form 4—Desk Review of Promotional and Informational or Educational Materials Collected at Health Facilities or Retailers and Form 6—Promotions at Retail Outlets and Pharmacies. Westat also led a Media Monitoring training session via Skype providing instruction to the Media Monitoring Coordinator. Westat reviewed the websites designated for monitoring and instructed IBERO/INSP how to save data and images.

The training followed the approach recommended by NetCode and was based on the protocol. It introduced the Data Collectors to the importance of breastfeeding, oriented them to the Code and national label regulations, and trained them on the use of the NetCode data collection forms. The training sought to empower the Data Collectors with adequate skills for successful performance in the field. After the training sessions, the Westat Trainer provided training exercises for the Data Collectors to complete and provided feedback after reviewing the individual exercises. For further detail on the training, please find the training agenda in Appendix E.

C. Data Collection

The 2017 NetCode protocol used three different methods to assess and quantify the level of compliance with the Code: field observations, media monitoring, and label and insert assessment. The following describes the processes used for each.

Field Data Collection

Data Collectors completed hardcopy versions of the questionnaires, following the procedures outlined in the data collection training and the NetCode protocol. Westat staff trained the Coordinator to upload the data following data collection at each large retailer. The Westat Sr. Epidemiologist reviewed all uploaded data and provided any data discrepancies to the Coordinator for resolution. Westat and IBERO/INSP repeated this task until all discrepancies were resolved for all data.

Media Monitoring and Online Retailer Data Collection

IBERO/INSP contracted with Eficiencia Informativa (EFINFO) to monitor traditional media, including radio and television, for promotions of BMS and CF products. Westat developed a table shell that EFINFO used to compile the dataset. EFINFO provided retrospective data for 4 months (May through August 2020) and prospective data for 2 months (September and October 2020). During the two months of live data collection, EFINFO's monitoring occurred on 31 television channels and 44 radio stations, estimated to reach more than 70% of the Mexico population.

For online media monitoring, Westat developed an Excel spreadsheet that IBERO/INSP used to collect data on a weekly basis. The spreadsheet was based on Form 8—Desk Review of Promotions on the Media. IBERO/INSP collected screenshots of each observed promotion and recorded data for the observations in the spreadsheet and delivered the data and screenshots to Westat on a weekly basis.

For the online retailer monitoring, IBERO/INSP visited five online retailers. IBERO/INSP collected screenshots of each observed promotion and recorded data for the observations in the spreadsheet used for the online media monitoring. IBERO/INSP delivered the data and screenshots to Westat on a weekly basis.

Label and Insert Assessment

For label assessment, ATNI and Westat developed an Excel spreadsheet used to abstract and enter data relevant to the labels and inserts for all products on the final BMS/CF list. We based the spreadsheet on Form 7—Desk Review of Product Labels. Westat staff conducted training via Skype to instruct IBERO/INSP staff how to complete the Excel spreadsheet for each label and insert and how to capture clear images of each BMS and CF product and insert.

Since there were no observations of inserts, IBERO/INSP's evaluation included only labels for relevant products included on the final BMS/CF list. IBERO/INSP photographed each side of every BMS and CF product (~6 images/product). IBERO/INSP delivered the Excel spreadsheet with the label abstraction dataset and product label images to Westat on a weekly basis.

D. Quality Control

Westat implemented QC measures for all data collected for this study. This section describes the QC processes for each of the data collection processes.

Field Data and Images

IBERO/INSP uploaded the data and images to the designated Westat FTP website upon completion of data collection at each of the ten large retailers. The Westat Sr. Epidemiologist compared the list of retailer datasets to the list of large retailers to ensure the receipt of all forms. The Westat Sr. Epidemiologist communicated with the IBERO/INSP Coordinator when there was a discrepancy with the forms received and submitted data. The Westat Project Assistant reviewed 100% of the images from the large retail outlets (Form 6—Promotions at Retail Outlets and Pharmacies) for clarity and completeness and saved each image that met the study criteria for quality in a folder by company and brand. The Senior Epidemiologist then reviewed 100% of the images that met the study criteria to determine whether the observation was compliant with the Code and relevant national legislation.

Media Monitoring Data and Images

IBERO/INSP reviewed the data provided by EFINFO for television and radio to ensure that the observations included products within the scope of the study (BMS and CF products intended for children up to 36 months) and removed any irrelevant observations. Additionally, EFINFO provided a link to a recording or image of each promotion listed in the data that ATNI and/or Westat could use to review and confirm the relevance and accuracy of each observation.

For online media monitoring, edit checks were created within the Excel spreadsheet using conditional formatting to direct the user dynamically to the required entry fields based on input for each observation. The edit checks helped to reduce data entry errors into irrelevant fields and to ensure proper formatting for the data entered into the form.

The Westat Project Assistant reviewed 100% of the screenshots from the weekly online media monitoring submissions for clarity and completeness to ensure that each image accurately documented the corresponding observation. The Westat Task Manager reviewed the queries from the Project Assistant's review each week and made changes/updates as needed and reviewed other critical data points (company, brand, product, promotion type, messages, etc.) before returning comments with the updated form template to IBERO/INSP. When IBERO/INSP submitted all the data, the Westat Task Manager reviewed 100% of the promotions and critical data again, checking the product/company/brand information against the product list and reviewing the other critical data points for consistency and accuracy.

BMS/CF Product List

For the Philippines and Mexico studies, ATNI introduced a new element of QC in the form of a review by the ATNI-Index companies of the initial findings of all observed noncompliance. ATNI uploaded to its online research platform images of all of the observed pieces of equipment, promotional materials, advertisements, promotions, and labels. The companies were given two weeks to review the findings and provide feedback. The intention was to identify any erroneous findings, e.g., any related to parallel imports on online retailers' sites, with which the companies did

not have a formal contract. Each of the six companies reviewed the findings and provided feedback to ATNI. ATNI evaluated their feedback and passed on points of disagreement to Westat.

Label and Insert Data and Images

ATNI and Westat designed an Excel spreadsheet to make data entry user-friendly and to minimize error. A reminder of the applicable product types for each question was included in the form in order to help ensure appropriate data entry for each product.

As noted previously, there was no data or images for inserts. After IBERO/INSP completed the assessment of labels each week, the Westat Project Assistant performed 100% QC review of the images for clarity and completeness and contacted IBERO/INSP to resolve any issues. Upon completion of image QC, Westat referenced the images to complete a QC review of 100% of the noncompliance for accuracy and relevance. The Westat Task Manager sent feedback weekly. When IBERO/INSP submitted all label assessment data, the Task Manager reviewed each incident of noncompliance against the images in the completed dataset.

5. Study Results

The aim of the 2017 NetCode protocol is to assess compliance of baby food companies with selected Articles of the Code and relevant national regulations that go beyond the Code. In practice, this is evaluated by measuring possible noncompliance, i.e., by observing where there appears to be lack of compliance with a particular provision of the Code or local legislation or regulation. The results from the analysis of the data collected in this study in Mexico are presented below, organized by Article of the Code for which data was captured in the NetCode data collection forms and adapted, as noted in Chapter 3. As noted in Chapter 1, the scope of the study was modified to exclude visits to HFs and MCs, due to the global SARS-CoV-2 pandemic, and therefore, no data was collected with Form 1—Questionnaire for Mothers, Form 2—Questionnaire for HPs and Form 3—Observations of informational/educational materials at HFs.

For each Article, if there were a substantial number of observations, the accompanying table shows this data overall and disaggregated by company name.

A. Article 4: Information and Education

The data collected on Form 6—Promotions at Retail Outlets and Pharmacies was used to assess the compliance with Sub-article 4.2, informational and educational materials.

Sub-article 4.2

Informational and educational materials dealing with the feeding of infants and intended to reach pregnant women and mothers of infants and young children.

It is worth noting that although Form 4—Desk Review of Promotional and Informational or Educational Materials Collected at Health Facilities or Retailers was used to assess promotional materials observed in physical (or “brick-and mortar”) retail outlets, the data collection team did not observe any informational and educational material related to IF, FOF, GUM, CF <6 months, or CF 6-36 months in the large retail outlets visited, and therefore no noncompliances were observed relating to the sub-items under Sub-article 4.2. Similar to our findings in the Philippines, Thailand and Nigeria, the use of informational and educational materials to reach mothers/caregivers in retail outlets in Mexico appears to be very limited.

B. Article 5: The General Public and Mothers

Data collected as part of the media monitoring component of the study was used to assess compliance with sub-article 5.1 of Article 5 of the Code and WHA 69.9 Recommendation 4.

Sub-article 5.1

Sub-article 5.1: No advertising or other form of promotion to the general public of products within the scope of this Code.³³

The media monitoring component of the study included direct observations of both traditional media sources (such as television and radio), and online and social media sources to determine the level of compliance with sub-article 5.1. Data collection for the online and traditional media monitoring used spreadsheets adapted from NetCode Form 8, Desk Review of Promotions in the Media.

The IBERO/INSP researchers contracted with a professional media monitoring service, Eficiencia Informativa (EFINFO) to monitor traditional media, whereas, Westat trained IBERO/INSP staff to conduct online media monitoring:

- *Traditional media monitoring* – EFINFO provided recordings of the programming, which IBERO/INSP reviewed and found 13 unique observations of television advertisements or promotions. Thirteen (13) individual products were mentioned in these promotions, 10 were GUM products and 3 were CF 6-36 products (some promotions include more than one product and some products are referenced in more than one promotion). All of the observations in the traditional media monitoring were for Nestlé, Abbott, and RB products. Of the 13 televised promotions, there were 3 (~23%) observations for RB, 4 (~31%) observations for Abbott and 6 (~46%) observations for Nestlé. The unique television promotions were repeated on TV channels 831 times (187 times for RB, 216 times for Abbott, and 428 times for Nestlé). There were no reports of radio promotions.
- *Online media monitoring* – IBERO/INSP found 87 eligible observations of advertisements or promotions online. Sixteen (16) of these observations were not related to a particular product, but rather advertised brands from Nestlé (11), RB (4), and Siegfried Rhein (1). Seventy-six (76) of these observations appeared on company/brand associated websites or social media pages, while 11 of these promotions were observed on parenting websites and/or their social media pages.

While neither the Mexican regulations nor the Code or WHA 69.9 prohibit the advertisement or promotion of CF 6-36 months per se, WHA 69.9 Recommendation 4 stipulates that certain messages should or should not be conveyed in all forms of promotion. Therefore, each advertisement or promotion for these products was reviewed to determine whether it was compliant with that recommendation. The observations described and presented in tables are only of those that were not compliant.

³³ Covered products are those for children from birth to 36 months of age, including all commercial baby milk products (i.e., infant formula [IF], follow-on formula [FOF], and growing-up milk [GUM]) as well as complementary food products (CFs) for children less than 36 months.

The number of unique observations in traditional media in Mexico (13) was less than that documented in the Philippines (27) and Thailand (31). With regard to observed promotions from the online media monitoring, there were significantly more promotions observed in Mexico (87) when compared to the Philippines (22), however there were still far fewer observed in Mexico than the number of online media promotions observed in Thailand (2,777). There were no promotions observed in Nigeria for the online or traditional media monitoring.

The findings from media monitoring are generally in line with the advertising spending reported in Chapter 3, as the majority of the promotions observed in the media monitoring occurred in online media and television. These findings resembled those observed in the Philippines, where TV and online media promotions made up the majority of the total observed promotions (~65%).

However, there were also a significant number promotions observed on radio in the Philippines (~35%), whereas there were no radio promotions observed in Mexico.

As part of the online media monitoring, IBERO/INSP monitored company and brand websites local to Mexico and their associated social media pages (i.e., Facebook, Instagram, YouTube, and/or Twitter) along with 10 parenting websites (i.e., online magazines, forums, membership clubs, etc.) and their associated social media pages which reflect digital paid advertising.

Table 5-1 displays the number of observations of company advertisements of their BMS and CF 6-36 products across all media types. In terms of company paid advertisement on traditional media platforms, findings were only attributed to televised advertisements which make up ~13% of the total observed paid advertisements; EFINFO and IBERO/INSP did not identify any promotions on the monitored radio channels. In total, there were 87 unique promotions observed on company/brand websites or their related social media pages and parenting websites along with their related social media pages. Of these, 11 (~13%) advertisements were on parenting sites, 1 of which was on a parenting Facebook page, whereas the remaining 76 (~87%) promotions were on companies' own sites across various digital platforms. Five (5) (~46%) of the observations from parenting websites were for RB and 4 (~36%) were for Nestlé, and among the 'other' companies, there was only 1 finding for Holle and 1 for Lactalis; cumulatively these contribute to ~18% of the remaining paid promotions. There were no such findings on parenting sites in the Philippines. Table 5-1 also further describes the observed findings on companies' own media.

Table 5-1. Total number of observations by monitored media (traditional and online): No advertising or promotions of BMS and marketing of CF 6-36 in line with WHA 69.9 (May 2020–October 2020)					
Company	By media type				Total no. unique ads/promotions observed
	Traditional ¹		Online		
	Television	Radio	Parenting sites	Company's own media	
ATNI-Index Companies					
Abbott	4	0	0	8	12
Danone	0	0	0	1	1
FrieslandCampina	0	0	0	12	12
KraftHeinz	0	0	0	0	0
Nestlé	6	0	4	31 ²	41
RB	3	0	5	20 ²	28

Table 5-1. Total number of observations by monitored media (traditional and online): No advertising or promotions of BMS and marketing of CF 6-36 in line with WHA 69.9 (May 2020–October 2020) – (continued)

Company	By media type				Total no. unique ads/promotions observed
	Traditional ¹		Online		
	Television	Radio	Parenting sites	Company's own media	
Other companies					
Bayer	0	0	0	1	1
Holle	0	0	1	0	1
Lactalis	0	0	1	0	1
Siegfried Rhein	0	0	0	3 ²	3
Total	13	0	11	76	100

Source: ATNI Mexico (2020)

¹ Two promotions of a GUM product made by Nestlé were found in print media, but are not included as findings in this Report.

² Includes observations that were not related to a specific product. Companies with observations that were not related to a specific product include Nestlé (11), RB (4), and Siegfried Rhein (1).

Table 5-2 displays the cumulative number of media observations (both online and traditional, including on company's own media and paid for advertising) by company and by product type (from May through October 2020). In total there were 32 (~32%) paid for advertisements out of the total 100 promotions observed, which includes the remaining 76 (~76%) findings on companies' own online platforms.

The majority of the observations, 76 of the 100 (~76%), relate to GUM products, followed by 16 (~16%) branded promotions that did not relate to a specific product but advertised the company or brand in relation to its BMS/CF products, followed by 5 findings for CF 6-36 products (~5%) and 3 for IF products (~3%). Nestlé had the most findings for media advertisement, with 41 out of the total observed findings (~41%) for 13 different products, followed by 28 for 7 of RB's products (~28%). These findings are similar to the Philippines as Nestlé and RB were the companies with the most observed noncompliances for media monitoring. No advertisements were found on any of the media platforms for Kraft Heinz product or related brands.

Table 5-2. Media observations related to Sub-article 5.1 and recommendation 4 of WHA 69.9: No advertising or promotions of BMS and marketing of CF 6-36 in line with WHA 69.9, by product type

Company	By product type						Total no. unique ads/promotions observed
	Infant Formula (IF) < 6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) < 6 mos*	Complementary Food (CF) 6-36 mos*	Not a specific product	
ATNI-Index Companies							
Abbott	0	0	12	NA	NA	0	12
Danone	0	0	1	0	0	0	1
FrieslandCampina	0	0	12	NA	NA	0	12
Kraft Heinz	0	0	0	0	0	0	0
Nestlé	0	0	25	0	5	11	41
RB	0	0	24	NA	NA	4	28

Table 5-2. Media observations related to Sub-article 5.1 and recommendation 4 of WHA 69.9: No advertising or promotions of BMS and marketing of CF 6-36 in line with WHA 69.9, by product type – (continued)

Company	By product type						Total no. unique ads/promotions observed
	Infant Formula (IF) < 6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) < 6 mos*	Complementary Food (CF) 6-36 mos*	Not a specific product	
Other companies							
Bayer	0	0	1	0	0	0	1
Holle	1	0	0	0	0	0	1
Lactalis	1	0	0	0	0	0	1
Siegfried Rhein	1	0	1	0	0	1	3
Total	3	0	76	0	5	16	100

Source: ATNI Mexico (2020)

* NA denotes findings of complementary food products as not being applicable to companies that do not produce and market these product types.

Table 5-3 displays the number of observations in companies' own online media by media type. Across the 76 total promotions observed in the online monitoring of companies' own media, the majority of promotions were observed on company/brand websites with a total of 36 (~47%), followed by Facebook pages with a total of 12 observations (~16%), and equally 12 observations through e-mails received as part of digital company subscriptions. In fact, these e-mails reflect additional, indirect contact initiated by the companies with mothers and caregivers which is considered noncompliant with sub-article 5.5 of the Code.

These findings differ from the Philippines, where the most observations occurred on Facebook pages. However, the findings in Mexico resemble those in Thailand, where the most observed promotions also occurred on the company/brand sites included in the media monitoring.

Table 5-3. Observations in company's own online media related to Sub-article 5.1 and recommendation 4 of WHA 69.9: No advertising or promotions of BMS and marketing of CF 6-36 in line with WHA 69.9, by media type

Company	By media type						Total no. unique ads/promotions observed
	Websites	YouTube	Facebook	Twitter	Instagram	Other*	
ATNI-Index companies							
Abbott	6	0	0	0	0	2	8
Danone	1	0	0	0	0	0	1
Kraft Heinz	0	0	0	0	0	0	0
Friesland Campina	0	0	4	4	4	0	12
Nestlé	20	0	6	0	5	0	31
RB	7	3	0	0	0	10	20

Table 5-3. Observations in company's own online media related to Sub-article 5.1 and recommendation 4 of WHA 69.9: No advertising or promotions of BMS and marketing of CF 6-36 in line with WHA 69.9, by media type – (continued)

Company	By media type						Total no. unique ads/promotions observed
	Websites	YouTube	Facebook	Twitter	Instagram	Other*	
Other companies							
Bayer	1	0	0	0	0	0	1
Holle	0	0	0	0	0	0	0
Lactalis	0	0	0	0	0	0	0
Siegfried Rhein	1	0	2	0	0	0	3
Total	36	3	12	4	9	12	76

Source: ATNI Mexico (2020)

* The "Other" category includes observations in email subscriptions originating from websites included in the online media monitoring.

The majority of the promotions were observed for GUM products differing from the findings in the Philippines, where the most common product type observed in companies' own media was CF 6-36. In Thailand, the most common product type observed in the online media was GUM, similar to the findings in Mexico.

The data collected on Form 6—Promotions at Retail Outlets and Pharmacies was also used to assess the compliance with Article 5 and relevant sub-articles that address point-of-sale promotions and contact with the company and its marketing personnel. For the data collection from online retail sites, an adapted spreadsheet based on Form 8—Desk Review of Promotions on the Medias was used.

Sub-articles 5.3, 5.5 and WHA 69.9 Recommendation 5

Sub-article 5.3: For products within the scope of this Code, there should be no point-of-sale advertising, giving of samples, or any other promotion device to induce sales directly to the consumer at the retail level.

Sub-article 5.5: Marketing personnel, in their business capacity, should not seek direct or indirect contact of any kind with pregnant women or with mothers of infants and young children.

Marketing practices are increasingly moving beyond traditional settings to virtual platforms such as social media channels and websites where online communication is initiated.

WHA 69.9 recommendation 5: Companies that market breast-milk substitutes should refrain from engaging in the direct or indirect promotion of their other food products for infants and young children by establishing relationships with parents and other caregivers.

Although not directly captured by the NetCode protocol, this recommendation addresses promotions of complementary foods 6-36 months, particularly related to companies that produce both BMS and CF, to avoid the cross-promotion of products.

