

4 (2016)  
**RANK**  
**6**  
**SCORE**  
**0%**

	Weight	Score	
		2018	2016
BMS 1: Corporate Profile	50%	0%	0%
BMS 2: In-country assessment	50%	0%	33%
<b>Total</b>	<b>100%</b>	<b>0%</b>	<b>17%</b>
Impact on the Global Index score		<b>-1.5</b>	<b>-1.25</b>

## BMS 1: Corporate Profile analysis

### Application of policy

Product type	Product made	Policy scope	Geographic coverage	Stance on local regulations
Infant formula: 0-6 months	✓	-	-	-
Complementary foods: 0-6 months	✓	-	-	
Follow-on formula: 6-12 months	✓	-	-	
Growing-up milks: 12-24 months	✓	-	-	

### Initial Corporate Profile score

Section	Article	Topic	2018	Score 2016
1	Intro	Overarching commitments	0%	0%
2	4	Information & education	0%	0%
3	5	The general public and mothers	0%	0%
4	6	Healthcare systems	0%	0%
5	7	Healthcare workers	0%	0%
6	8	Persons employed by manufacturers and distributors	0%	0%
7	9	Labeling	0%	0%
8	10	Quality	0%	0%
9	11	Implementation	0%	0%
10		Lobbying (policy and objectives)	0%	0%
11		Disclosure	0%	0%
<b>Initial Corporate Profile score</b>			<b>0%</b>	<b>0%</b>

### About the company<sup>1</sup>

Baby food global market share (2016)	< 10%
Percentage of baby food revenues out of total F&B revenues (2016)	< 10%
Key global brands	Heinz, Plasmon, Farley's, Nipiol

<sup>1</sup> Source: Derived from Euromonitor International: Packaged Food, 2017 Edition



## Analysis

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### Overarching commitments

Kraft Heinz does not publish on its group website any documents that explicitly acknowledge the importance of The International Code of Marketing of Breast-milk Substitutes (The Code) nor subsequent World Health Assembly (WHA) resolutions. In December 2017, after ATNF had concluded its research, the company published its first CSR report in which it recognized the importance and the superiority of breastmilk in feeding infants and young children. The company referred to its Charter for Marketing Breast-milk Substitutes. However, details of its scope and commitments are not available publicly. Overall, support by Kraft Heinz for exclusive breastfeeding for the first six months or continued breastfeeding for two years or more is limited.

### Policy commitments on marketing

Kraft Heinz does not disclose its policy related to marketing breast-milk substitutes (BMS), the Charter for Marketing Breast-milk Substitutes. It therefore scores zero in this area.

Kraft Heinz should adopt a global policy that mirrors all Articles of The Code and relevant WHA resolutions as a matter of urgency. This policy should apply to all products it makes for children up to 36 months of age<sup>2</sup> and apply in all countries. Taking this action would clearly demonstrate the company's support for WHO's recommendation that infants continue to be breastfed up to two years of age or beyond, while also being given appropriate CF from six months on. Furthermore, Kraft Heinz should commit to upholding its own policy in countries where regulation is absent or weaker than that policy.

### Management systems

Kraft Heinz does not disclose any information about the management systems it uses to implement any commitments related to BMS marketing. It therefore is the worst performer of the six companies assessed. Kraft Heinz should urgently develop instructions for staff to explain how they should interpret and apply its policy and develop comprehensive global procedures to ensure that policy is properly implemented.

### Policy commitments on lobbying

Kraft Heinz does not disclose a policy to guide its lobbying on BMS issues nor does it score on any of the other indicators relating to this topic. It should publish such documents as soon as possible.

### Disclosure

Kraft Heinz does not disclose any policy, management systems or any other type of documents related to BMS marketing.

<sup>2</sup> This age threshold is to align with the clarified definition in the WHA resolution 69.9, now covering products up to 36 months of age.



