

ACCESS TO  
**NUTRITION**  
INITIATIVE

# CF Marketing Index 2024

**March 2024**

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## Acknowledgement

This report is being supported by the Bill & Melinda Gates Foundation and the Foreign, Commonwealth and Development Office. The writing of this report, the underlying methodology development and the research were conducted by the Access to Nutrition Initiative Infant and Young Child Nutrition project team, which consists of Efi Chatzinikolaou, Lucy Cosenza, Daniela Hernández Morales, Ludovica Ibba, Nadine Nasser, Marina Plyta, Irene Santoro, and Mark Wijne. We would also like to thank colleagues for their support in various steps of the process: Babs Ates, Freddie von Kaufmann, Eaindra Aye, Aurélie Reynier, Omari Palmer, Vrinda Poojari, and Philip Eisenhart as well as Juliana Constantino, who supported the research as part of her internship at ATNI. The ATNI team drew on the expertise and advice of the ATNI BMS expert group members Elizabeth Zehner, Laurence Grummer-Strawn (observer), Linda Meyers, Shelly Sundberg, and Shiriki Kumanyika and would like to thank them for their valuable input throughout this research and the underlying methodology. The views expressed in this report, however, do not necessarily reflect the views of the group's members or their institution. Underlying data for the country studies has been sourced from Digimind, Innova Market Insights, and Nielsen Ad Intel International under license.

ATNI would like to thank Kummer & Herman and Studio September for design, Wren Media for editing and proofreading, 73Bit for setting up the data platform and M&C Saatchi for communications.

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Pages: 56

# Contents

<b>About the Access to Nutrition Initiative</b>	<b>6</b>
<b>Executive summary</b>	<b>7</b>
<b>1. Introduction</b>	<b>10</b>
<b>2. Context</b>	<b>11</b>
2.1 The importance of optimal infant and young child nutrition	11
2.2 Why is the use of commercial complementary foods (CF) increasing?	11
2.3 International recommendations on complementary feeding	12
<b>3. Approach to company assessment</b>	<b>14</b>
<b>4. Companies' overall performance against the Code</b>	<b>16</b>
<b>5. Detailed results: CF country studies</b>	<b>17</b>
5.1 Introduction to the CF country assessments	17
5.2 Country selection	17
5.3 Company presence	17
5.4 Scope of the CF country studies	20
5.5 Scoring	20
5.6 Data verification	21

5.7 CF country studies: combined results	21
5.7.1 Online monitoring results	25
5.7.2 Traditional media monitoring results	30
5.7.3 Product label results	31
5.8 Conclusions and recommendations	34
5.9 Limitations of the CF Country Studies	35
<b>6. Detailed results: CF corporate profile</b>	<b>36</b>
6.1 Companies' policies	36
6.2 Companies' engagement	36
6.3 Are companies' policies aligned to the Code across topics?	37
6.4 Geographic penalty and final scores	45
6.5 Conclusions on CF corporate profile	46
<b>7. Conclusions and recommendations</b>	<b>48</b>
<b>Annex 1: Recommendations</b>	<b>50</b>
<b>References</b>	<b>52</b>

## Abbreviations

<b>ATNI</b>	Access to Nutrition Initiative
<b>BMS</b>	Breast-milk substitute
<b>CF</b>	Complementary food
<b>COMMIT</b>	Consortium for Improving Complementary Foods in Southeast Asia
<b>IFBA</b>	International Federation of Biosafety Associations
<b>IYCF</b>	Infant and young child feeding
<b>NGO</b>	Non-governmental organization
<b>NPPM</b>	Nutrient and Promotion Profile Model
<b>PAHO</b>	Pan American Health Organization
<b>UNICEF</b>	United Nations Children's Fund
<b>WHA</b>	World Health Association
<b>WHO</b>	World Health Organization

# About the Access to Nutrition Initiative

The Access to Nutrition Initiative (ATNI) is a global nonprofit established in 2013 to transform markets so they provide more nutritious, affordable, and sustainable foods for all. ATNI empowers key actors in the global food system and at national levels – especially industry and investors – to accelerate access to nutritious, affordable, and sustainable foods for all. ATNI – which is funded by governments and philanthropies – is dedicated to objectively assessing and improving the contribution made by the private sector to addressing global nutrition challenges. ATNI does this by designing and regularly publishing various indexes and other private sector accountability tools. These indexes and tools measure and track, over time, the extent to which companies are working to increase consumers' access to healthy foods and responsibly exercising their influence on consumer choice and behavior.

# Executive summary

**Complementary foods (CF, see box below) should provide sufficient energy, micronutrients, and protein to cover a child’s nutrient and energy needs, together with breastmilk.** Commercially produced food products that are promoted as appropriate for children between six months and three years of age – including instant cereals, porridges, puréed foods, food in pouches, snacks and ready-to-eat or instant meals – are known as “commercially produced complementary foods.” Over the last decade, there has been substantial global growth in the commercial CF market<sup>1</sup>. Global retail sales

of CF products were estimated to amount to almost USD 18 billion in 2021. Continued growth is expected, reaching a total market value of over USD 26 billion by 2028.<sup>2,3</sup>

This CF Marketing Index 2024 is the first standalone Access to Nutrition Index on companies that produce and distribute CF. It builds on a decade-plus of ATNI experience assessing compliance of companies that sell baby foods with the 1981 International Code of Marketing of Breast-milk Substitutes (‘the Code’). The Code provides guidelines for the responsible marketing of breast-milk substitutes (BMS), including commercial CF for infants and young children. The NetCode protocol/toolkit and the World Health Organization (WHO) Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children were used as reference for this research.

The CF Marketing Index 2024 assesses ten of the largest companies that sell CF products, and for which CF amount to at least 5% of their estimated global baby food sales. Together, these companies are estimated to account for 49% of the global sales of commercial CF products. This Index has two components weighing in equally to a total CF score: a Corporate Profile assessment of the quality of companies’ CF marketing policies, management systems and their level of transparency; and a Country Study

March 2024

assessment of marketing practices in five global markets (China, Germany, Indonesia, Viet Nam, and the US). For this research ATNI assessed compliance with the International Code of Marketing of Breast-milk Substitutes, relevant subsequent WHA resolutions and WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children. ATNI did not assess compliance with local regulations or laws.

Social listening tools were used to monitor companies’ online marketing activities to determine their level of compliance with the Code and WHA Resolution 69.9, identifying paid advertisements and promotions for CF products across websites, social media, and retail platforms. Traditional media were monitored to evaluate advertisements on broadcast media (TV and radio) and print. Product labels were reviewed based on images obtained from a third-party database and, in some cases, pictures provided by companies. The assessment period for each method varied, with social listening spanning eight weeks, traditional media monitoring up to six months, and the product label review targeting products launched between March 2020 and February 2023.

ATNI also conducted related research in 2023, applying the WHO Nutrition Promotion and Profiling Model to assess labelling practices as well as the nutritional quality of CF in ten markets around the world. The results of this work can be found [here](#).

**None of the companies was found to be fully compliant with the Code and guidance on appropriate promotion of foods for infants and young children in policies and practice.** The highest total CF score is 25% for *Hain Celestial*. *Danone* scored 23%, *Nestlé* 20%, and *Beingmate*, *Lactalis* and *Vinamilk* each scored 17%, while *HiPP* scored 11%. Three companies (*Hero*, *Kraft Heinz* and *Progress*) each scored 0%.

For the Corporate Profile assessment none of the companies had a specific CF marketing policy covering CF products intended for infants 6-36 months. The companies’ scores across nine topics ranged from 0% to 21%. None of the companies showed commitments on ‘marketing messages’

(0%), and 'avoidance of cross-promotion' (0%), whereas on 'guiding principles for Infant and Young Child Feeding' (21%), 'implementation and monitoring' (14%), and 'lobbying and influencing' (14%) companies showed more commitments. *Danone*, *HiPP*, *Nestlé* and *Kraft Heinz* showed more commitments across the nine topics compared to the other companies. All companies obtained a geographic 'penalty' of 90% because no information was found or presented on if and how commitments are upheld in companies' markets around the world. The average corporate profile score was 3.5%, dropping to 0.4% after the geographic penalty was applied. *Danone* had the highest score (1%) followed by *Nestlé* (0.8%), *HiPP* (0.7%) and *Kraft Heinz* (0.5%). The other companies had scores less than 0.2%.

Marketing practices were assessed for nine out of the ten [90]. The combined overall score for marketing practices in the five specific markets shows an average score of 30% across all companies, marketing channels and labels assessed. This indicates substantial room for improvement in adherence to the Code [90] and the WHO guidance on ending inappropriate promotion of foods.

