

ACCESS TO
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Benchmarking of Commercially Produced Complementary Foods (CPCF) companies in Viet Nam

December 14, 2023



Acknowledgments

The ATNI team would like to thank Irish Aid for their financial support. This report was produced by the Infant and Young Child Nutrition team, consisting of: Nadine Nasser, Lucy Cosenza, Laura Trijsburg, Ludovica Ibba, Mark Wijne, Efi Chatzinikolaou and Daniela Hernández. The ATNI team would also like to thank all partners of the Consortium for Improving Complementary Foods (COMMIT) in the Southeast Asia region for providing essential data for this study and for their ongoing support and reviews of the work. Special thanks are also due to Kummer & Herman for their contributions to the design.

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Abbreviations

ATNI	Access to Nutrition Initiative
CPCF	Commercially Produced Complementary Foods
FOP	Front of pack
NPM	Adapted WHO Europe nutrient profile and promotion model for CPCF
WHO	World Health Organization

About the Access to Nutrition Initiative

Access to Nutrition Initiative (ATNI) is an independent, not-for-profit organization established in 2013. It publishes independent, comprehensive analyses and commentary on companies' efforts to improve consumers' access to nutritious foods and beverages, both globally and within specific markets. Assessing producers of breast-milk substitutes and complementary foods is an integral part of ATNI's work. In the course of its research, ATNI collaborates with a wide range of stakeholders, including the investment community, to ensure that its Indexes and reports are useful tools as they engage with and invest in companies.

About the Southeast Asia Consortium for Improving Complementary Foods (COMMIT)

The COMMIT initiative is a consortium of organizations¹ that have been working together since 2020 to improve the quality of Commercially Produced Complementary Foods (CPCF) in Southeast Asia. COMMIT aimed to address the need for a strong evidence base on CPCF through different workstreams, including reviews of existing national legislation and standards for CPCF, micronutrient landscape analyses, understanding caregivers' perceptions of CPCF, and assessments of CPCF using an adapted World Health Organization (WHO) Europe nutrient profile and promotion model for CPCF (NPM) for these products sold in the capital cities and through online retailers in seven Southeast Asian countries. COMMIT's work spans across the following countries: Cambodia, Indonesia, Lao PDR, Malaysia, Philippines, Thailand, and Viet Nam. The findings from COMMIT's different workstreams will be used to provide technical support for improving complementary feeding through three main platforms, namely strengthening, or developing government regulations on CPCF, building consumer awareness on CPCF, and encouraging industry reformulation of CPCF to meet nutrient composition and labeling requirements.

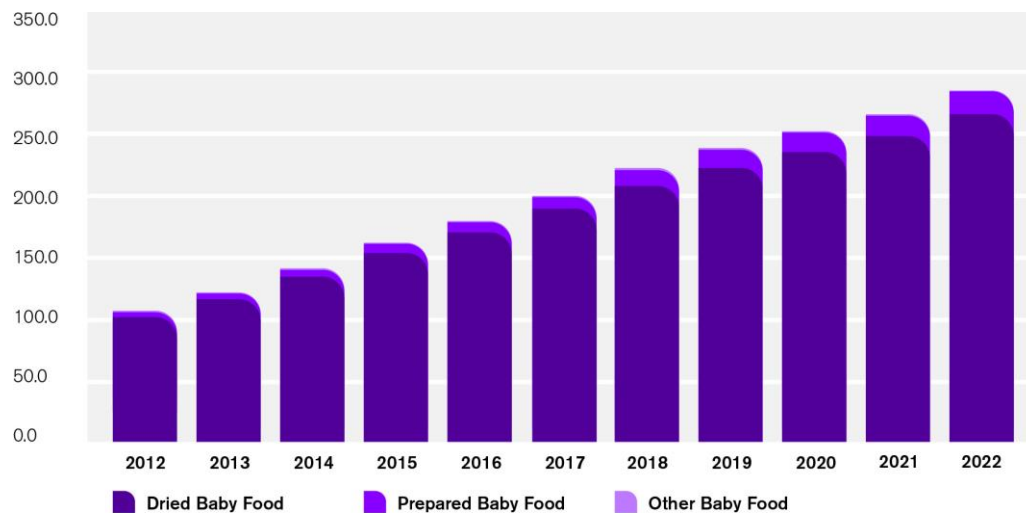
¹ COMMIT partners include Access to Nutrition Initiative; Alive & Thrive; Helen Keller International; JB Consultancy; School of Food Science, University of Leeds, UNICEF East Asia Pacific Regional Office (EAPRO), WFP Regional Bureau, Bangkok (WFP RBB) and WHO Southeast Asia Regional Office (SEARO) (observer).



1. Context: Viet Nam's complementary foods market

The market for commercially available complementary foods CPCF in Viet Nam sales of CPCF more than doubled during the past 10 years, going from slightly over USD 100 million in 2012 to around USD 286 million in 2022 according to Euromonitor International data (See Figure 1). The majority of CPCF sold on the Vietnamese market were 'dried' baby foods (over USD 260 million in 2022), while a small proportion of sales came from 'prepared' baby food (about USD 15 million in 2022) (see Box 1 for CPCF categories as defined in the Euromonitor International database).

Figure 1. CPCF market size in Viet Nam, 2012-2022 (USD million)*



Box 1. Euromonitor International baby food category definitions

Baby food: This is the aggregation of milk formula, prepared, dried, and other baby food.

Dried baby food: Products which require the addition of water before consumption, and which are usually sold in packets. Cereals and dehydrated soups are also included. Please note that retail volumes are shown in terms of as sold and are not reconstituted volumes.

Prepared baby food: Baby products sold in jars, cans, or retort flexible pouches which do not require any cooking preparation other than heating. Includes puréed food, yogurts, chilled desserts, soup, desserts, and ice cream marketed for babies.

Other baby food: Any other products marketed for babies are included here; examples may include baby rusks, teething biscuits, baby fruit juices, baby herbal tea, etc.

