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The BMS and CF Marketing Indexes 2023

Methodology assessing baby food companies' compliance with the International Code of Marketing of Breast-Milk Substitutes and all subsequent relevant World Health Assembly resolutions

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Context

The importance of optimal breastfeeding and appropriate complementary feeding

Nutrition is particularly important within the first 1,000 days of a child's life (from conception to age two). Optimal breastfeeding is a crucial element of infant and young child nutrition. The World Health Organization (WHO) recommends that infants everywhere be exclusively breastfed for the first six months, at which point safe, appropriate complementary foods (CF) should be introduced to meet their evolving nutritional requirements. The WHO also notes that CF should not be used as a breast-milk substitute (BMS), and that infants and young children should continue to be breastfed until they are aged two or older.¹ Any product that potentially replaces the consumption of breastmilk before the age of 36 months is considered to be a BMS. Nevertheless, while breastfeeding up to the age of two years is encouraged, the importance of appropriate CF from the age of six months onwards should not be undermined. CF of poor nutritional quality, particularly those that are high in sugar and calories, can contribute to weight gain, while CF of appropriate nutritional quality has the potential to reduce stunting in young children.² These foods should have appropriate levels of micronutrients, either inherently or through fortification, to provide all of the vitamins and minerals essential to healthy development.³

Breastfeeding has long been proven to provide a myriad of significant health benefits compared to BMS. These benefits are unique to breastfeeding and help both mother and infant.^{4,5} Positive long-term benefits for infants include protection against becoming overweight or obese, as well as against certain non-communicable diseases such as diabetes mellitus.^{6,7} Furthermore, in areas of the world where hygiene is poor and the availability of, and access to, food is sub-optimal, breastfeeding is key to lowering infants' risk of undernutrition and infectious diseases.⁸ Evidence from a systematic review and meta-analysis found that babies that continued to be breastfed after 12 months of age exhibited a two-fold lesser risk of mortality than those not breastfed.⁹

For mothers, breastfeeding can reduce the risk of certain types of cancer, such as ovarian and breast cancer,¹⁰ and prolonged breastfeeding reduces post-partum weight retention.¹¹ Continued breastfeeding, rather than simply breastfeeding for a short period, can also reduce the risk of type 2 diabetes as well as cardiovascular diseases for the mother.^{12,13} The 2019 *Cost of Not Breastfeeding* tool has shown that optimal breastfeeding has the potential to prevent an additional 98,243 deaths of mothers annually from cancer and type 2 diabetes.¹⁴

In the lowest-income countries particularly, breastfeeding is vital to many children's survival and development. In 2019, the *Cost of Not Breastfeeding* tool showed that 595,379 childhood deaths (0 to 23 months) from diarrhea and pneumonia were attributable to not breastfeeding according to the global WHO and United Nations Children's Fund (UNICEF) recommendations, with 64% occurring in lower middle-income countries.¹⁵

Due to the sub-optimal rates of breastfeeding worldwide, and continuing infant mortality and poor health outcomes, in 2014, WHO set the global target for 2025 of achieving 50% exclusive breastfeeding in the first six months of age in all countries and regions.¹⁶ This target was extended in 2016 to at least 70% exclusive breastfeeding by 2030¹⁷. UNICEF estimates of exclusive breastfeeding rates during the first six months of life show that they improved from 33% in 1995, to 44% in 2020. A significant effort needs to be made to reach the global target, as four of the eight global regions have rates well below 40%, with only South Asia and Eastern and Southern Africa having levels slightly above 50%.¹⁸

Optimal infant and young child nutrition is also an essential component of achieving the global nutrition goals set by the WHO for 2025 to combat growing levels of overweight and obesity and reduce deaths and illness from diet-related chronic diseases.¹⁹ Substantially improving the diets of infants and young child nutrition is also a critical element in delivering Sustainable Development Goal (SDG) 2 (Ending Hunger) and SDG 3 (Good Health and Well-being), and will contribute to achieving many other SDGs.



International recommendations on breastfeeding and complementary feeding

In 1981, The International Code of Marketing of Breast-milk Substitutes was adopted by the World Health Assembly (WHA) as a minimum requirement to protect and promote appropriate infant and young child feeding.²⁰ Since 1981, several WHA resolutions have been passed that augment or reinforce the original Code.²¹ ('The Code', used throughout this document, collectively refers to the 1981 WHO Code and all subsequent and relevant WHA resolutions, up to and including WHA 71.9). The resolution adopted in May 2016, WHA Resolution 69.9, further clarifies the scope of BMS products covered by the Code, i.e., all formulas intended for infants from birth to three years of age, including infant formula (IF), follow-up formula (FUF), and growing-up milk (GUM). It is important to note that formulas for special medical purposes have always been included within the Code's scope. WHA resolution 69.9 also introduces recommendations for the appropriate marketing of CF marketed as suitable for older infants and young children aged between 6 and 36 months.²² Technical guidance on the implementation of WHA resolution 69.9 was developed by the WHO in 2017.²³

The Code is the recommended basis for action for member states to regulate and monitor the marketing of BMS and CF. Article 11 of the Code also states that manufacturers and distributors of products within the scope of the Code should regard themselves as responsible for monitoring their marketing practices according to the principles and aim of the Code, and for taking steps to ensure that their conduct at every level conforms to them.

To give legal effect to the Code, countries need to enact laws and regulations and rigorously monitor compliance. Over 40 years since the Code was released, efforts to encourage all countries to incorporate the Code into national legislation have persisted globally, yet 50 of the 194 member state countries still have none of the Code's provisions in their law and only 32 countries have legal measures that are substantially aligned with the Code.²⁴ The significant gaps in national legislation is one of the reasons that manufacturers of BMS and CF products for infants and young children must commit to complying with the Code, to demonstrate their commitment to protecting breastfeeding and supporting optimal nutrition among young children.

Scaling up exclusive and continued breastfeeding is not only essential for individual health and wellbeing, but also for optimal human capital development and strengthened individual and national economic outcomes.²⁵ While the vast majority of women can breastfeed their infants, and most infants are able to be breastfed, in low-, middle- and high-income countries, breastfeeding rates are falling and a marked transition in global infant and young child feeding has occurred, with higher use of commercial milk formulas.²⁶ The transition is linked with rising rates of female participation in the labor force in many developing markets, urbanization, and increasing incomes and aspirations, which have encouraged the adoption of convenience-oriented lifestyles and made formulas and prepared infant foods more desirable.

Structural factors such as inadequate maternity protection, workplace breastfeeding policies and hospital and antenatal clinic policies that are not supportive of breastfeeding strongly shape a mother's feeding preference even before birth.²⁷ Socio-cultural factors further play a role where breastfeeding and complementary feeding practices are largely based on cultural customs and significantly influenced by grandmothers and the elderly in the community. Marketing of BMS and CF, which includes advertising, promotions and information presented on labels, significantly shapes the perceptions of caregivers by acting as an influential source of information – this has been demonstrated to contribute to decreasing rates of breastfeeding.^{28, 29} Baby food companies can play a critical role in supporting optimal breastfeeding and the timely introduction of CF by marketing their products in line with the Code. In doing so they can also contribute to achieving global nutrition targets and the SDGs.



ATNI's approach to assessing baby food companies' BMS and CF marketing

Basis for company assessment

The BMS and CF marketing methodology is based on the following key international guidelines, recommendations and standards:

- The International Code of Marketing of Breast-milk Substitutes developed in 1981, including all subsequent WHA resolutions that make significant additions or provide clarifications to the original provisions outlined in 1981 - these are collectively referred to hereafter as **the Code**^a
- Codex Alimentarius Standards^b
- Relevant local regulations in the countries in which ATNI conducts in-country studies.
- NetCode Toolkit: Monitoring the Marketing of Breast-milk Substitutes: Protocol for Periodic Assessment (2017)^c

In the BMS/CF Marketing Index 2021, the recommendations of the guidance associated with the 2016 WHA resolution 69.9 were incorporated for the first time in the methodology and will continue to be incorporated in the methodology for the BMS and CF Marketing Indexes 2023. These recommendations expanded on and strengthened various elements of the Code; however, the findings of the BMS/CF Marketing Index 2021 showed that the companies have not yet fully adopted and implemented the WHA 69.9 recommendations. ATNI, with the technical support of the World Health Organization, the United Nations Children's Fund, Helen Keller International, and Save the Children, has developed a model company policy that consolidates the Code provisions to date (up to and including WHA 69.9 recommendations) to guide companies in responsibly marketing their BMS products.^d

WHA 69.9 recommendations also included guidance on the responsible marketing of commercial CF products. Although a primary requirement for CF marketing is that the products are of appropriate nutritional quality, ATNI could not assess the nutritional composition of CF products for the BMS/CF Marketing Index 2021 and therefore the assessment was limited to labeling/messaging, promotional and other marketing practices. ATNI did however conduct a pilot study assessing the nutritional composition and labeling practices of commercial CF in the Philippines against WHO Europe's draft nutrient profiling model for commercially available CF.^e For the BMS and CF Marketing Indexes 2023, ATNI has received additional funding to assess the nutritional composition and labeling of commercial CF against WHO Europe's nutrient and promotion profile model (NPPM) for food products for infants and young children 6-36 months^f (see page 14 for more details).

^a For more information about the Code: [WHO | Code and subsequent resolutions](#)

^b Codex Standard 72-198 for infant formula and formulas for special medical purposes intended for infants
Codex Standard 156-1987 for follow-up formula

CAC/RCP 66-2008 Codex Alimentarius Code of Hygienic Practice for Powdered Formulae for Infants and Young Children

^c For more information about the NetCode Toolkit: <https://apps.who.int/nutrition/publications/infantfeeding/netcode-toolkit-periodic-assessment/en/index.html>

^d ATNI's model company policy on BMS marketing (March 2022): [Model-policy-on-BMS-marketing-ATNI.pdf \(accessstonutrition.org\)](#)

^e For more information about ATNI's study on CF in the Philippines: https://accessstonutrition.org/app/uploads/2021/05/ATNI_PH-CPCF-landscape-study.pdf

^f For more information about WHO Europe's NPPM: [Nutrient and promotion profile model: supporting appropriate promotion of food products for infants and young children 6–36 months in the WHO European Region](#)



Product scope

The **BMS Marketing Index 2023** assesses whether companies market the following products in line with the recommendations of the Code:

Formula milk (in liquid or powdered form, including all formulas for special medical purposes 'FSMPs' intended for infants and young children aged 0-36 months irrespective of their classification in national legislation)⁹

- IF: infant formula, also referred to as Stage 1 formula (intended for infants aged 0-6 months)
- FUF: follow-up formula, also referred to as Stage 2 formula (intended for older infants between 6 and 12 months)
- GUM: growing-up milk, also called toddler milk or referred to as Stage 3 formula (milks or milk replacements intended for young children between 12 and 36 months of age)

Note: In line with the definition of breast-milk substitutes (BMS), as set out by the World Health Assembly (WHA), BMS products include any food or milk that is marketed as partially or fully replacing breast milk. Although the Code also applies to the marketing of feeding bottles and teats, ATNI does not cover the marketing of these products in the assessments as these are generally not manufactured by food and beverage companies.

The **CF Marketing Index 2023** assesses whether companies market the following products in line with the recommendations of the Code:

Complementary foods (including baby porridge and cereals, dairy/fruit/vegetable-based baby purées, savory meals and snack foods for infants and young children, as well as baby teas, juices and water)

- CF marketed as suitable for infants aged 0-6 months (CF < 6).

Note: In line with the World Health Assembly definition, CF marketed to infants aged under six months are breast-milk substitutes, as these products interfere with exclusive breastfeeding in the first six months. However, ATNI will assess these products in the CF Marketing Index rather than the BMS Marketing Index to emphasize that CF products should only be intended for older infants and young children aged from 6 to 36 months and not be introduced to infants aged under six months who should be exclusively breastfed.

- CF marketed as suitable for older infants and young children between six and 36 months of age (CF 6-36).

Objectives

ATNI's principal objective in assessing the selected major baby food companies is to determine the extent to which they market their BMS and CF in line with the Code. ATNI's ultimate goal is to encourage all baby food companies to market their products in line with this international standard and/or national legal measures, whichever are stricter.

ATNI undertakes its assessments using the methodology set out here. The methodology is again based on the recommendations and guidance of organizations such as WHO and UNICEF, and relevant resolutions passed by the WHA.

⁹ There are various types of infant formula. As noted in the 2017 NetCode Protocol for Periodic Monitoring, the upper age indication on the product label varies from country to country but is usually between 6 and 12 months. These include "special" formulas such as soy formula, lactose-free formula, low-birthweight/premature formula and therapeutic milks. According to Codex (STAN 72-1981) Standard for infant formula and formulas for special medical purposes intended for infants (revision 2007), formula for special medical purposes intended for infants means a substitute for human milk or infant formula that is specially manufactured to satisfy, by itself, the special nutritional requirements of infants with specific disorders, diseases or medical conditions during the first months of life up to the introduction of appropriate complementary feeding.



The assessment is designed to enable stakeholders to track changes over time in the selected baby food companies' policies, practices and disclosure and to compare:

- The alignment of their marketing policies with the Code and subsequent relevant WHA resolutions
- The markets and products to which companies uphold their policies
- How robust the companies' related management systems are and how consistently they apply them in different markets
- The completeness of the companies' disclosure
- Their approach to lobbying on BMS and CF marketing topics
- The effectiveness of the companies' policies and management systems in key markets in ensuring their marketing of BMS and CF products complies with their policies and/or the Code and local regulations.

A score is generated for all manufacturers. Previously, in 2016 and 2018, ATNI published the results of these assessments within each Global Index report. For the first time in 2021, ATNI published the results in a separate Index, called the BMS/CF Marketing Index 2021, and the findings were also included in the Global Index 2021 report. This methodology describes the assessments that will be conducted for the second iteration of the BMS and CF Marketing Index(es) which will be published in 2023.

The report on the consultations for the BMS and CF Marketing Indexes 2023^h details the suggested changes discussed on adjusting final Global Index scores based on the BMS and CF Marketing Index scores (for those companies that are also constituents of the Global Index 2024). The Global Index adjustment will be further discussed during the consultations and preparations for the Global Index 2024.

Additional background and material on ATNI's approach to assessing BMS and CF marketing can be found on [ATNI's website](#), including previous Index reports, scorecards for each BMS/CF company and previous methodologies.

Company selection

The BMS and CF Marketing Indexes 2023 will collectively assess the 20 largest baby food manufacturers globally, based on 2021 retail sales. ATNI estimates these companies hold >70% of the global baby food (BMS and CF) market share.ⁱ The previous assessment included only the nine largest baby food companies. ATNI was provided with additional funding to expand the company scope in response to stakeholder input.

Six out of the 20 companies are constituents of the Global Index 2024, which assesses 25 of the world's largest food and beverage manufacturers. The remaining 14 companies are not assessed on the Global Index 2024 either because they are not classified as food and beverage sector companies (for example, Abbott and Reckitt), or if they do classify as food and beverage companies, they are not among the 25 largest globally.