None of the companies assessed achieved complete compliance with the Code in any of the countries included in this study. *Hero* and *Kraft Heinz* scored 0% on average, indicating more than 20 observations of non-compliance. *HiPP*, *Lactalis*, *Beingmate* and *Vinamilk* scored between 22% (*HiPP*) and 33% (the other three). *Hain Celestial*, *Danone* and *Nestlé* obtained average scores of 50%, 44% and 40%, respectively, indicating less than 20 observations of non-compliance.

A total of 449 incidences of inappropriate baby food marketing not compliant with the Code and WHO guidance were identified across all companies in the five markets they were assessed in. These incidences were almost evenly distributed across product labels (239) and online channels (205), while only five occurrences were found in traditional media. A total of 155 incidences of non-compliance with the Code concerned CF products sold by *Nestlé*, and in descending order 90 incidences were observed for *HiPP*, 65 for *Kraft Heinz*, 52 for *Hero*, 39 for *Danone*, 14

incidences for *Hain Celestial*, 12 for *Beingmate* (all in China), 11 for *Lactalis*, and 11 for *Vinamilk* (all in Viet Nam).

The CF Marketing Index 2024 reveals that companies, investors, policymakers, and civil society organizations must double down on their efforts towards optimal infant and young child nutrition and to achieve nutrition goals. These include goals set by the WHO for 2025 to achieve higher levels of exclusive breastfeeding globally, combat growing levels of overweight and obesity and reduce deaths and illness from diet-related chronic diseases. Compliance with the Code and adherence to WHO guidance on ending inappropriate promotion of foods for infants and young children, and following national legal measures is critical in order to achieve these goals.

### Companies assessed in the CF Index





**Excerpt from the 2023 World Health Organization (WHO) Guideline for complementary feeding of infants and young children 6–23 months of age**

“Complementary feeding, defined as the process of providing foods in addition to milk when breast milk or milk formula alone are no longer adequate to meet nutritional requirements, generally starts at age 6 months and continues until 23 months of age. This is a developmental period when it is critical for children to learn to accept healthy foods and beverages and establish long-term dietary patterns. It also coincides with the peak period for risk of growth faltering and nutrient deficiencies. The World Health Assembly endorsed a comprehensive implementation plan for maternal, infant and young child nutrition, which includes three targets for 2025 that directly relate to appropriate complementary feeding, essential to fostering healthy growth: 1) 40% reduction in the number of under-5s who are stunted; 2) reduce and maintain childhood wasting to less than 5%; and 3) no increase in childhood overweight. Appropriate complementary feeding is also fundamental to achieving several of the targets in the second Sustainable Development Goal to achieve zero hunger by 2030.”

# 1. Introduction

The Access to Nutrition Initiative (ATNI) is dedicated to objectively assessing and improving the contribution made by the private sector to addressing global nutrition challenges. ATNI does this by designing and regularly publishing various indexes and other private sector accountability tools. These indexes and tools measure and track, over time, the extent to which companies are working to increase consumers' access to healthy foods and responsibly exercising their influence on consumer choice and behavior.

One of ATNI's core activities is assessing the extent to which companies that make formulas and foods for infants and young children market their products in line with the prevailing international gold standard: the 1981 International Code of Marketing of Breast-milk Substitutes, including all subsequent, relevant World Health Assembly (WHA) resolutions up to WHA 71.9, collectively referred to hereinafter as 'the Code'. The Code lays provisions on the responsible marketing of breast-milk substitutes (BMS) and complementary foods (CF). For the purpose of this report, focused on the assessment of industrial food products, when the term complementary foods or the acronym CF is used, it refers to commercially or industrially produced CF.

Having been provided additional funding, and based on the input of stakeholders, ATNI expanded the coverage of this assessment to include the 20 largest companies in the global baby food segment, 18 of which sell BMS products contributing to at least 5% of their estimated global baby food sales. Of these 18 companies, 10 also sell CF products that contribute 5% of their estimated global baby food sales at minimum; while, for two other companies, their estimated global baby food sales are mainly of CF products. Given the variation in the companies' portfolios and the differences in marketing requirements (BMS marketing is subject to stricter provisions than CF marketing), ATNI is presenting the assessments in this iteration in two separate indexes: the BMS Marketing Index 2024 and the

CF Marketing Index 2024. The division of the assessments was broadly welcomed by stakeholders during consultations that took place in 2022.

As the company scope has expanded for the BMS and CF Marketing Indexes 2024 (from nine companies in 2021 to 20 companies for this assessment), the geographic variability of the companies' markets warranted the selection of a minimum of five countries (compared to only two countries in prior country study assessments), to ensure each of the 20 companies is assessed on BMS/CF marketing in at least one country. The increased number of companies and countries assessed for the BMS and CF Marketing Indexes 2024, as well as the division of the BMS and CF marketing assessments, warranted several adjustments to the methodology. ATNI undertook an [extensive consultation process](#) during which these changes were discussed.

This report presents the results of the CF Marketing Index 2024, ATNI's second comprehensive assessment of the marketing policies and practices of the world's largest companies selling CF products to determine in how far they comply with the Code. In addition to this report, ATNI publishes [company scorecards](#) and [country study reports](#) where the results are described in more detail by company and by country, respectively.

For companies assessed on both the BMS and CF Marketing Indexes 2024, the results are presented separately for each assessment and will not be combined, as was done in the BMS/CF Marketing Index 2021.

Companies are expected to play their part in contributing to optimal infant and young child nutrition and achieving nutrition goals – particularly those set by the World Health Organization (WHO) for 2025 and national governments to combat growing levels of overweight and obesity and reduce deaths and illness from diet-related chronic diseases – by complying with the Code and relevant national legal measures.

## 2. Context

### 2.1 The importance of optimal infant and young child nutrition

Nutrition plays a fundamental role in children's development within the first 1,000 days of life (from conception to age two).<sup>4</sup> The World Health Organization (WHO) recommends that infants everywhere be exclusively breastfed for the first six months, after which point safe, adequate, and nutrient-rich foods, also known as complementary foods (CF), should be introduced when breastmilk or milk formula alone are no longer adequate to meet the nutritional requirements of growing infants. This period is known as complementary feeding, which generally starts at the age of six months and lasts up to 23 months of age, although breastfeeding may continue beyond this period, as recommended by WHO.<sup>5</sup> WHO also notes CF, homemade or commercially produced, should not be given as a breast-milk substitute (BMS) to infants below six months of age.

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 overlooked. The complementary feeding period is critical to prevent all forms of childhood malnutrition, including stunting, wasting, micronutrient deficiencies, overweight, obesity, and diet-related non-communicable diseases.<sup>6</sup> CF of poor nutritional quality, like those high in sugar and calories, can contribute to weight gain, while those of suitable nutritional quality have the potential to reduce stunting in young children.<sup>7</sup> These foods should have appropriate energy density, macronutrient levels, and micronutrient levels, either inherently or through fortification, to provide all of the vitamins and minerals essential for healthy development.<sup>8</sup> Poor quality and quantity of nutrition sources during this period are related to lifelong consequences on survival, growth, and optimal development.<sup>9,10</sup> The latest United Nations Children's Fund (UNICEF) estimates show that,

globally, in 2021, only 18% of older infants and young children between 6-23 months of age consumed a minimum acceptable diet sufficient in diversity and frequency, as per complementary feeding recommendations.<sup>11</sup>

Often, low-nutrient CF can lead to increasing prevalence of obesity and risk of diet-associated non-communicable disease in children.<sup>12,13</sup> Food additives and artificial sweeteners found in some CF may be linked to greater sugar consumption later in life.<sup>14</sup> The flavor, texture, and appearance of CF (i.e., sweet and salty taste, soft foods, 'ready to eat' snacks) are linked with unfavorable outcomes – including influencing preferences and habits of children later in life towards liking processed foods, eating and consuming calories too quickly, hindering progression to foods with different textures, and reluctantly accepting the original version of foods.<sup>15,16</sup> In addition, confectionary products (i.e., biscuits, wafers, and puffs, among others) can encourage snacking while simultaneously impeding children from consuming diverse foods rich in essential nutrients.<sup>17</sup>

The inappropriate promotion of CF for children younger than six months of age has also been linked to earlier termination of exclusive breastfeeding. Additionally, the cross-promotion of a company's BMS products on the labeling of CF can create further confusion.<sup>18</sup>

### 2.2 Why is the use of commercial complementary foods (CF) increasing?

Over the last decade, there has been substantial global growth in the CF market.<sup>19</sup> Global retail sales of CF products were estimated to amount to

almost USD 18 billion in 2021<sup>a</sup>. The global CF market is forecast to see continued growth, reaching a total market value of over USD 26 billion by 2028. This market expansion caused WHO and UNICEF to raise global doubt about the suitability of some CF products for infants and young children.<sup>20,21</sup>