Table 5-4 shows that the study included ten large retail outlets (five supermarkets and five pharmacies), visited for direct observation of any promotions of BMS and CF 6-36 products, or informational or educational materials on infant and young child feeding, or related equipment. Promotions of CF 6-36 months are not prohibited by WHA 69.9; however, the recommendations require that certain messaging is in place or omitted when promoting these products and that indirect cross-promotion of BMS products is avoided.

Table 5-4. Characteristics of participant retail outlets		
Characteristics of Retail Outlets	Number	Percent
Large retailers	5	50.0%
Pharmacies	5	50.0%
Total retail outlets visited	10	100.0%

Source: ATNI Mexico (2020)

Appendix Table G-1 shows the location and type (supermarket or pharmacy) of the large retail outlets visited in this study. No incidents or refusals were reported in any of the visits and there was no need to use the reserve sample.

In addition, IBERO/INSP collected data from five Mexican online retailers—Mercado Libre, Amazon, Chedraui, Farmacia San Pablo, Walmart Mexico—for 2 months, from September through October 2020.

Of the total number of promotions enumerated across the physical retailer and online retailer data collection, ~73% of them were found on online retailers' sites, while ~27% of them were found in physical retailers.

Observations in Physical Retail Outlets

Table 5-5 shows the number of promotions observed at physical retail outlets. The data collection team documented 33 promotions in retail outlets, the majority of which are noncompliances as per the sub-items under Sub-article 5.3, while some were noncompliant per Sub-article 5.3 and only 1 related to WHA 69.9 recommendation 5. Approximately two thirds of promotions observed (67%) were for GUM products and 24% were IF products. No promotions for CF <6 months were observed in the five pharmacies and five supermarkets visited. Nineteen (19) unique products were found in the 33 promotions.

By type of promotions, there was evidence of 5 price-related promotions and 5 promotions in the form of free gifts, as well as one in the form of a special display in the store; all of these promotions were for GUM products. Moreover, there were 17 instances (~52%) of incentives to purchase products (e.g. two cans of the same product in different sizes sold in one pack, with promotional stickers suggesting 'special price' for the two products, or with statements of the products' yield '10% more yield per kilogram' or 'special price' for making up to a certain number of servings implying *good value* of the purchase, or with statements on a product's new look). The 17 incentives to purchase products were observed in 11 GUM products (65%) and 6 IF products (35%). Table 5-5 also displays 5 instances (2 IF products, 2 FOF products and 1 CF 6-36 months product) where the packaging of the products include an invitation to make contact with the company. For example, the CF 6-36 product made by Nestlé explicitly invites the consumer to visit a website asking the visitor to 'be part of the club' and sign up to Nestlé *Baby and me*, a noncompliance as per Recommendation 5 of WHA 69.9 on cross promotions. Similar invitations pertaining to BMS products were found and are noncompliances per sub-article 5.5 of The Code.

Table 5-5. Number and type of point-of-sale promotions observed at physical retail outlets (related to sub-articles 5.3, 5.5 and recommendation 5 of WHA 69.9), by product type

	By product type					Total
	Infant Formula (IF) < 6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) < 6 mos	Complementary Food (CF) 6-36 mos	
All promotions documented (n=53)	8	2	22	0	1	33
Percent of total reported promotions	24.2%	6.1%	66.7%	0.0%	3.0%	100%
Type of promotion						
Price	0	0	5	0	0	5
Displays	0	0	1	0	0	1
Free gifts	0	0	5	0	0	5
Product samples	0	0	0	0	0	0
Company representative	0	0	0	0	0	0
Other						
Incentives to purchase products	6	0	11	0	0	17
Seeking contact through inviting to visit company website or Facebook pages	2	2	0	0	1	5
Total	8	2	22	0	1	33

Source: ATNI Mexico (2020)

Table 5-6 shows the number of promotions and type of products involved, by company and product type at physical retail outlets. Among the 33 promotions observed in the five pharmacies and five supermarkets visited, 11 (~33%) were for products made Nestlé, 8 for products made by RB (~24%), 6 for products made by Abbott (~18%), 5 were products made by FrieslandCampina (~15%) and 3 products made by Lactalis (~9%). No promotions were observed among Danone and Kraft Heinz products.

While all promotions related to FrieslandCampina and Lactalis were for GUM products, the promotions related to Abbott and RB were mostly for GUM products, but also for IF products. In contrast, the promotions of Nestlé covered a broader range of products, including IF, FOF, GUM, as well as 1 CF 6-36 months product that did not comply with WHA 69.9 recommendations on CF 6-36 promotions.

Table 5-6. Number of promotions at physical retail outlets (related to Sub-articles 5.3, 5.5 and recommendation 5 of WHA 69.9), by company and product type

Company	By product type					Total
	Infant Formula (IF) < 6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) < 6 mos*	Complementary Food (CF) 6-36 mos*	
ATNI-Index companies						
Abbott	2	0	4	NA	NA	6
Danone	0	0	0	0	0	0
FrieslandCampina	0	0	5	NA	NA	5
Kraft Heinz	0	0	0	0	0	0
Nestlé	4	2	4	0	1	11
RB	2	0	6	NA	NA	8

Table 5-6. Number of promotions at physical retail outlets (related to Sub-articles 5.3, 5.5 and recommendation 5 of WHA 69.9), by company and product type - (continued)						
Company	By product type					Total
	Infant Formula (IF) < 6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) < 6 mos*	Complementary Food (CF) 6-36 mos*	
Other companies						
Lactalis	0	0	3	0	0	3
Total	8	2	22	0	1	33
% of total	24.2%	6.1%	66.7%	0.0%	3.0%	100%

Source: ATNI Mexico (2020)

* NA denotes findings of complementary food products as not being applicable to companies that do not produce and market these product types.

The 33 promotions observed in the ten physical retailers in Mexico contrast with findings in the most recent previous studies. While no promotions were documented in the Philippines and Nigeria where 43 retail outlets were visited in each country, the field team identified 154 promotions in the 43 retail outlets in Thailand.

Observations in Online Retail Sites

Table 5-7 presents the number of promotions observed on online retailers' sites by product type. A total of 91 promotions were documented, all of which are noncompliant as per the sub-items under Sub-article 5.3. Seventy-five (75) of these promotions (~82%) were price-related discounts, 14 (~15%) were incentives to purchase products in the form of accumulating points for added benefits, and 2 (~2%) were observations relating to a free gift type of promotion. No banner advertisements on the online retailers' sites for the products assessed were identified.

The most common type of promotion was for GUM products as 83 (~91%) of the total observations were of this product type. Among the GUM product promotions, 68 (~82%) were price-related promotions followed by 13 (~16%) incentives to purchase products, and 2 (~2%) free gifts.

Table 5-7. Number and type of promotions observed at online retail outlets (related to Sub-article 5.3) - No point-of-sale advertising or promotions, by product type ³⁴						
Type of promotion	By product type					Percent of total promotions
	Infant Formula (IF) <6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) <6 mos	Total number unique ads/promotions observed	
Incentives to purchase products	1	0	13	0	14	15.4%
Price-related promotions	4	3	68	0	75	82.4%
Free gifts	0	0	2	0	2	2.2%
Total promotions observed	5	3	83	0	91	-
% of total	5.5%	3.3%	91.2%	0.0%	-	100.0%

Source: ATNI Mexico (2020)

³⁴ The table does not include CF 6-36 products given that guidance on the assessment of the marketing of these products on online retail settings is limited, and therefore, they are excluded from the scope of online retail monitoring.

Table 5-8 displays the number of observed promotions at online retail outlets by company. In total, there were 91 promotions across 24 products observed on online retail websites. The company with the most observed promotions was Nestlé with a total of 37 (~41%). The most common product type found in the promotions observed on online retail websites was GUM with 83 promotions (~91%) for 15 products, followed by IF with 5 promotions (~6%) for 3 products.

Table 5-8. Number of observed promotions at online retail outlets (related to Sub-article 5.3), by company and product type					
Company	By product type				
	Infant Formula (IF) <6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) <6 mos*	Total no. of product promotions
Companies in ATNI 2021 Index:					
Abbott	0	0	14	NA	14
Danone	0	0	0	0	0
FrieslandCampina	0	0	3	NA	3
Kraft Heinz	0	0	0	0	0
Nestlé	0	0	37	0	37
RB	2	2	17	NA	21
Other companies:					
Alpura	0	0	4	0	4
Ausnutria	1	0	1	0	2
Bayer	2	0	2	0	4
Lactalis	0	1	5	0	6
Total no. of product promotions	5	3	83	0	91
% of total	5.5%	3.3%	91.2%	0.0%	100.0%

Source: ATNI Mexico (2020)

* NA denotes findings of complementary food products as not being applicable to companies that do not produce and market these product types.

Summary of Retailer Observations Across Physical and Online Settings

Table 5-9 shows the number and type of point-of-sale promotions observed at physical retailers and on online retailer websites, by promotion type and company. In total, there were 124 observed promotions with 33 (~27%) promotions observed at physical retailers and 91 (~73%) promotions observed on online retailer websites. The most common type of promotion observed was price related, with 80 (~65%) observations. Of the price related promotions, there were 5 (~6%) observed at physical retailers, while 75 (~94%) were observed on online retailer websites. The company with the most observed promotions was Nestlé with a total of 48 across online and physical retailers (~39%). Nineteen (11) (~23%) of the promotions observed for Nestlé were found in physical retailers, while 37 (~77%) of Nestlé's promotions were observed on online retailer websites. Similarly, the most common promotion type observed in Thailand and the Philippines was price-related (88% in Thailand and 82% in the Philippines), though only promotions from online retailers were found in the Philippines, whereas the findings from Thailand included promotions from both physical and online retailers.

Table 5-9. Number and type of point-of-sale promotions observed at retail outlets (related to sub-article 5.3), by retail outlet type and company

	Physical retailer ("brick & mortar") n=10		Online retailer n=5		Total no. promotions observed	
	No.	%	No.	%	No.	%
Type of promotion*						
Price related (e.g., coupon/ stamps, discounts, special discount sales)	5	15.2%	75	82.4%	80	64.5%
Displays (e.g., brand shelf, special displays, shop window, posters/ banners, shelf tag/talkers, product launch)	1	3.0%	n/a	-	1	0.8%
Free gifts	5	15.2%	2	2.2%	7	5.6%
Product samples	0	0.0%	0	0.0%	0	0.0%
Company representative (physical retailers only)	0	0.0%	n/a	-	0	-
Incentives to purchase products	17	51.5%	14	15.4%	31	25.0%
Seeking contact through inviting to visit company website or Facebook pages	5	15.2%	0	0.0%	5	4.0%
Total promotions observed	33	100.0%	91	100.0%	124	100.0%
By company						
Abbott	6	18.2%	14	15.4%	20	16.1%
Alpura	0	0.00%	4	4.4%	4	3.2%
Ausnutria	0	0.00%	2	2.2%	2	1.6%
Bayer	0	0.0%	4	4.4%	4	3.2%
Danone	0	0.0%	0	0.0%	0	0.0%
FrieslandCampina	5	15.2%	3	3.3%	8	6.5%
Kraft Heinz	0	0.0%	0	0.0%	0	0.0%
Lactalis	3	9.1%	6	6.6%	9	7.3%
Nestlé	11	33.3%	37	40.7%	48	38.7%
RB	8	24.2%	21	23.1%	29	23.4%
Total	33	100.0%	91	100.0%	124	100.0%

Source: ATNI Mexico (2020)

* Note that only promotional materials that reference the five main product types [IF, FOF, GUM, CF<6, CF 6-36] are included in these counts.

C. Article 9: Labeling

Data was collected from labels to allow for the assessment of compliance with the sub-articles of Article 9, WHA 58.32, WHA 61.20, WHA 69.9, and various Mexican regulations pertaining to the labeling of baby food products. (No inserts were found). Label data was abstracted initially from a total of 120 product labels. If a product was available in more than one size, then the most popular or common size was purchased and used in the analysis.

Table 5-10 displays the number of product labels assessed by company. In total, there were 156 observations of label noncompliance with 101 labels having at least 1 observed noncompliance. There were 86 BMS products included in the label analysis with 67 of those products having 1 or

more observed noncompliance. In addition, there were 34 CF 6-36 month products, all of which had at least one or more observed noncompliance. Comparatively, in the Philippines, there were 126 labels assessed and 68 products with at least one observed noncompliance. In Thailand, 224 product labels were assessed with 119 products having at least one observed noncompliance, while in Nigeria, 35 labels were assessed, all of which had at least one noncompliance.

The company with the most observed incidences of noncompliance in the label analysis was Nestlé with 50 (~32%) across 47 products analyzed. Among the other ATNI-Index companies, 65 (~54%) of the products included in the label analysis had at least one noncompliance against Article 9 of the Code and/or WHA 61.20. Among the 'other' companies, the largest number of observations of noncompliance were for Lactalis, which had a total of 17 (~11%). These findings differed with the Philippines, where the largest number of incidents of noncompliance were observed for RB. In Nigeria, the ATNI-Index company with the most observed noncompliances was KraftHeinz, while in Thailand, the largest number of incidents were observed for Danone.

Table 5-10 also displays the average number of incidents of noncompliance per product (i.e., per unique label included in the labeling assessment). In total, there was an average of 1.3 observed incidents per product. Alpura recorded the largest average number of observed incidence of noncompliance with 6 per product from a total of 2 products. Of the ATNI-Index companies in this study, RB had the highest average number of incidence of noncompliance per label with 1.8. Similarly, in the Philippines, there was an average of 1.3 observed noncompliances per product, while Thailand averaged 2.2 and Nigeria averaged 5.8.

Company	Number of product labels/inserts assessed	Total number of incidents of noncompliance	Average number of incidents of noncompliance per product	Number of products with at least one noncompliance
ATNI-Index companies:				
Abbott	10	11	1.1	10
Danone	7	2	0.3	2
FrieslandCampina	6	7	1.2	6
Kraft Heinz	5	5	1.0	5
Nestlé	47	50	1.1	33
RB	9	16	1.8	9
Other companies:				
Alpura	2	12	6.0	2
Bayer	9	9	1.0	9
Lactalis	11	17	1.5	11
Migh International Distribution	3	10	3.3	3
Nucitec	3	8	2.7	3
Perrigo	1	2	2.0	1
Siegfried Rhein	4	4	1.0	4
Super Pharmacies Guadalajara	3	3	1.0	3
Total number reports	120	156	1.3	101

Source: ATNI Mexico (2020)

Sub-article 9.2

Manufacturers and distributors of infant formula should ensure that each container has a clear, conspicuous, and easily readable and understandable message printed on it, or on a label which cannot readily become separated from it, in an appropriate language, which includes all the following points:

- **(a) the words “Important Notice” or their equivalent;**

For all IF, FOF, GUM, and CF <6 months (86 products total), 4 products (~5%) were missing “Important Notice” or an equivalent statement. The companies with products that were missing this information included RB, Alpura, Lactalis, and Nucitec. These incidents of noncompliance were observed only on GUM products from these companies. In the Philippines, 6% of products were missing this information, while in Thailand and Nigeria, all products assessed were compliant for this item in the Code or comparable regulations.

- **(b) a statement of the superiority of breast-feeding;**

For all IF, FOF, GUM, and CF <6 months (86 products total), 6 products (~7%) were missing a statement of the superiority of breastfeeding. The companies with products that were missing this information included Alpura, Lactalis, Nestlé, Nucitec, and RB. The incidents of noncompliance were observed only on GUM products from these companies. In the Philippines, 6% of products were noncompliant for this sub-article of the Code, while all labels assessed in Thailand were compliant. However, in Nigeria, one IF label was noncompliant, while the labels of 17% of FOFs, 17% of GUMs, and 100% of CFs <6 months products did not include this statement.

- **(c) a statement that the product should be used only on the advice of a health worker as to the need for its use and the proper method of use;**

For all IF, FOF, GUM, and CF <6 months (86 products total), 6 products (~7%) did not include a statement that the product should be used only on the advice of a health worker as to the need for its use and the proper method of use. These incidents of noncompliance were observed on IF and GUM product labels from Alpura, Lactalis, Nestlé, Nucitec, and RB. In the Philippines, 6% of eligible products were missing this statement. In Thailand, noncompliance was observed for IF (60%) and FOF (63%) products, while in Nigeria 29% of the IF products were noncompliant for this section of the Code.

- **(d) instructions for appropriate preparation, and a warning against the health hazards of inappropriate preparation.**

The Mexican regulations gave effect to the instructions for appropriate preparation requirement in this sub-article of the Code by requiring BMS product labels to include instructions for appropriate storage, preservation, use, preparation, and consumption. Among the applicable product types (IF, FOF, GUM, CF <6 months; 86 products total), all of the products assessed were compliant for these requirements. However, 5 (~6%) labels were missing the warning against the health hazards of inappropriate preparation. These incidents of noncompliance were observed on GUM products from Alpura, Lactalis, Nestlé, and RB. In the Philippines, 4% of products were noncompliant for this sub-article, while in Thailand, all products assessed included the statements required under this section of the Code. In contrast in Nigeria, 36% of IFs, 17% of GUMs, and 100% of CFs <6 month product labels were not compliant for this section.

Sub-article 9.2 of the Code also specifies that neither the container nor the label should have pictures of infants, nor should they have other pictures or text which may idealize the use of infant formula. All IF, FOF, GUM, and CF <6 months products were compliant for this element of the sub-article. In the Philippines, 1% of products were noncompliant on this point of the sub-article. In

Nigeria, 43% of IFs were noncompliant and included pictures of infants, or other pictures or text which may idealize the use of infant formula, while all products assessed in Thailand were compliant.

In addition, sub-article 9.2 of the Code states that the content of labels of infant formula products should be written in an appropriate language, however the Mexican regulations do not require labels to use a particular language. In Mexico, all of the product labels in the analysis (120 products total) were compliant for this sub-article of the Code, as all of the label content on each product was in Spanish. In the Philippines, 33% of all products were not compliant with this requirement. The regulations in Nigeria specified that the label directions appear in the three main languages; however, 89% of all products assessed were noncompliant with this requirement. There was no additional language requirement in Thailand.

Sub-article 9.3

Food products within the scope of this Code, marketed for infant feeding, which do not meet all the requirements of an infant formula, but which can be modified to do so, should carry on the label a warning that the unmodified product should not be the sole source of nourishment of an infant.

The interpretation of this sub-article is not completely clear. Therefore, we are not reporting on this sub-article.

Sub-article 9.4

The label of food products within the scope of this Code should also state all the following points: (a) the ingredients used; (b) the composition/analysis of the product; (c) the storage conditions required; and (d) the batch number and the date before which the product is to be consumed, taking into account the climatic and storage conditions of the country concerned.

All of the products assessed in Mexico were compliant for sub-article 9.4 of the Code. However, in the Philippines, 40% of the products assessed for these requirements were noncompliant for at least one of these requirements. For Nigeria, the local regulations required the nutritional composition for this product type, and 51% of the assessed products were missing the nutritional composition on the labels (noncompliance was only found for the CF 6-36 months products in Nigeria, which were not assessed for this item in the Mexico and the Philippines). All products assessed in Thailand were compliant for this sub-article.

Other Recommendations Relating to Labels Set Out in WHA Resolutions

WHA 58.32 – Nutrition and Health Claims

According to the WHA 58.32, nutrition and health claims are not permitted for breast-milk substitutes except where specifically provided for in relevant Codex Alimentarius standards or national legislation³⁵. This has been reiterated in WHA 69.9 for all foods for infants and young children including CF 6-36 months products. Among the 120 labels assessed in Mexico, 20 (17%) labels included nutrition and/or health claims. This was not analyzed in the Philippines, as the legality of nutrition and health claims was not clear in the Filipino regulations. However, in Nigeria,

³⁵ Mexico's regulations prohibit the use of health and nutrition claims on BMS products

54% of the products assessed were noncompliant, 59% of the products in Thailand were noncompliant as well.