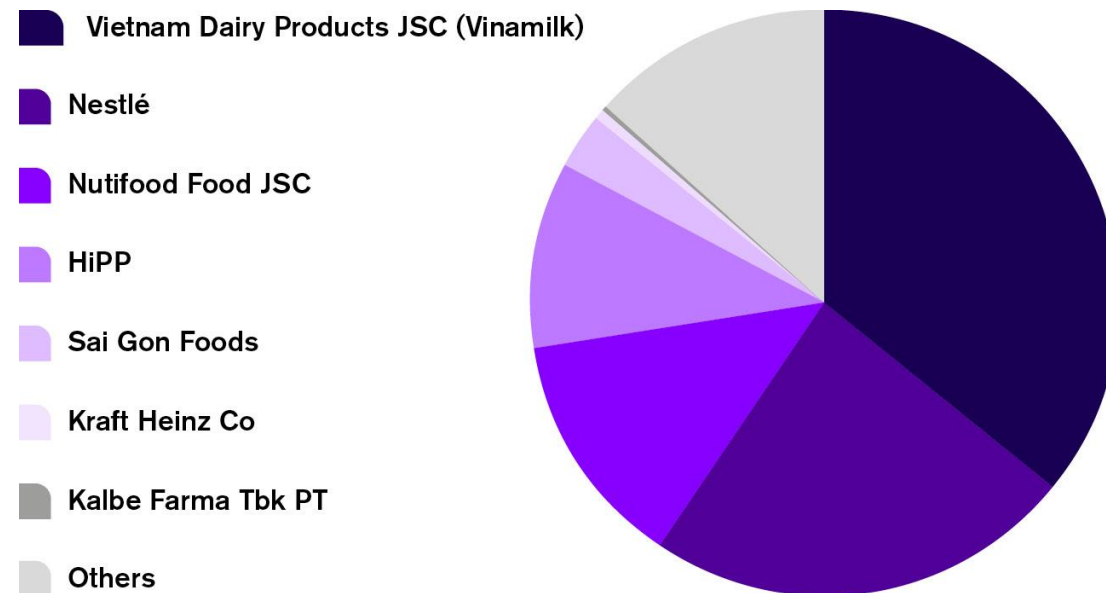
Note: Euromonitor International's categorization of CPCF does not align with World Health Organization (WHO) Europe's categorization of CPCF as described in its draft nutrient profiling model.

Source: Euromonitor International 2012-2022.



As shown in figure 2, according to Euromonitor International, in 2022, Vietnam Dairy Products JSC (36%) and Nestlé (24%) accounted for over half of the CPCF market share in Viet Nam, followed by Nutrifood Food JSC (13%) and Hipp (10%). The majority of the brand share is taken by Vietnam Dairy Products and Ridielac (38.4%) (dried baby foods), followed by Nestlé's Cerelac (25.4%) (dried baby food).

Figure 2. Company shares of the CPCF market in Viet Nam, 2022 (USD million)



Source: Euromonitor International 2022



2. Findings

2.1 Products by company

The study used a cross-sectional design to gather data on CPCF nutrient content and labeling practices in Hanoi, Viet Nam. A total of 486 unique CPCF products were identified for the study. From these, 241 were excluded because:

- Some did not provide the required nutrition label information in Vietnamese or English (n=215)
- Did not include nutritional information (n=21)
- The nutritional information was provided as a range (n=4) or with no reference value (n=1)

A final count of 245 CPCF products were included in this analysis. As shown in Table 1, the 245 products belonged to 42 companies, of which 29 were based outside of Viet Nam. Most of the products belonged to CPCF companies headquartered in Viet Nam (21.5%), followed by Germany (21.2%). Of all 245 products, 53 belonged to 13 Vietnamese companies (see Table 1). Most assessed CPCF products belonged to HiPP (18.8%), followed by Kraft Heinz Co. (14.3%) and Nestlé (10.2%). Most products were of the categories 'dry powdered and instant cereal/starchy food' (39.6%) and 'soft-wet spoonable' (32.2%), followed by 'dry finger foods' (17.6%), 'juices and other drinks' (2.9%), and 'meals with chunky pieces' (0.4%) (see Annex 1).

Of the 245 products, 217 were assessed against the NPM. The remaining 28 products were not assessed, meaning no nutrient composition and labeling assessments were conducted on these products. Ten out of 28 products were automatically excluded, as they fell under the categories 4.1 (n=3 from Bededang Do Lts.) or 5.1 (n=6 from Artifex Instant s.r.o and n=1 from HiPP) (confectionery/sweet spreads/fruit chews, juices/other drinks). These categories should not be marketed to children under three years of age and therefore automatically 'failed' the NPM. Additionally, 18/28 products fell under the category 6.1 'other', which were not able to be classified within the NPM categories and, therefore, were also excluded. Products belonging to the 'other' category included oils (e.g., walnut oil, olive oil, fish oil), seasoning powders (e.g., spinach powder, carrot and cheese seasoning, abalone mushrooms powder), and sauces (e.g., fish sauce).

Table 1. CPCF by parent company name, headquarters, and brand name (grouped by headquarter location in alphabetical order)*