CF choices can be influenced by diverse factors, including conventional cultural practices, societal norms, food availability, affordability, knowledge sources, and awareness of caregivers on appropriate feeding practices for older infants and young children.<sup>22,23</sup> Preparing foods at home with locally available ingredients is a common practice to help meet the growing nutrient needs of children. However, families are increasingly providing older infants and young children with more convenient and processed options, such as CF, due to rapid urbanization and the modern world.<sup>24</sup> For instance, in low- and middle-income countries, families are increasingly moving to cities and access to nutritious, safe, affordable, and sustainable diets is constrained.<sup>25</sup> Barriers including inequities, increasing cost of nutritious foods, lack of resources, and poor access to clean water can further constrain families' diets.<sup>26</sup> Additionally, more women are joining the workforce, meaning their available time to prepare healthy homemade foods is restricted.<sup>27</sup> Yet, CF of poor nutritional quality are generally lower in essential nutrients and higher in calories, sugar, salt, and unhealthy fats. These CF should be avoided, as they can displace healthier foods, and may be associated with undernutrition, overweight, and adverse cardiometabolic outcomes.<sup>28</sup>

A recent study (2023) of mothers surveyed in five Southeast Asian countries revealed that more than one-third of them gave commercial CF to their 6-23-month-old child at least once a day, and almost half of mothers fed their child such products at every or most feedings or meals. While factors such as convenience and affordability influenced the purchase of these products, the mothers reported that the perceived nutritional benefits of commercial CF

were a primary reason in resorting to these foods.<sup>29</sup> Inappropriate marketing of commercial CF can undermine the value of homemade foods, discourage caregivers from feeding children a diverse diet, create dependency on commercial products for nutrition sources, and affect taste preferences.<sup>30,31</sup>

. Addressing these barriers and supporting caregivers is necessary to ensure growing infants receive healthy and enriching diets. Countries should have strong legislation in place to curb inappropriate corporate marketing of CF, and companies should ensure their CF products are marketed responsibly in line with public health recommendations.

## 2.3 International recommendations on complementary feeding

Since global guidelines and standards for the production and marketing of CF were developed decades ago, namely by Codex Alimentarius, the market has grown and the marketing landscape has evolved. Therefore, current regulations addressing CF product composition and labeling are outdated and insufficient,<sup>32</sup> resulting in the inappropriate promotion of foods for infants and young children.

In 2016, the World Health Assembly (WHA) approved the WHO Guidance on Ending Inappropriate Promotion of Foods for Infants and Young Children. This guidance was developed with the aim of protecting breastfeeding, preventing obesity and chronic diseases, promoting a healthy diet, and ensuring caregivers receive clear and accurate information on feeding infants and young children. This guidance, supported by WHA Resolution 69.9, introduced recommendations for the appropriate marketing of commercial CF for older infants and young children between six months and three years of age. The guidance includes recommendations around which messages should be present in various forms of CF marketing (advertising,

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<sup>a</sup> Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data,

promotions, labels) to support optimal infant and young child feeding (IYCF), and which are inappropriate and could undermine recommended practices. Other recommendations address conflicts of interest in healthcare settings that should be avoided by companies selling CF products, as well as cross-promotion, whereby companies that sell both BMS and CF should refrain from indirectly promoting BMS through their CF products.

In response to Recommendation 3 of the WHA 69.9 supported guidance, WHO's regional office for Europe published the Nutrient and Promotion Profile Model (NPPM) in 2022, which is currently the first and only official model specific to profiling commercial CF on both their nutritional quality and labeling practices. The model was developed to help implement WHO guidance for CF, drive product reformulation and re-packaging, and update guidelines and legislation.<sup>33</sup>

Countries are required to legislate laws and regulations that are updated in accordance with the latest international guidance on CF from WHO and UNICEF, and rigorously monitor compliance with globally recognized standards. WHA Resolution 69.9 called upon manufacturers and distributors of foods for infants and young children to end all forms of inappropriate promotion, as set forth in the recommendations of the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children. CF companies' demonstration of their commitment to the resolution through responsible marketing practices is important to protect breastfeeding, support optimal nutrition, and safeguard the health of growing infants and young children.

### 3. Approach to company assessment

The 10 companies assessed in ATNI's CF Marketing Index 2024 represent 49% of the global CF market.<sup>b</sup> The companies are assessed on two main components:

- The Country Studies assessment, which measures companies' marketing practices in selected countries. For this Index, five countries were selected, representing the companies' primary baby food markets: China, Germany, Indonesia, Viet Nam, and the US.
- The Corporate Profile assessment, which examines global corporate policies and procedures and disclosure levels.

The Corporate Profile and Country Studies evaluate the extent to which company policies and practices align with the various provisions of the Code. While the Corporate Profile assesses company policies and commitments on all aspects of the Code, the Country Studies evaluates marketing practices against specific provisions of the Code.

The **CF Marketing Index** assesses the marketing of commercial complementary foods (CF). These include baby porridge and cereals, dairy/fruit/vegetable-based baby purées, savory meals, and snack foods, as well as baby teas, juices, and water for infants and young children aged 6-36 months.

CF products marketed to infants aged under six months are considered unwanted breast-milk substitutes (BMS), as these interfere with exclusive breastfeeding in the first six months. However, ATNI assesses these

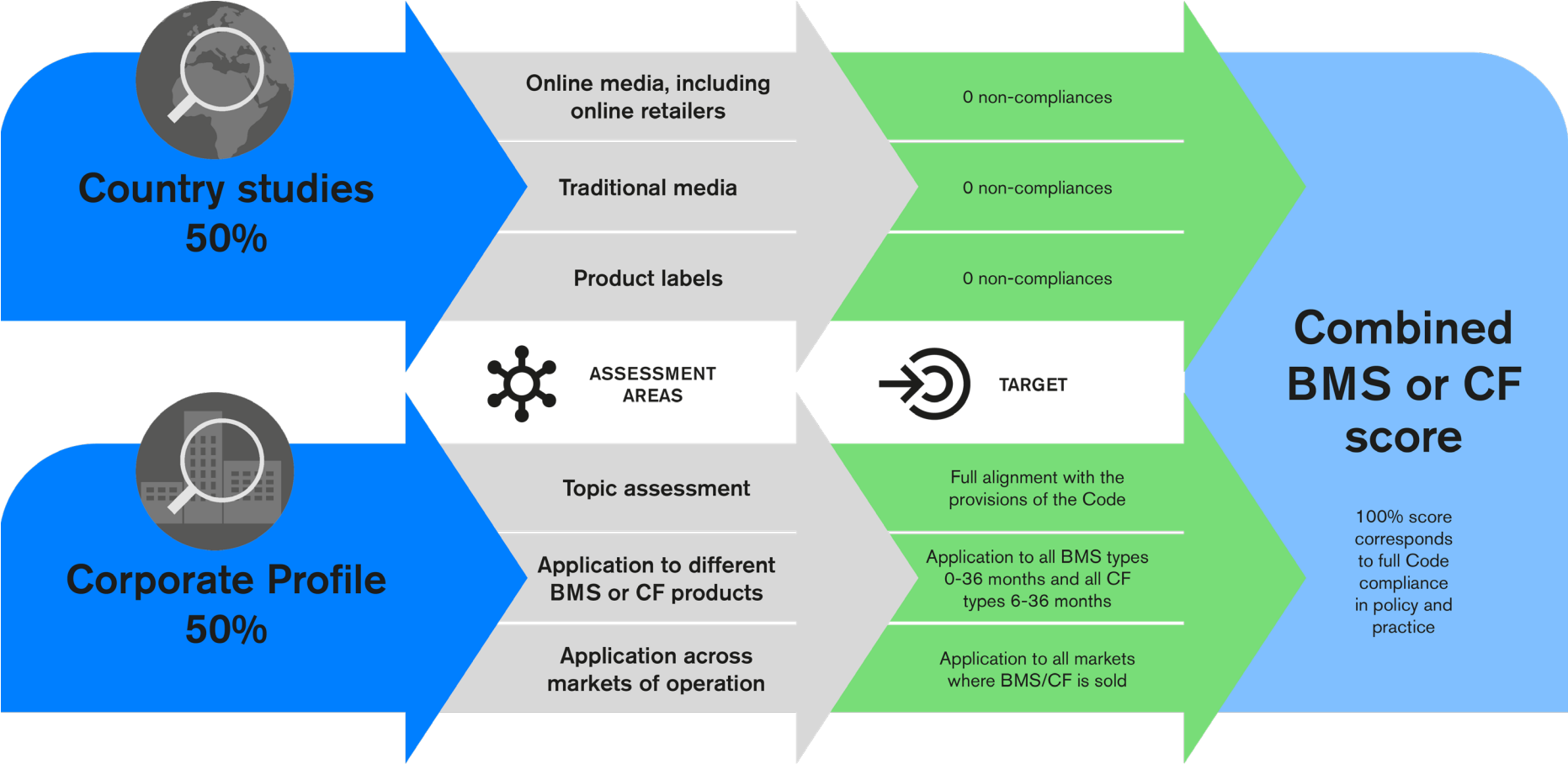
products in the CF Marketing Index rather than the BMS Marketing Index, to emphasize that CF products are intended for older infants and young children aged 6-36 months, and should not be introduced to infants aged under six months who should be exclusively breastfed.