^h For more information on ATNI's 2022 multi-stakeholder consultations for the BMS/CF Marketing Index 2023:

[BMS CF consultation report December2022.pdf \(accessnutrition.org\)](#)

ⁱ ATNI estimates derived from Euromonitor International



Table 1: Companies assessed in the BMS and CF Marketing Indexes 2023 and Global Index 2024

Company	Short name used in Index	HQ	New to this Index?	Part of Global Index 2024?
A2 Milk Co Ltd.	A2 Milk	New Zealand	Yes	No
Abbott Laboratories Inc.	Abbott	United States	No	No
Danone Group	Danone	France	No	Yes
Feihe International Inc	Feihe	China	No	No
Hain Celestial Group Inc	Hain Celestial	United States	Yes	No
Hangzhou Beingmate Group Co Ltd	Beingmate	China	Yes	No
Health & Happiness (H&H)	H&H	China	Yes	No
Hero Group GmbH	Hero	Switzerland	Yes	No
Hipp GmbH & Co Vertrieb KG	HiPP	Germany	Yes	No
Inner Mongolia Yili Industrial Group	Yili	China	No	Yes
Kraft Heinz Co	Kraft Heinz	United States	No	Yes
Lactalis, Groupe	Lactalis	France	Yes	Yes
Mead Johnson (Guangzhou) Ltd	Mead Johnson	China	Yes	No
Morinaga Milk Industry Co	Morinaga Milk	Japan	Yes	No
Nestlé S.A.	Nestlé	Switzerland	No	Yes
Progress OAO	Progress	Russia	Yes	No
Reckitt Benckiser Group Plc (RB)	Reckitt	United Kingdom	No	No
Royal FrieslandCampina NV	FrieslandCampina	Netherlands	No	Yes
Shijiazhuang Junlebao Milk Co Ltd	Junlebao	China	Yes	No
Vietnam Dairy Products JSC (Vinamilk)	Vinamilk	Vietnam	Yes	No



Methodology

Development and methodology revision

ATNI organizes multi-stakeholder consultations for companies, investors, public health experts and other interested parties after each iteration of its Indexes. Consistent with this approach, ATNI conducted a series of consultations with various stakeholders mid-2022 to discuss proposed changes and revisions to the BMS/CF Marketing methodology.¹ After the completion of the consultative process, ATNI finalized the methodology revisions for the BMS and CF Marketing Indexes 2023. The key changes in the methodology are described throughout this document.

Methodology structure

The BMS Marketing Index and CF Marketing Index 2023

The 2023 Index consists of a BMS Index and a CF Index. Following the methodology criteria of the BMS/CF Marketing Index 2021:

- companies that derived 5% or more of their total baby food (BMS and CF) revenues in 2021 from BMS products will be assessed on BMS marketing and therefore be part of the BMS Marketing Index 2023

Note: In the BMS Marketing Index 2023, BMS products constitute formula milk (see page 6).

- companies that derived 5% or more of their total baby food (BMS and CF) revenues in 2021 from CF products will be assessed on CF marketing and therefore be part of the CF Marketing Index 2023

Note: In the CF Marketing Index 2023, CF products include both categories of CF: CF for older infants and young children 6-36 months as well as CF for infants under six months (CF < 6).

Some companies may be assessed on both BMS and CF marketing and therefore be part of both Indexes; however, the BMS and CF assessments will **not** be combined to yield a final total score.

¹ For more information on ATNI's 2022 multi-stakeholder consultations for the BMS/CF Marketing Index 2023: [BMS_CF_consultation_report_December2022.pdf \(accessnutrition.org\)](https://www.accessnutrition.org/BMS_CF_consultation_report_December2022.pdf)



Table 2: Companies assessed in the BMS and CF Marketing Indexes 2023

Company name	2021 global retail sales of baby foods (BMS+CF), USD million	% BMS sales (2021)	% CF sales (2021)	Applicable Index
Nestlé	~13,400	69.2%	30.8%	BMS and CF
Danone	~8,550	85.7%	14.3%	BMS and CF
Feihe	~5,070	99.8%	0.2%	BMS
Abbott	~4,670	99.9%	< 0.1%	BMS
Reckitt	~3,800	100%	No CF sales	BMS
Yili	~3,500	100%	No CF sales	BMS
FrieslandCampina	~2,200	98.4%	1.6%	BMS
Junlebao	~1,860	100%	No CF sales	BMS
Mead Johnson	~1,400	100%	No CF sales	BMS
HiPP	~1,020	28.9%	71.1%	BMS and CF
Kraft Heinz	~1,000	3.6%	96.4%	CF
H&H	~980	99.6%	0.4%	BMS
Hero	~700	17.8%	82.2%	BMS and CF
Vinamilk	~700	85.5%	14.5%	BMS and CF
Progress	~690	No BMS sales	100%	CF
Hain Celestial	~600	10.5%	89.5%	BMS and CF
Morinaga Milk	~590	96.9%	3.1%	BMS
Lactalis	~520	87.9%	12.1%	BMS and CF
Beingmate	~510	86.5%	13.5%	BMS and CF
A2 Milk	~500	100%	No CF sales	BMS

Companies are presented by decreasing estimated global retail sales of BMS and/or CF in 2021 (final data was retrieved from Euromonitor International in the end of December 2022)



Corporate Profile and the In-country Assessments

The methodology retains the same overall structure as in the BMS/CF Marketing Index 2021. It assesses whether BMS/CF manufacturers take a responsible approach to marketing their products using two separate tools:

Corporate Profile assessment: in the methodology for the BMS/CF Marketing Index 2021, this element was also known as BMS/CF 1. However, as the methodology for the BMS and CF Marketing Indexes 2023 introduces two separate Indexes - one for BMS marketing and one for CF marketing – it consists of two forms of Corporate Profile assessments, BMS 1 and CF 1. The Corporate Profile assessments aim to evaluate companies' policies, management systems and disclosure in relation to BMS and CF marketing, as applicable to a company.

In-country assessments: in the methodology for the BMS/CF Marketing Index 2021, this element was also known as BMS/CF 2. However, as the methodology for the BMS and CF Marketing Indexes 2023 introduces two separate Indexes - one for BMS marketing and one for CF marketing – it consists of two forms of in-country assessments, BMS 2 and CF 2. In-country assessments are designed to measure companies' on-the-ground BMS and CF marketing practices in selected countries by assessing their compliance with provisions of the Code and/or national Code-relevant regulations, whichever are stricter.

The subsequent sections describe those two main elements of the BMS/CF Marketing methodology in further detail.



1. Corporate Profile: BMS 1 and CF 1

Approach

BMS 1 and CF 1 are surveys consisting of indicators assessing companies' commitments in relation to BMS marketing and CF marketing, respectively, and these indicators are based on the provisions of the Code. In both BMS 1 and CF 1, the main types of indicators are:

- **policy commitment indicators:** these assess companies' commitments on responsible BMS/CF marketing in company policies or other relevant documentation, and the extent to which they align with the Code.
- **management system indicators:** these assess the guidance and procedures provided by companies to their employees to ensure the implementation of the commitments on responsible BMS/CF marketing.
- **disclosure indicators:** these assess the companies' level of disclosure relating to responsible BMS/CF marketing.
- **lobbying indicators:** these assess the companies' approach to lobbying in relation to BMS/CF marketing.

Both BMS 1 and CF 1 also include a series of '**Basic Company Information**' questions which are not part of the indicators which companies are scored on, but rather serve to collect information to assess the scope of the companies' BMS/CF marketing commitments, in terms of the products and markets covered. The section below [Corporate Profile scoring](#) describes in further detail how the scope of the commitments affects the *final* Corporate Profile score.

Consistent with the usual approach of conducting Corporate Profile assessments, for both BMS 1 and CF 1, ATNI first reviews and scores companies based on publicly available information only. Under a non-disclosure agreement, should a company wish to sign one, it is then given the opportunity in two rounds to provide further information via the data collection platform *Probench* which ATNI uses to conclude the assessments.

BMS 1

Only those companies which in 2021 derived 5% or more of their baby food (BMS and CF) revenues from BMS products (specifically formula milk) will be assessed on the BMS 1 Corporate Profile.

The indicators in BMS 1 are revised from the BMS module of the BMS/CF Marketing Index 2021 – the revisions were mainly based on ATNI's model company policy (see page 5). The BMS 1 survey consists of a total of 11 sections: one section covers overarching commitments related to the Code, nine sections reflect the key Code provisions, one section covers lobbying and public policy influence, and another separate section covers disclosure. The full list of indicators for BMS 1 can be found in [Annex I](#), where the relevant Code provision is indicated next to each question.

Key changes

Compared to the previous methodology, an indicator has been incorporated in the first 'overarching' section to assess and score on whether a company applies its BMS marketing commitments to formulas for special medical purposes. This indicator will also carry heavier weighting compared to the remaining indicators in that section and contribute to 50% of the score on that section.

Other changes include removing one section on 'Information and Education' and adding one on 'Donations'. Indicators from the 'Information and Education' section have been moved across other sections, where relevant, whereas a total of ten indicators have been added to better capture



companies' commitments relating to donations. Compared to the previous single indicator on donations, the indicators in this revised methodology are more specific, covering commitments on donations in the healthcare system, in emergencies and humanitarian settings, and in social and welfare institutions. Additionally, the management systems indicator assessing if a company's system, to ensure it upholds commitments relating to the different Code provisions, is comprehensive and applied globally has been removed from this assessment and it is covered across the remaining management systems indicators addressing corporate guidance and procedures on these issues. Other changes throughout the BMS 1 survey include minor variations to the wording of some indicators, slightly modified answer options, some additional indicators along with other adjustments that have been made to improve the clarity and specificity of the indicators and enhance the overall assessment.

CF 1

Only those companies which in 2021 derived 5% or more of their baby food (BMS and CF) revenues from CF products will be assessed on the CF 1 Corporate Profile. The CF 1 survey is not designed to penalize companies for marketing CF intended for older infants and young children aged 6-36 months given the importance of giving children safe, appropriate, and nutritious CF from this age. The intent is rather to ensure that the marketing of these products is in accordance with the recommendations of the guidance associated with WHA resolution 69.9, i.e., that it does not undermine exclusive breastfeeding up to six months of age nor supplant continued breastfeeding up to two years or beyond.

The indicators in CF 1 are revised from the CF module of the BMS/CF Marketing Index 2021. The CF 1 survey consists of a total of 11 sections. Compared to the methodology for the BMS/CF Marketing Index 2021, the CF Corporate Profile assessment has three additional sections to ensure consistency with the BMS 1 Corporate Profile: one section covers donations, one addresses implementation and monitoring, and one section is on lobbying and public policy influence. The remaining six sections reflect the key recommendations of the guidance associated with WHA 69.9, including one section that covers the companies' disclosure in relation to responsible CF marketing.

The full list of indicators for CF 1 can be found in [Annex II](#), where the relevant WHA 69.9 recommendation is indicated next to each question.

Key changes

CF marketed as suitable for infants under six months of age (CF < 6) are effectively BMS products as they interfere with exclusive breastfeeding in the first six months; therefore, in previous ATNI BMS/CF Marketing methodologies, CF < 6 was part of the BMS product category and consequently part of the BMS assessments. In this revised methodology however, CF < 6 are now part of the CF product category – which entails CF < 6 and CF 6-36 – to emphasize that CF products should be limited to CF designated for older infants and young children between six months and three years of age and should not be marketed to infants under six months who should be exclusively breastfed based on WHO guidance on optimal infant and young child feeding practices.

In addition to the changes described above regarding the sections added to the CF 1 survey, other modifications across the sections include minor variations to the wording of some indicators, slightly adjusted answer options, as well as the addition of some indicators to ensure consistency with the BMS 1 survey. These revisions aim to improve the clarity and specificity of the indicators and enhance the overall assessment.

Areas not covered by methodology

While the Corporate Profile methodology aims to assess many important areas of companies' commitments and management practices, some key issues are not assessed, principally because they lie outside the scope of the Code. These include, for example, corporate funding of research and advocacy bodies and companies' programs or support for other organizations' programs to promote



breastfeeding; or programs that address nutritional deficiencies among children under two, and women of childbearing age.

While the CF 1 Corporate Profile methodology aims to assess many important areas of companies' commitments and management practices, other key areas - particularly relating to [WHO Europe's NPPM](#) – have not yet been incorporated into the methodology for the CF Marketing Index 2023 (see Box 1 below).

Box 1. Pilot assessment of commercial CF products using WHO Europe's Nutrient and Promotion Profile Model (2022)

In November 2022, WHO's Regional Office for Europe has published the [Nutrient and Promotion Profile Model](#), the only currently existing official model that sets out nutrient and promotion requirements across different CF product categories to support various stakeholders, including industry, in ensuring commercial CF products are suitable and appropriately promoted for older infants and young children aged six months up to three years of age. The use of the NPPM aligns with recommendation 3 of the guidance associated with WHA 69.9 which encouraged that "Nutrient profile models should be developed and utilized to guide decisions on which foods are inappropriate for promotion".

ATNI has recently received additional funding to conduct a pilot assessment of commercial CF using WHO Europe's NPPM. Although this assessment and its results will not feed into the assessment and scoring of the CF Marketing Index 2023, this pilot research will be considered in updating the CF methodology for consequent Indexes recognizing that such analyses can render more robust and comprehensive CF assessments.

The research from this pilot assessment will however be presented in the CF Marketing Index 2023 as it would provide relevant context and additional insights on CF manufacturers' performance, as well as recommendations on key areas of action for improvement on CF formulation and promotional practices. The research will also serve to supplement the Global Index 2024 product profile assessments which have thus far excluded CF products. The CF nutrient and promotion profile assessment will again not be incorporated in the product profile assessment and scoring for the Global Index 2024, but it may be considered in revising the methodology for future iterations. A standalone report will also present the CF pilot assessment and its findings in more detail.



Corporate Profile (BMS 1 and CF 1) scoring

Indicator level

All sections in both BMS 1 and CF 1 continue to be equally weighted because the Code does not suggest differential importance or application of any of the recommendations (for more information on this topic, refer to [ATNI's multi-stakeholder consultations report on the BMS and CF Marketing Indexes 2023](#)).

Apart from the sections on disclosure and lobbying - which consist of only one type of indicator - the remaining sections in both BMS 1 and CF 1 consist of both policy commitment indicators and management system indicators (see previous section on '[Approach](#)' on page 12), where each type of indicator carries 50% of the weight within the applicable sections. In BMS 1 however, section 9 on 'Implementation and Monitoring' consists of only a few policy commitment indicators while there are many management system indicators. For this section only, the policy commitment indicators carry 20% of the weight, and the management system indicators carry 80%.

At the indicator level, indicators have a number of scoring options and a fixed maximum score worth 10 points (scoring at the indicator level is shown in [Annex I](#) and [Annex II](#) for BMS 1 and CF 1, respectively). For each BMS 1 and CF 1, the aggregated indicator score, which is out of 10 points, is converted to a percentage score.

The aforementioned scoring criteria are consistent with the previous BMS/CF Marketing Index methodologies.

Key indicator changes

- **How Formulas for Special Medical Purposes are incorporated in the BMS Marketing Index 2023 scoring**

A main issue identified in the BMS/CF Marketing Index 2021 was the exclusion of some or all formulas for special medical purposes (FSMPs) from companies' BMS marketing policies. All provisions of the Code apply to FSMPs, and therefore there is no basis for their exclusion from companies' BMS marketing policies.

ATNI has revised the methodology for the BMS Marketing Index 2023 to now score companies on this element to ensure BMS marketing commitments are adopted across companies' full range of formula, including FSMPs.

An indicator has been incorporated in the first 'overarching commitments' section to assess and score on whether a company applies its BMS marketing commitments to formulas for special medical purposes. This indicator (indicator 5) will also carry heavier weighting compared to the remaining indicators in that section, and contribute to 50% of the score on that section (section 1 of the BMS survey – see [Annex I](#)).

- **How Complementary Foods for infants under six months are incorporated in the CF Marketing Index 2023 scoring**

A main issue identified in previous BMS/CF marketing assessments was that CF continue to be marketed as suitable for infants under six months of age, which is against global recommended guidance on exclusive breastfeeding in the first six months and introduction of appropriate complementary foods from six months onwards.