Parent company	Headquarters	Brand name	%(n)	Category of products (n)
Bellamy's Organic Pty Ltd.	Australia	Bellamy's Organic	1.6% (4)	1: dry instant starch (1) 2: soft wet spoonable (3)
Max Biocare Pty Ltd.	Australia	Little Etoile Organic	2.4% (6)	2: soft wet spoonable (6)
Rafferty's Garden	Australia	Rafferty's Garden	3.7% (9)	2: soft wet spoonable (9)
SPES S.A.	Chile	Smart Kids	1.2% (3)	? 6: others (3)
Artifex Instant s.r.o	Czech Republic	Burine	2.4% (6)	5: juices and other drinks (6)
Danone	France	Aptamil	0.8% (2)	1: dry instant starch (2)
Aldi Stores Ltd.	Germany	Organic Mami	0.4% (1)	4: finger foods and snacks (1)
Elsdofe Molkerei und Feinkost Feinkost	Germany	Helio	0.4% (1)	2: soft wet spoonable (1)
HIPP	Germany	Hipp	18.8% (46)	1: dry instant starch (19) 2: soft wet spoonable (25) 4: finger foods and snacks (1) X 5: juices and other drinks (1)
ODW Frischprodukte GmbH	Germany	Burine	1.6% (4)	2: soft wet spoonable (4)
Apostolos I. Douzenis & Co Ltd.	Greece	Olympias	0.4% (1)	? 6: others (1)
Il Mangiarano S.P.A	Italy	Bio Junior	3.3% (8)	1: dry instant starch (3) 4: finger foods and snacks (5)
Bean Stalk Snow Co., Ltd.	Japan	Beanstalk	0.4% (1)	4: finger foods and snacks (2)
Morinaga & Co., Ltd	Japan	Morinaga	0.8% (2)	4: finger foods and snacks (2)
Tanabiki Seimen Co., Ltd	Japan	Tanabiki	1.2% (3)	1: dry instant starch (3)
Bebedang Co Ltd.	Korea	Bebedang	1.2% (3)	4: finger foods and snacks (3) X all were '4.1'
Ispoon	Korea	Ispoon	1.2% (3)	1: dry instant starch (3)
Natural Foods and Spices Manufacturing SDN. Bhd.	Malaysia	A1 Ak Koh	1.2% (3)	4: finger foods and snacks (3)
Friesland Campina	Netherlands	Friso Gold	0.8% (2)	1: dry instant starch (1)
Only Organic	New Zealand	Only Organic	1.6% (4)	2: soft wet spoonable (4)
Dana Dairy Group Ltd.	Switzerland	Dana Milk	4.9% (12)	1: dry instant starch (12)
		Danalac	1.6% (4)	4: finger foods and snacks (4)
Nestlé	Switzerland	Gerber	6.5% (16)	1: dry instant starch (4) 4: finger foods and snacks (12)
		Cerelac	3.7% (9)	1: dry instant starch (7) 4: finger foods and snacks (2)
Peachy Village Co., Ltd.	Thailand	Peachy	0.4% (1)	2: soft wet spoonable (1)
Kendal Nutricare Ltd.	UK	Kendamil	0.4% (1)	1: dry instant starch (1)
Sainsbury's Supermarket Ltd.	UK	Sainsbury's Little Ones	0.4% (1)	1: dry instant starch (1)
Sma nutrition	UK	Little Steps	0.8% (2)	4: finger foods and snacks (2)
Kraft Heinz Co	USA	Heinz	14.3% (35)	1: dry instant starch (12) 2: soft wet spoonable (16) 4: finger foods and snacks (7)
An An Agri Company	Viet Nam	Anpaso	0.8% (2)	1: dry instant starch (2)
EHK Joint Stock Com.	Viet Nam	Mabu	1.2% (3)	1: dry instant starch (3)
Nutifood Food JSC	Viet Nam	Nutiiq	0.4% (1)	1: dry instant starch (1)
Nutricare Nutrition JSC	Viet Nam	Metacare	3.7% (9)	1: dry instant starch (8) 2: soft wet spoonable (1)
Sai Gon Food	Viet Nam	Sg Food	4.1% (10)	2: soft wet spoonable (9) 3: meals with chunky pieces (1)
Vietnam Dairy Products	Viet Nam	Optimum Gold	1.2% (3)	1: dry instant starch (3)
		Vinamilk	4.1% (10)	1: dry instant starch (10)
Calofic	Viet Nam	Kiddy	0.8% (2)	? 6: others (2)
Konoha LLC	Viet Nam	Konofood Nutrition	0.8% (2)	? 6: others (2)
Tu Phong Co. Ltd	Viet Nam	Thuyen Xua	2.0% (5)	? 6: others (5)
Tuan Kha LLC	Viet Nam	Vaby	2.0% (5)	? 6: others (5)
Tuong An vegetable oil company	Viet Nam	Vio	0.4% (1)	? 6: others (1)
Total number of unique CPCF			100.0% (245)	

X = These products fell under the 4.1 (confectionery, sweet spreads and fruit chews), 5.1 (single or mixed fruit juices, vegetable juices, or other non-formula drinks) or 5.2 (cow's milk and milk alternatives with added sugar or sweetening agent) categories which should not be promoted to children < 3 years of age and thus automatically 'failed' the NPM.

? = These products are of the 6.1 'other' category of the NPM which are not assessed against the nutrient composition and labelling requirements. Products belonging to the 'other' category included oils (e.g., walnut oil, olive oil, fish oil), seasoning powders (e.g., spinach powder, carrot and cheese seasoning, abalone mushrooms powder), and sauces (e.g. fish sauce).

2.2 Combined results: nutrition composition and labeling practices

A total of 39 companies produced the 217 CPCF assessed using the NPM. As shown in Table 2, none of the companies' assessed CPCF products met both nutrient composition and labeling requirements of the NPM. Thus, no CPCF were found to be suitable for promotion for older infants and young children between six to 36 months of age. None of the products passed all labeling requirements. However, some companies performed better than others against the nutrient composition criteria:

- Almost a third of assessed CPCF products (around 31%, or n=68 out of a total of n=217 products) met all nutritional thresholds and, based on the NPM, were considered of appropriate nutrient content.
- Products meeting all relevant nutrient composition requirements (n=68) are in the following CPCF categories: 'dry or instant cereals/starches' (n=33), followed by 'soft-wet spoonable, ready-to-eat foods' (n=32) and 'other snacks' (n=3).
- All products marketed by the following six companies met all applicable nutrient composition thresholds: Aldi Stores Ltd., Bellamy's Organic Pty Ltd., Danone, Only Organic, Sainsbury's Supermarket Ltd., and SMA Nutrition.
- Nine companies had 50% or more of their assessed CPCF meet all applicable nutrient composition thresholds.
- Three companies had between 15% and 49% of their products meeting the nutrient composition thresholds.
- Seventeen companies' products did not meet any of the applicable nutrient composition thresholds.
- Of the products that did not meet all nutritional thresholds (n=149), the majority belonged to the categories 'dry instant starch' (n=64), followed by 'other snacks and finger food' (n=37), 'fruit pure' (n=17), 'dairy based desserts' (n=13), and 'puréed meal with meat/fish mentioned in product name' (n=12).

Table 2. Nutrient composition and labeling practices assessment, combined nutrient profiling outcome (n=217) *

Company	Number of products	% met all relevant nutrient composition requirements	% met all relevant labeling requirements	% met all requirements
Aldi Stores Ltd.	1	100.0%	0.0%	0.0%
An An Agri Company	2	0.0%	0.0%	0.0%
Bean Stalk Snow Co., Ltd	1	0.0%	0.0%	0.0%
Bellamy's Organic Pty Ltd.	4	100.0%	0.0%	0.0%
Dana Dairy Group Ltd	16	62.5%	0.0%	0.0%
Danone	2	100.0%	0.0%	0.0%
EHK Joint Stock Com.	3	0.0%	0.0%	0.0%
Elsdofer Molkerei und Feinkostund Feinkost	1	0.0%	0.0%	0.0%
Friesland Campina	1	0.0%	0.0%	0.0%
Kraft Heinz Co	35	20.0%	0.0%	0.0%
HiPP	45	53.3%	0.0%	0.0%
Il Mangiarsano S.P.A	8	37.5%	0.0%	0.0%
Ispoon	3	0.0%	0.0%	0.0%
Kendal Nutricare Ltd.	1	0.0%	0.0%	0.0%
Konoha LLC	1	0.0%	0.0%	0.0%
Max Biocare Pty Ltd.	6	16.7%	0.0%	0.0%
Morinaga & Co., Ltd	2	0.0%	0.0%	0.0%
Natural Foods and Spices Manufacturing SDN. Bhd.	3	0.0%	0.0%	0.0%
Nestlé	25	12.0%	0.0%	0.0%
Nutifood Food JSC	1	0.0%	0.0%	0.0%
Nutricare Nutrition JSC	9	0.0%	0.0%	0.0%
ODW Frischprodukte GmbH	4	0.0%	0.0%	0.0%
Only Organic	4	100.0%	0.0%	0.0%
Peachy Village Co., Ltd.	1	0.0%	0.0%	0.0%
Rafferty's Garden	9	66.7%	0.0%	0.0%
Sai Gon Food	10	0.0%	0.0%	0.0%
Sainsbury's Supermarket Ltd.	1	100.0%	0.0%	0.0%
Sma Nutrition	2	100.0%	0.0%	0.0%
Tanabiki Seimen Co., Ltd	3	0.0%	0.0%	0.0%
Vietnam Dairy Products	13	0.0%	0.0%	0.0%
Total number of products meeting NPM requirements	217	31.3% (68)	0.0% (0)	0.0% (0)