The [methodology](#) for the BMS and CF Marketing Indexes 2024 includes additional information about the companies selected and the respective Index(es) they are assessed in, as well as the basis and nature of the assessments for each component and how they feed into the overall Indexes.

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<sup>b</sup> Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data,  
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Figure 1. ATNI's methodology for the CF Marketing Index



## 4. Companies' overall performance against the Code

The overall results of the Complementary Foods (CF) Marketing Index 2024 are set out in **Table 1**, alongside the Country Studies score and Corporate Profile score. Each Country Studies score and Corporate Profile score contributes to half of the total combined CF score – except for Progress. As Progress doesn't sell CF in any of the five countries selected for this Index (China, Germany, Indonesia, the US, and Viet Nam), it was not assessed on this component and its total CF score is therefore only based on its Corporate Profile score.

A total CF score of 100% corresponds to full compliance in both policy and practice with the Code, specifically the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9.

A score of 100% on the Country Studies corresponds to full compliance with specific provisions of the Code that were assessed as part of this research, whereas a score of 0% indicates at least 20 incidences of Code non-compliance identified in each of the markets assessed.

A score of 100% on the Corporate Profile corresponds to full compliance with the Code, whereas a score of 0% indicates no policy or related commitments that align with the Code were found.

As seen in **Table 1**, none of the companies were found to be fully compliant with the Code in policy nor practice. The highest total CF score is 25% for *Hain Celestial*, while *Danone* scored 23%; *Nestlé* 20%; *Beingmate*, *Lactalis*,

and *Vinamilk* each scored 17%; and *HiPP* scored 11%. Three companies (*Hero*, *Kraft Heinz*, and *Progress*) each scored 0%.

There is notable variation in a company's performance on the Corporate Profile and Country Studies components. All 10 companies scored 1% or less on the Corporate Profile, but had higher scores on the Country Studies assessment, ranging from 22% up to 50%, except for two companies which received 0%. The higher Country Studies scores are likely due to the fact that these companies were either assessed in fewer markets or had relatively lower shares of the CF market. However, all marketing practices of commercial CF assessed in the Country Studies were found to have at least one incidence of non-compliance with the Code, in particular with the recommendations of the WHA 69.9 supported guidance. These findings also reflect the notable gap in company policies and guidelines dedicated to the responsible marketing of CF, in line with WHO guidance, as evidenced by the Corporate Profile assessment.

Companies' performances in each of the components, Country Studies and Corporate Profile, is described in further detail in the next sections.

**Table 1. Total combined CF scores per company**

Companies	Country Studies score	Corporate Profile score	Total combined score
Beingmate	33.0%	0.2%	16.6%
Danone	44.0%	1.0%	22.5%
Hain Celestial	49.5%	0.1%	24.8%
Hero	0.0%	0.0%	0.0%
HiPP	22.0%	0.7%	11.3%
Kraft Heinz	0.0%	0.5%	0.2%
Lactalis	33.0%	0.1%	16.5%
Nestlé	39.6%	0.8%	20.2%
Progress	N/A	0.1%	0.1%
Vinamilk	33.0%	0.1%	16.5%

Note: Progress doesn't sell CF in the five countries assessed in this Index



## 5. Detailed results: CF country studies

### 5.1 Introduction to the CF country assessments

This section presents a summary of the five in-country assessments carried out in China, Germany, Indonesia, Viet Nam, and the US by ATNI for the Complementary Food (CF) Marketing Index 2024. The purpose of these studies was to assess, within the selected markets, companies' compliance with the Code, namely recommendations 4, 5, and 6, of the guidance on ending the inappropriate promotion of foods for infants and young children supported by WHA Resolution 69.9, which address the public promotion of CF and their appropriate labeling. Detailed information on companies' performance in each country is presented in ATNI's country reports, [available here](#).

### 5.2 Country selection

Five countries were chosen for this CF marketing assessment. The increase in the number of on-the-ground assessments from the previous Breast-milk Substitute (BMS) and CF Marketing Indexes, published in 2021, which included Mexico and the Philippines ([available here](#)), reflects the broader scope and geographic variability of the CF Marketing Index 2024.

The selected countries were China, Germany, Indonesia, Viet Nam, and the US. The selection process aimed to capture each of the 20 companies assessed on the BMS and CF Marketing Indexes in at least one of their primary baby food markets, representing between 10% and 100% of their global baby food market share. Additionally, the aim was to ensure a balanced representation, considering other factors like exclusive

breastfeeding rates, national Code implementation, and practical considerations such as safety.

### 5.3 Company presence

In-country assessments were carried out for nine out of the 10 companies in scope for the CF Marketing Index 2024. *Progress* only sells CF products in Russia and limitations prohibited conducting country assessments in that market.

In total, six companies were assessed in China, five in the US, four in Germany, three in Viet Nam, and two in Indonesia. **Table 2** illustrates companies' presence in each country. *Nestlé* was the only company to be present in all five selected countries. *Danone* and *HiPP* were assessed in three of these countries, while *Hain Celestial*, *Hero*, and *Kraft Heinz* sell CF products in two of the five countries assessed. Finally, *Lactalis*, *Beingmate*, and *Vinamilk* were only assessed in one country each.

**Table 2. Summary of company presence**

	Beingmate	Danone	Hain Celestial	Hero	HiPP	Kraft Heinz	Lactalis	Nestlé	Vinamilk
China	✓	✓	✓		✓	✓		✓	
Germany		✓		✓	✓			✓	
Indonesia						✓		✓	
US		✓	✓	✓			✓	✓	
Viet Nam					✓			✓	✓

**Table 3** presents the companies' estimated CF market shares per country, and the proportion of their estimated global CF sales in these markets.

The five selected countries represent at least 13% and up to 100% of the companies' estimated global CF sales.

- In China, the six companies assessed account for over 22% of the country's total CF market, with *Nestlé* holding the highest market share (~14%).
- In Germany, the total CF market share accounted for by the four assessed companies amounts to more than 56%. Among these, *HiPP* is a key player, with a market share of an estimated 44%, representing an estimated 40% of the company's global CF sales.
- In Indonesia, *Nestlé* holds a high CF market share (~22%) and, together with *Kraft Heinz*, accounts for an estimated 30% of the total CF market in this country.
- In the US, *Nestlé* dominates the CF market, with an estimated share of almost 40%, contributing to 25% of the company's global CF sales. The US is *Lactalis*' main CF market, despite the company holding relatively lower shares in the US CF market. The total CF market share accounted for by the five companies assessed in the US is over 54%.

- In Viet Nam, *Vinamilk* holds a larger proportion of the CF market among the three companies assessed in the country, with a share of 37%. The total CF market share attributed to these companies amounts to approximately 71%. *Vinamilk* only sells CF in Viet Nam.

**Table 3. Estimated CF market shares per country\***

	China		Germany		Indonesia		US		Viet Nam		Estimated combined share of the company's global CF sales
	CF market share	Proportion of global CF sales	CF market share	Proportion of global CF sales	CF market share	Proportion of global CF sales	CF market share	Proportion of global CF sales	CF market share	Proportion of global CF sales	
<b>Beingmate</b>	< 5%	100%	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	100%
<b>Danone</b>	No information	No information	12%	6%	N/A	N/A	< 5%	7%	N/A	N/A	13%
<b>Hain Celestial</b>	< 5%	20%	N/A	N/A	N/A	N/A	10%	48%	N/A	N/A	68%
<b>Hero</b>	N/A	N/A	< 5%	< 5%	N/A	N/A	6%	27%	N/A	N/A	30%
<b>HiPP</b>	< 5%	8%	44%	40%	N/A	N/A	N/A	N/A	10%	< 5%	52%
<b>Kraft Heinz</b>	8%	34%	N/A	N/A	8%	< 5%	N/A	N/A	N/A	N/A	36%
<b>Lactalis</b>	N/A	N/A	N/A	N/A	N/A	N/A	< 5%	100%	N/A	N/A	100%
<b>Nestlé</b>	14%	15%	No information	No information	22%	< 5%	38%	25%	24%	< 5%	43%
<b>Progress</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Vinamilk</b>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	37%	100%	100%
<b>Total CF market share per country</b>	>22%		>56%		30%		>54%		71%		

\* Euromonitor International Limited, Dairy Products and Alternatives Edition, 2021 data, © All rights reserved

Note: N/A indicates that the company does not sell in this country.