Table 5-11 displays the number of nutrition and/or health claims by company. The company with the largest number of nutrition and/or health claims was Nestlé with a total of 12 observations. Additionally, Table 5-11 also displays examples of nutrition/health claims found on the products assessed in Mexico.

Table 5-11. Examples of nutrition and health claims observed on labels		
Company/Brand	Examples of phrases and text on products' labels considered as nutrition or health claims	Total no. of claims
ATNI-Index Companies		
Abbott	It contains more protein and calcium than Similac Isomil 1, which helps meet the nutritional needs of growing children.	1
FrieslandCampina	They contain important nutrients for the growing child.	1
Nestlé	Active prebiotics that provide protection against infectious diseases; They train and strengthen the immune system; Unique and exclusive protein known to facilitate digestion; High quality protein that promotes proper future health.	12
RB	The combination of MFGM and DHA, along with other nutrients to stimulate and support the mental development of your child.	1
Other companies		
Alpura	DHA is important for the proper functioning and development of the brain.	2
Migh International Distribution	Fatty acids that can improve your baby's vision and mental development.	3

Source: ATNI Mexico (2020)

WHA 61.20 – Labeling Requirements for Powdered Formula

NetCode Form 7 assesses the labels of all formula in powdered form to include the following information, to align to the WHO/FAO guidance associated with WHA 61.20.

- The label shows clear graphic instructions illustrating the method of preparation;
- Instructions show the use of hygienic practices, e.g., clean hands, preparation surfaces;
- Instructions show the need to boil water and sterilize utensils;
- Instructions show necessity for powdered formula to be prepared one feed at a time;
- Instructions show necessity of using water at or above 70°C in order to minimize microorganisms contamination during preparation; and
- Instructions show the need to cool the formula before feeding if using hot water for reconstitution;
- Instructions show that left-overs of the product need to be discarded immediately.

The Mexican regulations related to the labeling of baby food/formula products expand upon the sixth bullet, requiring that “instructions indicate that the product must be prepared with water first boiled for five minutes, and cooled until it is lukewarm. In case boiled water is not available, purified water at room temperature can be used.” In the label analysis, the applicable products were assessed for these additional requirements in the Mexican regulations.

Among the 85 powdered IF, FOF, GUM, and CF <6 months products included in the label analysis, there were a total of 62 (~73%) products that were noncompliant with the requirements relating to WHA 61.20. The most common reason for noncompliance was that the label instructions did not describe the necessity for preparing powdered formula one feed at a time, as this was missing from the instructions of 56 (66%) of the assessed products. Lactalis recorded the largest number of noncompliances for these requirements with 11 (~13%) in total. Of the ATNI-Index companies, Abbott recorded the most incidents of noncompliance with 10 (~12%) in total. In the Philippines, 40% of the products assessed for these requirements were noncompliant, and the most common reason for noncompliance was the same as in Mexico.

WHA 69.9 – Recommendation 4 requirements

- Data collected from the labels also allowed for the assessment of compliance with Recommendation 4 of WHA 69.9, which states that all products include the appropriate age of introduction on the label. Additionally, the Mexican regulations require that the appropriate age range to be located near the product name on the label. All products assessed in Mexico were compliant for these requirements.
- Recommendation 4 of WHA 69.9 also notes that messages should not “convey an endorsement or anything that may be construed as an endorsement by a professional or other body, unless specifically approved by relevant national, regional or international regulatory bodies.” There were 3 (~3%) incidences of noncompliance in this regard on labels from Danone and RB. An example of a phrase that could be construed as an endorsement included, “#1 Pediatrician Recommended Brand”.
- Recommendation 4 also requires labels of CFs 6-36 months to not “include any image, text or representation that might suggest use for infants under the age of 6 months.” All products in this analysis were compliant with this requirement.
- Additionally, Recommendation 4 stipulates a statement on the importance of continued breastfeeding for up to 2 years or beyond on the product label for CF 6-36 month products. Among the 34 CF 6-36 month products included in the assessment, all of them were noncompliant for this requirement. The company with the most incidents of recorded noncompliance was Nestlé with a total of 29 (85%). The remaining 5 (~15%) incidents were found on KraftHeinz products.
- Lastly, to comply with Recommendation 4 a statement should be provided on a label on the importance of not introducing CFs before 6 months of age for CF 6-36 month products. All of the CF 6-36 month products included in this analysis were compliant for this requirement.

Table 5-12 displays the number of noncompliant labels, i.e., had one or more noncompliant elements, disaggregated by product type for each company. Label data was abstracted from 120 products and the product type with the most observed incidents of noncompliance was IF with 35 (~35%), followed by 34 (~34%) for CF 6-36 months products. These results differ from those

found in the Philippines, Thailand, and Nigeria. In the Philippines, the product type with the most incidents of noncompliance was for CF 6-36 months products. In Thailand, the product type with the most incidents in the label analysis was GUM, whereas in Nigeria, the largest incidence of noncompliance was for CF <6 months products. Supplementary Table B in Appendix H provides additional details regarding the most prominent types of noncompliance by company.

Company	By product type					Total no. of noncompliant labels
	Infant Formula (IF) <6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) <6 mos*	Complementary Food (CF) 6-36 mos*	
Companies in ATNI's 2021 Index						
Abbott	7	1	2	NA	NA	10
Danone	1	1	0	0	0	2
FrieslandCampina	4	1	1	NA	NA	6
Kraft Heinz	0	0	0	0	5	5
Nestlé	0	0	4	0	29	33
RB	6	1	2	NA	NA	9
Other companies						
Alpura	0	0	2	0	0	2
Bayer	6	3	0	0	0	9
Lactalis	6	3	2	0	0	11
Migh International Distribution	1	1	1	0	0	3
Nucitec	1	1	1	0	0	3
Perrigo	0	1	0	0	0	1
Siegfried Rhein	2	1	1	0	0	4
Super Pharmacies Guadalajara	1	1	1	0	0	3
Total	35	15	17	0	34	101

Source: ATNI Mexico (2020)

* NA denotes findings of complementary food products as not being applicable to companies that do not produce and market these product types.

Requirements in the Mexican regulations that go beyond the standards required by the Code and relevant WHA resolutions

The legal analysis conducted by ATNI determined that several Mexican regulations went beyond the standards required by the Code and relevant WHA resolutions. These regulations included more requirements for IF, FOF, GUM, and CF <6 months products as well as other stipulations related to non-dairy products, CF 6-36 products, and Formulas for Special Medical Purposes (FSMPs), defined in the Codex Alimentarius of International Food Standards as “a breast-milk substitute specially manufactured to satisfy, by itself, the nutritional requirements of infants during the first months of life up to the introduction of appropriate complementary feeding.”³⁶ The FSMP products assessed in the label analysis were categorized as either FSMP 0-6 months or FSMP 6-36

³⁶ www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXS%2B72-1981%252FCXS_072e.pdf

months products, depending upon the age range indicated on the product, in order to account for the requirements in the Mexican regulation related to these products.

- **Art. 140 (II) of the Regulations for the Sanitary Control of Products and Services** requires that in the case of non-dairy formula, when the product does not contain milk or any of its derivatives, the label must expressly indicate: “Does not contain milk”, “Does not contain dairy derivatives”, or an equivalent legend.”

This regulation applied to 5 products (non-dairy IFs and FOFs) included in the label analysis. There was 1 noncompliance observed on an IF product made by RB (~20%). The noncompliance was due to the product missing information stating that the product “Does not contain dairy derivatives.”

- **Art. 10.3.10.1 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** specifies that the label must include written and graphic instructions on how to prepare and use the product in such a way that it does not undermine breastfeeding. (Note: In the case of liquid formulas: the graphic instructions may be included in the collective packaging only).

This regulation applied to 51 IF products included in the label analysis. All of the products assessed were compliant with this regulation.

- **Art. 10.3. and 10.4 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** specifies that the label must contain “Instructions indicating that the product should not be heated using a microwave oven in order to avoid the risk of causing serious burns”.

This regulation applied to the 86 IF, FOF, GUM, and/or CF 0-6 products included in the label analysis. In total, there were 6 (~7%) observed incidents of noncompliances due to product labels omitting this statement. These incidents were observed on products made by Alpura, Nestlé, and Might International Distribution.

- **Art. 10.3.10.1 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** says that product labels must include written and graphic instructions on the preservation of the product, before and after opening the container and once the product is prepared, and a statement indicating that prolonged storage and excessive temperatures should be avoided (Note: In the case of liquid formulas: the graphic instructions may be included in the collective packaging only).

This regulation applied to 51 IF products included in the label analysis. All of the products assessed were compliant with this regulation.

- **Art. 10.3.15 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that the product label contain a statement that, “in addition to the consumption of this product, infants should also be fed weaning foods from an age that is appropriate for their specific growth and development needs according to the guidance of the health professional (doctor or nutritionist), and in any case from six months onward.”

This regulation applied to 51 IF products included in the label analysis. The interpretation of this regulation is not completely clear. Therefore, we are not reporting on this regulation.

- **Art. 10.3.16 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that the product label contain a statement that the product is part of the weaning process and should not be given to infants under 6 months.

This regulation applied to the 35 FOF and GUM products included in the label analysis. There were 5 (~14%) observed incidents of noncompliance on products made by Alpura, Lactalis, Migh International Distribution, Nucitec, and Perrigo due to product labels omitting the required statement.

- **Art. 10.3.18 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for FSMPs contain a prominent statement in bold that says “USE UNDER MEDICAL SUPERVISION”, separate from any other written, printed or graphical information.

This regulation applied to the 44 FSMP 0-6 months and FSMP 6-36 months products included in the label analysis. There was 1 (~2%) observed noncompliance on an FSMP 6-36 months made by Nucitec due to the product label omitting the required statement.

- **Art. 10.3.5 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for FSMPs indicate in suitable descriptive terms as part of the name, the essential characteristic of the product, but not the disorder, disease or specific medical condition for which they are intended.

This regulation applied to the 44 FSMP 0-6 months and FSMP 6-36 months products included in the label analysis. All of the products assessed were compliant with this regulation.

- **Art. 10.4.4 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for CF include instructions for its preparation and use, as well as for its storage and preservation before and after the container has been opened.

This regulation applied to the 34 CF 6-36 months products included in the label analysis. All of the products assessed were compliant with this regulation.

- **Art. 10.4.5 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** requires that product labels for CF include a statement that the decision on the precise time when to start weaning, including any exceptions to the six-month age limit, should be made in consultation with a healthcare professional (doctor or nutritionist), based on the specific growth and development needs of the infant.

This regulation applied to the 34 CF 6-36 months products included in the label analysis. All of the products assessed were compliant with this regulation.

- **Arts. 10.4.8 & 10.4.9 of the Official Mexican Standard on Infant formula, follow-on formula and formula for special medical purposes** require that product labels for cereals that must be prepared by adding milk or other suitable nutritious liquids, the label/insert contains the following:
 - A statement saying “Use milk or formula but not water”, or an equivalent indication and
 - A statement that the added ingredients (milk or other suitable nutritious liquids) must be recommended by a health professional (doctor or nutritionist).

This regulation applied to the 5 CF 6-36 months products included in the label analysis. All of the products assessed were compliant with this regulation.

6. Conclusions and Recommendations

This report is based on a study carried out for ATNI using the 2017 Network for Monitoring and Support for Adherence to the Code (NetCode) protocol adapted for Mexico. It is the seventh ATNI study Westat has conducted (following studies in Vietnam, Indonesia, and India, which were undertaken using the 2007 Interagency Group on Breastfeeding Monitoring [IGBM] protocol, and studies in Thailand and Nigeria in 2017 (using the 2015 NetCode protocol), and the Philippines study in 2020 (using the 2017 NetCode protocol).

While this study was reduced in scope due to the global SARS-CoV-2 pandemic, compared to the planned study, and the parallel study carried out in the Philippines, and has some limitations (as discussed in Chapter 7), it provides valuable insights about baby food companies' compliance with the Code and local regulations in Mexico that go beyond the Code. Additionally, this study can serve as a model for similar studies in other countries or in other locations, for example, rural locations. The methodology of the 2017 NetCode protocol can serve as a valuable complement to other approaches to monitoring compliance with the Code, such as the surveillance approach employed by International Baby Food Action Network (IBFAN).

A. Conclusions about compliance with the Code and National Regulations

Informational and Educational Materials (Sub-article 4.2): The results relative to Article 4 presented in Chapter 5 note that the data collection team did not observe any informational and educational material related to Infant Formula (IF), Follow-on Formula (FOF), Growing-up Milk (GUM), Complementary Food (CF) <6 months, or CF 6-36 months in the large retail outlets at the time they visited. Based on these findings, no printed informational or educational material appears to be distributed by manufacturers to retail outlets. Therefore, companies demonstrate strong compliance with this aspect of the Code.

Advertising and Promotion (Sub-article 5.1) augmented by recommendation 4 of WHA 69.9: The media monitoring component of the study included direct observations of both traditional media sources (television and radio) as well as online media sources. There were 13 unique advertisements or promotions observed through traditional media monitoring, all observed on television channels. In total, there were 87 eligible observations from online media sources. Seventy-six (76)(87%) of these observations appeared on company/brand associated websites or social media pages, while 11 (13%) of these promotions were observed on parenting websites and/or their social media pages.

Overall, there were 100 media promotions observed for 32 unique products in the traditional and online media monitoring. The company with the largest number of promotions observed was Nestlé with a total of 41 advertisements (41%) for 14 of its unique products, followed by RB with a total of 28 promotions (28%) for 5 of its products. The most common product type included in the observed promotions was GUM with a total of 76 promotions (76%) for 21 different GUM products, and to a lesser extent CF 6-36 month products (5%) and IF products (3%). While advertisements and promotions for CF 6-36 months are not a noncompliance per se, WHA 69.9 stipulates that certain messages must be included or excluded. Five (5) promotions for six (6) products of this type did not do so. Sixteen (16) (16%) of the media findings related to brand promotions that did not

relate to a specific product. Compliance with Article 5.1 of the Code and WHA 69.9 was therefore found to be poor.

Point-of-Sale Promotions (Sub-article 5.3): Of the 124 promotions enumerated across the physical retailer and online retailer data collection, 73% of them were found on online retailers' sites, while 27% were found in physical retailers. A total of 91 online promotions for 24 BMS/CF products were identified in the five prominent online retailers. In addition, 33 promotions for 19 BMS/CF products were identified in the ten retail outlets. Overall, 80 promotions (65%) were price related; 31 promotions were incentives to purchase products (25%), 7 promotions were free gifts (6%), 5 were the companies were seeking contact through an invitation to visit company website or Facebook pages (4%), and 1 was a special display (<1%).

Among promotions observed in the ten physical retailers, more than half of them (52%) were incentives to purchase products. By company, 11 (33%) of the 33 promotions documented were related to products made by Nestlé, 8 for products made by RB (24%), 6 for products made by Abbott (18%), 5 were for FrieslandCampina products (15%) and 3 for products made by Lactalis (9%). Two thirds (67%) of the promotions involved GUM products, 24% IF products, 6% FOF products, and one (1) CF 6-36 month product from Nestlé that explicitly invites the consumer to visit a website, a noncompliance as per Recommendation 5 of WHA 69.9.

Specifically among 91 observed promotions referencing 24 products on online retail websites, the company with the most products observed in these promotions was Nestlé with a total of 8 (33%). The most common product type found in the promotions observed on online retail websites was GUM with 83 point-of-sale promotions (91%) for 19 different products, followed by 5 promotions (6%) of 3 IF products and 3 (3%) promotions for 2 FOF products. Among the GUM product promotions, 68 (82%) were price-related, followed by 13 (16%) incentive to purchase products. Compliance with this Article of the Code was therefore found to be poor.

ATNI checked with the six ATNI-Index companies in the Mexican market on whether they had formal commercial contracts with each of the online retail sites on which promotions were found. The observed promotions included in the results for the ATNI-Index companies only include observations from online retailers that had a confirmed contracts with each ATNI-Index company.

Company Contact with Mothers (Sub-article 5.5): Observations in physical retailers documented 5 instances (2 IF products, 2 FOF products and 1 CF6-36 month product) where the packaging of these products made by Nestlé included an invitation to make contact with the company by visiting its website and/or Facebook page. Specifically, the only CF 6-36 months product identified in physical retailers explicitly invites the consumer to visit a website asking the visitor to 'be part of the club' and sign up to Nestlé *Baby and me*, a noncompliance as per Recommendation 5 of WHA 69.9 on cross promotions. Additionally, in the online monitoring of companies' own media, promotional e-mails received as part of digital company subscriptions reflect indirect contact initiated by the companies with mothers and caregivers which is noncompliant with sub-article 5.5 of the Code. The e-mails were mainly received by RB promoting its GUM products. While only a few instances of noncompliance were found in this study, there is some room for improvement.

Labeling (Article 9, WHA 58.32, WHA 61.20, and recommendation 4 of WHA 69.9): This study included a product label analysis component, in which eligible product labels were assessed for their compliance with the Code, as well as with WHA 58.32 and WHA 61.20 and relevant Mexican regulations that go beyond the Code. Eligible products included all BMS/CF products intended for children from birth to 36 months of age; however, only the legitimate products for the ATNI-Index

companies that met these criteria were included. In total, 50 parallel import products for ATNI-Index companies were excluded from the label analysis; as a result it is not possible to state whether they were labeled in conformance with national requirements.

After assessing 120 product labels, there were 156 observations of noncompliance with 101 labels having at least one observed noncompliance. There were 86 BMS products included in the label analysis with 67 of those products (78%) having one or more observed noncompliance. Forty-six percent (46%) of the BMS products with an observed noncompliance were from ATNI-Index companies, while the remaining 54% were from 'other' companies. In addition, there were 34 CF 6-36 month products, all of which (100%) had at least one or more observed noncompliance.

The **company with the most observed incidence of noncompliance** in the label analysis was Nestlé with 50 (31%) across 47 products analyzed. Among the other ATNI-Index companies, 65 (77%) of the products included in the label analysis had at least one noncompliance against Article 9. Additionally, at least one labeling noncompliance was observed on all of the products purchased from 'other' companies and the largest number of observations of noncompliance (17) (47%) were for Lactalis.

On average, the **number of incidents of noncompliance per product** was 1.3. Alpura recorded the largest average number of observed incidence of noncompliance with 6 per product from a total of 2 products. Of the ATNI-Index companies in this study, RB had the highest average number of noncompliance per label with 1.8.

Overall, the **product type with the most observed incidence of noncompliance** in the label analysis was IF with 35 (35%), followed by 34 (34%) for CF 6-36 months products. Among the ATNI-Index companies, the study reviewed 47 Nestlé products and found 50 incidents of noncompliant labels on 33 of these products. Moreover, each of the products analyzed for Abbott (10), Kraft Heinz (5), RB (9) and FrieslandCampina (6) had one or more incidence of noncompliance, while only 2 products for Danone recorded one or more incidence of noncompliance. Noncompliance due to missing statements such as "Important Notice" (observed only on GUM products), missing statements of the superiority of breastfeeding (observed only on GUM products), or that the product should be used only on the advice of health workers (observed on GUM and IF products), were in small numbers (<10%).

Other observations of noncompliance found are labels that include **nutrition and/or health claims** (17%). The company with the largest number of such claims was Nestlé with a total of 12 observations. Among the 85 powdered IF, FOF, GUM, and CF <6 months products, 62 (73%) were noncompliant with requirements from **WHA 61.20 (method of preparation and hygienic practices)**, which was the most common reason for noncompliance in the label analysis. Lactalis recorded the largest number of noncompliances for these requirements with 11 (13%) total. Of the ATNI-Index companies, Abbott recorded the most incidents of noncompliance with 10 (12%). There were also 3 (4%) incidents of noncompliance among products from Danone and RB because of the inclusion of what are considered **endorsements** by professional bodies or groups.