*Note only applicable to products assessed against the NPM (n=217), i.e., excludes product categories 4.1 and 6.1

2.3 Nutrient composition results

Table 3 sets out the proportion of each company's CPCF products that met each of the seven nutrient composition thresholds in the NPM. With regards to thresholds applicable to all CPCF product types:

- Most products (93.1%) met total fat threshold requirements, with only Sai Gon Food having none of its products adhering to this criterion.
- The majority of products (70.5%) met the sodium requirements,
- About half (52.1%) met the 'no added sugar/sweeteners' criterion. For the latter, there was a large variation among companies - all products belonging to 11 companies met the 'no added sugar/sweeteners' criterion and, for 13 companies, none of their assessed CPCF met this.

For the criteria assessed for specific categories:

- Most companies' relevant CPCF products (91.7%) passed the 'low/no added fruit' requirement.
- Further, 88.8% of relevant products per company met the protein thresholds.
- Of the 79 relevant products, 65.8% met the energy thresholds.
- Of products falling under the 'other snacks and finger foods', 30.0% met the required criterion of having < 15% energy from total sugar.

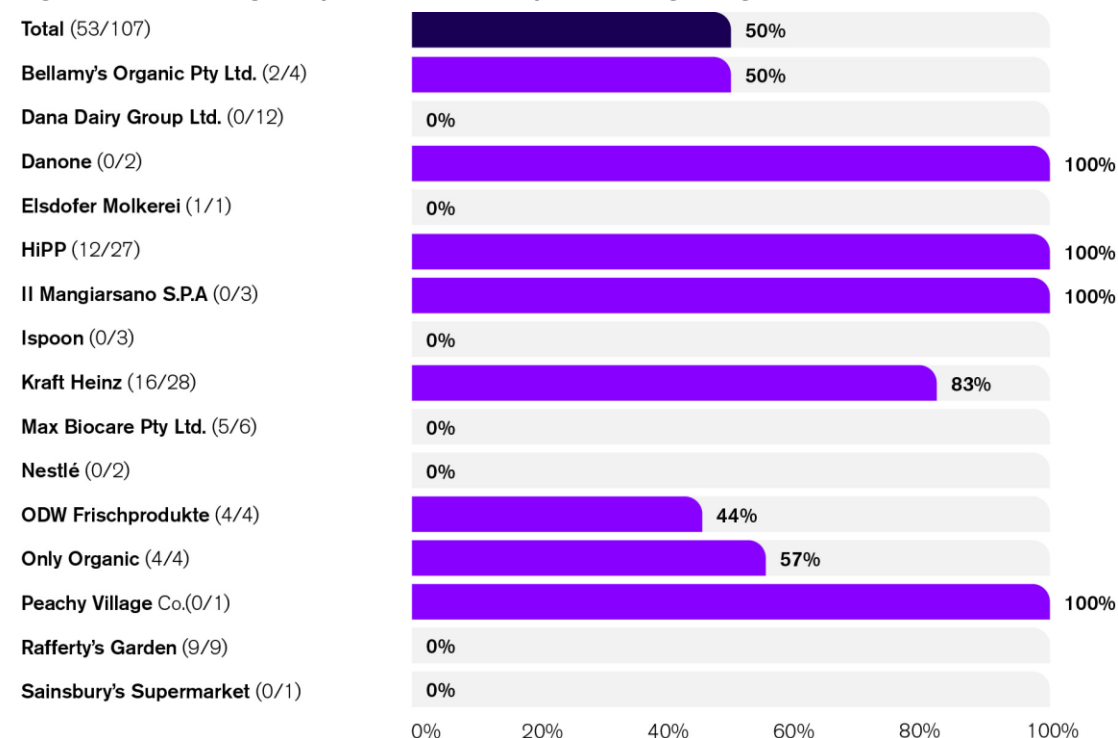
Table 3. Proportion of products that met applicable nutrient thresholds per company*