## Final Corporate Profile score

Product type weighting	35%	25%	20%	20%
Product type	IF	CF	FOF	GUM
Initial score	0%	0%	0%	0%
Score with geographic penalty (-25%)	0%	0%	0%	0%
Score with regulatory penalty (-15%)	0%	0%	0%	0%
<b>Final Corporate Profile score</b>	<b>0%</b>			

**Research:** The research was undertaken by ATNF between August-September 2017, based on documents available in the public domain or provided by the company by the end of October. Any documents published since are not reflected in the score. Kraft Heinz did not actively engage in the research process.

**Methodology used:** The 2018 ATNI Global Index BMS Marketing Corporate Profile methodology was the basis for assessment, developed with extensive input from the ATNI Expert Group, available at [www.accessnutrition.org](http://www.accessnutrition.org).

**Product scope:** In line with the WHO definitions set out in The Code and its statement of July 2013, the 2018 Global Index scores are based on whether companies restrict marketing of their BMS products in line with the recommendations of The Code and relevant WHA resolutions. These include complementary foods and beverages identified as being suitable for infants up to six months of age, any type of milk-based formula or follow-on formula (also called follow-up formula) or growing-up milk (also called toddler milk) identified as being suitable for infants and young children up to 24 months of age. ATNF also calculated, for BMS 1, what each company's score would have been had its compliance with WHA 69.9 been included, i.e. including formulas marketed as suitable for infants up to 36 months age and complementary foods for young children from 6-36 months of age. Companies' scores in the next Global Index will be based on these scores.

**Initial Corporate Profile score:** This score is based on an initial analysis of the company's policy, management systems and disclosure, as set out in the ATNI 2018 BMS Marketing methodology. It reflects the extent to which its policies are aligned with The Code and subsequent WHA resolutions (up to but not including WHA 69.9), its policy commitments on lobbying, the scope and

strength of its management systems, and extent of its disclosure (but not yet taking into account the product scope).

**Weighted scores:** The initial Corporate Profile score is adjusted according to: i) which types of countries the policy applies to (the score is reduced by 25% if the policy applies only in higher-risk countries for a particular product type); ii) where local regulations are weaker than its policy, whether the company complies with local regulations or its own policy (the score is reduced by a further 15% if it does not commit to following its own policy in these circumstances). The scores under each product type show the level of compliance each company achieves for that product type. If the company does not apply its policy to any product category it scores zero. This is also the case if it does not disclose its policy.

**Final Corporate Profile score:** This is the final score weighted according to whether the company's policy applies to each type of BMS product being assessed for the 2018 Global Index. That is, using the scores after the relevant penalties have been applied: [(IF score \* IF weighting) + (CF score \* CF weighting) + (FOF score \* FOF weighting) + (GUM score \* GUM weighting)]. If a company derives less than 5% of its baby food revenues from CF, it is not scored for that product type. The 25% weighting for CFs is re-allocated to IF, i.e. its score for IF is multiplied by a weighting of 60%.

**Adjustment to Global Index score:** For those companies included in the 2018 Global Index, the total possible adjustment relating to the Corporate Profile is 0.75, 50% of the maximum possible adjustment of 1.5. The final Corporate Profile score represents the level of compliance with the ATNI methodology; the adjustment is based on the level of non-compliance. Therefore, the calculation for the adjustment is:  $0.75 \times (100\% - \text{final CP score})$ .