A key scoring change at the indicator level has been applied to the CF 1 survey. Section 1 of the CF 1 survey on the 'guiding principles underpinning infant and young child feeding' consists of an additional indicator (indicator 4) that determines whether companies market CF for infants under six months of age. This indicator weighs 50% of the total CF 1 survey score such that:



- If a company markets CF < 6
 - > the score on this indicator is 0
 - > therefore the *maximum possible* CF 1 total survey score is 50%
- If a company does not sell CF < 6 in any market
 - > the score on this indicator is 10
 - > therefore the *maximum possible* CF 1 total survey score is 100% dependent on the company's marketing of CF 6-36 products
 - > and the *minimum* CF 1 total survey score is automatically 50% for complying with responsibly marketing CF products only to older infants and young children from six months of age.

Note: all remaining indicators of the CF 1 survey address marketing of CF 6-36 products and collectively weigh the remaining 50% of the total CF 1 survey.

Product weightings

To fully comply with the Code, companies should apply their BMS/CF marketing commitments to all BMS/CF products.

With regards to **BMS marketing**, commitments should apply to all types of formula (refer to page 6): Weightings are assigned to each product category, and these have been revised for the BMS Marketing Index 2023 as follows:

- **Infant formula (IF) "45%":** Inappropriate BMS marketing poses the highest risk on the health of the youngest and most vulnerable age group (infants from birth up to six months of age), so it is important that the infant formula product category is the most heavily weighted, which is consistent with the previous BMS/CF Marketing methodologies.
- **Follow-up formula (FUF) "35%":** The aim of the BMS/CF Marketing Index methodology is to drive industry towards responsibly marketing all products defined by WHO as BMS, so increased weight has been placed on the follow-up formula category. The scoring system of the previous BMS/CF Marketing methodologies did not credit companies in a sufficiently balanced way, particularly with regards to applying responsible marketing commitments for follow-up formula in all markets.
- **Growing-up milk (GUM) "20%":** There has been no change to the weighting of this product category. ATNI has not reduced the weighting of this product category because of its importance, but it has also not been possible to increase its weighting without affecting other elements of the scoring.

With regards to **CF marketing**, the weightings assigned to the product categories are as follows:

- Complementary foods marketed to infants under six months (CF < 6) "50%" (see page 15 for the implications of marketing CF < 6 on the CF 1 survey score).
- Complementary foods marketed to older infants and young children between six months and three years of age (CF 6-36) "50%"

Compared to the previous BMS/CF Marketing methodologies, the weightings for both CF < 6 and CF 6-36 have increased to further emphasize the importance of both not marketing CF to infants under six months and responsibly marketing CF products to older infants and young children 6-36 months to ensure optimal infant and young child feeding practices.



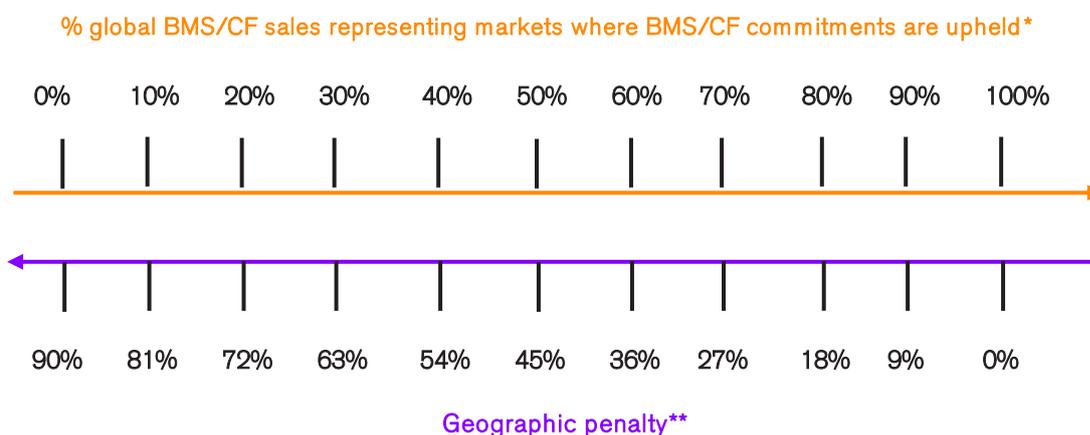
Geographic penalty (applied to each product category)

An additional requirement to fully comply with the Code is that companies should not only apply their BMS/CF marketing commitments to all BMS/CF products, but also ensure that for each product type they uphold these commitments in all the markets they sell their BMS/CF products in.

As observed throughout ATNI's assessments on industry commitments to BMS marketing, companies may have relatively strong commitments in their policies but do not uphold those commitments for all (or any) BMS products where national Code regulation is non-existent or is weaker than a company's policy. The aim of ATNI's BMS and CF Marketing Indexes is to incentivize action towards achieving full Code compliance, so upholding company marketing commitments for all BMS/CF products in all markets, where national Code regulation is absent or weaker, is a key requirement against which every company is assessed.

For the BMS and CF Marketing Indexes 2023 a single geographic penalty is introduced ranging from 0% up to 90% depending on whether a company fully upholds its BMS/CF marketing commitments in all or none of the countries in which it operates, respectively, where national Code regulations are absent or less stringent than the company's policies and standards. This is a considerably higher penalty compared to the previous BMS/CF Marketing methodology to emphasize the need for companies to uphold their commitments in all their markets because otherwise it means that the company is not taking any additional steps beyond legal compliance to fully comply with the Code. The penalty is however gradually reduced from 90% relative to the global BMS/CF sales representing the markets where companies uphold their BMS/CF marketing commitments i.e. if the markets where a company upholds its commitments beyond legal compliance contribute to a relatively higher proportion of the company's global BMS/CF sales, the geographic penalty will be relatively lower such that with every '+' one percentage point of sales, the penalty is reduced by '-' (0.9). Refer to **Figure 1** below for more details on how the geographic penalty would be applied.

Figure 1: Graduated geographic penalty (per product category: IF, FUF, GUM, CF 6-36)



* Based on rounded sales values

** Value of the penalty applied will be of up to two decimal places

The graduated geographic penalty is applied in both BMS 1 and CF 1 to each product category to which the companies' commitments apply, and therefore the global sales of each applicable product type is considered in determining the relative penalty. The geographic penalty is however not applied to CF <6 as this product should not be marketed, neither to FSMPs which are scored as described in the previous section.



With this new penalty, ATNI also no longer distinguishes countries based on [FTSE4Good's categorization](#) of 'higher-risk'^k and 'lower-risk', but rather intends to capture the impact of those commitments as the Code applies universally and all children have the right to protected breastfeeding. ATNI will however continue to use FTSE4Good's country classification alongside the following sources of information to assess how companies uphold their BMS/CF marketing commitments, and therefore determine the appropriate geographic penalty:

- Euromonitor International data
- Information retrieved from the 'Basic Company Information' questions in the BMS 1 and CF 1 Corporate Profile surveys
- The [2022 Status Report](#) on the National Implementation of the International Code by WHO, UNICEF and IBFAN.

Overarching remarks

As previously mentioned, the 'Basic Company Information' questions of both the BMS 1 and CF 1 survey aim to gather the information required to determine the appropriate *product weightings* and *geographic penalty* (per product) to be applied to each survey score and calculate the Corporate Profile (BMS 1 and CF 1) scores. Where this information is missing or not provided by the companies, ATNI will then use Euromonitor International sales data or data from Innova Market Insight's product database. [Annex III](#) and [Annex IV](#) each provides an overview of how the final Corporate Profile score is obtained for the BMS Marketing Index 2023 (BMS 1) and the CF Marketing Index 2023 (CF 1), respectively.

^k Countries were considered 'higher-risk' based on whether either of the following criteria applied to it: mortality rate of more than 10 per 1000 children under-5 or more than 2% acute malnutrition (moderate and severe wasting) in children under-5



2. In-country assessments: BMS 2 and CF 2

Underlying methodology

The methodology for the in-country assessments (BMS 2 and CF 2) is guided by the second edition of the [NetCode protocol for periodic assessment](#) published in 2017, which was also used as a basis for the BMS/CF Marketing Index 2021 methodology and which ATNI had expanded in scope to ensure that relevant elements of the guidance associated with WHA 69.9 were incorporated.¹ 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.”³⁰

The objective of the in-country assessments is to evaluate companies' compliance with the Code, including compliance with any relevant national regulations that go beyond the scope of the Code. Table 3 below shows the different areas of marketing assessed by ATNI for the in-country studies of the BMS and CF Marketing Indexes 2023, with a brief description of the data collection methods following the NetCode protocol.

Table 3: In-country assessment data collection methods

NetCode protocol modules		Sampling (per country)	Duration
Advertising, contact and online point-of-sale promotion	Traditional: TV, radio, and print	National public and private channels with a reach of > 70% of the population*	4 months retrospective 2 months prospective
	Online websites and social media channels	<ul style="list-style-type: none"> ▪ 10 most popular online forums targeting parents ▪ country-specific company & brand websites ▪ 5 large retailers' websites (based on local knowledge and online searches) + corresponding social media for <u>each website</u> including Facebook, Twitter, YouTube, Instagram and other country-specific platforms	8 weeks
	Note on media findings: ATNI's research only considers findings of sponsored and paid content or content that is promoted by the companies assessed.		
Information and messaging	Product labels	Unique BMS/CF products ^m found across stores and on online platforms*	Ongoing during overall data collection period

* denotes adaptations by ATNI in the data collection methods

¹ Earlier methodologies for ATNI's in-country studies on BMS marketing were based on the first edition of the NetCode protocol, and previously the IGBM protocol.

^m Products should be considered **distinct** if they differ in at least one of the following characteristics: company name, brand name, sub-brand name, product descriptive name, age of introduction, availability in powder or ready-to-use format (for formula), and serving size

On the other hand:

- single serving and multi-serving packages, or different sizes of the same product are considered to be one product

- products with the same name but with different types of packaging (tin, box, jar) are considered to be one product

- different flavors of the same product are considered to be one product



Changes in the assessment approach

As noted in the earlier section on [company selection](#), the BMS and CF Marketing Indexes 2023 will collectively assess the 20 leading BMS/CF manufacturers globally – 11 additional companies compared to the 2021 assessment. The expanded company scope results in the following key changes in the methodology:

1) As the company scope has expanded for the BMS and CF Marketing Indexes 2023, the geographic variability of the companies' markets would require the selection of **a minimum of five countries**, to ensure each of the 20 companies is assessed on BMS/CF marketing in at least one country. Many of the companies sell BMS/CF products in more than one of the countries, while some are only present in one.ⁿ

One of the main criteria in previous BMS/CF Marketing methodologies was the selection of 'higher-risk' countries^o to conduct the on-the-ground assessments in. However, as noted in an earlier [section](#), the BMS and CF Marketing Indexes 2023 will not distinguish between 'higher-risk' and 'lower-risk' countries in any of the elements of the methodology.^p Other considerations in country selection include a balanced representation of countries in terms of their levels of exclusive breastfeeding and the status of national Code implementation, as well as practical factors such as safety.^q

To ensure comparability across the companies' in-country assessments in the BMS and CF Marketing Indexes 2023, ATNI's country selection is also based on ensuring that the companies are assessed in their main BMS/CF markets that represent over 10% up to 100% of their global BMS/CF market.

Consistent with previous BMS/CF Marketing methodologies, companies are not informed of the location or timing of the in-country studies prior to their commencement. Companies are informed of the selected countries only once data collection is completed in a country.

2) In the past BMS/CF Marketing in-country studies, ATNI commissioned a research organization to undertake on-the-ground assessments in *two* countries per iteration. The research organization would also identify and contract a specialist in-country partner to conduct the assessments in the capital or largest city in each of the two countries. However, the changes of the BMS and CF Marketing Indexes 2023 warrant a modified approach. After examining alternative ways of conducting the in-country assessments in an efficient and feasible manner within the bounds of the projected work, ATNI has identified three companies, each providing a form of service that covers the scope and objectives of the monitoring studies in each country. **Figure 2** below provides an overview of the different marketing elements monitored in each of the countries, and the corresponding service provider for each form of monitoring. This centralized approach results in standardized data collection processes for each form of monitoring across the different countries. All collected data will be cleaned, processed, and analyzed by ATNI's researchers. ATNI will also continue to consult and work with local stakeholders in each country who, being familiar with the context and the language, can provide valuable knowledge and support to improve the research processes.

ⁿ Market presence was determined using Euromonitor International 2021 data.

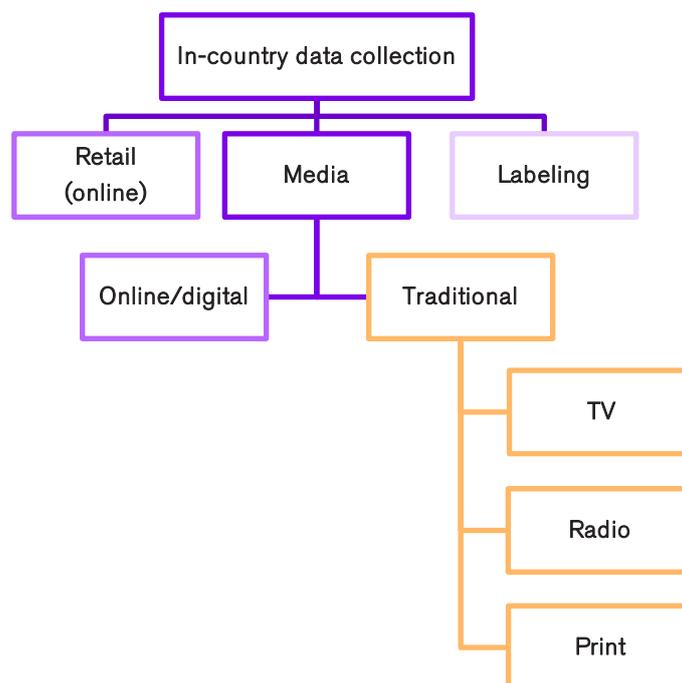
^o Countries were considered 'higher-risk', based on a risk rating system used by FTSE4Good, when either of the following criteria applied: mortality rate of more than 10 per 1000 children under-5 or more than 2% acute malnutrition (moderate and severe wasting) in children under-5.

^p For more information read ATNI's report on the multi-stakeholder consultations for the BMS and CF Marketing Indexes 2023 [BMS_CF_consultation_report_December2022.pdf \(accessnutrition.org\)](#)

^q If it is not possible to assess a company in its major baby food market due to a country's conditions, the company's BMS/CF marketing assessment would then solely be based on its Corporate Profile assessment.



Figure 2: BMS/CF marketing channels monitored



Monitoring methods for the BMS and CF Marketing Indexes 2023 in-country studies

- Social listening will be used to monitor company websites and social media, parenting sites, and online retailers.
- Media monitoring will be used to monitor for paid content on print and broadcast (TV & radio) platforms.
- Product database will provide access to a repository of existing BMS/CF products on the market across several countries globally, retrieved from physical stores and online channels.

3) The increased number of companies assessed may **limit the capacity to assess and report on other companies** which are not part of the BMS and CF Marketing Indexes 2023 but which were found in the selected countries not complying with the Code, as done in previous BMS and CF Marketing assessments.