Company	Number of products	Criteria assessed for all categories			Criteria assessed for specific categories			
		% products with no added sugar/sweeteners	% products meeting sodium requirements	% products meeting total fat requirements	Products with low/no added fruit % (n)	Products with < 15% total E from total sugar % (n)	Products meeting E density requirements % (n)	Products meeting protein requirements % (n)
Aldi Stores Ltd.	1	100.0%	100.0%	100.0%	-	100.0% (1)	-	-
An An Agri Company	2	100.0%	0.0%	50.0%	100.0% (2)	-	-	100.0% (2)
Bean Stalk Snow Co., Ltd	1	0.0%	0.0%	100.0%	-	0.0% (0)	-	-
Bellamy's Organic Pty Ltd.	4	100.0%	100.0%	100.0%	100.0% (2)	0.0% (0)	100.0% (3)	100.0% (1)
Dana Dairy Group Ltd	16	62.5%	75.0%	100.0%	100.0% (12)	-	-	100.0% (12)
Danone	2	100.0%	100.0%	100.0%	100.0% (2)	-	-	100.0% (2)
EHK Joint Stock Com.	3	100.0%	0.0%	100.0%	100.0% (3)	-	-	100.0% (3)
Elsdofer Molkerei und Feinkostund Feinkost	1	0.0%	100.0%	100.0%	0.0% (0)	-	100.0% (1)	-
Friesland Campina	1	0.0%	100.0%	100.0%	100.0% (1)	-	-	100.0% (1)
Kraft Heinz Co	35	48.6%	77.1%	100.0%	71.4% (15)	0.0% (0)	75.0% (12)	100.0% (14)
HiPP	45	91.1%	88.9%	100.0%	82.6% (19)	0.0% (0)	60.0% (15)	95.7% (22)
Il Mangiarsano S.P.A	8	37.5%	50.0%	100.0%	100.0% (3)	80.0% (4)	-	100.0% (3)
Ispoon	3	0.0%	0.0%	100.0%	100.0% (3)	-	-	100.0% (3)
Kendal Nutricare Ltd.	1	100.0%	0.0%	100.0%	100.0% (1)	-	-	100.0% (1)
Konoha LLC	1	0.0%	0.0%	100.0%	100.0% (1)	-	-	100.0% (1)
Max Biocare Pty Ltd.	6	83.3%	100.0%	83.3%	100.0% (4)	-	33.3% (2)	0.0% (0)
Morinaga & Co., Ltd	2	0.0%	100.0%	100.0%	-	0.0% (0)	-	-
Natural Foods and Spices Manufacturing SDN. Bhd.	3	0.0%	0.0%	100.0%	-	100.0% (3)	-	-
Nestlé	25	28.0%	72.0%	92.0%	100.0% (11)	14.3% (2)	-	100.0% (11)
Nutifood Food JSC	1	0.0%	100.0%	100.0%	100.0% (1)	-	-	100.0% (1)
Nutricare Nutrition JSC	9	0.0%	88.9%	88.9%	100.0% (9)	-	100.0% (1)	100.0% (8)
ODW Frischprodukte GmbH	4	0.0%	100.0%	100.0%	100.0% (4)	-	100.0% (4)	-
Only Organic	4	100.0%	100.0%	100.0%	-	-	100.0% (4)	-
Peachy Village Co., Ltd.	1	100.0%	0.0%	100.0%	100.0% (1)	-	100.0% (1)	100.0% (1)
Rafferty's Garden	9	100.0%	100.0%	100.0%	100.0% (1)	-	66.7% (6)	-
Sai Gon Food	10	0.0%	0.0%	0.0%	100.0% (10)	-	33.3% (3)	0.0% (0)
Sainsbury's Supermarket Ltd.	1	100.0%	100.0%	100.0%	100.0% (1)	-	-	100.0% (1)
Sma Nutrition	2	100.0%	100.0%	100.0%	-	100.0% (2)	-	-
Tanabiki Seimen Co., Ltd	3	0.0%	0.0%	100.0%	100.0% (3)	-	-	100.0% (3)
Vietnam Dairy Products	13	0.0%	46.2%	100.0%	100.0% (13)	-	-	100.0% (13)
Total products that meet nutrient composition requirements	217	52.1% (113)	70.5% (153)	93.1% (202)	91.7% (122)	30.0% (12)	65.8% (52)	88.8% (103)
Total products applicable to each requirement		217	217	217	133	40	79	116

*Note when no value is presented, the '-' indicates that the NPM requirement was not applicable to the company's CPCF product type(s).

The NPM also assessed products to determine whether they would require front of pack (FOP) 'high sugar' warning label. A 'high sugar' warning label would be required if the percentage energy from total sugar content exceeds category-specific thresholds. The 'high sugar' warning applied to all categories of CPCF products, except for category 4.3 'snacks/finger foods', to which a total sugar threshold was applied (as seen in Table 4). A total of 107 CPCF product labels declared total sugar content and were thus assessed against this additional threshold. Of the 107 products, 50% would require a 'high sugar' FOP warning, as the energy percentage from total sugar content exceeded the category-specific thresholds. Products belonging to seven companies did not require a 'high sugar' FOP label, while the remaining companies had between 44% and 100% of their products require such a warning label based on the high proportion of 'empty' calories contributed by the products' total sugar content (Figure 3).

Figure 3. Percentage of products that required a 'high sugar' FOP label*



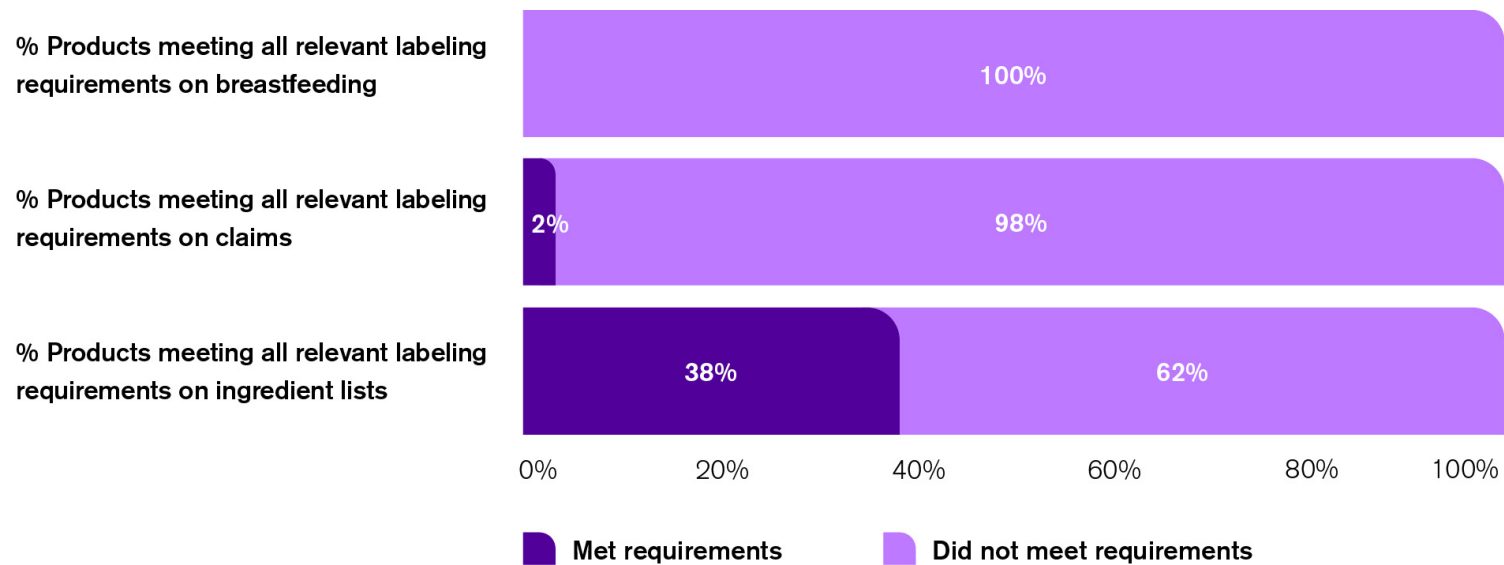
*107 require this warning label, out of 217 applicable products that declared total sugar content on labels and are thus assessed on the need for a 'high sugar' FOP label. A FOP 'high sugar' warning was required if the percentage energy from total sugar content is \geq the threshold for that product category: 1.1: 40%; 2.1/2.2/2.3: 30%; 2.4: 20%; 2.5/2.6/2.7/3.1/3.2: 15%.