## Preliminary analysis of compliance with WHA 69.9

For the assessment of compliance with WHA 69.9 for the next Global Index, the BMS 1 Corporate Profile will comprise two parts: the first part – the BMS module will retain the same structure as the current methodology but indicators that relate to the new recommendations will be adjusted to reflect them. A second module will then be added – the CF module – to assess companies' marketing of CF for infants and young children between 6-36 months of age. This module will only be applied to companies that derive more than 5% of their total baby food sales from CF for children 6-36 months. The new module will also assess companies' policies and management systems that relate to CF for infants and young children between 6-36 months of age. All sections will carry equal weight, i.e. 16.67% each. The final BMS 1 score will combine the scores for each module: the BMS module will carry 95% of the weight and the CF 6-36 module will carry 5% of the weight. This reflects the fact that whereas The Code is designed to protect breastfeeding and deter inappropriate marketing of BMS products that might discourage breastfeeding, WHA 69.9 is not designed to deter marketing of CF 6-36 in general but rather to ensure that they are not marketed in such a way as to discourage breastfeeding or raise brand awareness for BMS products made by the

same company via cross-marketing. Moreover, it is intended to prevent conflicts of interest in healthcare facilities all throughout health systems.

**Initial assessment of the company's application of WHA 69.9**

For the 2018 Global Index, the BMS 1 assessment does not include analysis of companies' compliance with the provisions of WHA 69.9. However, analysis has been conducted to determine companies' progress in implementing this resolution. Kraft Heinz does not publish any documents nor did it provide any information to ATNF under NDA relating to WHA 69.9. It would therefore score 0% on BMS 1 were the new approach to be applied. The company should adopt a policy which would reflect the recommendations of WHA 69.9.

**Kraft Heinz analysis**

Total score if WHA 69.9 analysis included	0%
BMS marketing score (95% weight)	0%
CF marketing score (5% weight)	0%

## BMS 2: In-country assessment in Nigeria

Note that Kraft Heinz does not sell BMS products in Thailand. This company's assessment is based only on the Nigeria study.

	Thailand	Nigeria	Total
<b>Total number of BMS products assessed</b>		<b>9</b>	<b>9</b>
Infant formula	N/A	–	–
Complementary foods	N/A	9	9
Follow-on formula	N/A	–	–
Growing-up milks	N/A	–	–
<b>Total incidences of non-compliance identified</b>		<b>94</b>	<b>94</b>
Infant formula	N/A	–	–
Complementary foods	N/A	94	94
Follow-on formula	N/A	–	–
Growing-up milks	N/A	–	–
Formula, age not specified	N/A	–	–
<b>Ratio of incidences of non-compliance by products assessed</b>	N/A	10.4	
<b>Level of compliance</b>		Low	
<b>Aggregate score</b>			0%
<b>Adjustment to Global Index score (out of 0.75)</b>			-0.75

Note that the final adjustment to the Global Index score based on the in-country assessments is calculated as follows:  
 $0.75 \times (100\% - \text{aggregate in-country score})$ .

### Key to levels of compliance

**Complete:** No incidences of non-compliance found

**High:** Fewer than or equal to 1 incidence of non-compliance by number of products assessed

**Medium:** Between 1.1 and 2 incidences of non-compliance by number of products assessed

**Low:** More than 2.1 incidences of non-compliance by number of products assessed.

## Product brands

Nigeria Farley's

### Article 4: Information and educational materials, including donations of equipment

- No incidences of non-compliance with Article 4 were found.

### Article 5: Advertising and promotion to the general public and mothers

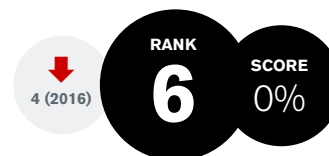
- 85 incidences of non-compliance with Article 5 were observed. These were all point-of-sale promotions on online retailers' sites. As Kraft Heinz did not respond to ATNF's enquiry as to whether it has commercial relationships with these retailers, all have been included in its score
- None of the women interviewed recalled seeing an advertisement on any form of media for what they believed to be a Kraft Heinz product.

### Article 6: Healthcare systems (promotion within)

- No incidences of non-compliance with Article 6 were found.

### Article 9: Labeling

- All 9 Kraft Heinz products assessed had product labels or inserts that were not compliant with The Code. As the company did not respond to ATNF's enquiry as to whether any or some of the products found were parallel imports, all have been included in its score. They were all labeled as being suitable for infants under six months of age. Some of the products carried health or nutrition claims; none carried a NAFDAC registration number. Most were missing the date of manufacture.