4) The expanded company scope results in increased variability among companies in terms of their product portfolios, warranting a **separation of the assessments into BMS 2 and CF 2**. The BMS 2 and CF 2 data collection surveys reflect those of BMS 1 and CF 1, respectively, where BMS marketing *practices* are assessed against the Articles of the Code and relevant WHA resolutions and CF marketing *practices* are assessed against the recommendations of the guidance associated with WHA resolution 69.9 – this is consistent with the 2021 BMS/CF Marketing methodology. The main areas of marketing assessed in both BMS 2 and CF 2 for the BMS and CF Marketing Indexes 2023 are online points-of-sale, traditional and online media outlets, and product labels. As in previous BMS/CF



marketing methodologies, data collection is conducted using forms adapted from the 2017 edition of the NetCode toolkit^f, namely:

- Form 5 'List of relevant products sold at point-of-sale'
- Form 6 'Promotions at retail outlets and pharmacies'
- Form 7 'Desk review of labels'
- Form 8 'Desk review of promotions on the media'

Unless specified otherwise, all elements of the in-country assessments are applicable to both BMS 2 and CF 2.

Areas not covered by the methodology

Although commitments in the following areas are assessed to a certain extent within the Corporate Profile (BMS 1 and CF 1) component of the BMS and CF Marketing Indexes 2023, ATNI recognizes the limitation in not capturing how companies' commitments are reflected in practice on these issues:

- Articles 1-3 (the aim, scope and definitions of the Code), including recommendations 1 and 2 of the guidance associated with WHA resolution 69.9, provide the context and structure for the in-country studies but are not monitored per se.
- **Methodology change:** In relation to Article 5 of the Code, point-of-sale promotions will not be monitored in physical retail stores given limitations in conducting this form of assessment on-the-ground. Point-of-sale promotions will however continue to be monitored on online retail platforms.
- **Methodology change:** Due to a number of limitations, Articles 6 and 7 of the Code and recommendation 6 of the guidance associated with WHA resolution 69.9, which address marketing within healthcare systems and to healthcare workers are not within the scope of the in-country studies for the BMS and CF Marketing Indexes 2023.
 - ATNI's [report](#) on the consultations for the BMS and CF Marketing Indexes 2023 includes further details on the discussions around this proposed change.
- Article 10 of the Code requires special inspection of manufacturing processes, which is not covered by the NetCode protocol and, therefore, not within the scope of the on-the-ground assessments.
- Similarly, Article 11 of the Code primarily targets governmental responsibilities which the NetCode protocol did not address and is also therefore not within the scope of the in-country studies. Furthermore, corporate lobbying is not monitored as part of the on-the-ground studies, however this topic may be explored in future iterations, as noted in ATNI's [consultation report](#).



This icon, found in the BMS 1 and CF 1 surveys (see [Annex I](#) and [Annex II](#), respectively) indicates Code provisions assessed in practice in the country studies (in addition to being assessed on the Corporate Profile).

Box 2. WHO Europe's Nutrient and Promotion Profile Model (2022)

As described in the [CF 1 section](#), ATNI will conduct a pilot assessment of commercial CF products using WHO Europe's NPPM (2022). This NPPM is a useful tool to assess if commercial CF products meet WHO requirements in terms of suitable nutritional quality and appropriate labeling practices. Although this pilot study will not feed into the assessment and scoring of the CF Marketing Index 2023, the research will be considered in updating the CF methodology for consequent Indexes.

^f Adaptations of the NetCode data collection forms include the incorporation of relevant requirements of national legislative frameworks and assessments of CF 6-36 products.



Verification process

Once the research and preliminary analysis is complete, ATNI asks companies to confirm certain factual elements of the research – this is consistent with the verification process followed during the research for the BMS/CF Marketing Index 2021. This process entails providing the companies with the opportunity to review any form of evidence (namely images/audio/video/print) of the incidences of non-compliance with the Code found in each country. For each country assessment, ATNI's online research platform would open for a few weeks for companies to review the uploaded findings.

General considerations of the in-country findings of non-compliance include:

- **Parallel imports:** ATNI offers the companies the opportunity to share the BMS/CF products that are officially intended for sale in the assessed countries. This step is taken because findings attributed to parallel imports – branded goods that are imported into a market and sold there without the consent of the owner of the trademark in that market - are excluded from companies' scoring calculations. If companies do not provide this information, it will not be possible to determine which products are parallel imports, and therefore all findings will be considered in the scoring.
- **Retailers:** Online retailers sometimes procure and/or sell products through suppliers that do not have formal contracts with the manufacturers where such contracts should include provisions on the promotion of BMS/CF products. ATNI therefore only scores companies based on findings from retailers which companies have confirmed contractual relationships with in each country. If companies do not provide this information all findings will be considered in the scoring.

The total number of parallel imports found per company in each country, and the total number of promotions found with retailers which companies do not have contractual relationships with, will however be flagged to encourage companies to raise these issues with distributors and retailers, as well as to encourage local authorities to take necessary actions to address these concerns.

In-country assessments (BMS 2 and CF 2) scoring

Each company's score will be based on the findings from the countries in which it sells its BMS/CF products:

- If a company sells its BMS/CF products in only one of the five countries, its score will be based solely on the results of that country assessment.
- If a company sells its BMS/CF products in more than one of the five countries, its score will be based on the average of each country score. See [Annex III](#) and [Annex IV](#).
- The increased number of countries assessed (from two countries in previous BMS/CF Marketing studies) aims to provide more representative findings of companies' BMS/CF marketing practices on-the-ground.

Calculation of scores per country and relevant changes

Each country score is calculated by aggregating the total number of incidences of non-compliance with the Code identified in each country. All instances of non-compliance attributed to BMS (formula) products/brands are added to determine the in-country BMS 2 score, and similarly all counts of non-compliance attributed to CF products/brands are combined to determine the in-country CF 2 score. In this iteration any CF < 6 found during the research is directly counted as a non-compliance with the Code in CF 2, consistent with the Corporate Profile CF 1 methodology. Also similar to the Corporate Profile (BMS 1 and CF 1) assessment, no differential weighting is applied to the findings across different forms of marketing. This first step in the scoring calculations follows the same initial step applied in calculating in-country scores in previous BMS/CF Marketing country studies, except that the BMS and CF findings are processed separately for the BMS and CF Marketing Indexes 2023,



respectively. Refer to **Figure 3** below for an overview of the types of non-compliances assessed and scored on for BMS 2 and CF 2.

However, in previous methodologies, for each company, the number of incidences of non-compliance found in each country was normalized by dividing that value by the total number of the company's BMS/CF products found in each country, which provides a relative measure of the scale of Code non-compliance in a country that was then translated to a percentage country score.

For the BMS and CF Marketing Indexes 2023 in-country studies, the levels of non-compliance and their corresponding percentage scores remain the same as in previous BMS/CF Marketing methodologies (as shown in Table 4 below). Levels of non-compliance however will be determined solely by the number of incidences of non-compliance⁵ rather than by the normalized score, as calculated in previous methodologies.

Table 4: Code compliance levels and in-country scores

Number of non-compliances with the Code per country	Code compliance level	BMS 2 or CF 2 score per country
0	Complete	100%
> 0 -10	High	66%
> 10 - 20	Medium	33%
> 20	Low	0%

⁵ ATNI has already conducted seven in-country studies in total since 2016, the findings from which provide a good basis to define this change i.e. determining respective levels of non-compliance with the Code (complete-high-medium-low) and percentage scores based on the number of non-compliances with the Code.



Figure 3: BMS 2 and CF 2 assessment in each country



Overarching remarks

Separate country reports will be published presenting the findings from each country assessment. These results will also be discussed in detail in the report on the BMS and CF Marketing Indexes and included in each company's BMS/CF Marketing Indexes Scorecard.



Final scoring and reporting of results

For each of the BMS and CF Indexes, a company's Corporate Profile score and In-country assessment score are averaged to obtain a company's total BMS score or CF score, respectively *i.e.*, *the total BMS score is the average of BMS 1 and BMS 2 and the total CF score is the average of CF 1 and CF 2*. The total possible score for each of the Corporate Profile (BMS 1/CF 1) and In-country assessments (BMS 2/CF 2) is 100% and the total possible combined score is 100%. The higher that score, the closer a company has come to achieving full compliance with the recommendations of the Code (and local regulations where they go beyond the Code), as assessed using the ATNI methodology.

As shown in [Table 2](#), some companies (Beingmate, Danone, Hain Celestial, Hero, HiPP, Lactalis, Nestlé, Vinamilk) are assessed on both the BMS and CF Indexes. Compared to the BMS/CF Marketing Index 2021, these companies' BMS and CF scores are not combined to yield one final score for the BMS and CF Marketing Indexes 2023. The final report and company scorecards will present the two main components, the BMS Marketing Index and CF Marketing Index, in separate sections. For companies assessed on both the BMS Index and CF Index, the respective results will be presented in each section.



Annex I Corporate Profile BMS 1

Note:



This icon indicates Code provisions assessed in practice in the country studies (in addition to being assessed on the Corporate Profile).

Newly introduced sections and indicators are denoted as 'NEW' while 'ADAPTED' denoted indicators that have been modified.

Basic Company Data

- Full list of all formula brands specified by age intended for infants and young children from birth to 36 months of age
- Full list of BMS marketing policies or relevant documents that cover this topic.
- Types of products covered by BMS marketing policy and related policies (IF, FUF, GUM, including Formulas for Special Medical Purposes (FSMP), and CF 0-6)
- The company's definition of FSMPs
- List of FSMPs covered by the company's BMS marketing policy
- Full list of countries where the company sells one or more of its BMS products (IF, FUF, GUM) and the respective sales of each product type in each of those countries
- For each type of product, full list of countries where the company upholds its policy and standards on BMS marketing (i.e., company fully applies its policy provisions where local Code regulations are absent/weaker than the company's BMS marketing policy or related policies), or full list of countries where the company only follows national regulations on BMS marketing

Section 1

OVERARCHING COMMITMENTS: Commitments relating to the introduction of the International Code			
#	Policy commitments		Score
	Indicators 1-4 collectively contribute to 50% of section 1's score and indicator 5 contributes to the remaining 50% of this section's score.		
	Support for breastfeeding		
1	Does the company explicitly state support for the following?	Exclusive breastfeeding for the first six months, and continued breastfeeding for two years or more	10
		Exclusive breastfeeding for the first six months	7.5
		Exclusive breastfeeding for the first four to six months	5
		Breastfeeding generally with no mention of specific age ranges	2.5
		The company does not make such commitments	0
	Support for appropriate introduction of complementary foods		
2	Does the company explicitly state support for the introduction of appropriate complementary foods [†]	Yes, explicitly	10
		The company does not make such commitments	0

[†] According to WHO, complementary foods should be adequate in nutritional composition to provide sufficient energy, protein, and micronutrients to meet a growing child's needs, avoiding added sugar and salt, and they should be hygienically stored and prepared, and fed with clean hands using clean utensils.



	from the age of six months?		
3 ADAPTED	Acknowledgement of the Code and WHA resolutions		
	Does the company acknowledge The International Code of Marketing of Breast-milk Substitutes and all subsequent WHA resolutions (including WHA 71.9)?	Yes, explicitly	10
		Yes, but not explicitly acknowledging resolutions up to WHA 71.9	7.5
		Yes, but only acknowledging the original Code (of 1981)	5
		The company does not acknowledge the Code	0
Additional information: Follow this link to see the full list of WHA resolutions WHO Code and subsequent resolutions			
4	Application to joint ventures (JV) and subsidiaries		
	Do the company's commitments apply to:	All joint ventures and subsidiaries where the company has a holding	10
		Joint ventures and subsidiaries where the company has a holding of greater than 50%	7.5
		The company does not make such commitments	0
		Not applicable	N/A
5 NEW 	Application to Formulas for Special Medical Purposes		
	Does the company's BMS marketing commitments apply to formulas for special medical purposes?	Yes, to all special formulas and formulas for special medical purposes	10
		No	0

Section 2

Advertising to the general public and mothers			
#	Policy commitments <small>Indicators 1-7 contribute to 50% of section 2's score</small>		Score
1 ADAPTED 	Advertising and other forms of promotion		
	Does the company state that it will not use advertising or other forms of promotion of its BMS products to reach the general public (Code article 5.1)?	Yes, and covering the following forms of media: a. TV, radio, print and outdoor media b. Digital, internet and social media	10 Option A – 5 points Option B – 5 points
		Yes, but not stating which forms of media are covered by this commitment	2.5
		The company does not make such commitments	0
2 	Samples of products		
	Does the company explicitly state that it will not provide directly or indirectly samples of products to caregivers of infants and young children (Code article 5.2)?	Yes, explicitly	10
		The company does not make such commitments	0
3 ADAPTED	Point-of-sale promotion		
	Does the company	Yes, explicitly and states that this is applicable to:	10



	explicitly state that it will not use point-of-sale advertising, giving of samples, or any other promotion device^u to induce sales of BMS products directly to the consumer at the retail level (Code article 5.3)?	a. physical retail stores b. online retail stores	Option A – 5 points Option B – 5 points
		Yes, but not stating which forms of retail are covered by this commitment	2.5
		The company does not make such commitments	0
Distribution of gifts			
4 	Does the company explicitly state that it will not distribute in any setting or via any means to caregivers of infants and young children, any coupons, gifts of articles or utensils that may promote the use of BMS or bottle feeding (Code article 5.4, recommendation 6 of WHA 69.9)?	Yes, explicitly	10
		The company does not make such commitments	0
Company contact			
5 ADAPTED 	Does the company commit that its staff, particularly its marketing personnel, will not engage in direct or indirect contact of any kind by establishing relationships with caregivers of infants and young children , including through baby clubs, social media groups, childcare classes and contests? (Code article 5.5, recommendation 5 of WHA 69.9)?	Yes, explicitly	10
		The company does not make this commitment in full	5
		The company does not make such commitments	0
Informational and educational materials intended for caregivers of infants and young children			
6 ADAPTED 	Does the company explicitly state that it will not directly nor indirectly provide education on infant and young child feeding to caregivers of infants and young children (recommendation 6 WHA 69.9). This should cover informational and educational material in	Yes, and explicitly stating this is applicable in all forms of communication	10
		Yes, but explicitly stating this is applicable to some forms of communication	7.5
		Yes, but does not explicitly state to which forms of communication this is applicable to	5
		The company does not make such commitments/commitments are not made in full	0

^u These include special displays, discount coupons, premiums, special sales, loss-leaders and tie-in sales



	all forms including verbal, written, audio, visual or any other tangible or digital form of communication.		
	Additional information: Recommendation 6 of the guidance associated with WHA resolution 69.9 supersedes Article 4 of the 1981 Code and WHA resolutions 58.32 and 61.20		
7	Cross-promotion		
	Does the company establish the following commitments not to cross-promote across the different types of BMS products (including FSMPs)^v (recommendation 5 of WHA 69.9)? (tick all that apply)	Packaging design will be different across the different types of BMS	5
Labeling will be different across the different types of BMS		5	
NEW			
			
#	Management systems Indicators 8-9 contribute to 50% of section 2's score		Score
8 ADAPTED	Clear instructions to staff (Do's and Don'ts)		
	In relation to advertising to the general public and mothers , does the company demonstrate that (tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments to advertising and public promotion	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments on all provisions on product samples	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments on point-of-sale promotion	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments on gift distribution	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments on company contact	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments on informational and educational materials	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments on cross-promotion	10/7
9 ADAPTED	Procedures		
	Can the company demonstrate procedures to implement commitments made relating to all Code provisions on advertising to the general public and mothers? (tick all that apply)	The company can demonstrate such procedures for all provisions on advertising and public promotion	10/7
		The company can demonstrate such procedures for all provisions on product samples	10/7
		The company can demonstrate such procedures for all provisions on point-of-sale promotion	10/7
		The company can demonstrate such procedures for all provisions on gift distribution	10/7
		The company can demonstrate such procedures for all provisions on company contact	10/7
		The company can demonstrate such procedures for all provisions on informational and educational materials	10/7
		The company can demonstrate such procedures for all provisions on cross-promotion	10/7