2.4 Labeling assessment results

None of the companies' products met all labeling requirements (i.e. protection and promotion of breastfeeding, claims and ingredient list clarity). As seen in Figure 4, for the subcategories of the labeling requirements, none of the products met the labeling criteria on the **protection and promotion of breastfeeding**. Only 2.3% of products met labeling requirements on **claims**, and slightly more than a third (38.1%) of companies' products met labeling criteria on **ingredient lists**.

Figure 4. Percentage of products meeting all labeling requirements on the protection and promotion of breastfeeding, claims and ingredient lists clarity





2.4.1 Labeling requirements on protection and promotion of breastfeeding

The main reason products did not meet labeling requirements on the protection and promotion of breastfeeding was because none of the products included a **message on the importance of continued breastfeeding up to two years of age or beyond**. In addition, 74.7% of products indicated the **recommended age of introduction to be at least six months**. However, just over half of the products (57.1%) were not promoted as suitable for consumption by infants younger than six months and about half of the companies (n=14) met this requirement fully. None of the products suggested **superiority or equivalence to breast milk**, and most products (except for the product of Bean Stalk Snow Co.) **do not recommend or promote bottle feeding** (See Annex 2 for specific criteria).

2.4.2 Labeling requirements on claims

While most products did not meet all labeling criteria on claims (i.e. non-permitted compositional claims, no nutrient content claims, no nutrient function claims, no disease risk reduction claims and no other claims). All products from two Japanese-based companies did meet all criteria on claims: Morinaga & Co. Ltd and Tanabiki Seimen Co. The main reason most products did not meet all labeling requirements was that only 10.6% of products did not contain **non-permitted compositional claims** : all products from Friesland Campina, Nutifood Food JSC, Morinaga & Co., Ltd., Tanabiki Seimen Co., and some products belonging to Kraft Heinz Co. (5.7%), ODW Frischprodukte GmbH (75.0%), and Vietnam Dairy Product (84.6%) did not have such claims. About one-third of products belonging to 13 companies did not show **other claims**. Less than half of the products did not make claims on nutrient content, and more than half (64.1%) did not present nutrient function claims. Meanwhile, almost all (97.7%) did not present disease risk claims (See Annex 3 for specific criteria).

2.4.3 Labeling requirements on product name and ingredient list clarity

Over one-third (37.7%) of the products met all relevant labeling criteria on product name and **ingredient list clarity** (i.e. product name reflects ingredients in descending order as per ingredient list; fruit stated on ingredient list; percentage of added water stated on the ingredient list; and percentage of protein stated on ingredient list) Less than half of the products (n=98 out of n=217) listed the **ingredients in descending order** as per the ingredient list. On category-specific criteria, 83.9% of the applicable products presented the **percentage of fruit** on the ingredient list. Only 14.3% of the products stated the **percentage of added water** on the ingredient list, and these products belonged to Kraft Heinz Co (n=5). Of the 19 products assessed on stating the **percentage of protein** in the ingredients list, 89.5% met this requirement. Companies' products that did not pass this requirement were HiPP (three out of four products) and Sai Gon Food (nine out of 10 products) (See Annex 4 for specific criteria).



2.4.4 Labeling requirements on blended/puréed products

Products from 11 companies were assessed on labeling requirements specific for blended/puréed products and only one CPCF met the criteria specified for this food group of having the **maximum recommended age of consumption of 12 months**. Among the blended/puréed CPCF, 35 have spouts and 82.9% of these have a '**choking hazard**' warning label. However, none of the 35 products have a statement informing that **children should not be allowed to suck from the container** (see Annex 5 for specific criteria).

3. Summary

- The CPCF market in Viet Nam has almost tripled in the past 10 years, reaching over USD 286 million sales in 2022. Yet, the results of this research show that none of the companies' CPCF products passed both nutrient and labeling requirements according to the NPM. Therefore, none of the products are considered suitable to be promoted to older infants and young children between six and 36 months of age.
- Most of the 245 CPCF products belonged to three companies: HiPP (n=46), Kraft Heinz Co. (n=35), and Nestlé (n=25).
- A total of 10 products automatically failed the NPM and belonged to Bededang Do Ltd., Artifex Instant s.r.o., or HiPP. These products fell under the categories 4.1 or 5.1 and, therefore, should not be promoted for children under three years of age. An additional 18 products (falling under the category 6.1 'other') could not be classified within the NPM categories and, therefore, were also excluded.

Nutritional quality

- Almost a third of the companies' assessed CPCF products met all relevant nutritional thresholds and were thus of appropriate nutritional quality. Products from the following companies met all nutritional quality requirements: Aldi Stores Ltd., Bellamy's Organic Pty Ltd., Danone, Only Organic, Sainsbury's Supermarket Ltd., and SMA Nutrition.

Labeling practices

- None of the companies' products met all labeling criteria, as none met the labeling requirements for breastfeeding. While all products **do not suggest superiority or equivalence to breast milk**, none of the products contained a message on the importance of **continued breastfeeding for up to two years or beyond**. Most products (except for the product of Bean Stalk Snow Co.) **do not recommend or promote bottle feeding**.
- Only 2.3% (n=5) of the CPCF products met all labeling requirements on **claims**, and all were produced by Morinaga & Co. Ltd and Tanabiki Seimen Co.
- Only 38% of companies' products met the labeling requirements on **ingredient lists**, with less than half (45.2%) reflecting **ingredients in descending order**. Of the applicable products, 83.9% included the **percentage of fruit** and 89.5% stated the **percentage of protein** on the ingredient list. Additionally, only five products (all from Kraft Heinz Co.) included the **percentage of added water**, while none of the other six companies included such information on the label.
- For blended/puréed products, only one product (from Kraft Heinz Co.) contained a **maximum recommended age of use of 12 months**. For products with a spout, none had a statement to inform that **children should not be allowed to suck from the container**. On the other hand, almost all companies' products (except for the n=6 products from Max Biocare Pty Ltd.) with spout had a **warning that the cap is a choking hazard**.