Specifically related to CF 6-36 months products, this study found that 34 products (100%) were noncompliant with the requirement of stating the **importance of continued breastfeeding for up to two years or beyond**. These noncompliances were recorded among 29 products from Nestlé and 5 products from Kraft Heinz.

On the *positive side*, the label content of all 120 products assessed were in Spanish and all products assessed in Mexico were compliant for sub-article 9.4 of the Code (the label should state all the following points: ingredients used; composition/analysis of the product; storage conditions required; and batch number and the date before which the product is to be consumed). All products included the appropriate age of introduction, required to be located near the product name on the label in Mexico. All applicable products (86 IF, FOF, GUM, and CF <6 months) were compliant with the requirement to include instructions for appropriate storage, preservation, use, preparation, and consumption. Similarly, none of the containers or labels of these products have pictures of infants, or other pictures or text which may idealize the use of infant formula, or that might suggest use for infants under the age of 6 months. Finally, all of the CF 6-36 month products were compliant with the requirement of stating the importance of not introducing CFs before 6 months of age.

The following results refer to label requirements in the **Mexican regulations that go beyond the standards required by the Code and relevant WHA resolutions**.

Among the 86 IF, FOF, GUM, and/or CF <6 months products assessed, 6 (7%) products (from Alpura, Nestlé, and Migh International Distribution) observed noncompliances due to products missing the statement indicating that the product should not be heated using a microwave oven in order to avoid the risk of causing serious burns. Thirty five (35) FOF and GUM products were reviewed and 5 (14%) had observed noncompliances due to labels missing the required statement that the product is part of the weaning process and should not be given to infants under 6 months. These 5 products were from Alpura, Lactalis, Migh International Distribution, Nucitec, and Perrigo.

Other noncompliances were only found in small numbers. This include that among 5 non-dairy products (IFs and FOFs), 1 noncompliance was observed on an IF product from RB (20%) due to the product missing information stating that it “Does not contain dairy derivatives”, or an equivalent legend. Similarly, only 1 FSMP 6-36 month product from Nucitec out of 44 FSMP 0-6 month and FSMP 6-36 month products (2%) observed noncompliance due to the product missing a prominent statement in bold that says "USE UNDER MEDICAL SUPERVISION", separate from any other written, printed or graphical information.

Several *positive findings* demonstrate **compliance with most areas of national regulation where it goes beyond the Code**. All 51 IF products reviewed were compliant for the regulation that specifies that the label must include written and graphic instructions on how to prepare and use the product in such a way that it does not undermine breastfeeding. Likewise, all these IF products included written and graphic instructions on the preservation of the product, before and after opening the container and once the product is prepared, and a statement indicating that prolonged storage and excessive temperatures should be avoided. Moreover, none of the 44 FSMP 0-6 month and FSMP 6-36 month products included in the label analysis describe the disorder, disease or specific medical condition for which they are intended but instead describe in suitable terms the essential characteristics of the products.

In addition, all of the 34 CF 6-36 months products assessed were compliant with the inclusion of instructions for its preparation and use, as well as for its storage and preservation before and after opening the container. Similarly, all CF 6-36 months products include a statement that the decision on the precise time when to start weaning, including any exceptions to the 6 month age limit, should be made in consultation with a healthcare professional (doctor or nutritionist), based on the specific growth and development needs of the infant. Finally, all the 5 cereal CF 6-36 months products assessed include a statement saying "Use milk or formula but not water", (or equivalent)

and that the added ingredients (milk or other suitable nutritious liquids) must be recommended by a health professional.

Compliance with Article 9 of the Code, recommendation 4 of WHA 69.9, WHA 58.32, WHA 61.20, and the various elements of Mexican regulations that go beyond the Code, is therefore patchy. Generally, the product labels assessed in Mexico exhibited lower levels of compliance with Article 9 of the Code and the relevant WHA resolutions, whereas the labels exhibited higher levels of compliance with the Mexican regulations. Furthermore, lower levels of compliance were observed on IF and CF 6-36 month products, while FOF and GUM products had higher levels of compliance. In regard to the companies included in the label assessment, ATNI-index companies had lower average incidences of noncompliance when compared to the average incidences of noncompliance found for 'other' companies.

Table 6-1 presents a summary of observed incidents of noncompliance for the six ATNI-Index companies (all of which officially sell their products in Mexico) and "other companies," regarding the covered BMS and CF products in Mexico City. (Note that this table is identical to Table ES-1.) Because noncompliance varies by sub-article and their relative importance may differ, this data is presented for descriptive purposes only.

Table 6-1. Summary of observations of incidence of noncompliance, by Code sub-article¹ and WHA 69.9, and company

Company	Total number of products found ²	Total number of incidence of noncompliance (sum of columns to the right)	Incidence of noncompliance by relevant Code sub-article and WHA 69.9		
			5.1/WHA 69.9 Media monitoring (traditional and online) ^{3,4} <i>Table 5-1</i>	5.3, 5.5, WHA 69.9 Promotions at retail outlets (physical and online retailers) <i>Table 5-9</i>	9.2, 9.4, WHA 69.9 Noncompliant product labels ⁵ <i>Table 5-10</i>
Abbott	15	42	12	20	10
Danone	14	3	1	0	2
FrieslandCampina	10	26	12	8	6
KraftHeinz	35	5	0	0	5
Nestlé	233	122	41	48	33
RB	27	66	28	29	9
Other ⁶	75	61	6	19	36
Total	409	325	100	124	101

Source: ATNI Mexico (2020)

¹ Observations for sub-article 4.2 are not shown in this table as there were no relevant findings in the retail outlets visited. Observations from health facilities (HFs) which relate to sub-articles 4.3, 6.3 and 6.8 are not presented in this table given that HF visits were not within the scope of this assessment.

² The count of products includes all the unique products found throughout course of the study, excluding 50 parallel imports. In total, 153 products were observed in the data collection. The labels of 120 products were assessed; the other 33 products were not able to be purchased but featured in marketing or advertising.

³ Note that the Media Monitoring component of the study (May - October 2020) includes observations of advertisements or promotions in traditional media (Television and Radio) and online (company and brand websites local to Mexico and their associated social media pages, along with 10 parenting websites and their associated social media pages).

⁴ The frequencies below include 84 observed promotions related to specific products in the media monitoring as well as 16 observed promotions that were not related to a specific product. The promotions that were not related to a specific product advertised a particular BMS/CF company or brand.

⁵ Counts of noncompliance include Sub-articles 9.2 and 9.4 of the Code, as well as WHA 58.32 and WHA 61.20, and relevant Mexican regulations (those which exceed the Code). Each label included in this analysis can have more than one noncompliance; however, this column shows the counts at the unique product level (i.e., number of eligible products with at least one [one or more] label noncompliance). Additionally, the 50 parallel imports were excluded from the label analysis results presented in this report and are therefore not counted in this column. Two-hundred and forty-eight (248) legitimate products and 39 products from “other” companies were not available for purchase in Mexico and are also excluded from the count in this column because they were not assessed in the label analysis.

⁶ “Other” companies from the data collection in Mexico included: Alpura, Ausnutria, Bayer, Holle, Lactalis, Migh International Distribution, Nucitec, Ordesa, Padsa, Perrigo, Siegfried Rhein, Similares, and Super Pharmacies Guadalajara. There were no observed findings for Ordesa, Padsa and Similares.

Table 6-2 presents a summary of observed incidence of noncompliance by product type, for the six ATNI-Index companies and “other companies” in Mexico City. (Note that this table is identical to Table ES-2.) Because noncompliance varies by sub-article and their relative importance may differ, this is presented for descriptive purposes only.

Company	Total no. of observed incidence of noncompliance by product type						
	Infant Formula (IF) <6 mos	Follow-on Formula (FOF) 6-11 mos	Growing-up Milk (GUM) 12-36 mos	Complementary Food (CF) <6 mos ²	Complementary Food (CF) 6-36 mos ²	Not a specific product	Total
Abbott	9	1	32	NA	NA	0	42
Danone	1	1	1	0	0	0	3
FrieslandCampina	4	1	21	NA	NA	0	26
Kraft Heinz	0	0	0	0	5	0	5
Nestlé	4	2	70	0	35	11	122
RB	10	3	49	NA	NA	4	66
Total ATNI-Index companies	28	8	173	0	40	15	264
Other ¹	23	12	25	0	0	1	61
Total	51	20	198	0	40	16	325

Source: ATNI Mexico (2020)

¹ “Other” companies from the data collection in Mexico included: Alpura, Ausnutria, Bayer, Holle, Lactalis, Migh International Distribution, Nucitec, Ordesa, Padsa, Perrigo, Siegfried Rhein, Similares, and Super Pharmacies Guadalajara. There were no observed findings for Ordesa, Padsa and Similares.

² NA denotes findings of complementary food products as not being applicable to companies that do not produce and market these product types.

B. Conclusions about the Code and the NetCode Protocol

As noted earlier, this is the seventh ATNI study on which we have reported, and the second study following the 2017 NetCode protocol. Additionally, we used the IGBM Protocol for the first three studies (in Vietnam, Indonesia, and India) and adapted the 2015 NetCode protocol for the Thailand and Nigeria studies. Most of our conclusions about the Code are similar to those we described in our reports for the previous six countries (Vietnam, Indonesia, India, Thailand, Nigeria and the Philippines).³⁷ Therefore, we will not repeat the detailed conclusions but refer the reader to the previous reports instead. A listing of the issues that should be addressed is provided below.

Definitions of Noncompliance. The Code includes a complex set of recommendations, some of which can be challenging to interpret or measure.

³⁷ <https://accesstonutrition.org/library/#types=bms>

The 2017 NetCode Protocol. ATNI selected the 2017 NetCode protocol to assess compliance by baby food companies with the recommendations of the Code because this protocol is seen as the best existing rigorous research-oriented approach to conduct such an assessment.

With its six sources of data collection, the 2017 NetCode protocol addresses a great number of the sub-articles of Articles 4, 5, 6, 7, and 9 of the Code. However, as described in Chapter 2 and mentioned in Chapter 7, it does not cover all aspects of the Code. Unfortunately, the scope of the study in Mexico was modified to exclude visits to HFs and MCs, due to the global SARS-CoV-2 pandemic, and therefore, no data was collected with Forms 1, 2 and 3 which are useful to assess compliance with Articles 4, 5, 6 and 7 of the Code. Findings from this study, however, covered sub-articles 4.2, 5.1 and 5.3, 5.5 as well as Article 9 and relevant WHA 69.9 recommendations.

As previously with the Philippines study, a notable improvement compared to the Thailand and the Nigeria studies and their use of the NetCode protocol was the inclusion for the study in Mexico of an assessment of online media. This includes advertisements for covered products appearing on online platforms such as the internet (companies' own media channels and those of parenting websites) and social media channels (including YouTube, Facebook, Twitter, and Instagram), as well as point-of-sale promotions on online retailer websites. For the Mexico study, the online media monitoring also included the social media pages for the parenting websites, a new component of media monitoring in the 2017 version of the NetCode protocol.

As previously in the Philippines, the study in Mexico monitored TV and radio. The NetCode protocol only describes monitoring television advertisements for traditional media, thus media monitoring practices for television that are described in the NetCode protocol were adapted for radio and customized as needed.

C. Recommendations

For Companies with Respect to Product Marketing: All baby food companies – those included in ATNI's Indexes and others - should work to strengthen corporate policies related to practices that are inconsistent with the intent of the Code. Specifically, companies should strengthen their marketing policies to bring them fully into line with the Code, by extending them to cover all BMS and CF products from birth to 36 months, and to include the recommendations of WHA 69.9. Likewise, baby food companies should take all reasonable steps, within anti-trust guidelines, to ensure that distributors and retailers of their products, including online retailers, understand their obligations under the Code and local regulations on marketing. They should revisit their commercial relationships (contracts) and engagement with online retailers to make clear that they should not discount or promote BMS. The companies should also curtail their direct promotion of their products via their own online media channels, such as Facebook, Instagram, Twitter and YouTube. They should take steps to ensure that their labels include all of the details recommended by the Code (particularly the provisions of WHA 61.20, which came into effect in 2008, and WHA 69.9, which came into force in May 2016).

For WHO and the Mexican Government: Findings from this assessment suggest that there are opportunities to bring local regulations more closely into line with the Code to further protect breastfeeding by limiting the marketing of all types of BMS and CF6-36.

Overall, results from the study in Mexico place the country in an intermediate position as compared to the lower incidence of noncompliance found in the Philippines, India and Nigeria, but in contrast to Indonesia and Thailand.

Television promotions found were repeated on TV channels 831 times; the Government could look at tightening its approval process for such ads, particularly for GUMs. Likewise, the relevant authorities should consider extending measures to online marketing of products and pay increased attention to monitoring how products are marketed by online retailers and e-commerce platforms.

The Government of Mexico could also look at how to strengthen its regulations to fully reflect the Code, particularly to ensure that labels of all BMS comply, and that marketing of CF 6-36 months products aligns with the recommendations of WHA 69.9.

Although the existing legislation is moderately aligned with the Code, rigorous continual monitoring is also necessary to document noncompliance with existing measures and to identify where enforcement efforts should be focused. The Government of Mexico could consider using the NetCode Toolkit: Protocol for Periodic Assessment on a regular basis for its own monitoring of companies' compliance with the national regulations and the Code. In addition, we suggest that particular focus be placed on restricting parallel imports to Mexico. Although 459 products were found throughout the data collection in Mexico City (i.e., found while compiling the BMS/CF list, observed in promotions at physical retailers, in various forms of media, purchased for label analysis, etc.), 50 of these products (11%) were parallel imports. We recommend consideration of stricter rules to prevent entry and marketing of parallel import products that do not comply with national regulations.

Another recommended area of focus is on restricting the use of digital media to promote products and contact mothers. The Government of Mexico and local stakeholders should particularly focus future efforts to ensure compliance of online advertising and social media. These media have changed the face of advertising and promotion, and they also have global reach, since they can be accessed by women from many different countries, not just those in a single country.

7. Limitations of the Study

As has been noted several times previously, this study followed the 2017 Network for Monitoring and Support for Adherence to the Code (NetCode) protocol and data collection forms, adapted for the context in Mexico. Typically, the NetCode protocol addresses most of the sub-articles in the Code that apply to manufacturers. Unfortunately due to the global SARS-CoV-2 pandemic, the scope of the study in Mexico was modified to exclude visits to HFs and MCs. Further, it seems feasible that the marketing identified was different to marketing that might have occurred during more normal times, due to the many types of business disruption the pandemic has caused. There were other limitations to the study and how the results from it should be interpreted and acted on by users.

A. Code's Articles not Assessed or Only Partially Assessed

Comparability with findings from other countries will be limited. In Mexico, no data was collected with Form 1—Questionnaire for Mothers, Form 2—Health Professional Assessment, and Form 3—Health Facility Listing of Promotional and Informational or Educational Materials. Consequently, this study only could partially assess compliance with Article 4 (Information and Education) and Article 5 (General Public and Mothers); compliance with Articles 6 (Health Care System) and 7 (Health Workers) was not measured at all. In contrast, compliance with Article 9 (Labeling) was fully assessed as established by the NetCode protocol. Among the important matters that were not assessed are:

- conflicts of interest in HFs (Sub-article 4.3, superseded by WHA 69.9, Recommendation 6);
- samples provided directly or indirectly by manufacturers and distributors to pregnant women, mothers, or their families (Sub-article 5.2);
- distribution from manufacturers and distributors to pregnant women, mothers, or their families of gifts of articles or utensils which may promote the use of BMS or bottle feeding (Sub-article 5.4);
- promotion of infant formula or other products in facilities of the healthcare system (Sub-article 6.2);
- display of products within the scope of the Code in HFs (Sub-article 6.3);
- free or subsidized supplies to health care institutions or organizations (Sub-articles 6.6, 6.7 superseded by WHA 47.5);
- equipment and materials with references to proprietary products within the scope of the Code in facilities of the healthcare system (Sub-article 6.8);
- information provided by manufacturers and distributors to health professionals that imply or create the belief that bottle feeding is equivalent or superior to breast-feeding (Sub-article 7.2);
- financial or material inducements offered by manufacturers and distributors to health professionals (Sub-article 7.3, superseded by WHA 69.9, Recommendation 6);

- samples of infant formula or other products, or equipment or utensils for their preparation provided by manufacturers and distributors to health professionals, and from the latter, to pregnant women, mothers, or their families (Sub-article 7.4); and
- conflicts of interest in HFs created by companies that market foods for infant and young children and offer gifts, incentives to healthcare staff, or sponsor meetings of health professionals and scientific meetings (Sub-article 7.5, superseded by WHA 69.9, Recommendation 6).

However, sub-articles 4.2, 5.1, and 5.3 were fully assessed and described in this Report in detail, and a far-reaching label assessment (Article 9 and subsequent WHA resolutions, and national regulations) was conducted for 120 products, 86 BMS and 34 CF 6-36 months products. The report also describes and presents other noncompliances observed throughout the assessments, namely in relation to sub-article 5.5 and recommendation 5 of WHA 69.9.

B. Selection of Retail Outlets

The selection of retail outlets to observe point-of-sale promotions was purposive, not representative. The objective was to select 10 large retailers that were deemed likely to sell commercially produced food/drink products for children from birth to 36 months. Because of this design, the study results cannot be generalized to the universe of stores in Mexico City. Further, each store was visited on only one day. On the positive side, we can say, however, that the selection only included major chains of large retail outlets and that none of the retail outlets was alerted prior to the visits or informed of the study objective, so the observations recorded very likely reflect an average day. However, we cannot speculate on whether the stock and/or promotional activity within the store, falling as the study did during the pandemic, was typical of more normal times.

C. Monitoring of Online Retailers and Other Websites

A trained data collector visited specified websites once a week (on the same day every week) during September and October 2020. Although findings from this study resulted from a systematic data collection, they are to some extent limited. The screenshots that were saved only reflect the content that was visible on specific dates at the time of the observations. Thus, it is possible that the same online retailers would have different promotions (and/or banner advertisements) at different hours or days of the week. The same is true for other websites monitored (company websites, brand websites, parenting and child websites, and their corresponding social media pages). The selection of participant websites was purposive, not representative, and consequently we cannot generalize the study results to the universe of online stores in Mexico City. Again, we cannot speculate on whether the stock and/or promotional activity on these sites was typical of more normal times.

D. Other Limitations

This study is a one-time cross-sectional survey that provides quantitative indicators for the point in time that it was conducted, although these indicators are not necessarily generalizable to other regions or cities of Mexico. These indicators describe the sample. At present, there is currently no ability to monitor changes over time or to provide continuous surveillance. However, follow-up studies in the same geographic area could make the results from this study a useful baseline to measure improvements or declines in compliance over time.