## 5.4 Scope of the CF country studies

The 2024 in-country assessments review marketing practices primarily through online points-of-sale, traditional and online media outlets, and product labels. Data collection utilizes adapted forms from the 2017 NetCode toolkit, focusing on compliance with the Code and specifically with WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9. Due to increased company and country assessments, online tools were employed for data collection.

The assessment methods include social listening, traditional media monitoring, and reviewing product labels.

Social listening involves monitoring companies' online marketing activities to determine their level of compliance with the Code, by identifying paid advertisements and promotions for CF products across websites, social media, and online retail platforms. Traditional media monitoring evaluates advertisements across broadcast media and print for compliance with the Code. Product labels were reviewed based on a third-party database's product information and assessed for compliance with the Code. ATNI's country studies do not assess against local regulations. The assessment period for each method varied, with social listening spanning eight weeks between May 12 2023 and July 6 2023; traditional media monitoring a total of six months, between January 1 2023 and June 30 2023; and product label reviews targeting products launched between March 2020 and February 2023.

More information on the assessment methods can be found in the country reports and in ATNI's full methodology for the BMS and CF Marketing Indexes 2024.

## 5.5 Scoring

The country scores are based on the sum of observed incidences of non-compliance across the three assessment methods, with higher observed incidences of non-compliance indicating lower compliance with the Code, specifically WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9, and result in lower scores. Conversely, full compliance is achieved when no incidences of non-compliance are observed across online and traditional media and product labels. No differential weighing is applied to the findings across different forms of marketing. Hence, levels of non-compliance were determined solely by the number of incidences of non-compliance, rather than by the normalized score, as calculated in previous methodologies.

The resulting score is thus calculated by:

- Aggregating the total number of incidences of non-compliance with the Code identified in each country
- Assigning a rating for the level of compliance in each country and a final percentage score, as shown in **Table 4**, below.

The same level of compliance ranges, as indicated in **Table 4**, were used for all countries in scope, consistent with previous studies. The final CF country score for each company was derived from these compliance ratings, which were averaged across all countries where the company was assessed, except in cases where companies were only assessed in one country.

**Table 4. Company country scores based on observed incidences of non-compliance with the Code\***

Observed incidences of non-compliance with the Code* in a country	BMS or CF country score
0	100%
1-10	66%
11-20	33%
>20	0%

\* Specifically, the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9

## 5.6 Data verification

Upon completion of data collection, ATNI informed all nine companies separately about the assessments and the countries they took place in. As part of ATNI's fact-checking process, each company was requested to confirm if the identified brands correctly represented the markets studied during the research time frame, and to confirm if there were any instances of parallel (illegal) imports, which were subsequently excluded from the assessment. As the verification process entails fact-checks and requests for additional information, it has no influence on the assessments and findings.

For the label assessment, companies were specifically requested in some cases to share additional product information and materials that could not be found in the public domain, if images of product packages were missing or when images available to ATNI were not clear enough to extract the information needed to complete the assessments. Four out of the nine companies assessed confirmed information with ATNI and shared additional information by sending product labels or images. These companies were *Danone*, *HiPP*, *Kraft Heinz*, and *Nestlé*. It should be noted that the additional information on product labels shared by *HiPP* and *Nestlé* was incomplete for some countries.

Companies were also asked to confirm whether they had contractual relationships with parenting websites (targeting parents/caregivers of infants and young children) in situations where company-related incidences of non-compliance were found, and with online retailers where point-of-sale promotions were monitored. As this is an assessment of company practices, ATNI verified if companies had any agreements with parenting websites and online retailers, or influence on their marketing practices, to determine whether the companies were in any way responsible for the findings and if

they should thus be attributed to the company or excluded from the assessments.

Two of the nine companies, *Danone* and *Nestlé*, provided information related to the online findings. The information sent by *HiPP* was incomplete for some countries and was communicated to ATNI after the verification phase.

If companies did not respond to ATNI's requests, all identified incidences of non-compliance were included in the assessments, and where clear images were missing, the label assessments remained incomplete and are noted as such.

During the fact-checking process, companies can review their findings, along with the evidence of all observed incidences of non-compliance in the form of images and screenshots, videos, and links. ATNI follows an independent and transparent approach with the companies to confirm to them ATNI's observations of non-compliance and where they were identified. These details also serve to provide the companies with the information they need to take corrective action.

More detailed information on the companies' level of engagement in relation to the findings on product labels, parenting websites, and online retailers in each country can be found in individual country [reports](#).

## 5.7 CF country studies: combined results

**Table 5** summarizes the number of incidences of non-compliance identified across the total number of products and promotions assessed and the resulting country scores (based on Table 4), as well as the average country score of the companies' performance across the different markets assessed.

**Table 5. Number of incidences of non-compliance and in-country CF scores by company**

Companies	CHINA		GERMANY		INDONESIA		US		VIET NAM		Average country score
	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	Country score (%)	No. of incidences of non-compliance out of total no. of products/pr promotions assessed	
Beingmate	33%	12/12	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33%
Danone	66%	9/9	33%	13/13	N/A	N/A	33%	17/17	N/A	N/A	44%
Hain Celestial	66%	1/1	N/A	N/A	N/A	N/A	33%	13/13	N/A	N/A	50%
Hero	N/A	N/A	0%	22/22	N/A	N/A	0%	30/30	N/A	N/A	0%
HiPP	0%	28/28	0%	53/53	N/A	N/A	N/A	N/A	66%	7/7	22%
Kraft Heinz	0%	29/29	N/A	N/A	0%	36/36	N/A	N/A	N/A	N/A	0%
Lactalis	N/A	N/A	N/A	N/A	N/A	N/A	33%	11/11	N/A	N/A	33%
Nestlé	33%	16/16	66%	2/2	66%	7/7	0%	116/116	33%	12/12	40%
Vinamilk	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	33%	10/10	33%
<b>Total</b>	N/A	<b>95/95</b>	N/A	<b>90/90</b>	N/A	<b>43/43</b>	N/A	<b>187/187</b>	N/A	<b>29/29</b>	<b>30%</b>

Note: N/A indicates that the company does not sell in this country.

Average country scores vary from 0% to 50%, highlighting considerable variation in the number of products and promotions found across different companies and countries, as well as the fact that none of the companies achieved complete compliance with the Code, specifically the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9, in any of the countries assessed in this study.

*Hain Celestial* achieved an average score of 50%, based on the assessment of one CF product label in China and a total of 13 incidences of non-compliance in the US. *Danone* obtained an average score of 44%, resulting from nine observations of non-compliance in China, 13 in Germany, and 17 in the US. For *Nestlé*, whose average score was 40%, fewer than 10 incidences of non-compliance were identified in Germany and Indonesia, fewer than 20 were detected in China and Viet Nam, and more than 100 observations were recorded in the US, where the company holds almost 40% of the CF market share. *Lactalis*, *Beingmate*, and *Vinamilk* each achieved a score of 33% in the US, China, and Viet Nam, respectively, indicating between 10 and 20 incidences of non-compliance. *HiPP* obtained an average score of 22%, resulting from fewer than 10 observations of non-compliance in Viet Nam, 28 in China, and 53 in Germany, its main market. *Hero* and *Kraft Heinz* both scored 0% on average, indicating more than 20 observations of non-compliance in each market they were assessed.

Overall, the largest number of incidences of non-compliance across countries were recorded in the US (187), followed by China (95) and Germany (95). The lowest number of non-compliant marketing practices were identified in Indonesia (43) and Viet Nam (29).

As illustrated in **Table 6**, a total of 449 incidences of non-compliance were identified across all companies in the five markets they were assessed in. Almost half of these observations occurred in online media and retailers (205 out of 449), while only 1% occurred in traditional media (five out of 449). Altogether, these 210 findings relate to non-compliances with the Code that specifically pertain to **Recommendations 4, 5, and 6 of the guidance supported by WHA 69.9**. Approximately 50% of the incidences of non-compliance were identified on product labels (239 out of 449); these relate to non-compliances with the Code associated with **Recommendation 4 of the guidance supported by WHA 69.9**.

The highest number of incidences of non-compliance concerned products sold by *Nestlé*, with a total of 155 observations. Of these, the large majority were found on product labels (98), while the remaining were found on online media (55) and traditional media (two). *HiPP* emerged as the company with the second-highest number of incidences of non-compliance, totaling 90 observations. In this case, incidences of non-compliance were found to be evenly distributed between online platforms (46) and product labels (42). A total of 65 and 52 observations of non-compliance were registered for *Kraft Heinz* and *Hero*, respectively. Products sold by *Kraft Heinz* were found to be promoted mainly online (52), while most observations of non-compliance associated with *Hero* products were identified on labels (36). Thirty-nine incidences of non-compliance were identified for *Danone*, of which 26 were found on product labels and 13 online. The lowest number of non-compliant marketing practices were found for *Hain Celestial* (14), *Beingmate* (12), and *Lactalis* and *Vinamilk* (11 each). These companies were each assessed in only one market, except for *Hain Celestial*, which was assessed in two countries, whereby the company is a smaller player. Although there is some variability in the predominant channels where these incidences of non-compliance have been identified, the majority were detected online and on labels.