4. Annexes

Annex 1: Commercial complementary foods per NPM-defined category and subcategory (n=245)

Category	Subcategory	% n
Category 1: Dry, powdered, and instant cereal/starchy food		39.6% (97)
Category 1.1	Dry or instant cereals/starch	39.6% (97)
Category 2: Soft-wet spoonable, ready-to-eat foods, typically smooth or semi-puréed packaged in jars or pouches and can be spoon-fed		32.2% (79)
Category 2.1	Dairy-based desserts and cereal products	5.3% (13)
Category 2.2	Fruit purée with or without addition of vegetables, cereals, or milk	18.0% (44)
Category 2.3	Vegetable only purée	0.8% (2)
Category 2.4	Puréed vegetables and cereals	0.8% (2)
Category 2.5	Puréed meal with cheese (but not meat or fish) mentioned in the name	0.0% (0)
Category 2.6	Puréed meal with meat or fish mentioned as first food in product name	5.3% (13)
Category 2.7	Puréed meals with meat or fish (but not named first in product name)	2.0% (5)
Category 2.8	Purées with only meat, fish or cheese in the name	0.0% (0)
Category 3: Meals with chunky pieces, often sold in trays or pots for older infants and young children		0.4% (1)
Category 3.1	Meat, fish, or cheese-based meal with chunky pieces	0.4% (1)
Category 3.2	Vegetable-based meal with chunky pieces	0.0% (0)
Category 4: Dry finger foods and snacks		17.6% (43)
Category 4.1	Confectionery, sweet spreads and fruit chews	1.2% (3)
Category 4.2	Fruit (fresh or dry whole fruit or pieces)	0.0% (0)
Category 4.3	Other snacks and finger foods	16.3% (40)
Category 5: Juices and other drinks		2.9% (7)
Category 5.1	Single or mixed fruit juices, vegetable juices, or other non-formula drinks	2.9% (7)
Category 5.2	Cow's milk and milk alternatives with added sugar or sweetening agent	0.0% (0)
Category 6. Other		7.3% (18)
Category 6.1	Other	7.3% (18)
Total unique CPCF		100.0% (245)

Annex 2. Labeling requirements on breastfeeding per company

Company	Number of products	% Products meeting all relevant labeling requirements on breastfeeding	% Products with minimum recommended age of introduction of at least 6 months*	% Products not marketed as suitable for <6m	% Products with a message on importance of breastfeeding ≥2y	% Products that do not suggest superiority or equivalence to breastmilk	% Products that do not recommend or promote bottle feeding
Aldi Stores Ltd.	1	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
An An Agri Company	2	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
Bean Stalk Snow Co., Ltd.	1	0.0%	100.0%	0.0%	0.0%	100.0%	0.0%
Bellamy's Organic Pty Ltd.	4	0.0%	25.0%	25.0%	0.0%	100.0%	100.0%
Dana Dairy Group Ltd	16	0.0%	93.8%	37.5%	0.0%	100.0%	100.0%
Danone	2	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
EHK Joint Stock Com.	3	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Elsdofer Molkerei und Feinkostund Feinkost	1	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Friesland Campina	1	0.0%	100.0%	0.0%	0.0%	100.0%	100.0%
Kraft Heinz Co.	35	0.0%	77.1%	65.7%	0.0%	100.0%	100.0%
HiPP	45	0.0%	40.0%	31.1%	0.0%	100.0%	100.0%
Il Mangiarsano S.P.A	8	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Ispoon	3	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Kendal Nutricare Ltd.	1	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
Konoha LLC	1	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Max Biocare Pty Ltd.	6	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Morinaga & Co., Ltd.	2	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Natural Foods and Spices Manufacturing SDN. Bhd.	3	0.0%	100.0%	0.0%	0.0%	100.0%	100.0%
Nestlé	25	0.0%	100.0%	60.0%	0.0%	100.0%	100.0%
Nutifood Food JSC	1	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Nutricare Nutrition JSC	9	0.0%	88.9%	0.0%	0.0%	100.0%	100.0%
ODW Frischprodukte GmbH	4	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Only Organic	4	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Peachy Village Co., Ltd.	1	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Rafferty's Garden	9	0.0%	44.4%	33.3%	0.0%	100.0%	100.0%
Sai Gon Food	10	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Sainsbury's Supermarket Ltd.	1	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
Sma Nutrition	2	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Tanabiki Seimen Co., Ltd.	3	0.0%	0.0%	100.0%	0.0%	100.0%	100.0%
Vietnam Dairy Products	13	0.0%	100.0%	100.0%	0.0%	100.0%	100.0%
Total products that meet labeling requirements on breastfeeding	217	0.0% (0)	75.1% (163)	57.6% (125)	0.0% (0)	100.0% (217)	99.0% (216)



Annex 3. Labeling requirements on claims per company

Company	Number of products	% Products meeting all relevant labeling requirements on claims	% Products without non-permitted compositional claims	% Products with no nutrient content claims	% Products with no nutrient function claims	% Products with no disease risk reduction claims	% Products with no other claims
Aldi Stores Ltd.	1	0.0%	0.0%	0.0%	100.0%	100.0%	0.0%
An An Agri Company	2	0.0%	0.0%	0.0%	50.0%	50.0%	100.0%
Bean Stalk Snow Co., Ltd	1	0.0%	0.0%	100.0%	100.0%	100.0%	100.0%
Bellamy's Organic Pty Ltd.	4	0.0%	0.0%	100.0%	100.0%	100.0%	0.0%
Dana Dairy Group Ltd	16	0.0%	0.0%	12.5%	100.0%	100.0%	75.0%
Danone	2	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%
EHK Joint Stock Com.	3	0.0%	0.0%	0.0%	0.0%	66.7%	33.3%
Elsdofer Molkerei und Feinkostund Feinkost	1	0.0%	0.0%	0.0%	100.0%	100.0%	0.0%
Friesland Campina	1	0.0%	100.0%	0.0%	100.0%	100.0%	0.0%
Kraft Heinz Co	35	0.0%	5.7%	45.7%	77.1%	100.0%	17.1%
HiPP	45	0.0%	0.0%	53.3%	64.4%	93.3%	53.3%
Il Mangiarsano S.P.A	8	0.0%	0.0%	100.0%	100.0%	100.0%	100.0%
Ispeen	3	0.0%	0.0%	100.0%	100.0%	100.0%	100.0%
Kendal Nutricare Ltd.	1	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%
Konoha LLC	1	0.0%	0.0%	0.0%	100.0%	100.0%	0.0%
Max Biocare Pty Ltd.	6	0.0%	0.0%	66.7%	100.0%	100.0%	66.7%
Morinaga & Co., Ltd	2	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Natural Foods and Spices Manufacturing SDN. Bhd.	3	0.0%	0.0%	100.0%	100.0%	100.0%	0.0%
Nestlé	25	0.0%	0.0%	24.0%	44.0%	100.0%	0.0%
Nutifood Food JSC	1	0.0%	100.0%	0.0%	0.0%	100.0%	0.0%
Nutricare Nutrition JSC	9	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%
ODW Frischprodukte GmBH	4	0.0%	75.0%	100.0%	100.0%	100.0%	0.0%
Only Organic	4	0.0%	0.0%	75.0%	100.0%	100.0%	0.0%
Peachy Village Co., Ltd.	1	0.0%	0.0%	100.0%	100.0%	100.0%	0.0%
Rafferty's Garden	9	0.0%	0.0%	100.0%	100.0%	100.0%	44.4%
Sai Gon Food	10	0.0%	0.0%	0.0%	0.0%	100.0%	0.0%
Sainsbury's Supermarket Ltd.	1	0.0%	0.0%	100.0%	100.0%	100.0%	0.0%
Sma Nutrition	2	0.0%	0.0%	100.0%	100.0%	100.0%	50.0%
Tanabiki Seimen Co., Ltd	3	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Vietnam Dairy Products	13	0.0%	84.6%	0.0%	0.0%	100.0%	0.0%
Total products that meet labeling requirements on claims	217	2.3% (5)	10.6% (23)	44.2% (96)	64.1% (139)	97.7% (212)	32.7% (71)