Finally, we believe that promotion of baby food products is likely to be highest in an urban area such as Mexico City because of high population density and the ease of reaching women, but at this time we have no empirical evidence to confirm this belief. Readers should interpret these study results with this in mind. It is worth of mention, however, that findings from this assessment are in agreement with results from a rather similar study conducted in 2016 in two different Mexican cities.³⁸

³⁸ Hernández-Cordero, S.L., Lozada-Tequeanes, A.L., Shamah-Levy, T., Lutter, C., González de Cosío, T., Saturno-Hernández, P., Rivera Dommarco, J., and Grummer-Strawn, J. (2019). Violations of the international code of marketing of breast-milk substitutes in Mexico. *Maternal and Child Nutrition*, 15, e12682. Available at: <https://doi.org/10.1111/mcn.12682>

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Appendix A

Study Timeline

Appendix A

Study Timeline

Table A-1. Timeline

		July 2019				August 2019				September 2019				October 2019				November 2019				December 2019				January 2020				February 2020			
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32
	Time in weeks																																
1	Sign Contract with ATNI																																
2	Sign Contract with IBERO/INSP																																
3	Compile BMS Product List																																
4	Collect list of HCFs																																
5	Develop Sampling Frame																																
6	Adapt NetCode Forms for Spanish language																																
7	Submit/Obtain Westat IRB Approval																																
8	Submit/Obtain Ethical Review Approvals																																

	Westat		Ibero/INSP		Westat + Ibero/INSP		Ibero/INSP + Eficiencia Informativa		ATNI
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Table A-1. Timeline – (continued)

		March 2020				April 2020				May 2020				June 2020				July 2020				August 2020				September 2020				October 2020			
		33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64
	Time in weeks																																
7	Submit/Obtain Westat IRB Approval																																
8	Submit/Obtain Ethical Review Approvals																																
	Covid Pause																																
9	Training Prep																																
10	Skype Trainings																																
11	Data Collection (large retailers)																																
12	Traditional MM																																
13	QC Traditional MM																																
14	Online MM																																
15	QC Online MM Data																																
16	Label Analysis																																
17	QC Label Analysis Data																																
18	Data Analysis/ Draft Report																																

	Westat	Ibero/INSP	Westat + Ibero/INSP	Ibero/INSP + Eficiencia Informativa	ATNI
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Table A-1. Timeline – (continued)

		November 2020				December 2020				January 2021				February 2021				March 2021				April 2021				May 2021				June 2021			
		65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96
	Time in weeks																																
8	Submit/Obtain Ethical Review Approvals																																
9	Training Prep																																
10	Skype Trainings																																
11	Data Collection (large retailers)																																
12	Traditional MM																																
13	QC Traditional MM																																
14	Online MM																																
15	QC Online MM Data																																
16	Label Analysis																																
17	QC Label Analysis Data																																
18	Data Analysis/ Draft Report																																
19	Review Draft Report																																
20	Finalize/Submit Final Report																																

	Westat	Ibero/INSP	Westat + Ibero/INSP	Ibero/INSP + Eficiencia Informativa	ATNI
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Appendix B

List of BMS/CF Products

Appendix B

List of BMS/CF Products

Table B-1. List of 235 BMS/CF Products¹

Color Legend: Confirmed by company Parallel Import Non-ATNI-Index Company

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
1	ABBOTT	SIMILAC	ELECARE	PARA LACTANTES DE 0 A 12 MESES
2	ABBOTT	SIMILAC	SIMILAC ISOMIL 2	PARA NIÑOS DE 1 A 3 AÑOS
3	ABBOTT	SIMILAC	SIMILAC ISOMIL 1	PARA LACTANTES DE 0 A 12 MESES
4	ABBOTT	SIMILAC	SIMILAC 1/SIMILAC ET 1	PARA LACTANTES DE 0 A 6 MESES
5	ABBOTT	SIMILAC	SIMILAC 2/SIMILAC ET 2	PARA LACTANTES DE 6 A 12 MESES
6	ABBOTT	SIMILAC	SIMILAC 3/SIMILAC ET 3	PARA NIÑOS DE 1 A 3 AÑOS
7	ABBOTT	SIMILAC	SIMILAC AR REFLUJO	PARA LACTANTES DE 0 A 12 MESES
8	ABBOTT	SIMILAC	SIMILAC EYE Q PLUS 1 (WITH IMMUNIFY)	PARA BEBÉS DE 0 A 6 MESES
9	ABBOTT	SIMILAC	SIMILAC SENSITIVE SIN LACTOSA	PARA LACTANTES DE 0 A 12 MESES
10	ABBOTT	SIMILAC	SIMILAC TOTAL CONFORT	PARA LACTANTES DE 0 A 12 MESES
11	ABBOTT	SIMILAC	ALIMENTUM	PARA LACTANTES DE 0 A 12 MESES
12	ABBOTT	SIMILAC	SIMILAC TOTAL CONFORT 2	PARA NIÑOS DE 1 A 3 AÑOS
13	ABBOTT	SIMILAC	SIMILAC NEOSURE	A PARTIR DEL NACIMIENTO
14	ABBOTT	SIMILAC	SPECIAL CARE	A PARTIR DEL NACIMIENTO
15	ABBOTT	SIMILAC	NEOSURE	0-12 MESES
16	ABBOTT	PEDIASURE	PEDIASURE	1-10 YEARS
17	ALPURA	KIDS	ALPURA KIDS CRECIMIENTO DHA PREBIOTICOS	PARA NIÑOS DE 1 A 3 AÑOS

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
18	ALPURA	KIDS	ALPURA KIDS CON MIEL Y CEREAL LACTEO	1 AÑO +
19	AUSNUTRIA	KABRITA	KABRITA FORMULA DE CONTINUACION 2	DE 6-12 MESES
20	AUSNUTRIA	KABRITA	KABRITA FORMULA PARA LACTANTES 1 (A BASE DE LECHE DE CABRA) EN POLVO	DE 0-6 MESES
21	AUSNUTRIA	KABRITA	KABRITA FORMULA DE CONTINUACION 3	DE 1 A 3 AÑOS
22	BAYER	NOVALAC	NOVALAC AD	0-36 MESES
23	BAYER	NOVALAC	NOVALAC AD PLUS	DE 6 MESES EN ADELANTE
24	BAYER	NOVAMIL	NOVAMIL AE 3	DE 1 A 3 AÑOS DE EDAD
25	BAYER	NOVAMIL	NOVAMIL AC	DE 0 A 6 MESES DE EDAD
26	BAYER	NOVAMIL	NOVAMIL 1	DE 0 A 6 MESES DE EDAD
27	BAYER	NOVAMIL	NOVAMIL 2	DE 6 A 12 MESES DE EDAD
28	BAYER	NOVAMIL	NOVAMIL AE 1	DE 0 A 6 MESES DE EDAD
29	BAYER	NOVAMIL	NOVAMIL AE 2	DE 6 A 12 MESES DE EDAD
30	BAYER	NOVAMIL	NOVAMIL AR 2	DE 6 A 12 MESES DE EDAD
31	BAYER	NOVAMIL	NOVAMIL AR 1	DE 0 A 6 MESES DE EDAD
32	BAYER	NOVAMIL	NOVAMIL ARD	A PARTIR DEL NACIMIENTO
33	BAYER	NOVALAC	NOVALAC 3	DE 1 A 3 AÑOS
34	BAYER	NOVAMIL	NOVAMIL RICE FORMULA	A PARTIR DEL NACIMIENTO HASTA 36 MESES
35	BAYER	NOVAMIL	NOVAMIL SYMBIOTIC PREMIUM 3 FORMULA	PARA NIÑOS DE 1 A 3 AÑOS
36	BAYER	NOVAMIL	NOVAMIL ALLERNOVA FORMULA INFANTIL	A PARTIR DEL NACIMIENTO HASTA 36 MESES
37	BAYER	NOVAMIL	NOVAMIL SYMBIOTIC PREMIUM 1 FORMULA	PARA LACTANTES 0 A 6 MESES DE EDAD

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
38	DANONE/NUTRICIA	APTAMIL	APTAMIL PREMIUM PRONUTRA+ 1	PARA BEBÉS DE 0 A 6 MESES
39	DANONE/NUTRICIA	APTAMIL	APTAMIL PREMIUM PRONUTRA+ 2	PARA BEBÉS DE 6 A 12 MESES
40	DANONE/NUTRICIA	APTAMIL	APTAMIL AR	PARA BEBÉS DE 0 A 12 MESES
41	DANONE/NUTRICIA	APTAMIL	APTAMIL PREMIUM PRONUTRA+ COMFORT	PARA BEBÉS DE 0 A 12 MESES
42	DANONE/NUTRICIA	APTAMIL	APTAMIL PREMIUM PRONUTRA+ HA (HYPOALLERGENIC)	PARA BEBÉS DE 0 A 12 MESES
43	DANONE/NUTRICIA	APTAMIL	APTAMIL LACTOSE FREE PEPTI JUNIOR	PARA BEBÉS DE 0 A 12 MESES
44	DANONE/NUTRICIA	APTAMIL	APTAMIL SIN LACTOSA	PARA BEBÉS DE 0 A 12 MESES
45	DANONE/NUTRICIA	APTAMIL	APTAMIL PREMIUM PRONUTRA+ 3	A PARTIR DE 1 AÑO
46	DANONE/NUTRICIA	NEOCATE	NEOCATE JUNIOR	A PARTIR DE 1 AÑO DE EDAD
47	DANONE/NUTRICIA	APTAMIL	APTAMIL PREMIUM PRONUTRA+ PEPTI	PARA BEBÉS DE 0 A 12 MESES
48	DANONE/NUTRICIA	NEOCATE	NEOCATE LCP	PARA BEBÉS DE 0 A 12 MESES DE EDAD
49	DANONE/NUTRICIA	INFATRINI	INFATRINI POWDER	PARA LACTANTES DESDE EL PRIMER DÍA
50	DANONE/NUTRICIA	FORTINI	FORTINI POWDER	PARA NIÑOS A PARTIR DE 1 AÑO
51	DANONE/NUTRICIA	KETOCAL	KETOCAL 4:1	A PARTIR DE 1 AÑOS
52	FRIESLANDCAMPINA	FRISO	FRISOLAC COMFORT	0-12 MONTHS
53	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD 1	DE 0 A 6 MESES
54	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD 2	DE 6 A 12 MESES
55	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD 3	DE 1-3 AÑOS
56	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD COMFORT	DE 0-12 MESES
57	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD INTENSIVE HA	0 A 12 MESES
58	FRIESLANDCAMPINA	FRISO	FRISOLAC PEP AC	DE 0-12 MESES
59	FRIESLANDCAMPINA	FRISO	FRISO GOLD 3	DE 1-3 AÑOS
60	FRIESLANDCAMPINA	FRISO	FRISO GOLD COMFORT NEXT	DE 1-3 AÑOS

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
61	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD PREMATUROS	DESDE EL NACIMIENTO HASTA ALCANZAR
62	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD HIPOALERGENICO	DE 0-12 MESES
63	FRIESLANDCAMPINA	FRISO	FRISOLAC GOLD SIN LACTOSA	A PARTIR DEL NACIMIENTO
64	HOLLE	HOLLE	FÓRMULA ORGÁNICA DE HOLLE ETAPA 1	DE 0 A 6 MESES
65	KRAFTHEINZ	HEINZ	HEINZ PAPILLA DE FRUTAS MIXTAS	6+ MESES
66	KRAFTHEINZ	HEINZ	HEINZ FRUTAS CON TIPO YOGURT (FRUTAS MIXTAS)	A PARTIR DE 6 MESES
67	KRAFTHEINZ	HEINZ	HEINZ JUGO DE FRUTA ETAPA 2 (MANZANA)	A PARTIR DE 6 MESES
68	KRAFTHEINZ	HEINZ	HEINZ PAPILLA FRUTAS ETAPA 2 (MANZANA, NARANJA, ZANAHORIA)	6+ MESES
69	KRAFTHEINZ	HEINZ	HEINZ PAPILLA FRUTAS Y VEGETALES ETAPA 2 (MANZANA PERA ESPINACA)	A PARTIR DE 6 MESES
70	KRAFTHEINZ	HEINZ	HEINZ PAPILLA VEGETALES MIXTOS (CALABAZA CON PAPA)	6+ MESES
71	KRAFTHEINZ	HEINZ	HEINZ PAPILLA VEGETALES CON ARROZ (PAPA Y ARROZ)	6+ MESES
72	KRAFTHEINZ	HEINZ	HEINZ PAPILLA VEGETALES (ZANAHORIA)	6+ MESES
73	KRAFTHEINZ	HEINZ	HEINZ PAPILLA PROBADITAS (MANZANA; MANGO; PERA)	A PARTIR DE LOS 6 MESES
74	KRAFTHEINZ	HEINZ	HEINZ XPRIME DP (MANZANA MANGO; MANZANA, PLATANO, FRESA, FAMBUESA)	A PARTIR DE 1 AÑO
75	KRAFTHEINZ	HEINZ	HEINZ XPRIME PETIT SUISSE	A PARTIR DE LOS 12 MESES DE EDAD
76	KRAFTHEINZ	HEINZ	HEINZ PAPILLA DE FRUTAS ETAPA 3 (PERA; MANZANA)	9+ MESES
77	KRAFTHEINZ	HEINZ	HEINZ BANANA BISCOTTI SNACK	7+ MONTHS
78	KRAFTHEINZ	HEINZ	HEINZ APPLE BISCOTTI	7+ MONTHS
79	KRAFTHEINZ	HEINZ	HEINZ CHOCOLATE BISCOTTI	7+ MONTHS
80	KRAFTHEINZ	HEINZ	HEINZ MANGO & APRICOT BISCOTTI	7+ MONTHS

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
81	KRAFTHEINZ	HEINZ	HEINZ GOLDEN MULTIGRAIN BISCOTTI SNACK	7+ MONTHS
82	KRAFTHEINZ	HEINZ	HEINZ PAPILLA MAZANA CON AVENA	6+ MESES
83	KRAFTHEINZ	HEINZ	HEINZ PAPILLA PERA CON AVENA	6+ MESES
84	KRAFTHEINZ	HEINZ	HEINZ PAPILLA PLATANO CON AVENA	6+ MESES
85	KRAFTHEINZ	HEINZ	HEINZ PAPILLA CARNE DE RES CON VEGETALES	6+ MESES
86	KRAFTHEINZ	HEINZ	HEINZ PAPILLA CIRUELA PASA (FCO/JAR)	6+ MESES
87	KRAFTHEINZ	HEINZ	HEINZ PAPILLA GUAYABA (FCO/JAR)	6+ MESES
88	KRAFTHEINZ	HEINZ	HEINZ PAPILLA MANZANA	6+ MESES
89	KRAFTHEINZ	HEINZ	HEINZ PAPILLA MANGO	6+ MESES
90	KRAFTHEINZ	HEINZ	HEINZ PAPILLA PERA	6+ MESES
91	KRAFTHEINZ	HEINZ	HEINZ PAPILLA DURAZNO	6+ MESES
92	KRAFTHEINZ	HEINZ	HEINZ PAPILLA PLATANO	6+ MESES
93	KRAFTHEINZ	HEINZ	HEINZ WBF DP YOGURT MANZANA	6-36 MONTHS
94	KRAFTHEINZ	HEINZ	HEINZ WBF DP CTL FRUTS	6-36 MONTHS
95	KRAFTHEINZ	HEINZ	HEINZ WBF DP YOGURT-DURAZNO	6-36 MONTHS
96	KRAFTHEINZ	HEINZ	HEINZ WBF PAPAYA & CALABAZA	6-36 MONTHS
97	KRAFTHEINZ	HEINZ	HEINZ WBF VEGETALES & LENTEJA	6-36 MONTHS
98	KRAFTHEINZ	HEINZ	HEINZ DP CIRUELA	6-36 MONTHS
99	KRAFTHEINZ	HEINZ	HEINZ DP GUAYABA	6-36 MONTHS
100	KRAFTHEINZ	HEINZ	HEINZ DP MANZANA-PLATANO-FRESA-FRAMBUESA	6-36 MONTHS
101	KRAFTHEINZ	HEINZ	HEINZ DP MANZANA-FRESA	6-36 MONTHS
102	KRAFTHEINZ	HEINZ	HEINZ DP FRUTAS MIX	6-36 MONTHS
103	KRAFTHEINZ	HEINZ	HEINZ AVENAS DOYPACK	6-36 MONTHS
104	KRAFTHEINZ	HEINZ	HEINZ VEGETALES-ARROZ Y POLLO	6-36 MONTHS
105	KRAFTHEINZ	HEINZ	HEINZ MANZANA RANJAZANA	6-36 MONTHS
106	KRAFTHEINZ	HEINZ	HEINZ JUGO DE PERA	6-36 MONTHS
107	LACTALIS	WYETH	WYETH NURSOY GOLD	0-12 MESES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
108	LACTALIS	WYETH	WYETH PROGRESS GOLD	0-6 MESES
109	LACTALIS	WYETH	WYETH PROMIL GOLD	6-12 MESES
110	LACTALIS	WYETH	NURSOY GOLD SOYA	0-12 MESES
111	LACTALIS	WYETH	WYETH PROMIL GOLD 2	6-12 MESES
112	LACTALIS	WYETH	WYETH PROMIL GOLD 3	1-3 YEARS
113	LACTALIS	WYETH	WYETH S-26	0-6 MONTHS
114	LACTALIS	WYETH	WYETH SMA AR GOLD	0-12 MESES
115	LACTALIS	WYETH	WYETH SMA COMFORT GOLD	0-12 MESES
116	LACTALIS	WYETH	WYETH SMA CONFORT GOLD SENSITIVE	DESDE EL NACIMIENTO HASTA 12 MESES
117	LACTALIS	WYETH	WYETH SMA GOLD 1	0-6 MESES
118	LACTALIS	WYETH	WYETH SMA GOLD LF (SIN LACTOSA)	0-12 MESES
119	LACTALIS	WYETH	WYETH SMA HA GOLD	DESDE EL NACIMIENTO HASTA 12 MESES
120	LACTALIS	ASPEN LABS	ASPEN LABS INFACARE 1	DE 0-6 MESES
121	LACTALIS	ASPEN LABS	ASPEN LABS INFACARE 2	DE 6-12 MESES
122	LACTALIS	ASPEN LABS	ASPEN LABS INFACARE 3	PARA NIÑOS DE 1-3 AÑOS
123	LACTALIS	WYETH	PROGRESS GOLD 3	1-3 AÑOS
124	LACTALIS	PROMIL GOLD	PROMIL GOLD 2	6-12 MESES
125	MIGH INTERNATIONAL DISTRIBUTION	RAAM	RAAM 1	A PARTIR DE: 0-6 MESES
126	MIGH INTERNATIONAL DISTRIBUTION	RAAM	RAAM 2	A PARTIR DE: 6 A 12 MESES
127	MIGH INTERNATIONAL DISTRIBUTION	RAAM	RAAM 3	A PARTIR DE: 1 A 3 AÑOS
128	NESTLÉ	CERELAC	CERELAC CEREAL CON LECHE	A PARTIR DE LOS 12 MESES
129	NESTLÉ	GERBER	GERBER PAPILLA DE FRUTAS ETAPA 1A (PAPAYA CON MANZANA)	A PARTIR DE LOS 6 MESES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
130	NESTLÉ	GERBER	GERBER PAPILLA DE VERDURAS ETAPA 1A (EJOTE)	A PARTIR DE LOS 6 MESES
131	NESTLÉ	GERBER	GERBER PAPILLA FRUTAS MIXTAS ETAPA 2A (COSECHA NATURAL)	A PARTIR DE LOS 7 MESES/+6 MESES
132	NESTLÉ	GERBER	GERBER PAPILLA DE TERNERA CON VERDURAS Y PASTA ETAPA 2A	A PARTIR DE LOS 7 MESES
133	NESTLÉ	GERBER	GERBER PAPILLA CON POLLO Y JAMON ETAPA 3A	A PARTIR DE LOS 10 MESES
134	NESTLÉ	GERBER	GERBER PAPILLA DE VERDURAS CON CARNE ETAPA 3A (VERDURAS CON JAMON)	A PARTIR DE LOS 10 MESES
135	NESTLÉ	GERBER	GERBER PAPILLA DE VERDURAS CON POLLO Y PASTA ETAPA 3A	A PARTIR DE LOS 10 MESES
136	NESTLÉ	GERBER	GERBER 4 CEREALES ET 2 (CEREALO 4 CEREALES)	+7 MESES
137	NESTLÉ	GERBER	GERBER AGUA	PARA TU BEBÉ
138	NESTLÉ	GERBER	GERBER ARROZ Y AVENA CEREAL PARA PAPILLA ETAPA 2	+7 MESES
139	NESTLÉ	GERBER	GERBER AVENA CEREAL PARA PAPILLA ETAPA 1	+6 MESES
140	NESTLÉ	GERBER	GERBER BEBIDA CON FRUTAS/VEGETALES ETAPA 2 (MANZANA Y CIRUELA PASA)	A PARTIR DE LOS 7 MESES
141	NESTLÉ	GERBER	GERBER CEREAL DE ARROZ ET 1	9 MONTHS +
142	NESTLÉ	GERBER	GERBER NECTAR DE MANGO	A PARTIR DE LOS 10 MESES
143	NESTLÉ	GERBER	GERBER MANZANA PERA SPLASHERÂ'S ETAPA 2	A PARTIR DE LOS 6 MESES
144	NESTLÉ	GERBER	GERBER NUTRILAC LECHE SABORIZADA	COULD NOT BE VERIFIED
145	NESTLÉ	GERBER	GERBER PUFFS ETAPA 3 (PLATANO Y NARANJA)	A PARTIR DE LOS 8 MESES/A PARTIR DE 8 MESES
146	NESTLÉ	GERBER	GERBER PAPILLA DE VERDURAS CON CARNE ET2	A PARTIR DE LOS 7 MESES
147	NESTLÉ	GERBER	GERBER CHIPS ETAPA 3 (ZUCHINI/CALABACITA)	A PARTIR DE 8 MESES
148	NESTLÉ	GERBER	GERBER PAPILLA COMIDITA CASERA ETAPA 2 (JAMON Y VERDURAS)	A PARTIR DE 7 MESES
149	NESTLÉ	GERBER	GERBER MI POSTRECITO ETAPA 2 (MANZANA Y CANELA)	A PARTIR DE LOS 7 MESES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
150	NESTLÉ	GERBER	GERBER SOPA DE POLLO Y VERDURAS	A PARTIR DE LOS 6 MESES
151	NESTLÉ	GERBER	GERBER YOGURTH DE FRUTAS ET 3	A PARTIR DE LOS 8 MESES
152	NESTLÉ	GERBER	GERBER PAPILLA GOURMET ETAPA 4 (PAVO, VERDURAS Y ARROZ)	A PARTIR DE 12 MESES
153	NESTLÉ	GERBER	GERBER JUGO VEGGIE FRUIT ETAPA 2 (JUGO CON MANZANA, MANGO Y ZANAHORIA)	A PARTIR DE 7 MESES
154	NESTLÉ	GERBER	GERBER BEBIDA TOQUE DE FRUTA ETAPA 2 (AGUA Y PERA)	A PARTIR DE 6 MESES
155	NESTLÉ	GERBER	GERBER LIL' GALLETITASAS (TRIGO DE VAINILLA)	A PARTIR DE 12 MESES
156	NESTLÉ	GERBER	GERBER JUNIOR BEBIDA HIDRATANTE SABOR (MANGO)	A PARTIR DE LOS 12 MESES
157	NESTLÉ	GERBER	GERBER JUNIOR SPLASHERS BEBIDA FRUTAL ETAPA 4 (PINA Y NARANJA)	A PARTIR DE LOS 12 MESES
158	NESTLÉ	GERBER	GERBER JUNIOR COMIDITA POLLITO CON VERDURAS (RES CON VERDURAS)	A PARTIR DE LOS 12 MESES
159	NESTLÉ	GERBER	GERBER BEBIDA TOQUE DE FRUTA ETAPA 3 (AGUA, MANGO Y PINA)	A PARTIR DE 8 MESES
160	NESTLÉ	GERBER	GERBER JUNIOR PASTA ETAPA 3 (CON RES)	A PARTIR DE LOS 12 MESES
161	NESTLÉ	GERBER	GERBER JUNIOR VERDURAS/FRUTAS MIXTAS (MANZANA DURAZNO ESPINACA; MANZANA Y ZANAHORIA; PERA, CALABAZA, Y MANGO)	A PARTIR DE LOS 10 MESES
162	NESTLÉ	GERBER	GERBER JUNIOR FRUTAS CON YOGURTH (MANZANA)	A PARTIR DE LOS 9 MESES
163	NESTLÉ	GERBER	GERBER JUNIOR NUTRILAC (FRESA)	A PARTIR DE LOS 12 MESES
164	NESTLÉ	GERBER	GERBER JUNIOR POSTRECITO PAY DE FRUTA (MANZANA; LIMON)	A PARTIR DE LOS 12 MESES
165	NESTLÉ	GERBER	GERBER JUNIOR PUFFS CEREALITOS (FRESA Y MANZANA)	A PARTIR DE LOS 12 MESES
166	NESTLÉ	GERBER	GERBER JUNIOR YOGURT DESPUÉS DE 10 MESES (MANZANA Y CIRUELA PASA)	A PARTIR DE LOS 10 MESES
167	NESTLÉ	GOOD CARE	GOOD CARE OPTIPRO 3/GOOD CARE OPTIPRO SUPREME 3	A PARTIR DE 1 AÑO