^v different color schemes, designs, names, slogans and mascots other than the company name and logo should be used



Section 3

Healthcare systems			
#	Policy commitments <small>Indicators 1-7 contribute to 50% of section 3's score</small>		Score
1 ADAPTED	Promotion		
	Does the company explicitly state that it will not promote products within the scope of the Code (that are covered by the company's BMS marketing policy) through health care facilities (Code article 6.2):	Yes, explicitly	10
		The company does not make such commitments	0
2 ADAPTED 	Hosting events, contests and campaigns		
	Does the company explicitly state that it will not use health facilities to host events, contests or campaigns (recommendation 6 of WHA 69.9):	Yes, explicitly	10
		The company does not make such commitments	0
3	Display of products and materials		
	Does the company explicitly state that it will not display products within the scope of the Code (that are covered by its BMS marketing policy), or materials such as placards or posters concerning such products throughout health facilities (Code article 6.3)?	Yes, explicitly	10
		The company does not make such commitments	0
4 ADAPTED	Informational and educational materials intended to reach caregivers of infants and young children		
	Does the company explicitly state that it will not directly nor indirectly provide education on infant and young child feeding to caregivers in health care facilities (recommendation 6 WHA 69.9). This should cover informational and educational material in all forms including verbal, written, audio, visual or any other tangible or	Yes, and explicitly stating this is applicable in all forms of communication	10
		Yes, but explicitly stating this is applicable to some forms of communication	7.5
		Yes, but does not explicitly state to which forms of communication this is applicable to	5
		The company does not make such commitments/commitments are not made in full	0



	digital form of communication.		
	Additional information: Recommendation 6 of the guidance associated with WHA resolution 69.9 supersedes Article 4 of the 1981 Code and WHA resolutions 58.32 and 61.20		
	Gifts and coupons		
5	Does the company explicitly state that it will not give any gifts or coupons to caregivers of infants and young children throughout the health system (recommendation 6 of WHA 69.9)?	Yes, explicitly	10
		The company does not make such commitments	0
	Work in the health care system		
6	Does the company explicitly state that it will not provide or pay for 'professional service representatives', 'mothercraft nurses' or similar personnel to work in the health care system (Code article 6.4)?	Yes, explicitly	10
		The company does not make such commitments	0
	Demonstrations of feeding		
7	Does the company explicitly state that none of its staff or representatives will demonstrate feeding with formula , whether manufactured or home-prepared ^w (Code article 6.5)?	Yes, explicitly	10
		The company does not make such commitments	0
#	Management systems <small>Indicators 8-9 contribute to 50% of section 3's score</small>		Score
	Clear instructions to staff (Do's and Don'ts)		
8 ADAPTED	In relation to health care systems , does the company demonstrate that (tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments_on promotion within health facilities	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments_on hosting events, contests, and campaigns within health facilities	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments_related to displaying products and materials within health facilities	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments_related to	10/7

^w Formula feeding should only be demonstrated by health workers, or other community workers if necessary; and only to the mothers or family members who need to use it.



		providing IYCF education to caregivers within health facilities	
		It provides clear instructions to staff on how to interpret and apply relevant commitments_related to provision of gifts/coupons to caregivers within health facilities	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments_related to providing or paying for work (e.g. professional service representatives/mothercraft nurses) in the healthcare system	10/7
		It provides clear instructions to staff on how to interpret and apply relevant commitments_related to demonstrating formula feeding in health facilities	10/7
	Procedures		
9 ADAPTED	Can the company demonstrate procedures to implement commitments made relating to all Code provisions on marketing within the healthcare system ? (tick all that apply)	The company can demonstrate such procedures for all provisions on promotion within health facilities	10/7
		The company can demonstrate such procedures for all provisions on hosting events, contests, and campaigns within health facilities	10/7
		The company can demonstrate such procedures for all provisions on displaying products and materials within health facilities	10/7
		The company can demonstrate such procedures for all provisions on IYCF education to caregivers within health facilities	10/7
		The company can demonstrate such procedures for all provisions relating to gifts/coupons to caregivers within health facilities	10/7
		The company can demonstrate such procedures for all provisions on providing or paying for work (e.g. professional service representatives/mothercraft nurses) in the healthcare system	10/7
		The company can demonstrate such procedures for all provisions relating to demonstrating formula feeding in health facilities	10/7

Section 4 [NEW SECTION]



Donations			
#	Policy commitments <small>Indicators 1-7 contribute to 50% of section 4's score</small>		Score
Donations within the healthcare system			
1	Does the company explicitly state that it will not provide to caregivers through health workers or health facilities any of the following products within the scope of the Code that are covered by the company's policy (recommendation 6 of WHA 69.9)? (tick all that apply):	Free products	10/3
		Samples of products	10/3
		Reduced-price products ^x	10/3
2.1	Does the company explicitly state that if it supplies free products/samples/reduced-price products, these are distributed through officially sanctioned health programs ^y (recommendation 6 of WHA 69.9)?	Yes, and that products distributed in such programs will not display company brands	10
		Yes, but not explicitly stating that products distributed in such programs will not display company brands	5
		The company does not make such commitments	0
2.2	Does the company explicitly state that it will not (Code article 6.6 and 6.7): (tick all that apply)	Use such donations or low-price sales as a sales inducement	2.5
		Distribute these supplies for use outside the officially sanctioned health programs	2.5
3	Does the company explicitly state that it will only provide products within the scope of the Code (that are covered by the company's BMS marketing policy) to infants and young children who require them (in maternity wards) through normal procurement and distribution channels (WHA 39.28 and WHA 45.34) ?	Yes, explicitly	10
		The company does not make such commitments	0
4	Does the company explicitly state that it will	Yes, explicitly	10
		The company does not make such commitments	0

^x According to the Baby-Friendly Hospital Initiative guidance, "low-cost", "low-price" or "reduced-price" sales are sales at prices below the wholesale price, or lower than 80% of the retail price in the absence of a standard wholesale price.

^y In the case where government infrastructure is weak and government approval is not possible, other organizations that have high-level oversight on child health, such as UN organizations or large non-governmental organizations, must determine which products are appropriate for distribution



	not donate or distribute any equipment, materials (including educational materials), or services to any part of the health care system (recommendation 6 of WHA 69.9)?		
Donations in humanitarian settings and emergencies			
5	Does the company explicitly state that it will not provide donations of its products within the scope of the Code (that are covered by the company's BMS marketing policy) in humanitarian and emergency settings ^z , and that any required products should be purchased, distributed and used according to strict criteria (WHA 47.5 and WHA 63.23)?	Yes, explicitly	10
		The company does not make such commitments	0
6	Does the company state that if donations are officially requested by responsible government authorities and/or national humanitarian coordination structure, it will comply with the Code provisions outlined in the company's BMS marketing policy(ies) and the Operational Guidance for Infant and Young Child Feeding in Emergencies (WHA 63.23)?	Yes, explicitly	10
		The company does not make such commitments	0
Donations in social welfare institutions			
7	If the company donates or sells low-price products within the scope of the Code (that are covered by the company's BMS marketing policy) to infants and young children who require these products within social welfare institutions e.g. orphanages and food banks , does the company explicitly state that it will	Use such donations or low-price sales as a sales inducement	2.5
		Distribute these supplies for use outside these institutions	2.5
		Not applicable (only tick this option if the company does not donate or sell low-price products within the scope of the Code to infants and young children in social welfare institutions)	NA

^z Unless officially requested by responsible government authorities and/or national humanitarian coordination structure



	not (Code article 6.6 and 6.7)? (tick all that apply)		
#	Management systems Indicators 8-9 contribute to 50% of section 4's score		Score
8	Clear instructions to staff (Do's and Don'ts)		
	In relation to donations, does the company demonstrate that (tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments on product donations to caregivers through health workers or health facilities	10/6
		It provides clear instructions to staff on how to interpret and apply relevant commitments on supplying products through officially sanctioned health programs	10/6
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to providing BMS products to infants and young children who require them (in maternity wards)	10/6
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to donating or distributing any equipment, materials, or services to any part of the healthcare system	10/6
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to BMS product donations in humanitarian and emergency settings	10/6
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to donating or selling low-price BMS products to infants and young children who require them (in social welfare institutions, including orphanages and food banks)	10/6
9	Procedures		
	Can the company demonstrate procedures to implement commitments made relating to all Code provisions on donations? (tick all that apply)	It can demonstrate such procedures for all provisions on product donations to caregivers through health workers or health facilities	10/6
		It can demonstrate such procedures for all provisions on supplying products through officially sanctioned health programs	10/6
		It can demonstrate such procedures for all provisions on providing BMS products to infants and young children who require them (in maternity wards)	10/6
		It can demonstrate such procedures for all provisions related to donating or distributing any equipment, materials, or services to any part of the healthcare system	10/6
		It can demonstrate such procedures for all provisions on BMS product donations in humanitarian and emergency settings	10/6
		It can demonstrate such procedures for all provisions related to donating or selling low-price BMS products to infants and young children who require them (in social welfare institutions, including orphanages and food banks)	10/6



Section 5

Health Care Workers			
#	Policy commitments <small>Indicators 1-6 contribute to 50% of section 5's score</small>	Score	
Information to health workers			
1	Does the company explicitly state that information provided to health workers regarding the products within the scope of the Code (that are covered by the company's BMS marketing policy) will be restricted to scientific and factual matters (Code article 7.2 and recommendation 6 of WHA 69.9)?	Yes, explicitly	10
		The company does not make such commitments	0
2	Does the company state that any information it provides to health workers will (Code article 7.2 referencing article 4.2 which is augmented by WHA 58.32 and WHA 61.20):	<ul style="list-style-type: none"> a. not imply or aim to create a belief that bottle-feeding is equivalent or superior to breastfeeding b. include information on the benefits and superiority of breastfeeding c. include information on maternal nutrition, and the preparation for and maintenance of breastfeeding d. include information on the negative effect of introducing partial bottle-feeding on breastfeeding e. include information on the difficulty of reversing the decision not to breastfeed f. include information on the proper use of formula when being used, whether manufactured industrially or home-prepared 	10
		The company does not make such commitments	0
3	Does the company explicitly state that any material which contains information about formula use provided to health workers will include (Code article 7.2 referencing article 4.2 which is augmented by WHA 58.32 and WHA 61.20):	<ul style="list-style-type: none"> a. the social and financial implications of formula use b. the health hazards of inappropriate foods or feeding methods c. the health hazards of unnecessary or improper use of formula and other breast-milk substitutes d. the health hazards of improper preparation of powdered formula 	10
		The company does not make such commitments	0
4 NEW	Does the company explicitly state that health workers will be provided with the following instructions about the	<ul style="list-style-type: none"> a. graphically illustrate the method of preparation b. show the use of hygienic practices, e.g. clean hands and preparation surfaces c. show the need to boil water and sterilize utensils d. show that feeds from powdered formula must be prepared fresh each time 	10



	appropriate preparation of powdered formulas (WHO/FAO guidelines on safe preparation, storage and handling of powdered infant formula 2007 and the Codex Alimentarius Code of Hygienic Practice for Powdered Formulae for Infants and Young Children CAC/RCP 66-2008 as referenced in WHA 58.32 and WHA 61.20) which:	<p>e. show the necessity of using water at or above 70°C in order to minimize micro-organisms contamination during preparation</p> <p>f. show the need to cool the formula before feeding if using hot water for reconstitution</p> <p>g. show that left-overs of the product need to be discarded immediately</p>	
		The company does not make such commitments	0
	Financial or material inducements		
5	Does the company explicitly state that it will not offer any financial or material inducements (no gifts or incentives) to promote the products within the scope of the Code (that are covered by the company's BMS marketing policy) to health workers or members of their families (Code article 7.3, WHA 49.15, WHA 58.32, recommendation 6 of WHA 69.9)?	Yes, explicitly	10
		The company does not make such commitments	0
	Sponsorship		
6 	Does the company explicitly state that it will not (recommendation 6 of WHA 69.9) (tick all that apply):	Provide any form of contribution ^{aa} to health workers	5
		Sponsor any meetings of health professionals and scientific meetings	5
#	Management systems <small>Indicators 7-8 contribute to 50% of section 5's score</small>		Score
	Clear instructions to staff (Do's and Don'ts)		
7 ADAPTED	In relation to marketing to health workers , does the company demonstrate that	It provides clear instructions to staff on how to interpret and apply relevant commitments related to information provided to health workers	10/3
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to financial or material inducements	10/3

^{aa} contributions can be in the form of gifts, fellowships, study tours, and research grants



	(tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments related to sponsorship	10/3
8 ADAPTED	Procedures		
	Can the company demonstrate procedures to implement commitments made relating to all Code provisions related to marketing to health workers ? (tick all that apply)	It can demonstrate such procedures for all provisions related to information provided to health workers	10/3
		It can demonstrate such procedures for all provisions related to financial or material inducements	10/3
		It can demonstrate such procedures for all provisions related to sponsorship	10/3

Section 6

Persons employed by manufacturers and distributors			
#	Policy commitments <small>Indicator 1 contributes to 50% of section 6's score</small>		Score
1	Bonus calculations		
	Does the company explicitly state that (Code article 8.1):	Bonus calculations for its sales representatives will not include the volume nor value of sales ^{bb} of products within the scope of the Code (that are covered by the company's BMS marketing policy)	5
		It does not set quotas for the sales of products within the scope of the Code (that are covered by the company's BMS marketing policy)	5
		The company does not make such commitments	0
#	Management systems <small>Indicators 2 and 3 contribute to 50% of section 6's score</small>		Score
2 ADAPTED	Clear instructions to staff (Do's and Don'ts)		
	In relation to persons employed by manufacturers and distributors , does the company demonstrate that:	It provides clear instructions to staff on how to interpret and apply relevant commitments on bonus calculations	10
		The company does not provide such guidance	0
3 ADAPTED	Procedures		
	Can the company demonstrate procedures to implement commitments made relating to all Code provisions related to persons employed by manufacturers and distributors ?	It can demonstrate such procedures for all provisions related to bonus calculations	10
		The company does not demonstrate relevant procedures	0

^{bb} While The Code's Article 8.1 explicitly refers to "the volume of sales of products within the scope of this Code", ATNI has clarified with WHO that this implicitly includes consideration of all forms of sales values, including measures of market share



Section 7

Labeling			
#	Policy commitments <small>Indicators 1-9 contribute to 50% of section 7's score</small>		Score
Labeling & inserts: specific requirements			
1 	Does the company explicitly state that the labels/inserts for all products within the scope of the Code (that are covered by the company's BMS marketing policy) will (Code articles 9.1 and 9.2):	<ul style="list-style-type: none"> a. provide necessary information about the appropriate use of the product b. be clear and conspicuous c. be easy to read d. be in all relevant local languages e. be printed on the container or a label that cannot readily become separated from the container 	10
		The company does not make such commitments	0
Labels and inserts: information required			
2 	Does the company explicitly state that its containers' labels/inserts for infant formula will contain (Code article 9.2):	<ul style="list-style-type: none"> a. the words "Important Notice" or their equivalent b. a conspicuous statement of the superiority of breastfeeding 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 d. instructions for appropriate preparation e. warning against the health hazards of inappropriate preparation 	10
		The company does not make such commitments	0
3 	Does the company explicitly state that for all products within the scope of the Code (that are covered by the company's BMS marketing policy), the labels/inserts will include (Code article 9.4 and recommendation 4 of WHA 69.9):	<ul style="list-style-type: none"> a. ingredients used b. composition/analysis of the unmodified product c. storage conditions required d. batch number and date before which the product is due to be consumed, taking into account local storage conditions e. a statement on the importance of exclusive breastfeeding in the first 6 months of life and continued breastfeeding for up to 2 years or beyond f. the appropriate age range for consumption and for introduction <ul style="list-style-type: none"> - for FUF, labels should clearly state that the product should not be introduced to infants under 6 months of age - for GUM, labels should clearly state that the product should not be introduced to infants under 12 months of age 	10
		The company does not make such commitments	0
Labels and inserts: specific requirements for safe preparation of powdered formula			
4 ADAPTED 	Does the company explicitly state that labels/inserts of powdered infant formula include (WHA 58.32, WHA 61.20):	<ul style="list-style-type: none"> a. an explicit message that powdered formula may cause illness if not prepared properly b. instructions that graphically illustrate the appropriate method of preparing powdered formula instructions showing the use of hygienic practices e.g. clean hands and preparation surfaces when preparing formula 	10