## In-country assessment: Summary of methodology & scoring

**Research:** The research was undertaken by Westat, a U.S.-based health and social science research company, under contract to ATNF, working with a local partner in each country.

**Methodology used:** The methodology is based on the first edition of the NetCode protocol: Research Protocol for Periodic Surveys to Assess the Level of Compliance with The Code and Relevant National Measures. Full details of the methodology are available in the Westat reports for each country.

### Data collection methods:

- Interviews with pregnant women and mothers of infants in healthcare facilities.
- Interviews with healthcare workers in healthcare facilities.
- Identification of informational and educational materials produced by BMS manufacturers in healthcare facilities and retail stores.
- Identification of promotional materials produced by BMS manufacturers in healthcare facilities
- Identification of adverts and point-of-sale promotions by BMS manufacturers in retail stores and on online retail sites.
- Analysis of product labels and inserts of all available BMS products on the local market, in a large and small size where available.
- Media monitoring, including various forms of traditional and new media.

### Definitions used:

Westat's studies included the following types of products, following the definitions used in The Code and WHA 69.9

- BMS products include: infant formula (for infants less than six months of age); follow-on formula – sometimes called follow-up formula – (for infants 6-12 months of age); growing-up milk (for children 12-36 months of age); CF when recommended for infants less than six months of age and bottles and teats.
- CF marketed as suitable for young children from 6-36 months of age.

While Westat analyzed and presents data including CF 6-36 months, ATNF has based companies' BMS 2 results only on their scores relating to compliance with The Code and all resolutions up to but not including WHA 69.9, i.e. excluding results relating to CF 6-36 months and formulas marketed as suitable from 24 to 36 months of age.

- Definitions of non-compliance with The Code's recommendations: 2015 NetCode Protocol, WHO and other authoritative sources (such as the Helen Keller Institute) and local regulations in each country. Full list of definitions available as an Annex to the Westat reports.

**Location:** Lagos, Nigeria.

### Sampling:

- Healthcare facilities: Selected using a probability proportionate to size, sample frame of eligible facilities.
- Women and healthcare workers: Selected on a probability basis within each healthcare facility.
- Retailers: Three traditional retail stores near healthcare facilities selected on a purposive basis and major online retailers in each country identified with advice from local partners.
- Advertising: Various traditional media were monitored, such as television and print by a specialist agency in each country. Additional monitoring of online media undertaken by local partners.
- 330 women and 99 healthcare workers were interviewed in Thailand, and 315 women and 98 healthcare workers in Nigeria.
- Products: BMS and CF products were first identified through searches on online retailers and visits to 'brick and mortar' retailers. As many products as possible were purchased, in a large and small size pack where available. Not all products shown on online retail sites were in fact available for sale.

### Fact-checking with companies:

Once data collection was completed, each company was asked to confirm that the products assessed were products intended for each market (i.e. parallel imports were excluded). They were also asked to confirm which online retailers they have commercial relationships with. Point-of-sale promotions on online retail websites were only included where the companies confirmed they have commercial relationships. If companies did not respond to ATNF's request, the results from these online retailers were included within the assessment.

**Scoring:** For an explanation of how the scores were arrived at, see the [ATNF BMS Marketing methodology](#).



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### Note

Westat is 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 the BMS marketing standards and for preparation of summary reports that have been incorporated by ATNF into the scoring of company performance for the Access to Nutrition Index.

### Westat disclaimer

Westat, with its local subcontractors in Thailand and Nigeria, was 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 the BMS marketing standards and for preparation of summary reports that have been incorporated by Access to Nutrition Foundation (ATNF) into the scoring of company performance for the 2018 Access to Nutrition Global Index. Westat and its local subcontractor engaged with healthcare facilities, mothers of infants who attended those facilities, healthcare workers at the facilities, and retailers as part of the data collection and analysis process.

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