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
168	NESTLÉ	GOOD START	GOOD START SUPREME	6-12 MESES
169	NESTLÉ	GOOD START	GOOD START SUPREME PREMATURE 24	A PARTIR DEL NACIMIENTO
170	NESTLÉ	NAN	NAN AR	A PARTIR DEL NACIMIENTO
171	NESTLÉ	NAN	NAN CRECIMIENTO	DE 1 A 3 AÑOS
172	NESTLÉ	NAN	NAN ET 1 CONFORT	DESDE O NACIMIENTO
173	NESTLÉ	NAN	NAN HA 1	DE 0 A 6 MESES
174	NESTLÉ	NAN	NAN HA 2	6 A 12 MESES
175	NESTLÉ	NAN	NAN OPTIPRO 1	DE 0 A 6 MESES
176	NESTLÉ	NAN	NAN OPTIPRO 2	DE 6 A 12 MESES
177	NESTLÉ	NAN	NAN OPTIPRO 3	DE 1 A 3 AÑOS
178	NESTLÉ	NAN	NAN PREBIO AE	DE 0 A 12 MESES
179	NESTLÉ	NAN	NAN PRENAN	A PARTIR DEL NACIMIENTO
180	NESTLÉ	NAN	NAN SIN LACTOSA	A PARTIR DEL NACIMIENTO
181	NESTLÉ	NAN	NAN SOYA	A PARTIR DEL NACIMIENTO
182	NESTLÉ	NESTLÉ HEALTH SCIENCE	NESTLÉ HEALTH SCIENCE ALFARE	A PARTIR DEL NACIMIENTO
183	NESTLÉ	NESTLÉ HEALTH SCIENCE	NESTLÉ HEALTH SCIENCE ALTHERA	A PARTIR DEL NACIMIENTO
184	NESTLÉ	NESTLÉ HEALTH SCIENCE	NESTLÉ HEALTH SCIENCE ALFAMINO	A PARTIR DEL NACIMIENTO
185	NESTLÉ	NESTUM	NESTUM 4 CEREALES ET 2	A PARTIR DE LOS 7 MESES
186	NESTLÉ	NESTUM	NESTUM 8 CEREALES FASE 3	A PARTIR DE LOS 10 MESES
187	NESTLÉ	NESTUM	NESTUM CEREAL ET 1 (AVENA)	A PARTIR DE LOS 6 MESES
188	NESTLÉ	NESTUM	NESTUM CEREAL TRIGO Y MIEL ETAPA 4	A PARTIR DE LOS 12 MESES
189	NESTLÉ	NESTUM	NESTUM CEREAL TRIGO CON MIEL ET 2 (TRIGO CON MANZANA Y PLATANO)	A PARTIR DE LOS 7 MESES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
190	NESTLÉ	NESTUM	NESTUM PAPILLA DE FRUTA CON AVENA ETAPA 2 (DURAZNO)	A PARTIR DE LOS 7 MESES
191	NESTLÉ	NIDO	NIDO EXCELLA GOLD	1+
192	NESTLÉ	NIDO	NIDO KINDER (SIN AZUCAR)	1-3 AÑOS
193	NESTLÉ	NIDO	NIDO KINDER FACIL DIGESTION	1-3 AÑOS
194	NESTLÉ	NESTLÉ	NUTRILEARN SYSTEM EXCELLA GOLD	A PARTIR DE 1 AÑO
195	NESTLÉ	WYETH	WYETH COGNITA GOLD 3	1-3 AÑOS
196	NESTLÉ	GERBER	GERBER ORGANICO PAPILLA DE FRUTAS MIXTAS (TARRO) + 7 MESES (PERA Y FRAMBUESA; PERA Y MANZANA)	A PARTIR DE LOS 7 MESES
197	NESTLÉ	GERBER	GERBER ORGANICO MANZANA Y MANGO + 6 MESES	+6 MESES
198	NESTLÉ	GERBER	GERBER ORGANICO PAPILLA MIXTO DE FRUTAS Y VERDURAS (BOLSA) + 6 MESES	+6 MESES
199	NESTLÉ	NAN	NAN OPTIPRO 3 BAJA EN LACTOSA	DE 1 A 3 AÑOS
200	NESTLÉ	NAN	NAN OPTIPRO 4	2 AÑOS EN ADELANTE
201	NESTLÉ	GOOD CARE	GOOD CARE SUPREME 3	A PARTIR DE 1 AÑO
202	NESTLÉ	NAN	NAN CONFORT TOTAL 3	DE 1 A 3 AÑOS
203	NESTLÉ	GERBER	GERBER JUNIOR MIX DE FRUTAS /FRUTAS ETAPA 4 (MANZANA Y CITRUELA PASA; MANZANA, GUAYABA Y PLATANO)	A PARTIR DE 8 MESES
204	NESTLÉ	GERBER	GERBER FRUTAS CON YOGURT ETAPA 3 (DURAZNO CON YOGURT)	A PARTIR DE 8 MESES
205	NESTLÉ	NAN	NAN 3 L COMFORTIS	A PARTIR DE 1 AÑO
206	NESTLÉ	GERBER	GERBER PUFFS (TOMATE)	A PARTIR DE 8 MESES
207	NESTLÉ	NAN	NAN NATURA 1	DE 0 A 6 MESES
208	NESTLÉ	NAN	NAN NATURA 2	DE 6 A 12 MESES
209	NESTLÉ	NAN	NAN NATURA 3	1 AÑO EN ADELANTE
210	NESTLÉ	GOOD START	GOOD START 1 OPTIPRO SUPREME	0-6 MESES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
211	NESTLÉ	GOOD START	GOOD START 2 OPTIPRO SUPREME	6-12 MESES
212	NESTLÉ	GOOD START	GOOD START 1 (READY TO FEED)	0 MESES+
213	NESTLÉ	GERBER	GERBER ORGANIC MANGO APPLE PEAR PUREE	DE 6 MOIS
214	NESTLÉ	GOOD START	GOOD START 2	6 MOIS+
215	NESTLÉ	NIDO	NIDO 1+ PROTECCIÓN (CAN)	1+
216	NESTLÉ	GERBER	GERBER ORGANIC BANANA APPLE RASPBERRY PUREE	DES 6 MOIS
217	NESTLÉ	GERBER	GERBER ORGANIC PEAR APPLE BANANA PUREE (POUCH)	FROM 6 MONTHS
218	NESTLÉ	GERBER	GERBER ORGANIC BANANA MANGO PUREE	SITTER 2ND FOODS (FROM 6 MONTHS)
219	NESTLÉ	GERBER	GERBER ORGANIC APPLE PUREE	DES 6 MOIS
220	NESTLÉ	GERBER	GERBER ORGANIC APPLE KALE FIG	SITTER 2ND FOODS (FROM 6 MONTHS)
221	NESTLÉ	NAN	NAN 2 COMFORTIS	DE LA 6 LUNI
222	NESTLÉ	GERBER	GERBER ORGANIC APPLE BLUEBERRY SPINACH	SITTER 2ND FOODS (FROM 6 MONTHS)
223	NESTLÉ	NESTUM	NESTUM CERELAC TRIGO CON LECHE (WHEAT WITH MILK)	DESDE 12 MESES
224	NESTLÉ	NESTUM	NESTUM 8 CEREALES	DESDE 6 MESES
225	NESTLÉ	NESTUM	NESTUM PAPILLA DE MANZANA CON 4 CEREALES	A PARTIR DE LOS 7 MESES
226	NESTLÉ	GERBER	GERBER ETJUNIOR COOKIES	12+ MONTHS
227	NESTLÉ	GERBER	GERBER PUFFS APPLE CINNAMON	8+ MONTHS
228	NESTLÉ	GERBER	GERBER LIL CRUNCHIES GARDEN TOMATO PUFFS	8+ MONTHS
229	NESTLÉ	GERBER	GERBER JUNIOR TOSTADITAS DE ARROZ SABOR A LIMON	A PARTIR DE LOS 12 MESES
230	NESTLÉ	GERBER	GERBER JUNIOR TOSTADITAS DE ARROZ SABOR A QUESO	A PARTIR DE LOS 12 MESES
231	NESTLÉ	GERBER	GERBER JUNIOR TOSTADITAS DE ARROZ SABOR A TOMATE	A PARTIR DE LOS 12 MESES
232	NESTLÉ	WYETH	WYETH COGNITA GOLD 2	6-12 MESES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
233	NESTLÉ	WYETH	WYETH COGNITA GOLD 1	0-6 MESES
234	NESTLÉ	NIDAL	NIDAL 1	DE 0 A 6 MOIS
235	NESTLÉ	NIDAL	NIDAL 2	DE 6 MOIS A 1 AN
236	NESTLÉ	NESTUM	NESTUM PAPILLA DE MANGO CON 4 CEREALES	A PARTIR DE LOS 7 MESES
237	NESTLÉ	GERBER	GERBER 4 CEREALES CON ZANAHORIA Y PLATANO ETAPA 2	9 MONTHS +
238	NESTLÉ	GERBER	GERBER JUGO DE MANZANA ETAPA 2A	6 MONTHS+
239	NESTLÉ	GERBER	GERBER JUGO DE UVA BLANCA ETAPA 1A AND 2A (COSECHA NATURAL)	DESDE 6 MESES
240	NESTLÉ	GERBER	GERBER PAPILLA DE ZANAHORIA ETAPA 1A	4-6 MESES
241	NESTLÉ	GERBER	GERBER PAPILLA DE CHAYOTE ETAPA 1A	4-6 MESES
242	NESTLÉ	GERBER	GERBER PAPILLA DE CHICHARO ETAPA 1A	4-6 MESES
243	NESTLÉ	GERBER	GERBER PAPILLA DE MANZANA ETAPA 1A	6 MONTHS+
244	NESTLÉ	GERBER	GERBER PAPILLA DE PERA ETAPA 1A	6 MONTHS+
245	NESTLÉ	GERBER	GERBER PAPILLA DE CIRUELA PASA ETAPA 1A	6 MONTHS+
246	NESTLÉ	GERBER	GERBER PAPILLA DE MANGO ETAPA 1A	6 MONTHS+
247	NESTLÉ	GERBER	GERBER DURAZNO ETAPA 2A	A PARTIR DE LOS 6 MESES
248	NESTLÉ	GERBER	GERBER PERA ETAPA 2A	A PARTIR DE LOS 6 MESES
249	NESTLÉ	GERBER	GERBER PLATANO ETAPA 2A	A PARTIR DE LOS 6 MESES
250	NESTLÉ	GERBER	GERBER MANZANA ETAPA 2A	A PARTIR DE LOS 6 MESES
251	NESTLÉ	GERBER	GERBER MANGO ETAPA 2A	A PARTIR DE LOS 6 MESES
252	NESTLÉ	GERBER	GERBER POSTRE DE MANZANA ETAPA 2A	A PARTIR DE LOS 7 MESES
253	NESTLÉ	GERBER	GERBER MI POSTRECITO DELICIA DE FRUTAS ETAPA 2A	A PARTIR DE 6 MESES
254	NESTLÉ	GERBER	GERBER POSTRE GUAYABA ETAPA 2A	A PARTIR DE LOS 6 MESES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
255	NESTLÉ	GERBER	GERBER MANZANA GUAYABA ETAPA 2A	6 MONTHS+
256	NESTLÉ	GERBER	GERBER COCKTAIL DE FRUTAS ETAPA 2A	6 MONTHS+
257	NESTLÉ	GERBER	GERBER PAPILLA DE ZANAHORIA ETAPA 2A	6 MONTHS+
258	NESTLÉ	GERBER	GERBER PAPILLA DE DURAZNO ETAPA 1A	6 MONTHS+
259	NESTLÉ	GERBER	GERBER CIRUELA PASA ETAPA 2A	A PARTIR DE LOS 6 MESES
260	NESTLÉ	GERBER	CERELAC PROBIOTICS Cereal+Milk Wheat	6 MONTHS+
261	NESTLÉ	GERBER	GERBER JUGO DE PERA ETAPA 1A/2A	6 MONTHS+
262	NESTLÉ	GERBER	GERBER JUGO DE PERA ETAPA 3A (COSECHA NATURAL)	10 MONTHS+
263	NESTLÉ	GERBER	GERBER JUGO DE MANZANA ETAPA 3A	10 MONTHS+
264	NESTLÉ	GERBER	GERBER JUGO DE DURAZNO ETAPA 1A	6 MONTHS+
265	NESTLÉ	GERBER	GERBER BEBIDAS HIDRATANTE CIRUELA ETAPA 1A/2A	6 MONTHS+
266	NESTLÉ	GERBER	GERBER BEBIDAS HIDRATANTE UVA ROJA ETAPA 1A/2A	6 MONTHS+
267	NESTLÉ	GERBER	GERBER JUGO DE MANZANA CIRUELA ETAPA 2A (COSECHA NATURAL)	6 MONTHS+
268	NESTLÉ	GERBER	GERBER JUGO DE MANZANA PERA ETAPA 2A	6 MONTHS+
269	NESTLÉ	GERBER	GERBER JUGO DE LIMÓN Y PERA ETAPA 2A	7 MONTHS+
270	NESTLÉ	GERBER	GERBER JUGO DE GRANADA Y PERA ETAPA 2A	6-8 MONTHS+
271	NESTLÉ	GERBER	GERBER BEBIDAS HIDRATANTE KALE CON PERA ETAPA 2A	7 MONTHS+
272	NESTLÉ	GERBER	GERBER BEBIDAS HIDRATANTE ZANAHORIA NARANJA ETAPA 2A	7 MONTHS+
273	NESTLÉ	GERBER	GERBER JUICE BEETROOT APPLE ETAPA 2A	7 MONTHS+
274	NESTLÉ	GERBER	GERBER BABY DRINK COCONUT ETAPA 2A	6 MONTHS+
275	NESTLÉ	GERBER	GERBER BABY DRINK MANGO ETAPA 2A	6 MONTHS+

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
276	NESTLÉ	GERBER	GERBER JUGO CON PERA, MANGO Y CALABAZA BUTTERNUT ETAPA 2A	6 MONTHS+
277	NESTLÉ	GERBER	GERBER MIXED FRUIT DRINK ETAPA 2A	6 MONTHS+
278	NESTLÉ	GERBER	GERBER WHITE GRAPE JUICE & HIBISCUS BEVERAGE ETAPA 2A	6 MONTHS+
279	NESTLÉ	GERBER	GERBER APPLE & PRICKLY PEAR (TUNA) BEVERAGE ETAPA 2A	6 MONTHS+
280	NESTLÉ	GERBER	GERBER NECTAR YOGURT JUGO PERA ETAPA 2A	6 MONTHS+
281	NESTLÉ	GERBER	GERBER NECTAR YOGURT JUGO MANGO ETAPA 2A	6 MONTHS+
282	NESTLÉ	GERBER	GERBER NECTAR YOGURT MANZANA ETAPA 3A	10 MONTHS+
283	NESTLÉ	GERBER	GERBER NECTAR YOGURT MANGO PERA ETAPA 3A	10 MONTHS+
284	NESTLÉ	GERBER	GERBER NECTAR DE MANZANA ETAPA 3A	10 MONTHS+
285	NESTLÉ	GERBER	GERBER JUGO DE PERA (POUCH) ETAPA 3A	12 MONTHS+
286	NESTLÉ	GERBER	GERBER JUGO DE MANZANA (POUCH) ETAPA 3A	12 MONTHS+
287	NESTLÉ	GERBER	GERBER JUGO DE MANZANA PERA ETAPA 3A	10 MONTHS+
288	NESTLÉ	GERBER	GERBER BABY DRINK PINEAPPLE COCONUT ETAPA 3A	10 MONTHS+
289	NESTLÉ	GERBER	GERBER JUNIOR BEBIDA HIDRATANTE PEAR- BLUEBERRY	12 MONTHS+
290	NESTLÉ	GERBER	GERBER JUNIOR SMOOTHY APPLE PINEAPPLE	12 MONTHS+
291	NESTLÉ	GERBER	GERBER PUREE MIXED VEGETABLES PORRIDGE ETAPA 2A	7 MONTHS+
292	NESTLÉ	GERBER	GERBER PUREE VEGETABLE WITH CHICKEN AND RICE ETAPA 2A (COMIDITA SERA)	7 MONTHS+
293	NESTLÉ	GERBER	GERBER PUREE VEGETABLE WITH BEEF AND RICE ETAPA 2A	7 MONTHS+
294	NESTLÉ	GERBER	GERBER PUREE VEGETABLE WITH TURKEY AND RICE ETAPA 2A	7 MONTHS+
295	NESTLÉ	GERBER	GERBER PUREE GREEN BEAN WITH PUMPKIN ETAPA 2A (COSECHA NATURAL)	6 MONTHS+