		<p>c. instructions showing the need to boil water and sterilize utensils when preparing formula</p> <p>d. instructions showing the need for powdered formula to be prepared one feed at a time</p> <p>e. instructions showing the necessity of using water at or above 70°C in order to minimize microorganisms contamination during formula preparation</p> <p>f. instructions showing the need to cool the formula before feeding if using hot water for reconstitution</p> <p>g. instructions showing that left-overs of the product need to be discarded immediately</p>	
		The company does not make such commitments	0
	Labels and inserts: prohibited information		
5	 <p>Does the company explicitly state that its containers and labels/inserts for infant formula will not have (Code articles 9.1 and 9.2):</p>	<p>a. pictures of infants</p> <p>b. other pictures or text which may idealize the use of infant formula^{cc}</p> <p>c. the terms 'humanized', 'maternalized' or similar terms</p>	10
		The company does not make such commitments	0
6	 <p>The company explicitly states that labels on all products within the scope of the Code (that are covered by the company's BMS marketing policy) will not (recommendation 4 of WHA 69.9):</p>	<p>a. include any image, text or other representation that might suggest use for infants under six months for all products intended for older infants and young children 6-36 months of age (FUF and GUM)</p> <p>b. include any image, text or other representation that might suggest use for infants under 12 months for all products intended for young children 12-36 months of age</p> <p>c. include an image, text or other representation that is likely to undermine or discourage breastfeeding, make a comparison to breastmilk or suggest that the product is nearly equivalent to breastmilk or superior to breastmilk</p> <p>d. recommend feeding the product in a bottle or otherwise promoting bottle feeding</p> <p>e. 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 the national or international regulatory authorities</p>	10
		The company does not make such commitments	0
	Labels and inserts: avoidance of health or nutrition claims		
7	 <p>Does the company explicitly state that it will not make any health or nutrition claims on products for infants or young children except where specifically provided for in</p>	Yes, explicitly	10
		The company does not make such commitments	0

^{cc} Idealization is considered to be any pictures or text that imply that formula are superior or equal to breastmilk including pictures of infants and caregivers, pictures or text which imply that an infant's health and happiness is associated with these products, any references to infant or caregiver emotions, and any implication in text or graphics which directly or indirectly refers to "the best" or "ideal method" of feeding. Graphics however are allowed for easy identification of the product as a BMS and for illustrating methods of preparation.



	national legislation requirements set out by the national authorities (WHA 58.32, WHA 63.23 and WHA 69.9)?		
	Information required on labels and inserts of products for infant feeding other than formula^{dd}		
8	Does the company explicitly state that its labels/inserts of products that are marketed for infant feeding which do not meet all requirements of an infant formula but that can be modified to do so, will carry a warning label that the unmodified product is not suitable for infant feeding (Code article 9.3)?	Yes, explicitly	10
		The company does not make such commitments	0
		Not applicable	N/A
9	Does the company explicitly state that labels on sweetened condensed milk products will not contain any purported instructions on how to modify them for infant feeding or use them as the main ingredient for infant formula (Code article 9.3)?	Yes, explicitly	10
		The company does not make such commitments	0
		Not applicable	N/A
#	Management systems <small>Indicators 10-11 contribute to 50% of section 7's score</small>		Score
	Clear instructions to staff (Do's and Don'ts)		
10 ADAPTED	In relation to labeling , does the company demonstrate that (tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments on BMS product label requirements	10/4
		It provides clear instructions to staff on how to interpret and apply relevant commitments on prohibited information on BMS product labels	10/4
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to health and nutrition claims	10/4
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to labeling of products used for infant feeding (other than formula)	10/4
	Procedures		
11 ADAPTED	Can the company demonstrate procedures to implement commitments made relating to all Code provisions related to	It can demonstrate such procedures for all provisions on BMS product label requirements	10/4
		It can demonstrate such procedures for all provisions on prohibited information on BMS product labels	10/4
		It can demonstrate such procedures for all provisions related to health and nutrition claims	10/4

^{dd} These products include evaporated or condensed milk or milk creamers



	labeling? (tick all that apply)	It can demonstrate such procedures for all provisions related to labeling of products used for infant feeding (other than formula)	10/4
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Section 8

Quality			
#	Policy commitments		Score
	Indicator 1 contributes to 50% of section 8's score		
	Quality standards		
1	Does the company explicitly state that its products will meet the following standards (Code articles 10.1 and 10.2):	a. Codex Alimentarius Standards for Infant Formula and Formulas for Special Medical Purposes Intended for Infants. Codex Stan 72-1981. FAO and WHO, 2007	10
		b. Codex Alimentarius Standard for Follow-Up Formula. Codex Stan 156 – 1987. FAO and WHO, 2017	
		c. Codex Code of Hygienic Practice for Foods for Infants and Children (CAC/RCP 21-1979)	
		d. Code of Hygienic Practice for Powdered Formulae for Infants and Young Children (CAC/RCP 66-2008)	
		The company does not make such commitments	0
#	Management systems		Score
	Indicator 2 contributes to 50% of section 8's score		
	Procedures		
2	Can the company demonstrate procedures to implement commitments made relating to all Code provisions on quality and relevant Codex standards?	Yes, in full	10
		The company does not demonstrate relevant procedures	0

Section 9

Implementation and Monitoring			
#	Policy commitments		Score
	Indicators 1-3 contribute to 20% of Section 9's score		
	Supporting local governments and international bodies on Code compliance		
1	Does the company explicitly state that the company will support and not undermine any efforts by governments and international bodies in the adoption of Code-aligned legal frameworks by not expressing any objections to the enactment, monitoring or enforcement of any Code-aligned provisions in national legislation, decrees, or regulations (Code article 11.1)?	Yes, explicitly	10
		The company does not make such commitments	0
2	Responsibility of marketing practices		



	The company explicitly states that (Code article 11.3) (tick all that apply):	It is responsible for its marketing practices according to the principles and aim of the International Code	5
		It is responsible for taking steps to ensure that its conduct at every level conforms to its BMS marketing policy, national legislation, and the Code in this regard	5
	Apprising of marketing personnel		
3	Does the company explicitly state that it commits to apprising each member of its marketing personnel of its BMS marketing policy(ies) and their responsibilities relating to it (Code article 11.5)?	Yes, explicitly	10
		The company does not make such commitments	0
#	Management systems Indicators 4-20 contribute to 80% of Section 9's score		Score
	Responsibility for implementation of the company's BMS Marketing Policy/Commitments		
4	The company assigns formal responsibility for the implementation of the BMS marketing policy/relevant commitments to (tick all that apply):	A Board member with responsibility for overseeing implementation of its commitments	5
		An Executive Manager (or function) with responsibility for the implementation of its commitments	5
	Accountability and responsibility		
5	In addition to Board and Executive Management levels, assignment of accountability and responsibility is clearly specified as extending to (tick all that apply):	All national business units	5
		Third parties (contractual terms and conditions)	5
	Communication		
6	With regards to communicating BMS marketing commitments to its employees, does the company have:	An effective global system for communicating to all relevant employees	10
		A system for communicating to some relevant employees in some of its markets	5
		The company cannot demonstrate such a system	0
	Ensuring awareness and training		
7	Can the company provide evidence of a system to ensure that relevant executives are aware of their responsibilities under the company's own policies/commitments on BMS marketing?	The company can provide evidence of making relevant executives aware of their responsibilities under the company's own policies	10
		The company cannot provide such evidence	0
	Ensuring implementation and awareness of other key parties		
8	The company can demonstrate evidence of procedures relating to (tick all that apply):	Distributors	5
		Retailers	5
	Monitoring compliance with its policy		
9	Does the company monitor compliance with its BMS	Yes, using external auditors	10/3
		Yes, using its internal auditing system	10/3



	marketing policy(ies)? (tick all that apply)	Yes, using allegations systems ^{ee}	10/3
Auditing compliance with its policy			
10	The company conducts its external audits:	Annually	10
		Less frequently than annually, e.g. once every two years	5
		The company does not appear to conduct audits of its compliance with its policy(ies)	0
Allegations procedures			
11	The company has established a best practice internal allegations system that (tick all that apply):	Is accessible to all employees	2
		Enables employees to report outside their normal reporting line	2
		Protects employees from potential negative consequences of such reporting	2
		Offers employees a way to seek advice or guidance before making a formal complaint	2
		Raises awareness of the whistleblowing procedures among employees	2
12	The company can demonstrate that its external allegations system has (tick all that apply):	A procedure or communication channel through which organizations or individuals outside the company can report alleged non-compliances	2.5
		A procedure for recording external allegations of non-compliances	2.5
		Systems for investigating in a timely manner to alleged non-compliance with its BMS marketing commitments reported by organizations or individuals outside the company	2.5
		Systems for responding to alleged non-compliance with its BMS marketing commitments reported by organizations or individuals outside the company, in a timely manner	2.5
Investigating alleged non-compliances			
13	The company investigates alleged non-compliance incidents in:	All countries	10
		Some countries	5
		None	0
Responding to non-compliance incidents			
14.1	The company has (tick all that apply):	Clear guidelines on the process for taking corrective action in the event a non-compliance incident is confirmed	10/9
		Guidelines for employees on potential corrective actions that can be taken against them for non-compliance incidents	10/9
		Guidelines for all relevant third parties on potential corrective actions that can be taken against them for non-compliance incidents	10/9
14.2	The company tracks (tick all that apply):	Allegations of non-compliance incidents (nature of alleged non-compliance, location, date, complainant's details etc.)	10/9

^{ee} Also referred as "whistleblowing" is a system used to report wrongdoing in an organisation. This person is often an employee but can also be a third-party such as a supplier or customer.



		The findings of investigations	10/9
		Corrective actions taken	10/9
14.3	The company has a procedure to track corrective actions on all non-compliance incidents reported by (tick all that apply):	Employees	10/6
		Third parties	10/6
Independent verification of monitoring and compliance systems			
15	Does the company participate voluntarily in a third-party assessment of implementation of its monitoring and compliance systems (e.g. FTSE4Good or similar)?	Yes	10
		The company does not participate in such an assessment	0
Internal reporting systems in relation to non-compliance incidents			
16	The company can demonstrate that (tick all that apply):	It produces management reviews and/or an annual summary for the Board on the effectiveness of the internal reporting and corrective action system	10/3
		The summary includes corrective actions taken	10/3
		The quality and accuracy of the internal reporting systems are independently verified	10/3
Annual reporting to the Board			
17	Can the company demonstrate that the Board considers annually a summary report of its compliance with its policies/relevant commitments and the effectiveness of its management systems?	Yes	10
		The company does not produce an annual Board summary	0
Food safety & quality management certification			
18	Does the company use any of the following foods safety and quality management systems to certify its products: ISO 9001, FSSC22000 (ISO 22000 including ISO/TS 22001-1), HACCP, BRC, IFS?	Yes	10
		No	0
Sanctions			
19	Does the company have a clear set of sanctions/penalties for employees who do not comply with the requirements of its BMS marketing commitments?	Yes, the company has a clear set of sanctions/penalties	10
		The company does not have a clear set of sanctions/penalties	0
Incentives to company's employees			
20	The company can demonstrate (tick all that apply):	It does not offer incentives or compensation to reward employee performance that could increase the risk of failing to meet the company's BMS marketing requirements	5
		It offers incentives/compensation to reward employee compliance with BMS marketing commitments	5

Section 10



Lobbying and influencing governments and policy makers			
#	Policy commitments <small>Indicators 1-5 contribute to 50% of section 10's score</small>	Score	
Lobbying and engagement policy			
1	Does the company have a policy setting out under what circumstances and how it will lobby and engage with governments and policymakers on BMS issues?	Yes	10
		The company does not have such a policy	0
Consideration of public interest			
2	Does the company have:	A clear statement in lobbying policy that the purpose of all lobbying is to support the public interest as well as to meet the company's objectives	10
		Some recognition of the need for lobbying to serve the public interest	5
		The company does not make such statements	0
Respect for public policy frameworks and relevant laws, standards, codes			
3	Does the company have a (tick all that apply):	Commitment not to undermine existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code	5
		"Commitment to support public policy frameworks, the work of the WHO or similar agencies and national governments' efforts to develop policy measures to implement The Code"	5
Controls over trade associations and industry policy groups			
4	Does the company have (tick all that apply):	An explicit statement that it will periodically review the positions of trade associations and industry policy groups to which it belongs and assess the extent to which they align with the company's own policy positions	5
		An explicit statement that it will put in place controls over all lobbyists (in-house and intermediary, paid or unpaid) to ensure that they understand and adhere to organisational policies	5
Conflicts of interest			
5 NEW	Does the company policy include (tick all that apply – answer option 1 and 2 are mutually exclusive):	Comprehensive statements prohibiting Col, which clearly apply to lobbying, and that cover a wide range of possible cases of Col	5
		Some limited statements prohibiting Col which clearly apply to lobbying	2.5



#	Management systems <small>Indicator 6 contributes to 50% of section 10's score</small>	Score	
	Commitment to disclose any Cols identified	5	
6	Accountability and responsibility for policy implementation		
	Does the company give a clear description of its lobbying-related management system? (tick all that apply)	The company makes clear that the Board has oversight of the lobbying policy, lobbying positions, processes and practices, including the lobbying activity of third-party organisations it is a member of	5
		The company names an Executive / function with responsibility for implementing its policy on lobbying and engagement	2.5
		The company provides clarity on control mechanisms (e.g. regular reporting to the Board, internal audits)	2.5

Section 11

Disclosure			
#	Overarching commitments		Score
1	Does the company publicly disclose (tick all that apply):	The nature of its support for breastfeeding	2.5
		Acknowledgement of the importance of The Code	2.5
		Scope of application of its policies regarding JVs and subsidiaries	2.5
		Statement about the appropriate introduction of complementary foods and beverages for infants being from six months of age	2.5
2 ADAPTED	Policies		
	Does the company publish its policies/commitments relating to the following Code provisions (articles and relevant WHA resolutions)? (tick all that apply)	The company publishes its policy relating to advertising to the general public and mothers	10/9
		The company publishes its policy relating to health care systems	10/9
		The company publishes its policy relating to donations	10/9
		The company publishes its policy relating to health care workers	10/9
		The company publishes its policy relating to persons employed by manufacturers and distributors	10/9
		The company publishes its policy relating to labeling	10/9
		The company publishes its policy relating to quality	10/9
		The company publishes its policy relating to implementation and monitoring	10/9
The company publishes its policy relating to lobbying and influencing governments and Policymakers		10/9	
3 ADAPTED	Compliance assessment		
	Does the company publish information about how it internally assesses compliance with the commitments made relating to all aspects of the assessment? (tick all that apply)	The company publishes such information regarding advertising to the general public and mothers	10/9
		The company publishes such information regarding health care systems	10/9
		The company publishes such information regarding donations	10/9
		The company publishes such information regarding health care workers	10/9
		The company publishes such information regarding persons employed by manufacturers and distributors	10/9
The company publishes such information regarding labeling		10/9	