**Table 6. Total number of incidences of non-compliance found per company on online media, traditional media, and product labels**

	Labels	Online media and retailers	Traditional media	Total
Beingmate	8	4	0	12
Danone	26	13	0	39
Hain Celestial	9	5	0	14
Hero	36	16	0	52
HiPP	42	46	2	90
Kraft Heinz	13	52	0	65
Lactalis	2	9	0	11
Nestlé	98	55	2	155
Vinamilk	5	5	1	11
<b>Total</b>	<b>239</b>	<b>205</b>	<b>5</b>	<b>449</b>

**Table 7** shows the occurrences of incidences of non-compliance based on product type. More than half applied to **CF products targeted at older infants and young children between six and 36 months of age (CF 6-36)**, with a total of 236 observations, most of which were found on product labels (174). The second highest number of incidences of non-compliance applied to **product brands associated with CF products<sup>c</sup>** (186), most of which were found online (137). Lastly, 27 incidences of non-compliance related to **CF products targeted at infants younger than six months (CF <6)** that were detected both on product labels (21) and online (six). It is important to note that the Code recommends the introduction of CF products no earlier than six months of age to protect exclusive

<sup>c</sup> These relate to observations where no age is specified on a product or no specific product is promoted, but the observation is associated with a CF brand.

breastfeeding in this period. As those products should not be available on the market, they were counted as observations of non-compliance and not assessed on any further indicators that evaluate appropriate marketing practices.

**Table 7. Number of incidences of non-compliance found by country and product type\***

	China	Germany	Indonesia	US	Vietnam	Total
<b>CF &lt;6</b>	<b>0</b>	<b>16</b>	<b>5</b>	<b>3</b>	<b>3</b>	<b>27</b>
Online	0	2	2	0	2	6
Traditional	0	0	0	0	0	0
Label	0	14	3	3	1	21
<b>CF 6-36</b>	<b>61</b>	<b>66</b>	<b>12</b>	<b>78</b>	<b>19</b>	<b>236</b>
Online	36	14	6	5	1	62
Traditional	0	0	0	0	0	0
Label	25	52	6	73	18	174
<b>Product brand</b>	<b>34</b>	<b>10</b>	<b>26</b>	<b>108</b>	<b>8</b>	<b>186</b>
Online	29	8	25	68	7	137
Traditional	0	2	0	2	1	5
Label	5	0	1	38	0	44
<b>Total</b>	<b>95</b>	<b>92</b>	<b>43</b>	<b>189</b>	<b>30</b>	<b>449</b>

\*Product brand relates to observations where no age is specified on a product or no specific product is promoted, but the observation is associated with a CF brand



### 5.7.1 Online monitoring results

**Table 8** summarizes the total number of online promotions detected during the research period related to CF products sold by the nine companies across the five countries assessed. These promotions are subcategorized in occurrences found throughout the web and social media, and those found on retail websites.

A total of 205 online promotions were identified, of which 182 were online ads and 23 were point-of-sale promotions. All 205 online observations had at least one incidence of non-compliance with the Code, specifically with the recommendations of the guidance supported by WHA Resolution 69.9. The highest number of non-compliant online promotions was associated with *Nestlé* CF products, with 55 occurrences across the US, China, Indonesia, and Viet Nam, and *Kraft Heinz* CF products, with 52 occurrences across China and Indonesia. Two online adverts for Kraft Heinz in Indonesia were for CF intended for infants under six months. A total of 46 non-compliant online promotions of CF were found for *HiPP* across China, Germany, and Viet Nam. For *HiPP*, four of these observations related to CF products intended for infants under six months of age (two in Germany and two in Viet Nam).

For CF products sold by *Hero*, *Danone*, and *Lactalis*, the number of non-compliant online promotions found ranged from nine (*Lactalis* in the US) to 16 (*Hero* in the US and Germany). The lowest total number of online marketing practices was registered for *Hain Celestial* (five online promotions in the US), *Vinamilk* (five online promotions in Viet Nam), and *Beingmate*, (four point-of-sale promotions in China).

The results presented in **Table 8** highlight how promotions were primarily found in online media (182): company websites and social media platforms, which included Facebook, Instagram, and YouTube channels. Only two company-sponsored adverts were found on parenting sites, both of which were in the US and related to *Nestlé* CF brands. A smaller proportion of promotions were detected in online retailers.

**Table 8. Summary of promotions found online (media and retailers)**

	Number of non-compliant online promotions out of total promotions found in online media*	Number of non-compliant point-of-sale promotions out of total promotions found in online retailers**	Total number of non-compliant promotions across all promotions found
<b>Beingmate</b>	<b>0</b>	<b>4/4</b>	<b>4/4</b>
China	0	4/4	4/4
<b>Danone</b>	<b>13/13</b>	<b>0</b>	<b>13/13</b>
China	4/4	0	4/4
Germany	7/7	0	7/7
US	2/2	0	2/2
<b>Hain Celestial</b>	<b>5/5</b>	<b>0</b>	<b>5/5</b>
USA	5/5	0	5/5
<b>Hero</b>	<b>16/16</b>	<b>0</b>	<b>16/16</b>
Germany	1/1	0	1/1
US	15/15	0	15/15
<b>HiPP</b>	<b>40/40</b>	<b>6/6</b>	<b>46/46</b>
China	20/20	6/6	26/26
Germany	16/16	0	16/16
Viet Nam	4/4	0	4/4
<b>Kraft Heinz</b>	<b>44/44</b>	<b>8/8</b>	<b>52/52</b>
China	15/15	8/8	23/23
Indonesia	29/29	0	29/29
<b>Lactalis</b>	<b>9/9</b>	<b>0</b>	<b>9/9</b>
US	9/9	0	9/9
<b>Nestlé</b>	<b>50/50</b>	<b>5/5</b>	<b>55/55</b>
China	8/8	0	8/8
Indonesia	4/4	0	4/4
US	37/37	5/5	42/42
Viet Nam	1/1	0	1/1
<b>Vinamilk</b>	<b>5/5</b>	<b>0</b>	<b>5/5</b>
Viet Nam	5/5	0	5/5
<b>Total</b>	<b>182/182</b>	<b>23/23</b>	<b>205/205</b>

\*Local company websites and social media platforms, as well as local parenting websites with company sponsored content

\*\*Confirmed contractual relationships with two companies: Danone and Nestlé.

### Online retail

**Table 9** provides an overview of the point-of-sale promotions observed during the study period, along with the primary incidences of non-compliance associated with them.

A total of 23 point-of-sale promotions were observed on the websites of online retailers in China and the US. Eighteen of these instances were found in China, where eight point-of-sale promotions were observed for *Kraft Heinz*, six for *HiPP*, and four for *Beingmate*. In the US, five point-of-sale promotions related to *Nestlé* CF products were detected. The average number of observations of non-compliance per promotion was four, meaning that multiple incidences of non-compliance were identified per individual promotion. The most common observations of non-compliance were the absence of a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond, and the inclusion of nutrition, health, and marketing claims. Both types of observations of non-compliance were registered in all point-of-sale promotions identified.

For *Danone*, *Hain Celestial*, *Hero*, *Lactalis*, and *Vinamilk*, no point-of-sale promotions were detected on online retail channels monitored during the research period.

**Table 9. Summary of point-of-sale promotions and related incidences of non-compliance**

	Number of non-compliant point-of-sale promotions found	Average number of incidences of non-compliance per promotion	% of promotions without a statement on the importance of breastfeeding	% of promotions that included claims
<b>Beingmate</b>	<b>4</b>	<b>3</b>	<b>100%</b>	<b>100%</b>
China	4	3	100%	100%
<b>HiPP</b>	<b>6</b>	<b>4</b>	<b>100%</b>	<b>100%</b>
China	6	4	100%	100%
<b>Kraft Heinz</b>	<b>8</b>	<b>3</b>	<b>100%</b>	<b>100%</b>
China	8	3	100%	100%
<b>Nestlé</b>	<b>5</b>	<b>4</b>	<b>100%</b>	<b>100%</b>
USA	5	4	100%	100%
<b>Total</b>	<b>23</b>	<b>4</b>	<b>100%</b>	<b>100%</b>

### Online media

**Table 10** outlines the total number of online advertisements found for each company, along with the average number of observations of non-compliance per promotion and the most common types of incidences observed.