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
296	NESTLÉ	GERBER	GERBER PUREE VEGETABLE WITH CHICKEN AND PASTA ETAPA 2A	6 MONTHS+
297	NESTLÉ	GERBER	GERBER PUREE PAPAYA ETAPA 2A	6 MONTHS+
298	NESTLÉ	GERBER	GERBER SOUP CHICKEN ETAPA 2A	7 MONTHS+
299	NESTLÉ	GERBER	GERBER SOUP YOGOLINO PEAR ETAPA 2A	6 MONTHS+
300	NESTLÉ	GERBER	GERBER APPLE ZUCCHINI (PUMPKIN) BROCCOLI ETAPA 2A	6 MONTHS+
301	NESTLÉ	GERBER	GERBER PEAR CARROT PEA ETAPA 2A	6 MONTHS+
302	NESTLÉ	GERBER	GERBER VEGETABLE WITH TURKEY AND PASTA ETAPA 2A	6 MONTHS+
303	NESTLÉ	GERBER	GERBER PASTA SOUP WITH VEGETABLES ETAPA 2A	6 MONTHS+
304	NESTLÉ	GERBER	GERBER BEEF SOUP WITH VEGETABLES ETAPA 2A	6 MONTHS+
305	NESTLÉ	GERBER	GERBER ZUCCHINI SOUP WITH POTATO ETAPA 2A	6 MONTHS+
306	NESTLÉ	GERBER	GERBER SPINACH POTATO ETAPA 2A	6 MONTHS+
307	NESTLÉ	GERBER	GERBER PUREE BEETROOT PEAR ETAPA 2A	6 MONTHS+
308	NESTLÉ	GERBER	GERBER PUREE TUNA PEAR/PRICKLY PEAR ETAPA 2A	6 MONTHS+
309	NESTLÉ	CERELAC	CERELAC PROBIOTICS CEREAL+MILK WHEAT	12MO+
310	NESTLÉ	GERBER	GERBER 3AET PEAR BANANA BLACKBERRY RASPBERRY ORGANIC	10 MONTHS+
311	NESTLÉ	GERBER	GERBER 2AET APPLE BANANA STRAWBERRY RASPBERRY ORGANIC	6MO+
312	NESTLÉ	GERBER	GERBER 3AET PureePeachWhtPrctl	10 MONTHS+
313	NESTLÉ	GERBER	GERBER 3AET Puree Apple (COSECHA NATURAL)	10 MONTHS+
314	NESTLÉ	GERBER	GERBER 3AET PureeAppleWhtPrctl	10 MONTHS+
315	NESTLÉ	GERBER	GERBER 3AET Puree Pear	10 MONTHS+
316	NESTLÉ	GERBER	GERBER 3AETPuree Pear WhtPrctl	10 MONTHS+
317	NESTLÉ	GERBER	GERBER 3AET Puree Mango	10 MONTHS+

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
318	NESTLÉ	GERBER	GERBER 3AET PureeMangoWParticle	10 MONTHS+
319	NESTLÉ	GERBER	GERBER 3AET Puree Tropical Fruit (COSECHA NATURAL)	10 MONTHS+
320	NESTLÉ	GERBER	GERBER 3AET Puree Tropical Fruit Wht Prtcl	10 MONTHS+
321	NESTLÉ	GERBER	GERBER 3AET Puree Mixed Fruits with 'lil bits'	10 MONTHS+
322	NESTLÉ	GERBER	GERBER 3AET Porridge/Puree Vegetables with Chicken and Rice	10 MONTHS+
323	NESTLÉ	GERBER	GERBER 3AET Puree Vegetables with Beef+Rice (COMIDITA CASERA)	10 MONTHS+
324	NESTLÉ	GERBER	GERBER PORRIDGE 2AET Apple Yogurt	7MO+
325	NESTLÉ	GERBER	GERBER 2AET Yogurt with Mixed Fruits	7MO+
326	NESTLÉ	GERBER	GERBER 2AET Yogurt with Peach	7MO+
327	NESTLÉ	GERBER	GERBER 3AET Yogurt with Apple	10 MONTHS+
328	NESTLÉ	GERBER	GERBER 3AET Porridge Turkey Vegetables Pasta (COMIDITA CASERA)	10 MONTHS+
329	NESTLÉ	GERBER	GERBER 3AET Puree/Porridge Vegetables with Ham (COMIDITA CASERA)	10 MONTHS+
330	NESTLÉ	GERBER	GERBER 3AET Porridge Vegetables with Veal and Pasta (COMIDITA CASERA)	10 MONTHS+
331	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Turkey with rice	12MO+
332	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Chicken With Potatoes	12MO+
333	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Beef With Vegetables and Pasta	12MO+
334	NESTLÉ	GERBER	GERBER 3AET Puree Apple Mango	10 MONTHS+
335	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Fruit Mixed Pouch	9MO+
336	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Apple Guava Banana Pouch	9MO+
337	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Apple Prune	9MO+

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
338	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Pear Mango Pouch	9MO+
339	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Fruit Delight	9MO+
340	NESTLÉ	GERBER	GERBER ETJUNIOR Dessert Guava Pouch	10 MO+
341	NESTLÉ	GERBER	GERBER ETJUNIOR Dessert Apple Cinnamon Pouch	10MO+
342	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Apple Pouch	9MO+
343	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Banana Pouch	9MO+
344	NESTLÉ	GERBER	GERBER ETJUNIOR Puree Mango Pouch	9MO+
345	NESTLÉ	GERBER	GERBER ETJUNIOR Peach Pouch	9MO+
346	NESTLÉ	GERBER	GERBER ETJUNIOR Apple Pear Peach Pouch	9MO+
347	NESTLÉ	GERBER	GERBER ETJUNIOR Pear Zucchini Mango Pouch (Pumpkin)	10MO+
348	NESTLÉ	GERBER	GERBER ETJUNIOR Mango Apple Carrot Pouch	10MO+
349	NESTLÉ	GERBER	GERBER ETJUNIOR Yogurt Pear Banana SugarFree	8MO+
350	NESTLÉ	GERBER	GERBER ETJUNIOR Pear Pouch	9MO+
351	NESTLÉ	GERBER	GERBER ETJUNIOR Fruit Cocktail Pouch	9MO+
352	NESTLÉ	GERBER	GERBER ETJUNIOR Spinach Apple Peach Pouch	9MO+
353	NESTLÉ	GERBER	GERBER 1ERA. ETAPA Pear Pouch	6MO+
354	NESTLÉ	GERBER	GERBER 1ERA. ETAPA Mango Pouch	6MO+
355	NESTLÉ	GERBER	GERBER 1AET Mango Apple Pouch	6MO+
356	NESTLÉ	GERBER	GERBER 1 AET Peach Apple Pouch	6MO+
357	NESTLÉ	GERBER	GERBER 1AET Banana Mango Pouch	6MO+
358	NESTLÉ	GERBER	GERBER 1AET Apple Pouch	6MO+
359	NESTLÉ	GERBER	GERBER ETJUNIOR Apple Mango Pouch	9MO+
360	NESTLÉ	GERBER	GERBER ETJUNIOR Peach Mango Carrot Organic Coconut Splasher	12MO+

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
361	NESTLÉ	GERBER	GERBER ETJUNIOR Pouch Peach Oats	12MO+
362	NESTLÉ	GERBER	GERBER ETJUNIOR Pouch Mixed Fruits Oats	12MO+
363	NESTLÉ	GERBER	GERBER LIL'BEANIES Original	12MO+
364	NESTLÉ	GERBER	GERBER LIL'BEANIES White Cheddar and Broccoli	12MO+
365	NESTLÉ	GERBER	GERBER ETJUNIOR Cereal Puff Blueberry	8MO+
366	NESTLÉ	GERBER	GERBER Baby Cookies	12MO+
367	NESTLÉ	GERBER	GERBER ETJUNIOR Cereal Puff Banana	8MO+
368	NESTLÉ	GERBER	GERBER ETJUNIOR Cereal Puff Sweet Potato	8MO+
369	NESTLÉ	GERBER	GERBER PUFFS Banana Sweet Potato	8MO+
370	NESTLÉ	GERBER	GERBER Chips Carrot	8MO+
371	NESTLÉ	GERBER	GERBER Tostadita Chilli	12MO+
372	NESTLÉ	GERBER	GERBER ETJUNIOR Zucchini Carrot Chips (Pumpkin)	8MO+
373	NESTLÉ	NIDO	NIDO KINDER HONEY AND CEREALS	1-3 YRS
374	NESTLÉ	GERBER	GERBER 1AET Integral Oats	4-6MO
375	NESTLÉ	GERBER	GERBER 3AET Cereal Wheat with Apple	12 MONTHS+
376	NESTLÉ	GERBER	GERBER 3AET and 4AET Cereal Wheat with Honey	12MO+
377	NESTLÉ	GERBER	GERBER ETJUNIOR Drink Raspberry	12MO+
378	NESTLÉ	GERBER	GERBER ETJUNIOR Drink Apple Guava	12MO+
379	NESTLÉ	GERBER	GERBER ETJUNIOR Drink Pineapple Orange	12MO+
380	NESTLÉ	GERBER	GERBER JUNIOR Apple Beverage	12MO+
381	NESTLÉ	GERBER	GERBER JUNIOR Pear Beverage	12MO+
382	NESTLÉ	NESTUM	NESTUM 1AET CEREAL RICE CAN	6MO+
383	NESTLÉ	NESTUM	NESTUM PAP FRUIT MIX OATS	7MO+
384	NESTLÉ	NIDO	NIDO KINDER 1+LACTOSE FREE CAN	1-3 YRS

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
385	NESTLÉ	GERBER	GERBER 2AET Apple Banana Organic	6MO+
386	NESTLÉ	GERBER	GERBER 1AET Puree Banana (COSECHA NATURAL)	6MO+
387	NESTLÉ	GERBER	GERBER ETJUNIOR STRAWBERRY APPLE	8MO+
388	NESTLÉ	GOOD START	GOOD START CONFORT	A PARTIR DEL NACIMIENTO
389	NESTLÉ	NAN	NAN CONFORT TOTAL	A PARTIR DEL NACIMIENTO
390	NESTLÉ	NAN	NAN CONFORT TOTAL 2	1-3 AÑOS
391	NESTLÉ	GERBER	GERBER 2AET Pear Apple Banana Organic (JAR)	6MO+
392	NESTLÉ	GERBER	CEREAL ARROZ	6+ MESES
393	NESTLÉ	GERBER	CEREAL TRIGO CON MANZANA	9+ MESES
394	NUCITEC	ALPHA	ALPHA PRO ARACAE 1	0-12 MESES
395	NUCITEC	ALPHA	ALPHA PRO ARACAE 2	6-12 MESES
396	NUCITEC	ALPHA	ALPHA PRO ARACAE 3	1-3 AÑOS
397	NUCITEC	ALPHA	ALPHA PRO ARACAE SOYA 1	0-12 MESES
398	NUCITEC	ALPHA	ALPHA PRO ARACAE SOYA 2	COULD NOT BE VERIFIED
399	ORDESA	BLEMIL	BLEMIL PLUS 1	LECHE PARA LACTANTES
400	ORDESA	BLEMIL	BLEMIL PLUS 2	DESDE LOS 6 MESES
401	ORDESA	BLEMIL	BLEMIL PLUS 3	1-3 AÑOS
402	ORDESA	BLEMIL	BLEMIL PLUS AE 1	DE 0 A 6 MESES DE EDAD
403	ORDESA	BLEMIL	BLEMIL PLUS AE 2	A PARTIR DE LOS 6 MESES
404	ORDESA	BLEMIL	BLEMIL PLUS ARAC	DE 0 A 6 MESES DE EDAD
405	ORDESA	BLEMIL	BLEMIL PLUS ARROZ HIDROLIZADA 1	DE 0 A 6 MESES DE EDAD
406	ORDESA	BLEMIL	BLEMIL PLUS ARROZ HIDROLIZADA 2	A PARTIR DEL 6 MES
407	PADSA	SOYAVEN	SOYAVEN	FORMULA ALIMENTICIA PARA LACTANTES

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
408	PERRIGO	BELACTA	BELACTA ET 1	PARA BEBÉS DE 0 A 6 MESES
409	PERRIGO	BELACTA	BELACTA ET 2	PARA BEBÉS DE 6 A 12 MESES
410	PERRIGO	BELACTA	BELACTA ET 3	PARA NIÑOS DE 1 A 3 AÑOS
411	PERRIGO	PARENT'S CHOICE	PARENT'S CHOICE BABY CEREAL	STAGE 1: 4+ MONTHS
412	PERRIGO	PARENT'S CHOICE	PARENT'S CHOICE LITTLE MUNCHERS	STAGE 3: 9+ MONTHS
413	PERRIGO	PARENT'S CHOICE	PARENT'S CHOICE YOGURT LITTLE PUFFS	STAGE 3: 9+ MONTHS
414	RB	ENFAGROW	ENFAGROW PREMIUM 2	9 MESES EN ADELANTE
415	RB	ENFAGROW	ENFAGROW PREMIUM 3 (PLAIN)	A PARTIR DE 1 AÑO
416	RB	ENFAGROW	ENFAGROW PREMIUM 3 (VAINILLA)	A PARTIR DE 1 AÑO
417	RB	ENFAGROW	ENFAGROW PREMIUM PROMENTAL ETAPA 4	A PARTIR DE 1 AÑOS
418	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL ETAPA 1	DE 0 A 6 MESES
419	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL ETAPA 2	DE 6 A 12 MESES
420	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL AR	0 A 12 MESES
421	RB	ENFAMIL	ENFAMIL PREMIUM AR	0 A 12 MESES
422	RB	ENFAGROW	ENFAGROW PREMIUM PROMENTAL ETAPA 4	A PARTIR DE 2 AÑOS
423	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL CONFORT	0 A 12 MESES
424	RB	ENFAMIL	ENFAMIL PREMATUROS ENFA-CARE	0 A 12 MESES
425	RB	ENFAGROW	ENFAGROW PREMIUM PROMENTAL CONFORT ETAPA 2	DE 1 A 2 AÑOS
426	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL ETAPA 3	DE 1 A 3 AÑOS
427	RB	ENFAMIL	ENFAMIL SIN LACTOSA	DE 0 A 12 MESES
428	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL SOYA	DE 0 A 12 MESES
429	RB	LACTUM	LACTUM KIDS	1+

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
430	RB	NUTRAMIGEN	NUTRAMIGEN PREMIUM CON LGG	DE 0 A 12 MESES
431	RB	NUTRAMIGEN	NUTRAMIGEN PURAMINO	DE 0 A 12 MESES
432	RB	ENFAGROW	ENFAGROW PREMIUM PROMENTAL ETAPA 3 (PLAIN)	DE 1 A 3 AÑOS
433	RB	ENFAGROW	ENFAGROW PREMIUM PROMENTAL ETAPA 3 (VAINILLA)	DE 1 A 3 AÑOS
434	RB	NUTRAMIGEN	NUTRAMIGEN PREMIUM LGG 1 A 3 AÑOS	DE 1 A 3 AÑOS
435	RB	ENFAMIL	ENFAMIL PREMARE PREMIUM	DE 0 A 12 MESES
436	RB	ENFAMIL	ENFAMIL PREMIUM 1	DE 0 A 6 MESES
437	RB	ENFAMIL	ENFAMIL PREMIUM 2	DE 6 A 12 MESES
438	RB	ENFAMIL	ENFAMIL SOYA PREMIUM	0 A 12 MESES
439	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL SIN LACTOSA	DE 0 A 12 MESES
440	RB	PREGESTIMIL	PREGESTIMIL PREMIUM	DE 0 A 12 MESES
441	RB	ENFAMIL	ENFAMIL PREMATUROS PREMIUM	DE 0 A 12 MESES
442	RB	ENFAMIL	ENFAMIL CONFORT PREMIUM	DE 0 A 12 MESES
443	RB	ENFAMIL	ENFAMIL SIN LACTOSA PREMIUM	DE 0 A 12 MESES
444	RB	ENFAGROW	ENFAGROW PREMIUM CONFORT	2 A 3 AÑOS
445	RB	ENFAGROW	ENFAMIL PREMIUM PROMENTAL CONFORT	2 A 3 AÑOS
446	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL PREMARE	0 A 12 MESES
447	RB	ENFAMIL	ENFAMIL PREMIUM PROMENTAL PREMATUROS	0 A 12 MESES
448	SIEGFRIED RHEIN	NUTRIBABY	NUTRIBABY PREMIUM 1	DE 0 A 6 MESES
449	SIEGFRIED RHEIN	NUTRIBABY	NUTRIBABY PREMIUM 2	DE 6 A 12 MESES
450	SIEGFRIED RHEIN	NUTRIBABY	NUTRIBABY PREMIUM 3	DE 1 A 3 AÑOS
451	SIEGFRIED RHEIN	NUTRIBABY	NUTRIBABY PREMIUM BAJA LACTOSA	DE 0 A 6 MESES
452	SIMILARES	1ST CHOICE	NUTRI FORMULA PLUS ETAPA 1	A PARTIR DEL NACIMIENTO DE 0 A 6 MESES DE EDAD
453	SIMILARES	1ST CHOICE	NUTRI FORMULA PLUS ETAPA 2	COULD NOT BE VERIFIED

	Company Name	Brand Name	Product Name	Age Indicated on the Package (Spanish)
454	SIMILARES	1ST CHOICE	NUTRI FORMULA PLUS ETAPA 3	PARA NIÑOS DE 1-3 AÑOS DE EDAD
455	SIMILARES	FORMULAC	FORMULAC	A PARTIR DEL NACIMIENTO DE 0 A 6 MESES DE EDAD
456	SIMILARES	REFLULAC AR	REFLULAC AR	DESDE EL NACIMIENTO EN ADELANTE
457	SUPER PHARMACIES GUADALAJARA	NATU BABY	NATU BABY 1	PARA BEBÉS DE 0 A 6 MESES
458	SUPER PHARMACIES GUADALAJARA	NATU BABY	NATU BABY 2	PARA BEBÉS DE 6 A 12 MESES
459	SUPER PHARMACIES GUADALAJARA	NATU BABY	NATU BABY 3	PARA NIÑOS DE 1 A 3 AÑOS

Appendix C

Study Definitions

Appendix C

Study Definitions

General Definitions

Breast-milk Substitute (BMS) – Any food being marketed or otherwise represented as a partial or total replacement for breast-milk. This includes, infant formula, follow-up formula (sometimes referred to as “follow-on milk”), growing-up milk or any other milk for children under 36 months of age, in either liquid or powdered form, that may be available in the country and is specifically marketed for feeding infants and young children (0 to < 36 months). (NetCode, pages 4-5)