		The company publishes such information regarding quality	10/9
		The company publishes such information regarding implementation and monitoring	10/9
		The company publishes such information regarding lobbying governments and policymakers on BMS marketing	10/9
	Independent audits		
4	Does the company disclose?	Full auditors' report(s)	10
		Only a summary of the auditors' report(s)	5
		No disclosure of auditors' reports	0
	Accountability mechanisms		
5	Regarding responsibility for implementing policy on BMS marketing, does the company disclose:	The name/function of the Board member with responsibility for implementing its policy and commitments	10
		The company does not publish such disclosure	0
6	Has the company published a response to any third-party reports on alleged cases of non-compliance with The Code published in the last two years (e.g. ATNI, FTSE4Good, IBFAN, Save the Children, etc.)?	Yes, the company has published a response to all reports	10
		Yes, the company has published a response to some of the reports	5
		No	0
7	Regarding complaints made to the company by other stakeholders, what is the level of disclosure of the company?	The company discloses each complaint or criticism made by stakeholders and explains how it has responded to them	10
		The company makes a general statement about complaints or criticism received and how it has responded to them	5
		The company does not disclose any complaints or criticism or its response	0
8	Does the company publish a list of trade associations and industry groups it is a member of, relating to BMS/ Infant and Young Child Nutrition (YCN)?	Yes	10
		No	0
9	Does the company certify that the list it publishes is a full list of all such groups globally?	Yes	10
		No	0
10	Does the company	Yes, extensive	10
		Yes, limited	5



	publish a description of its lobbying activities?	No	0
11 NEW	Does the company publish information on:	All public policy positions and other documents submitted to governments globally are shared, or reasons provided for certain documents not being shared (due to a requirement of confidentiality of other parties)	10
		No publication of such documents	0
12 NEW	Does the company explicitly state if any of the following public policy frameworks and relevant laws, standards, and codes are respected when lobbying (tick all that apply):	The International Code of Marketing of Breast-milk Substitutes, and subsequent World Health Assembly resolutions making significant additions or clarifications to the original Code	2.5
		The WHO Framework of Engagement with Non-State Actors	2.5
		The OECD Principles for Transparency and Integrity in Lobbying	1.25
		The Transparency International Standards for Lobbying Regulation	1.25
		Industry initiatives, such as the IFBA Guiding Principles for Stakeholder Engagement	1.25
		The Responsible Lobbying Framework	1.25



Annex II Corporate Profile CF 1

Note:



This icon indicates Code provisions assessed in practice in the country studies (in addition to being assessed on the Corporate Profile).

Newly introduced sections and indicators are denoted as 'NEW' while 'ADAPTED' denoted indicators that have been modified.

Basic Company Data

- Full list of all brands of complementary foods intended for infants and young children from birth to 36 months of age (with an indication of the age range each product is intended for).
- Full list of CF marketing policies or relevant documents that cover this topic.
- Full list of countries where the company sells one or more of its CF products and the respective product sales in each of those countries.
- Full list of countries where the company upholds its policy and standards on CF marketing (i.e. company fully applies its policy provisions where local Code regulations are absent/weaker than the company's CF marketing policy or related policies), or full list of countries where the company only follows national regulations on CF marketing.

Section 1

RECOMMENDATION 1: Guiding principles underpinning infant and young child feeding			
#	Policy commitments		Score
	Indicator 4 contributes to 50% of the total CF survey		
	Infant and young child feeding principles		
1	Does the company explicitly state its commitment to optimal infant and young child feeding based on (tick all that apply):	WHO/UNICEF Global strategy for infant and young child feeding, 2003	2.5
		PAHO and WHO Guiding principles for complementary feeding of the breastfed child, 2003	2.5
		WHO Guiding principles for feeding non-breastfed children 6 – 24 months of age, 2005	2.5
		Encouraging the use of suitable, nutrient-rich, home-prepared, and locally available foods that are prepared and fed safely	2.5
	Support for breastfeeding		
2 ADAPTED	Does the company explicitly state support for any of the following?	Exclusive breastfeeding for the first six months, and continued breastfeeding for two years or more	10
		Exclusive breastfeeding for the first six months	7.5
		Exclusive breastfeeding for the first four to six months	5
		Breastfeeding generally with no mention of specific age ranges	2.5
		The company does not make such commitments	0



3	Support for appropriate introduction of complementary foods		
	Does the company explicitly state support for the introduction of appropriate complementary foods from the age of six months?	Yes, explicitly	10
		The company does not make such commitments	0
4 	Does the company explicitly commit not to market complementary foods for infants under six months of age in line with WHA 69.9 guidance?	Yes, explicitly	Total CF score ≥ 50%
		The company does not make such commitments	Total CF score < 50%
5 ADAPTED	Acknowledgement of the Code and WHA resolutions up to WHA 71.9		
	Does the company acknowledge The International Code of Marketing of Breast-milk Substitutes and all subsequent WHA resolutions up to WHA 71.9 (and including WHA 69.9 and all recommendations of its associated guidance)?	Yes, explicitly	10
		Yes, but not explicitly acknowledging resolutions up to WHA 71.9	7.5
		Yes, but only acknowledging the original Code (of 1981)	5
		The company does not acknowledge the Code	0
Additional information: Follow this link to see the full list of WHA resolutions WHO Code and subsequent resolutions			
6 NEW	Application to joint ventures (JV) and subsidiaries		
	Do the company's commitments apply to joint ventures and subsidiaries:	All joint ventures and subsidiaries where the company has a holding	10
		Where the company has a holding of greater than 50%	7.5
		The company does not make such commitments	0
Not applicable		N/A	

Section 2

RECOMMENDATION 3: Product formulation			
#	Policy commitments <small>Indicator 1 contributes to 50% of section 2's score</small>	Score	
1	Adherence to established standards and guidelines		
	Does the company explicitly commit to formulating complementary foods (6-36 months) according to (tick all that apply):	Codex Guidelines on formulated complementary foods for older infants and young children (CAC/GL-8-1991, revised in 2013)	2
		Codex standard for processed cereal-based foods for infants and young children (Codex/STAN 074-1981, revised in 2006)	2
		Codex standard for canned baby foods (Codex/STAN 73-1981, revised in 1989)	2
		Codex advisory list of vitamin components for use in foods for infants and children (CAC/GL 10-1979, revised in 2009)	2



		Additional national, regional and global standards for composition, safety, quality and nutrient levels	2
#	Management systems Indicator 2 contributes to 50% of section 2's score		Score
2 NEW	Procedures		
	Can the company demonstrate procedures to implement all guidelines relating to product formulation (listed in indicator 1 of this section)?	Yes	10
		Only for some of the guidelines listed	5
		The company cannot demonstrate such procedures	0

Section 3

RECOMMENDATION 4: Marketing messages			
#	Policy commitments Indicators 1-2 contribute to 50% of section 3's score		Score
1 	Marketing messages: information required		
	Does the company commit to ensuring that messages in all packaging and marketing/promotional materials ^{ff} of its complementary foods (6-36 months) (tick all that apply):	Will include a statement on the importance of continued breastfeeding for up to two years or beyond	2.5
		Will specify that the appropriate age of introduction of the food is not less than six months	2.5
		Will be written in language that is easily understood by parents or caregivers	2.5
		Will be visible and legible	2.5
2 	Marketing messages: prohibited information		
	Does the company commit, in all packaging and marketing/promotional materials ^{ff} of its complementary foods (6-36 months), not to (tick all that apply):	Use an image, text or other representation (including references to milestones and stages) that might suggest use for infants under the age of six months	10/6
		Use an image, text or other representation that is likely to undermine or discourage breastfeeding, make a comparison to breastmilk or suggest that the product is nearly equivalent to breastmilk or superior to breastmilk	10/6
		Recommend or promote bottle feeding	10/6
		Convey an endorsement or anything that may be construed as an endorsement by a professional or other body unless it has been explicitly approved by relevant national, regional or official authorities or health professional bodies	10/6

^{ff} Different forms of marketing include adverts, promotions, sponsorship (of any events or materials other than scientific or professional meetings), brochures and other printed material, online information and package labels and inserts.



		Make any health or nutrition claims except where specifically provided for in national legislation requirements set out by the national authorities (in line with CAC/GL 23-1997 Codex guidelines for the use of nutrition and health claims)	10/6
		Make any promotional claims that may imply that commercial foods are nutritionally superior to home-prepared foods	10/6
#	Management systems <small>Indicators 3-4 contribute to 50% of section 3's score</small>		Score
3	Clear instructions to staff (Do's and Don'ts)		
	In relation to CF marketing messages , does the company demonstrate that (tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments on required information in marketing CF products	5
		It provides clear instructions to staff on how to interpret and apply relevant commitments on prohibited information in marketing CF products	5
4	Procedures		
	Can the company demonstrate procedures to implement commitments made relating to CF marketing messages (tick all that apply)?	The company can demonstrate such procedures for all provisions on required information in marketing CF products	5
		The company can demonstrate such procedures for all provisions on prohibited information in marketing CF products	5

Section 4

Cross-promotion is a form of marketing where customers of one product or service are targeted with the promotion of a related product.

This section is only applicable to companies that are **also assessed on BMS marketing**.

RECOMMENDATION 5: Avoidance of cross-promotion

#	Policy commitments <small>Indicators 1-2 contribute to 50% of section 4's score</small>	Score	
1 	Commitments not to cross-promote		
	Does the company establish the following commitments not to cross-promote breast-milk substitutes through its complementary foods (6-36 months) ⁹⁹ ? (tick all that apply)	CF packaging design will be different to those used for BMS	10/3
		CF labeling will be different to those used for BMS	10/3
		Materials used to promote CF will be different to those used for BMS	10/3
2	Does the company commit that its staff,	Yes, explicitly	10
		The company does not make this commitment in full	5

⁹⁹ differences entail different colour schemes, designs, names, slogans and mascots other than company name and logo should be used



	<p>particularly its marketing personnel, will not engage in direct or indirect contact of any kind to promote their complementary foods (6-36 months) by establishing relationships with caregivers, including through baby clubs, social media groups, childcare classes and contests?</p>	<p>The company does not make such commitments</p>	<p>0</p>
<p>#</p>	<p>Management systems Indicators 3-4 contribute to 50% of section 4's score</p>		<p>Score</p>
<p>3</p>	<p>Clear instructions to staff (Do's and Don'ts)</p>		
	<p>Does the company demonstrate that it provides clear instructions to staff on how to interpret and apply all commitments relating to avoidance of cross-promotion:</p>	<p>Yes, in full</p>	<p>10</p>
		<p>Yes, but only for some of its commitments listed</p>	<p>5</p>
		<p>The company does not provide such guidance</p>	<p>0</p>
<p>4</p>	<p>Procedures</p>		
	<p>Can the company demonstrate procedures to implement all commitments relating to avoidance of cross-promotion?</p>	<p>Yes</p>	<p>10</p>
		<p>Only for some of the commitments listed</p>	<p>5</p>
		<p>The company cannot demonstrate such procedures</p>	<p>0</p>

Section 5

<p>RECOMMENDATION 6: Conflict of Interest in health facilities and throughout the health care system</p>			
<p>#</p>	<p>Policy commitments Indicators 1-5 contribute to 50% of section 5's score</p>	<p>Score</p>	
<p>1</p>	<p>Hosting events, contests, and campaigns</p>		
	<p>The company explicitly states that it will not:</p>	<p>Use health facilities to host events, contests or campaigns</p>	<p>10</p>
		<p>The company does not make such commitments</p>	<p>0</p>
<p>2</p>	<p>Gifts and coupons</p>		
	<p>Does the company explicitly state that it will not give any gifts or coupons to caregivers of infants and young children throughout the health system?</p>	<p>Yes, explicitly</p>	<p>10</p>
		<p>The company does not make such commitments</p>	<p>0</p>
<p>3</p>	<p>Informational and educational materials intended to reach caregivers of infants and young children</p>		
	<p>The company's policy explicitly states that the company will not directly nor</p>	<p>Yes, and explicitly stating this is applicable in all forms of communication</p>	<p>10</p>
		<p>Yes, but does not explicitly state to which forms of</p>	<p>5</p>



	indirectly provide education on infant and young child feeding to caregivers in healthcare facilities. This should cover informational and educational material in all forms including verbal, written, audio, visual or any other tangible or digital form of communication.	communication this is applicable to	
		The company does not make such commitments	0
	Information to health workers		
4	Does the company explicitly state that information provided to health workers regarding complementary foods (6-36 months) will be restricted to scientific and factual matters?	Yes explicitly	10
		The company does not make such commitments	0
5	Sponsorships		
	Does the company explicitly state that it will not (tick all that apply):	Provide any form of contribution ^{hh} to health workers or members of their families	5
		Sponsor any meetings of health professionals and scientific meetings	5
#	Management systems		Score
	Indicator 6-7 contribute to 50% of section 5's score		
	Clear instructions to staff (Do's and Don'ts)		
6	In relation to health care systems and health workers, does the company demonstrate that (tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments on hosting events, contests, and campaigns within health facilities	10/5
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to provision of gifts/coupons to caregivers within health facilities	10/5
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to providing IYCF education to caregivers within health facilities	10/5
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to information provided to health workers	10/5
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to sponsorship	10/5
	Procedures		
7	Can the company demonstrate procedures to implement commitments made relating to marketing throughout the health care system and through health workers? (tick all that apply)	The company can demonstrate such procedures for all provisions on hosting events, contests, and campaigns within health facilities	10/5
		The company can demonstrate such procedures for all provisions on giving gifts/coupons to caregivers within health facilities	10/5
		The company can demonstrate such procedures for all provisions on IYCF education to caregivers within health facilities	10/5

^{hh} contributions can be in the form of fellowships, study tours, research grants, gifts and any financial or material incentives



	The company can demonstrate such procedures for all provisions on information provided to health workers	10/5
	The company can demonstrate such procedures for all provisions on sponsorship	10/5

Section 6 [NEW SECTION]

RECOMMENDATION 6: Donations			
#	Policy commitments <small>Indicators 1-6 contribute to 50% of section 6's score</small>		Score
	Donations within the healthcare system		
1	Does the company explicitly state that it will not provide to caregivers through health workers or health facilities any of the following products of its complementary foods? (tick all that apply)	Free products	10/3
		Samples of products	10/3
		Reduced-price products ⁱⁱ	10/3
2	Does the company explicitly state that if it supplies free products/samples/reduced-price complementary foods, these are distributed through officially sanctioned health programs ^{jj} ?	Yes, and that products distributed in such programs will not display company brands	10
		Yes, but not explicitly stating that products distributed in such programs will not display company brands	5
		The company does not make such commitments	0
3	Does the company explicitly state that it will not (tick all that apply):	Use such donations or low-price sales as a sales inducement	2.5
		Distribute these supplies for use outside the institutions	2.5
4	Does the company explicitly state that it will not donate or distribute any equipment, materials (including educational materials), or services to any part of the health care system ?	Yes, explicitly	10
		The company does not make such commitments	0
5	Donations in humanitarian settings and emergencies		
		Yes, explicitly	10

ⁱⁱ According to the Baby-Friendly Hospital Initiative guidance, "low-cost", "low-price" or "reduced-price" sales are sales at prices below the wholesale price, or lower than 80% of the retail price in the absence of a standard wholesale price.

^{jj} In the case where government infrastructure is weak and government approval is not possible, other organizations that have high-level oversight on child health, such as UN organizations or large non-governmental organizations, must determine which products are appropriate for distribution.