In total, 182 online promotions were identified for eight of the nine companies assessed (no online advertisements were found for *Beingmate* in China over the eight-week monitoring period). These were detected on companies' websites and social media platforms, as well as on parenting websites publishing content sponsored by companies.

The three companies with the highest amount of promotional content associated with their CF products are *Nestlé* (50), *Kraft Heinz* (44), and *HiPP* (40). The number of online promotional activities identified for the remaining five companies ranged from 16 (for *Hero* in Germany and the US) to five (each for *Vinamilk* in Viet Nam and *Hain Celestial* in the US; no online advertisements were found for *Hain Celestial* in China over the eight-week monitoring period).

Four of the 40 online promotions for *HiPP* (two in Germany and two in Viet Nam) and two of the 44 for *Kraft Heinz* in Indonesia related to CF products intended for infants under six months of age. It is important to note that the Code recommends the introduction of CF products no earlier than six months of age to protect exclusive breastfeeding in this period. As those products should not be available on the market, they were counted as observations of non-compliance and not assessed on any further indicators that evaluate appropriate marketing practices.

The remaining findings primarily involved advertisements for the companies' CF brands or products intended for older infants and young children between 6-36 months of age, or that had no clear recommended age, which did not meet Recommendation 4 of the guidance supported by WHA Resolution 69.9. Multiple incidences of non-compliance with Recommendation 4 were identified per individual promotion, with an average of three observations per promotion. The most common observation of non-compliance, found in all promotions detected, was the absence of a

statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. Additionally, companies frequently included nutrition, health, and marketing claims<sup>d</sup> (77% of observations) and did not specify the recommended age for introducing the product (55% of observations).

Considerable regional variation was observed among certain companies concerning their CF marketing practices where no recommended age of introduction is stated and where claims are included. Specifically, *Nestlé* was found not to state the recommended age of introduction in China and the US, but included this information in Indonesia and Viet Nam. Similarly, half or less of *Nestlé's* CF marketing practices in China, Indonesia, and the US included claims, but all marketing practices identified in Viet Nam for the company featured claims. Similar regional variations were also observed for *Danone*, *HiPP*, and *Kraft Heinz*.

Other identified forms of non-compliant online marketing practices concerned companies that also sell BMS. All nine companies sell BMS and, of these, *Danone*, *Hero*, *HiPP*, *Lactalis*, and *Nestlé* were found to solicit contact with caregivers by asking them to sign up to contests or baby clubs. According to Recommendation 5 of the guidance supported by WHA Resolution 69.9, "Companies that market breast-milk substitutes should refrain from engaging in the direct or indirect promotion of their other food products for infants and young children by establishing relationships with parents and other caregivers (for example through baby clubs, social media groups, childcare classes and contests)".

Companies' findings from the online monitoring across the five countries are described in further detail on each company's scorecard (available [here](#)). The country reports (available [here](#)) include additional details about the methods and the platforms monitored.

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<sup>d</sup> In this research, ATNI referred to WHO Europe's Nutrient and Promotion Profile Model for the definition of the different types of claims. Where local regulations require the inclusion of certain claims, these were not counted in this assessment.

**Table 10. Summary of online promotions and related incidences of non-compliance**

	Total number of non-compliant promotions identified	Average number of incidences of non-compliance per promotion	% of promotions without a statement on the importance of breastfeeding	% of promotions not clearly stating the recommended age of introduction	% of promotions that included claims
<b>Danone</b>	<b>13</b>	<b>4</b>	<b>100%</b>	<b>64%</b>	<b>69%</b>
China	4	3	100%	100%	50%
Germany	7	3	100%	43%	57%
US	2	5	100%	50%	100%
<b>Hain Celestial</b>	<b>5</b>	<b>2</b>	<b>100%</b>	<b>40%</b>	<b>80%</b>
US	5	2	100%	40%	80%
<b>Hero</b>	<b>16</b>	<b>3</b>	<b>100%</b>	<b>100%</b>	<b>40%</b>
Germany	1	2	100%	100%	0%
US	15	3	100%	100%	80%
<b>HiPP</b>	<b>40</b>	<b>2</b>	<b>100%</b>	<b>36%</b>	<b>75%</b>
China	20	3	100%	45%	85%
Germany	16	2	100%	14%	57%
Viet Nam	4	2	100%	100%	100%
<b>Kraft Heinz</b>	<b>44</b>	<b>3</b>	<b>100%</b>	<b>88%</b>	<b>60%</b>
China	15	3	100%	80%	87%
Indonesia	29	2	100%	93%	44%
<b>Lactalis</b>	<b>9</b>	<b>3</b>	<b>100%</b>	<b>100%</b>	<b>56%</b>
US	9	3	100%	100%	56%
<b>Nestlé</b>	<b>50</b>	<b>3</b>	<b>100%</b>	<b>50%</b>	<b>53%</b>
China	8	3	100%	100%	50%
Indonesia	4	2	100%	0%	50%
US	37	3	100%	100%	11%
Viet Nam	1	4	100%	0%	100%
<b>Vinamilk</b>	<b>5</b>	<b>3</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
Viet Nam	5	3	100%	100%	100%
<b>Total</b>	<b>182</b>	<b>3</b>	<b>100%</b>	<b>77%</b>	<b>55%</b>

## 5.7.2 Traditional media monitoring results

**Table 11** presents an overview of promotional activities detected on traditional media.

Three of the nine companies were found to advertise their CF products and brands on TV; two TV advertisements were recorded for both *HiPP* and *Nestlé*, while one was detected for *Vinamilk* in Viet Nam. No advertisements for the nine companies' CF products and brands were found on the radio and print media monitored in the six-month period. No CF advertisements were found for Beingmate, Danone, Hain Celestial, Hero, Kraft Heinz, and Lactalis on any traditional media platform during the six-month monitoring period.

Each of the five advertisements observed on TV were found to have at least one incidence of non-compliance with the Code, specifically Recommendation 4 of the guidance supported by WHA Resolution 69.9 – with the average number of non-compliant observations ranging from three (for *HiPP* in Germany) to seven (for *Vinamilk* in Viet Nam). All advertisements included at least one type of claim. None of these promotional activities included a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond, and none clearly stated the recommended age of introduction for the associated CF product.

Companies' findings from the traditional media monitoring across the five countries are described in further detail on each company's scorecard (available [here](#)). The country reports (available [here](#)) include additional details about the methods and the platforms monitored.

**Table 11. Summary of traditional media advertisements (TV, radio, and print)**

	Total number of promotions identified	Number of TV ads	Number of radio ads	Number of print ads	Average number of incidences of non-compliance per promotion	% of promotions that included claims	% of promotions not clearly stating the recommended age of introduction	% of promotions without a statement on the importance of breastfeeding
<b>HiPP</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
Germany	2	2	0	0	3	100%	100%	100%
<b>Nestlé</b>	<b>2</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>4</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
USA	2	2	0	0	4	100%	100%	100%
<b>Vinamilk</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>7</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>
Viet Nam	1	1	0	0	7	100%	100%	100%
<b>Total</b>	<b>5</b>	<b>5</b>	<b>0</b>	<b>0</b>	<b>5</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>

### 5.7.3 Product label results

**Table 12** illustrates the results of the product label assessment carried out across different companies and countries. Various incidences of non-compliance were identified on product labels, with the most common being the inclusion of claims and the absence of a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond, in line with WHO recommendations.