Infant Formula. Includes any formula that is labelled for infants under 6 months of age. The age might be listed 0-6 months or 0-12 months. It may be labelled “Stage 1.” (NetCode, page 63)

Follow-on Formula (also called follow-up milk or follow-up formula). Any milk product that is labelled for infants under 12 months of age but not under 6 months of age. The age might be listed 6-12 months or 6+ months. It may be labelled “Stage 2.” (NetCode, page 63)

Growing-up Milk (also called toddler milk). Any milk product for which the target age range includes children under 36 months of age and over 12 months of age. The age might be listed 12-36 months or 1 to 5 years. It may be labelled “Stage 3.” (NetCode, page 63)

Combination of Products. Infant food products are often promoted as a group without reference to a specific age group. For the purposes of this study, the term “combination” refers to any group of foods that includes infant formula. (NetCode, page 63)

Other Milks. Any milk product that is not explicitly labeled for children under 36 months but that might be consumed by young children. (NetCode, page 63)

Commercial Complementary Foods (CFs). Any food or drink other than baby milk that is labelled for children under 24 months of age. (NetCode, page 63)

Complementary Foods 0-6 months (CF 0-6 months). Any other food or liquid targeted for infants under 6 months of age. All such products are considered BMS and within the scope of the Code since resolution WHA 54.2 recommends exclusive breastfeeding for 6 months. (NetCode, page 5)

Complementary Foods 6-36 months (CF 6-36 months). Includes any non-formula food or drink product marketed for use after the age of 6 months. Foods marketed for use after the age of 6 months generally fall outside the scope of the Code. WHA 69.9 stipulates that CFs should not be promoted in a way to cross-promote BMS, should not recommend or promote bottle-feeding, should state the importance of continued breastfeeding for up to 2 years and beyond, and should not discourage breastfeeding. (NetCode, page 6)

Other commercial foods. Any processed food or drink not labelled for children under 24 months of age. (NetCode, page 63)

Natural Foods. Any food that is produced at home or sold without industrial processing. (NetCode, page 63)

Cross-promotion. When one product in the combination of any group of foods that includes infant formula is promoted, the others are indirectly promoted as well due to their similar names, colors, images, etc. (NetCode, page 63)

Baby milk. Any milk product targeted for babies where the age range is not specified on the label or is unknown. (NetCode, page 86)

Relevant Products. Refers to the list of products covered by the scope of this assessment. (NetCode, page 10)

Parallel Import. Branded goods that are imported into a market and sold there without the consent of the owner of the trademark in that market. (ATNI/Westat definition)

Brand. A name or symbol that legally identifies a company, a single product, or a product line, to differentiate it from other companies and products in the marketplace (WHO, 2012)

Company (or Manufacturer, per the Code). For the purposes of this study, any corporation that manufactures or markets (either directly or through an agent) relevant products intended for infants and young children. (ATNI/Westat definition)

Form 6 – Promotions at Retail Outlets and Pharmacies

Retailer. Brick-and-mortar retail outlet that sells products covered by the Code and included as part of this assessment. (NetCode, pages 10 and 31)

Large Retailer. Large stores that sell a high volume and variety of relevant products. Large stores would include national chain grocery stores, supermarkets, and baby stores. (NetCode, page 30)

Promotional Materials. Includes anything with a logo of a company that produces foods for infants and young children. May include clothing, clocks, pens, free samples or gifts of baby milks, bottles or teats, coupons, price reductions or special offers, displays, informational material, such as posters or brochures, or the presence of a sales representative from a company of relevant products. (NetCode, pages 61-62)

Form 7 – Desk Review of Product Labels

Labels. Information on relevant products printed on the container or is on a well-attached label. (NetCode, page 111)

Insert. Information on relevant product that may or may not be attached to relevant products. (ATNI/Westat definition)

Health Claim. Conveys endorsement of the product or the benefits, quality, necessity, superiority, etc. of the product. (NetCode, page 112)

Images. Pictures of any infant or young child being bottle-fed; any representation of animals, toys, cartoon characters, or brand mascots; images that idealize the product such as hearts, flowers/landscapes. (NetCode, page 107)

Ingredients. List of all the components used to make the infant formula (ATNI/Westat definition)

Form 8 – Desk Review of Promotions of the Media

Media. Advertisements broadcast/promoted on national TV (government and private), radio, printed magazines, and internet-based channels. (NetCode, page 11)

Traditional Media Advertisements. Any audiovisual material meant to promote relevant products using TV/radio/print as a means of dissemination. (ATNI definition)

Online Media. Includes baby food manufacturers' own websites, online retailers, online magazines or forums for pregnant women and mothers of young children, Facebook, Twitter, YouTube channels, and/or Instagram accounts. (NetCode, pages 42-43)

Online Promotions. Includes internet-based banner adverts, information, notes, interviews, news reports, opinion/analysis/debate, viral marketing encouraging mothers to contact their peers about a specific product or brand; sweepstakes and promotions; club memberships, and incentives for product purchase. (NetCode, pages 72, 75, and 115)

Online Retailer. Selected based on local knowledge and online searches. Sells relevant products that are available for purchase in the country and may or may not be in brick-and-mortar stores. (NetCode, page 30-31)


Appendix D

Population Data for Mexico City

Appendix D

Population Data for Mexico City

Table D-1. Mexico City is the capital and largest city in Mexico. Located in central Mexico, the city has 16 subdivisions (*alcaldías*) and is home to almost 9 million people (2015).¹

<i>Alcaldías</i>	Total population	
Azcapotzalco*	400,161	
Coyoacán*	608,479	
Cuajimalpa de Morelos	199,224	
Gustavo A. Madero*	1,164,477	
Iztacalco	390,348	
Iztapalapa*	1,827,868	
La Magdalena Contreras	243,886	
Milpa Alta*	137,927	
Álvaro Obregón*	749,982	
Tláhuac	361,593	
Tlalpan*	677,104	
Xochimilco*	415,933	
Benito Juárez*	417,416	
Cuauhtémoc*	532,553	
Miguel Hidalgo*	364,439	
Venustiano Carranza*	427,263	

* Selected to participate in the study

Map available at:

https://upload.wikimedia.org/wikipedia/commons/thumb/f/fc/Mexico_relief_location_map.jpg/250px-Mexico_relief_location_map.jpg

Table D-2. Number of women of reproductive age in the 10 participant subdivisions (*alcaldías*) in Mexico City.

Participant <i>alcaldías</i>	Female age 15-49 ¹	
Álvaro Obregón	209,543	
Azcapotzalco	109,251	
Benito Juárez	119,944	
Coyoacán	167,449	
Cuauhtémoc	150,391	
Gustavo A. Madero	316,051	
Iztapalapa	517,212	
Tlalpan	190,953	
Venustiano Carranza	114,327	
Xochimilco	117,286	

¹ Source: Mexico, National Institute of Statistics and Geography (INEGI) Encuesta Intercensal 2015.

Appendix E

Training Agenda

Appendix E

Training Agenda

NetCode Protocol

Monitoring the Marketing of Breast-milk Substitutes: Protocol for Periodic Assessment

Training ATNI Mexico Study

Entrenamiento para el estudio de ATNI en México

DAY 1

September 10th, 2020

In-Country Assessment of Baby Food Companies' Compliance with the International Code of Marketing of Breastmilk Substitutes in Mexico

ATNF Mexico Training of Trainers

Observations at Retail Outlets: Form 6

Observations at Retail Outlets: Form 4

ATNF Mexico Supervisor's Assignment Report (SAR)

Submissions using the Westat FTP account

DÍA 1

10 de Septiembre de 2020

Evaluación del cumplimiento por parte de la Industria Alimenticia con el Código Internacional para la Publicidad de Productos Sucedáneos de la Leche Materna en México

ATNF México. Entrenamiento a los Entrenadores.

Observaciones en Comercios Minoristas: Cuestionario 6

Observaciones en Comercios Minoristas: Cuestionario 4

ATNF México. Reporte de Tareas del Supervisor (SAR por sus siglas en inglés)

Envíos usando el Programa de Transferencia de Documentos (FTP por sus siglas en inglés) de Westat

DAY 2

September 11th, 2020

Practice session:

Introduction to the Excel spreadsheet for data collection Forms 6 and 4

Wrap-up

DÍA 2

11 de Septiembre de 2020

Sesión de práctica:

Introducción al uso de la hoja de Excel para recogida de información de los cuestionarios 6 y 4

Conclusiones

Appendix F

List of Monitored Sources
for Media Monitoring

Appendix F

List of Monitored Sources for Media Monitoring

Online Media Monitoring Websites

Source Name	Type	Website
Alpura	Company Website	https://www.alpura.com/
Alpura	Company Social Media Page	https://www.youtube.com/user/AlpuraOnline
Alpura	Company Social Media Page	https://www.facebook.com/alpuraoficial
Alpura	Company Social Media Page	https://twitter.com/alpuraoficial
Alpura	Company Social Media Page	https://www.instagram.com/alpuraoficial/?hl=en
Novamil	Brand Website	https://novamil3.com/
Novamil	Brand Social Media Page	https://www.youtube.com/channel/UCJZ29TQWfqXTM7Flnytr8w
Novamil	Brand Social Media Page	https://www.facebook.com/Novamil3/
Novamil	Brand Social Media Page	https://www.instagram.com/novamil3/
Danone	Company Website	http://grupodanone.com.mx/
Danone	Company Social Media Page	https://www.youtube.com/channel/UCK1qaiGgd1IDcny5wckfg5A
Danone	Company Social Media Page	https://www.facebook.com/DanoneMX/
Danone	Company Social Media Page	https://twitter.com/danonemx?lang=en
Danone	Company Social Media Page	https://www.instagram.com/danonemx/
Friso	Brand Website	https://www.friso.com.mx/
Friso	Brand Social Media Page	https://www.youtube.com/user/FrisoMexico
Friso	Brand Social Media Page	https://www.facebook.com/Friso.com.mx/
Friso	Brand Social Media Page	https://twitter.com/friso_mexico
Friso	Brand Social Media Page	https://www.instagram.com/friso_mexico/
Nestlé	Company Website	https://www.nestlé.com.mx/
Nestlé	Company Social Media Page	https://www.youtube.com/channel/UCG3BGkZBkN0h0DzTuY05c8A
Nestlé	Company Social Media Page	https://www.facebook.com/nestlé.MX/
Nestlé	Company Social Media Page	https://twitter.com/nestlémx
Nestlé	Company Social Media Page	https://www.instagram.com/nestlémx/?hl=es
Nestlé Health Science	Brand Website	https://www.nestléhealthscience.com.mx/que-es-nhsc
Nestum	Brand Website	https://www.comienzosano.Nestlé.com/marca/cereales-infantiles-nestum
Nucitec	Company Website	http://nucitec.com.mx/
Perrigo	Company Website	http://www.perrigo.com.mx/
Enfagrow	Brand Website	https://www.enfabebe.com.mx/productos/nutricion-por-etapa/enfagrow-premium-3
Enfagrow	Brand Social Media Page	https://www.youtube.com/channel/UCyl8fYfgG8IOOv2dooQGfQ/featured

Source Name	Type	Website
Enfagrow	Brand Social Media Page	https://www.facebook.com/ClubEnfaBebeMX/
Lactum	Brand Social Media Page	https://www.facebook.com/LactumMexico
Siegfried Rhein	Company Website	http://www.siegfried.com.mx/
Siegfried Rhein	Company Social Media Page	https://www.facebook.com/SiegfriedRhein/?ref=bookmarks7
Siegfried Rhein	Company Social Media Page	https://twitter.com/Siegfried_Rhein
NutriBaby	Brand Website	https://nutribaby.mx/
NutriBaby	Brand Social Media Page	https://www.facebook.com/NutriBabyMexico/
Mercado Libre	Online Retailer Website	https://www.mercadolibre.com.mx/
Amazon	Online Retailer Website	https://www.amazon.com/
Chedraui	Online Retailer Website	https://www.chedraui.com.mx/
F. San Pablo	Online Retailer Website	https://www.farmaciasanpablo.com.mx/
Walmart - Mexico	Online Retailer Website	https://www.walmart.com.mx/
Mom and Me	Parenting Website	www.momandme.nestlé.com
Mom and Me	Parenting Social Media Page	https://www.youtube.com/channel/UCeOGwKS2mtdF-nyaHnSvGg
Mom and Me	Parenting Social Media Page	https://www.facebook.com/ComienzoSanoCentroamerica
Club Enfabebe	Company Website	https://www.enfabebe.com.mx/
Club Enfabebe	Company Social Media Page	https://www.youtube.com/channel/UCyl8fyfxgG8IOOv2dooQGFQ/featured
Club Enfabebe	Company Social Media Page	https://www.facebook.com/ClubEnfaBebeMX/
Master Mama	Parenting Website	https://www.mastermama.mx/
Biobebe	Parenting Website	https://biobebe.mx/blogs/alimentacion
Biobebe	Parenting Social Media Page	https://www.facebook.com/biobebemx/
Biobebe	Parenting Social Media Page	https://www.instagram.com/biobebemx/
Danone Early Life Nutrition - Aptclub Blog	Company Website	http://www.aptaclub.com.mx/blog/
Danone Early Life Nutrition - Aptclub Blog	Company Social Media Page	https://www.facebook.com/AptaclubMx/
Danone Early Life Nutrition - Aptclub Blog	Company Social Media Page	https://www.instagram.com/aptaclubmx/?hl=en
Nestlé Baby & Me	Company Website	https://www.nestlébabyandme.com.mx/
Nestlé Baby & Me	Company Social Media Page	https://www.facebook.com/BabyandMeMX/
Nestlé Baby & Me	Company Social Media Page	https://www.instagram.com/babyandmemx/
Madre Tips	Parenting Website	https://tipsdemadre.com/
Madre Tips	Parenting Social Media Page	https://www.facebook.com/tipsdemadre
Madre Tips	Parenting Social Media Page	https://twitter.com/tipsdemadre
Madre Tips	Parenting Social Media Page	https://instagram.com/tipsdemadre/
Para Su Bebe (For your baby)	Parenting Website	https://www.parasubebe.com/
Para Su Bebe (For your baby)	Parenting Social Media Page	https://www.facebook.com/Parasubebecom-841804662545078/

Source Name	Type	Website
Para Su Bebe (For your baby)	Parenting Social Media Page	https://twitter.com/parasubebe
Naran Xadul	Parenting Website	https://www.naranxadul.com/
Naran Xadul	Parenting Social Media Page	https://www.youtube.com/channel/UCTVLVKNnzXDz9Zq-dNkj6hA
Naran Xadul	Parenting Social Media Page	https://www.facebook.com/soynaranjadulce/
Naran Xadul	Parenting Social Media Page	https://www.instagram.com/naranxadul/
Salud 180 - el estilo de vida saludable (Health 180 - healthy lifestyle)	Parenting Website	https://www.salud180.com/maternidad-e-infancia
Salud 180 - el estilo de vida saludable (Health 180 - healthy lifestyle)	Parenting Social Media Page	https://www.youtube.com/subscription_center?add_user=Salud180
Salud 180 - el estilo de vida saludable (Health 180 - healthy lifestyle)	Parenting Social Media Page	https://www.facebook.com/Salud180
Salud 180 - el estilo de vida saludable (Health 180 - healthy lifestyle)	Parenting Social Media Page	https://twitter.com/#!/Salud180
Salud 180 - el estilo de vida saludable (Health 180 - healthy lifestyle)	Parenting Social Media Page	https://www.instagram.com/salud_180/?hl=es-la

Appendix G

Summary of Data Collection by Retail Outlet

Appendix G

Summary of Data Collection by Retail Outlet

Table G-1. Summary of data collection and location of ten large retailers visited for the study

	Retailer	Number of visits	Location
Main Sample	Pharmacy 1	1	Álvaro Obregón
	Pharmacy 2	1	Benito Juárez
	Supermarket 1	1	Venustiano Carranza
	Supermarket 2	1	Azcapotzalco
	Pharmacy 3	1	Gustavo A. Madero
	Supermarket 3	1	Coyoacán
	Pharmacy 4	1	Iztapalapa
	Supermarket 4	1	Cuauhtémoc
	Supermarket 5	1	Tlalpan
	Pharmacy 5	1	Xochimilco
Reserve Sample	Pharmacy 1	0	Benito Juárez/Miguel Hidalgo
	Pharmacy 2	0	Álvaro Obregón
	Supermarket 1	0	Gustavo A. Madero
	Pharmacy 3	0	Cuauhtémoc

Table G-2. Ten large retail outlet chains where observations were conducted (one each)

Pharmacy chains (<i>in alphabetical order that DOES NOT correspond to the numeric identifier 1 to 5 displayed in the table above</i>)	Supermarket chains (<i>in alphabetical order that DOES NOT correspond to the numeric identifier 1 to 5 displayed in the table above</i>)
Farmacias Benavides	Chedraui
Farmacias del Ahorro	LaComer (LaComer, Citymarket, Sumesa, Fresko)
Farmacias Guadalajara	Soriana (Soriana, Soriana Mercado, Mega Soriana)
Farmacia San Pablo	Superama
Farmacias Similares	Walmart

Appendix H

Most Frequent Incidents of Noncompliance
Observed on Labels by Company

Appendix H

Most Frequent Incidents of Noncompliance Observed on Labels by Company

Table H-1. The most frequent incidents of noncompliance observed in label abstraction data

Company	WHA 61.20	Rec. 4 WHA 69.9	WHA 58.32/69.9 Mexican regulations	Code sub-article 9.2 Mexican regulations	Code sub-article 9.2 Mexican regulations	Mexican regulations
	Contains all of the criteria specified in Q26.*	Does the label/insert include a statement on the importance of continuing breast feeding for at least 2 years?	Label/insert contains nutrition or health claims?	Includes a statement on the superiority of breast feeding?	Contains a statement that the product should be used only on the advice of a health worker, in a font size that is easily visible, in bold and on a contrasting background?	Instructions indicate that the product should not be heated using a microwave oven in order to avoid the risk of causing serious burns.
ATNI-Index Companies						
Abbott	10	0	1	0	0	0
Danone	0	0	0	0	0	0
KraftHeinz	0	5	0	0	0	0
Nestlé	2	29	12	2	1	2
RB	9	0	1	1	1	0
FrieslandCampina	6	0	1	0	0	0
Other companies:						
Alpura	1	0	2	1	1	1
Bayer	9	0	0	0	0	0
Lactalis	11	0	0	1	2	0
Migh International Distribution	3	0	3	0	0	3
Nucitec	3	0	0	1	1	0
Perrigo	1	0	0	0	0	0
Siegfried Rhein	4	0	0	0	0	0
Super Pharmacies Guadalajara	3	0	0	0	0	0
Total	62	34	20	6	6	6

Source: ATNI Mexico (2020)

* Question 26 in the label analysis required each of the following criteria per WHA 61.20, as set out in the 2017 NetCode protocol, page 34:

- a. The label shows clear graphic instructions illustrating the method of preparation;
- b. Instructions show the use of hygienic practices, e.g., clean hands, preparation surfaces;
- c. Instructions show the need to boil water and sterilize utensils;
- d. Instructions show necessity for powdered formula to be prepared one feed at a time;
- e. Instructions show necessity of using water at or above 70°C in order to minimize microorganisms contamination during preparation;
- f. Instructions show the need to cool the formula before feeding if using hot water for reconstitution; and
- g. Instructions show that left-overs of the product need to be discarded immediately.

The Mexican regulations related to the labeling of baby food/formula products expanded upon point 'f' above, requiring that "instructions indicate that the product must be prepared with water first boiled for five minutes, and cooled until it is lukewarm. In case boiled water is not available, purified water at room temperature can be used." The products included in the label analysis were assessed for the additional requirements from the Mexican regulations.