	Does the company explicitly state that it will not provide donations of its complementary foods in humanitarian and emergency settings , and that any required or officially requested products by responsible government authorities and/or national humanitarian coordination structure should comply with the company's provisions on CF marketing, and the Operational Guidance for Infant and Young Child Feeding in Emergencies?	The company does not make such commitments	0
Additional information: The Operational Guidance for Infant and Young Child Feeding in Emergencies was endorsed at the World Health Assembly in 2010 (WHA resolution 63.23)			
Donations in social welfare institutions			
6	If the company donates or sells low-price complementary foods to older infants and young children (6-36 months) who require these products within social welfare institutions e.g. orphanages and food banks, does the company explicitly state that it will not? (tick all that apply)	Use such donations or low-price sales as a sales inducement	2.5
		Distribute these supplies for use outside these institutions	2.5
		Not applicable (only tick this option if the company does not donate or sell low-price complementary foods to older infants and young children in social welfare institutions)	NA
#	Management systems <small>Indicators 7-8 contribute to 50% of section 6's score</small>		Score
Clear instructions to staff (Do's and Don'ts)			
7	In relation to donations , does the company demonstrate that (tick all that apply):	It provides clear instructions to staff on how to interpret and apply relevant commitments on product donations to caregivers through health workers or health facilities	10/5
		It provides clear instructions to staff on how to interpret and apply relevant commitments on supplying products through officially sanctioned health programs	10/5
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to donating or distributing any equipment, materials, or services to any part of the healthcare system	10/5



		It provides clear instructions to staff on how to interpret and apply relevant commitments related to CF product donations in humanitarian and emergency settings	10/5
		It provides clear instructions to staff on how to interpret and apply relevant commitments related to donating or selling low-price CF products to infants and young children who require them (in social welfare institutions, including orphanages and food banks)	10/5
	Procedures		
8	Can the company demonstrate procedures to implement commitments made relating to CF donations ? (tick all that apply)	It can demonstrate such procedures for all provisions on product donations to caregivers through health workers or health facilities	10/5
		It can demonstrate such procedures for all provisions on supplying products through officially sanctioned health programs	10/5
		It can demonstrate such procedures for all provisions related to donating or distributing any equipment, materials, or services to any part of the healthcare system	10/5
		It can demonstrate such procedures for all provisions on CF product donations in humanitarian and emergency settings	10/5
		It can demonstrate such procedures for all provisions related to donating or selling low-price CF products to infants and young children who require them (in social welfare institutions, including orphanages and food banks)	10/5

Section 7 [NEW SECTION]

Implementation and monitoring			
#	Management systems		Score
1	Responsibility for implementation of the company's CF Marketing Policy/relevant commitments		
	The company assigns formal responsibility for the implementation of the CF marketing policy/relevant commitments to (tick all that apply):	A Board member with responsibility for overseeing implementation of its commitments	5
		An Executive Manager (or function) with responsibility for the implementation of its commitments	5
2	Accountability and responsibility		



	In addition to Board and Executive Management levels, assignment of accountability and responsibility is clearly specified as extending to (tick all that apply):	All national business units	5
		Third parties (contractual terms and conditions)	5
Communication			
3	With regards to communicating CF marketing commitments to its employees, does the company have:	An effective global system for communicating to all relevant employees	10
		A system for communicating to some relevant employees in some of its markets	5
		The company cannot demonstrate such a system	0
Ensuring awareness and training			
4	Can the company provide evidence of a system to ensure that relevant executives are aware of their responsibilities under the company's own policies/commitments on CF marketing?	The company can provide evidence of making relevant executives aware of their responsibilities under the company's own CF policies/commitments	10
		The company cannot provide such evidence	0
Ensuring implementation and awareness of other key parties			
5	The company can demonstrate evidence of procedures relating to (tick all that apply):	Distributors	5
		Retailers	5
Food safety & quality management certification			
6	Does the company use any of the following foods safety and quality management systems to certify its products: ISO 9001, FSSC22000 (ISO 22000 including ISO/TS 22001-1), HACCP, BRC, IFS?	Yes	10
		No	0

Section 8 [NEW SECTION]

Lobbying and influencing governments and policy makers			
#	Policy commitments		Score
Lobbying and engagement policy			
1	Does the company have a policy setting out under what circumstances and how it will lobby and engage with governments and policymakers on CF issues?	Yes	10
		The company does not have such a policy	0



Consideration of public interest			
2	Does the company have:	A clear statement in lobbying policy that the purpose of all lobbying is to support the public interest as well as to meet the company's objectives	10
		Some recognition of the need for lobbying to serve the public interest	5
		The company does not make such statements	0
Respect for public policy frameworks and relevant laws, standards, codes			
3	Does the company have a (tick all that apply):	Commitment not to undermine existing public policy frameworks, the work of WHO or similar agencies, and Government efforts to develop regulations to implement the Code	5
		"Commitment to support public policy frameworks, the work of the WHO or similar agencies and national governments' efforts to develop policy measures to implement the Code"	5
Controls over trade associations and industry policy groups			
4	Does the company have (tick all that apply):	An explicit statement that it will periodically review the positions of trade associations and industry policy groups to which it belongs and assess the extent to which they align with the company's own policy positions	5
		An explicit statement that it will put in place controls over all lobbyists (in-house and intermediary, paid or unpaid) to ensure that they understand and adhere to organisational policies	5
Conflicts of interest			
5	Does the company policy include (tick all that apply – answer option 1 and 2 are mutually exclusive):	Comprehensive statements prohibiting Col, which clearly apply to lobbying, and that cover a wide range of possible cases of Col	5
		Some limited statements prohibiting Col which clearly apply to lobbying	2.5
		Commitment to disclose any Cols identified	5
Accountability and responsibility for policy implementation			
6	Does the company give a clear description of its lobbying-related management system? (tick all that apply)	The company makes clear that the Board has oversight of the lobbying policy, lobbying positions, processes and practices, including the lobbying activity of third-party organisations it is a member of	5
		The company names an Executive / function with responsibility for implementing its policy on lobbying and engagement	2.5
		The company provides clarity on control mechanisms (e.g. regular reporting to the Board, internal audits)	2.5
Disclosure			
7	Does the company publish information on:	All public policy positions and other documents submitted to governments globally are shared, or reasons provided for certain documents not being shared (due to a requirement of confidentiality of other parties)	10
		No publication of such documents	0
8	Does the company explicitly state if any of the following public	The International Code of Marketing of Breast-milk Substitutes, and subsequent World Health Assembly resolutions making significant additions or clarifications to the original Code	5



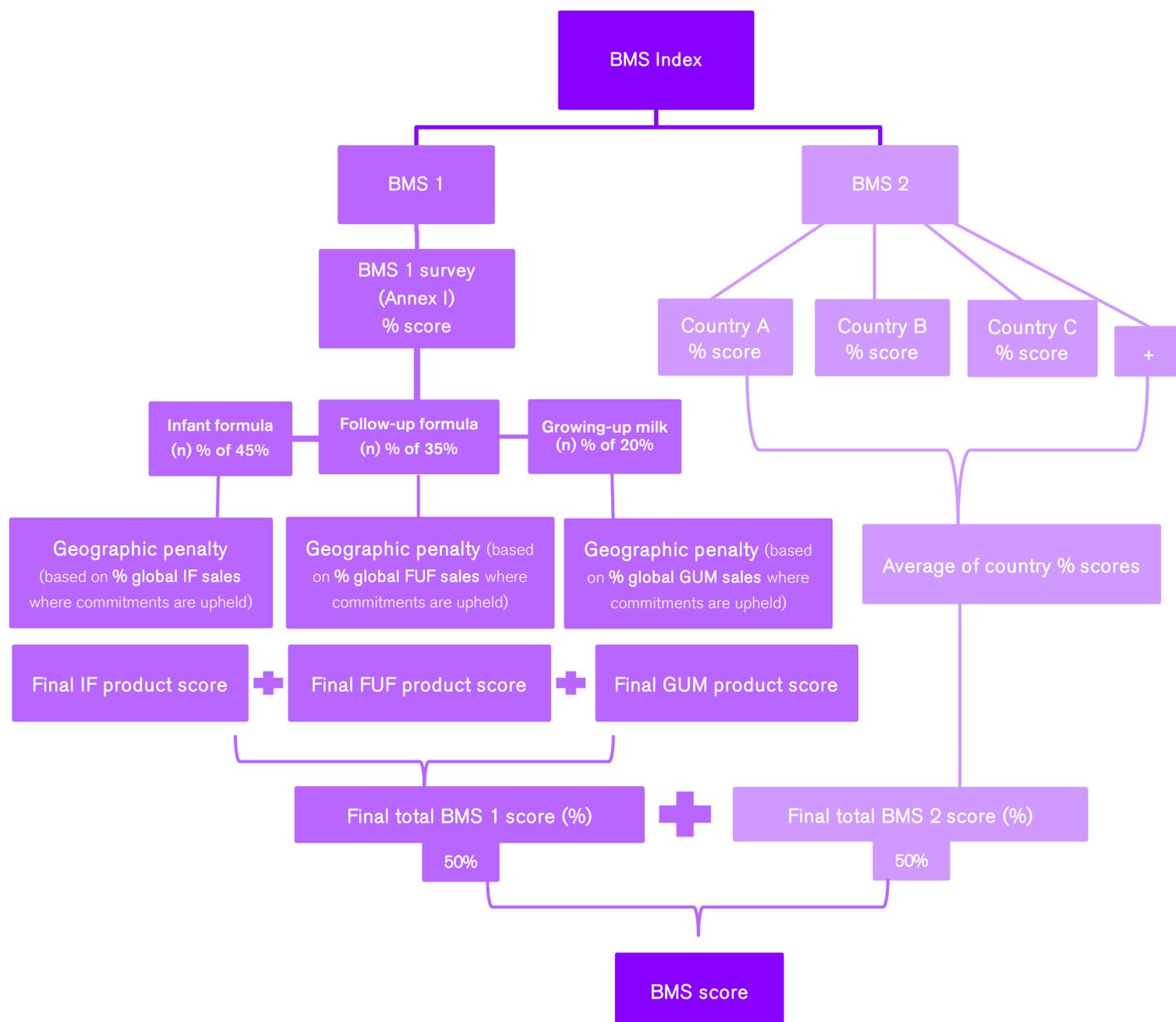
	policy frameworks and relevant laws, standards, and codes are respected when lobbying (tick all that apply):		
		The WHO Framework of Engagement with Non-State Actors	5
		The OECD Principles for Transparency and Integrity in Lobbying	2.5
		The Transparency International Standards for Lobbying Regulation	2.5
		Industry initiatives, such as the IFBA Guiding Principles for Stakeholder Engagement	2.5
		The Responsible Lobbying Framework	2.5

Section 9

Disclosure			
#	Overarching commitments		Score
1	Does the company disclose its commitments to infant and young child feeding according to WHO and other guidelines? (tick all that apply):	Optimal infant and young child feeding based on WHO/UNICEF Global strategy for infant and young child feeding, 2003	2.5
		PAHO and WHO Guiding principles for complementary feeding of the breastfed child, 2003	2.5
		WHO Guiding principles for feeding non-breastfed children 6 – 24 months of age, 2005	2.5
		Encouraging the use of suitable, nutrient-rich, home-prepared, and locally available foods that are prepared and fed safely	2.5
2	Does the company publish its policies/commitments relating to the following recommendations of the guidance associated with WHA 69.9? (tick all that apply)	The company publishes its policy relating to product formulation	10/6
		The company publishes its policy relating to marketing messages	10/6
		The company publishes its policy relating to avoidance of cross-promotion	10/6
		The company publishes its policy relating to conflicts of interest in health facilities or throughout the health care system	10/6
		The company publishes its policy relating to donations	10/6
		The company publishes its policy relating to lobbying and influencing governments and Policymakers	10/6

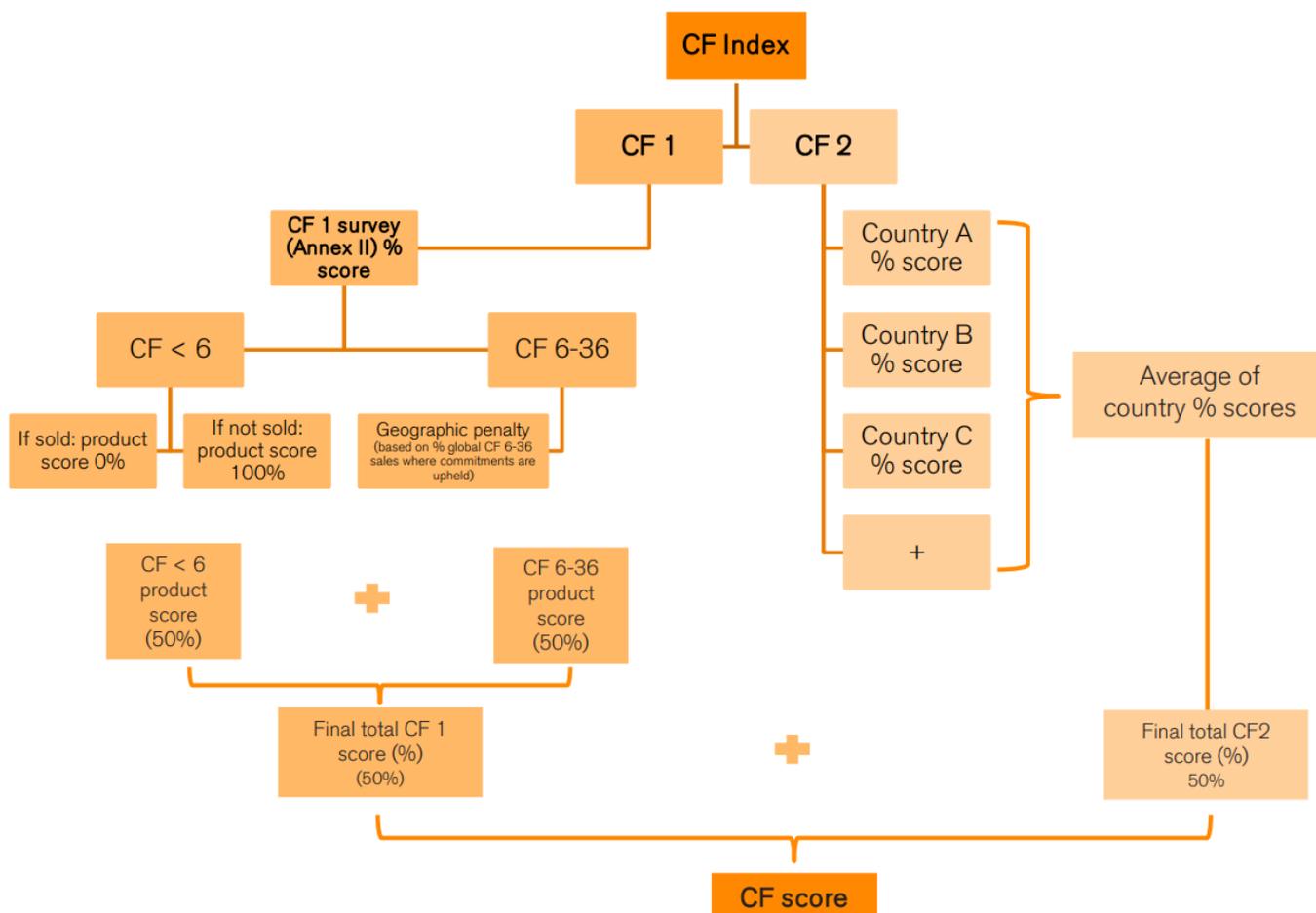


Annex III Elements of the BMS Marketing Index 2023





Annex IV Elements of the CF Marketing Index 2023





Endnotes

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