Annex 4. Product name and ingredient list clarity*

Company	Number of products	% Products meeting all relevant labeling requirements on ingredient lists	% Products where product name reflects ingredients in descending order as per ingredient list	% Products with % of fruit stated on ingredient list ¹	% Products with % of added water stated on ingredient list ²	% Products with % of protein stated on ingredient list ³
Aldi Stores Ltd.	1	0.0%	0.0%	-	-	-
An An Agri Company	2	50.0%	50.0%	-	-	-
Bean Stalk Snow Co., Ltd	1	100.0%	100.0%	-	-	-
Bellamy's Organic Pty Ltd.	4	25.0%	50.0%	100.0% (2)	0.0% (0)	-
Dana Dairy Group Ltd	16	12.5%	12.5%	66.7% (2)	-	-
Danone	2	0.0%	0.0%	100.0% (1)	-	-
EHK Joint Stock Com.	3	0.0%	0.0%	-	-	-
Elsdofer Molkerei und Feinkostund Feinkost	1	0.0%	100.0%	0.0% (0)	-	-
Friesland Campina	1	0.0%	0.0%	-	-	-
Kraft Heinz Co	35	31.4%	45.7%	71.4% (15)	55.6% (5)	100.0% (2)
HiPP	45	38.6%	44.4%	83.9% (26)	0.0% (0)	75.0% (3)
Il Mangiarsano S.P.A	8	0.0%	0.0%	75.0% (3)	-	-
Ispoon	3	0.0%	0.0%	-	-	-
Kendal Nutricare Ltd.	1	0.0%	0.0%	-	-	-
Konoha LLC	1	100.0%	100.0%	-	-	-
Max Biocare Pty Ltd.	6	33.3%	66.7%	100.0% (2)	0.0% (0)	100.0% (2)
Morinaga & Co., Ltd	2	0.0%	0.0%	-	-	-
Natural Foods and Spices Manufacturing SDN. Bhd.	3	0.0%	0.0%	-	-	-
Nestlé	25	72.0%	72.0%	92.3% (12)	-	-
Nutifood Food JSC	1	100.0%	100.0%	-	-	-
Nutricare Nutrition JSC	9	55.6%	55.6%	100.0% (2)	-	-
ODW Frischprodukte GmBH	4	50.0%	50.0%	-	-	-
Only Organic	4	0.0%	25.0%	100.0% (4)	0.0% (0)	-
Peachy Village Co., Ltd.	1	100.0%	100.0%	-	-	100.0% (1)
Rafferty's Garden	9	25.0%	33.3%	100.0% (8)	0.0% (0)	-
Sai Gon Food	10	40.0%	60.0%	-	0.0% (0)	90.0% (9)
Sainsbury's Supermarket Ltd.	1	0.0%	0.0%	-	-	-
Sma Nutrition	2	50.0%	50.0%	-	-	-
Tanabiki Seimen Co., Ltd	3	33.3%	33.3%	-	-	-
Vietnam Dairy Products	13	84.6%	84.6%	100.0% (1)	-	-
Total products that meet all labeling requirements on product name and ingredient list clarity t	217	37.7% (82)	45.2% (98)	83.9% (78)	14.3% (5)	89.5% (17)

* Note where no value is presented, the ' - ' indicates that the NPM requirement was not applicable to the company's CPCF product type(s).¹All products excluding category 2.3 products were assessed against this question.

² All products excluding category 1 and 4 products were assessed against this question.

³Only categories 2.6, 2.7, and 3 products were assessed against this standard.



Annex 5. Messages on blended/puréed products and products with spouts*

Company	Number of blended/puréed products	% Products with maximum recommended age of use of 12 months ¹	Number of products with spouts	% Products with spout stating not to suck from the container ²	% Products with spout warning that cap is a choking hazard ²
Bellamy's Organic Pty Ltd	3	0.0%	3	0.0%	100.0%
Elsdofer Molkerei und Feinkostund Feinkost	1	0.0%	-	-	-
Kraft Heinz Co.	16	6.3%	5	0.0%	100.0%
HiPP	25	0.0%	8	0.0%	100.0%
Max Biocare Pty Ltd.	6	0.0%	6	0.0%	0.0%
Nutricare Nutrition JSC	1	0.0%	-	-	-
ODW Frischprodukte GmbH	4	0.0%	-	-	-
Only Organic	4	0.0%	4	0.0%	100.0%
Peachy Village Co., Ltd.	1	0.0%	1	0.0%	100.0%
Rafferty's Garden	9	0.0%	8	0.0%	100.0%
Sai Gon Food	9	0.0%	-	-	-
Total products that meet applicable labeling requirements	79	1.3% (1)	35	0.0% (0)	82.9% (29)

*Note where no value is presented, the '-' indicates that the NPM requirement was not applicable to the company's CPCF product type(s).

¹Only category 2 products (n=79) were assessed against this requirement.

²Only category 2 products with spouts (n=35) were assessed against these criteria.

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