**Table 12. Summary of product labels incidences of non-compliance**

	Number of products assessed	Number of product labels of CF <6	Number of product labels of CF 6-36/no clear age CF with one or more incidences of non-compliance	Products for which clear images were not available	Average number of incidences of non-compliance per label	% of product labels that included claims	Most common non-compliances on product labels		
							% of product labels without a statement on the importance of breastfeeding	% of product labels including image, text, or other element suggesting use for infants under the age of six months	% of product labels with information undermining appropriate complementary feeding*
<b>Beingmate</b>	<b>8</b>	<b>0</b>	<b>8</b>	<b>5</b>	<b>2</b>	<b>100%</b>	<b>38%</b>	<b>13%</b>	<b>0%</b>
China	8	0	8	5	2	100%	38%	13%	0%
<b>Danone</b>	<b>26</b>	<b>1</b>	<b>25</b>	<b>0</b>	<b>3</b>	<b>100%</b>	<b>100%</b>	<b>0%</b>	<b>49%</b>
China	5	0	5	0	2	100%	100%	0%	40%
Germany	6	1	5	0	3	100%	100%	0%	60%
USA	15	0	15	0	4	100%	100%	0%	47%
<b>Hain Celestial</b>	<b>9</b>	<b>1</b>	<b>8</b>	<b>2</b>	<b>2</b>	<b>100%</b>	<b>50%</b>	<b>22%</b>	<b>15%</b>
China	1	0	1	1	1	100%	0%	0%	0%
USA	8	1	7	1	3	100%	100%	43%	29%
<b>Hero</b>	<b>36</b>	<b>4</b>	<b>32</b>	<b>11</b>	<b>3</b>	<b>71%</b>	<b>67%</b>	<b>18%</b>	<b>22%</b>
Germany	21	2	19	10	2	42%	33%	21%	5%
USA	15	2	13	1	3	100%	100%	15%	38%
<b>HiPP</b>	<b>42</b>	<b>11</b>	<b>31</b>	<b>0</b>	<b>2</b>	<b>89%</b>	<b>89%</b>	<b>0%</b>	<b>30%</b>
China	2	0	2	0	2	100%	100%	0%	0%
Germany	37	11	26	0	2	100%	100%	0%	23%
Viet Nam	3	0	3	0	3	67%	67%	0%	67%
<b>Kraft Heinz</b>	<b>13</b>	<b>3</b>	<b>10</b>	<b>0</b>	<b>3</b>	<b>100%</b>	<b>100%</b>	<b>0%</b>	<b>0%</b>
China	6	0	6	0	3	100%	100%	0%	0%
Indonesia	7	3	4	0	3	100%	100%	0%	0%
<b>Lactalis</b>	<b>2</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>5</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>50%</b>
USA	2	0	2	0	5	100%	100%	100%	50%
<b>Nestlé</b>	<b>98</b>	<b>0</b>	<b>98</b>	<b>4</b>	<b>3</b>	<b>90%</b>	<b>66%</b>	<b>54%</b>	<b>16%</b>
China	8	0	8	0	3	50%	100%	100%	0%
Germany	2	0	2	1	3	100%	50%	0%	0%
Indonesia	3	0	3	0	2	100%	0%	0%	0%
USA	74	0	74	1	4	99%	100%	99%	46%
Viet Nam	11	0	11	2	4	100%	82%	73%	36%
<b>Vinamilk</b>	<b>5</b>	<b>0</b>	<b>5</b>	<b>3</b>	<b>2</b>	<b>100%</b>	<b>40%</b>	<b>0%</b>	<b>20%</b>
Viet Nam	5	0	5	3	2	100%	40%	0%	20%
<b>Total</b>	<b>239</b>	<b>20</b>	<b>219</b>	<b>25</b>	<b>3</b>	<b>94%</b>	<b>72%</b>	<b>23%</b>	<b>22%</b>



\* of product labels with information text, image, or other element undermining appropriate complementary feeding or suggesting the product is superior to home prepared foods

A total of 239 products were evaluated, all of which were found to have at least one incidence of non-compliance with the Code, specifically Recommendation 4 of the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9.

Of the 239 products, **20 were CF products intended for infants under six months of age:** 11 products for *HiPP* in Germany, four for *Hero* (two in the US and two in Germany), three for *Kraft Heinz* in Indonesia, one for *Danone* in Indonesia, and one for *Hain Celestial* in the US. It is important to note that the Code recommends the introduction of CF products no earlier than six months of age to protect exclusive breastfeeding in this period. As those products should not be available on the market, they were counted as observations of non-compliance and not assessed on any further indicators that evaluate appropriate marketing practices.

The remaining 219 findings were of the companies' CF products intended for older infants and young children between 6-36 months of age, or that had no clear recommended age, all of which did not meet Recommendation 4 of the guidance supported by WHA Resolution 69.9. Multiple incidences of non-compliance with Recommendation 4 were identified per individual label, with an average of three observations per promotion. The highest average number of observations of non-compliance per label was detected for *Lactalis* (five) in the US.

As noted in the section on [Data verification](#), some companies did not provide ATNI with additional information in the case of unclear product images. However, since at least one incidence of non-compliance was identified from the existing images, these labels were counted as a non-compliant observation.

Ninety-four percent of all product labels assessed across companies and countries included at least one type of claim. *Hero* stands out thanks to a lower percentage of labels containing claims, averaging at 71% across evaluations conducted in Germany and the US. However, considerable region variation was observed within this company across different regions: 42% of product labels assessed in Germany featured claims, contrasting with a 100% occurrence rate in the US.

Seventy-two percent of all labels assessed did not feature a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. Notably, some companies showed particularly high percentages of labels lacking this statement, such as *Lactalis* (100%), *Kraft Heinz* (100%), *Danone* (100%), and *HiPP* (89%). The highest compliance with the Code with respect to this requirement was identified on the labels of products sold by *Hain Celestial* (50%), *Vinamilk* (40%), and *Beingmate* (38%).

In total, 23% of labels included suggestions of use for infants under six months, contradicting WHO recommendations for exclusive breastfeeding during this period. *Nestlé* displayed significant variation in different regions, with almost all labels in China and the US suggesting use for infants under six months, while all labels in Indonesia and Germany exhibited full compliance with this requirement. *Lactalis* exhibited the highest rate of non-compliance in this aspect, while full compliance with this requirement was observed for labels from *Danone*, *HiPP*, *Kraft Heinz*, and *Vinamilk*.

Moreover, 22% of labels were found to include content that either undermined appropriate complementary feeding practices or suggested that the product was superior to home-prepared foods. The highest number of non-compliance incidences were found for *Lactalis* and *Danone* (in 50% and 49% of the labels assessed, respectively), while all labels assessed from *Beingmate* and *Kraft Heinz* adhered fully to this requirement. Additionally, regional variation is apparent across different companies. For instance, *HiPP* shows no instances of such labeling in China, but a notably high percentage in Viet Nam (67%). Similarly, *Nestlé's* labeling practices

also vary regionally, with no instances in China, Germany, and Indonesia, but higher percentages in the US and Viet Nam.

Companies' findings from the product label assessment across the five countries are described in further detail on each company's scorecard (available [here](#)) and in the country reports (available [here](#)).

## 5.8 Conclusions and recommendations

The findings of the in-country assessments carried out for the CF Marketing Index 2024 highlight that compliance with the Code varies across companies and countries. None of the companies assessed achieved full compliance with the Code – specifically the recommendations of the guidance supported by WHA Resolution 69.9 – in any of the countries included in the study over the period between January 2023 and July 2023, with average country scores ranging from 0% to 50%.

A total of 182 promotions and 23 point-of-sale promotions were observed online, along with five advertisements found on TV, all of which had at least one incidence of non-compliance with the Code, specifically with Recommendations 4, 5, and 6 of the guidance supported by WHA 69.9. Online media emerged as the primary platform for promotions, while traditional media advertising was less prevalent, with TV being the dominant channel. These results suggest a potential shift towards digital and other media platforms for promotional efforts.

All product labels assessed were found to contain one or more incidences of non-compliance with the Code associated with Recommendation 4 of the guidance supported by WHA 69.9. The most common incidences of non-compliance found were the inclusion of claims and the absence of a statement on the importance of exclusive breastfeeding in the first six months of life and continued breastfeeding for up to two years or beyond. Additionally, more than half of the product labels assessed did not clearly

state the recommended age for introducing the product, with around 20% of labels including suggestions of use for infants under six months and content that either undermines appropriate complementary feeding practices or suggests the product is superior to home-prepared foods.

Most observed incidences of non-compliance concerned CF products intended for older infants and young children between six and 36 months of age and brands associated with CF products, while fewer incidences of non-compliance related to CF products intended for infants younger than six months.

Based on the CF country study results presented in this report, ATNI makes the following recommendations to CF companies:

- Companies should prioritize efforts to enhance and harmonize compliance with the Code, specifically WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9, across all countries they operate in, ensuring consistently high levels of adherence to its recommendations.
- Companies should responsibly market their CF products in digital environments, in line with the latest WHO guidance on restricting the digital marketing of foods for infants and young children.<sup>34</sup>
- Companies should ensure that contracted distributors abide by responsible marketing practices for their CF products. Companies should also implement robust monitoring systems to ensure compliance, especially on online retailers.
- Companies should adopt Code-compliant policies and practices so their products are labeled according to the Code, including relevant elements of the guidance supported by WHA Resolution 69.9. These policies should also address the inclusion of nutritional, health, and marketing claims on CF product labels.

- Companies should extend these policies and responsible marketing practices to cover commercial CF for children up to 36 months of age, ensuring full alignment with the Code's recommendations.
- As several parallel imports were found in Indonesia, companies should ensure that only products intended for the dedicated market are sold in the country.
- Companies should promptly take corrective actions upon receiving reports of incidences of non-compliance with the Code.

## 5.9 Limitations of the CF Country Studies

During this study, ATNI encountered several limitations that warrant acknowledgment. The expanded scope of the CF Marketing Index 2024 warranted a modified approach to conducting assessments for the Country Studies, considering the resources available to ATNI. ATNI undertook an [extensive consultation process](#) during which these changes were discussed. Despite the modifications, the methods are still guided by the NetCode protocol.

ATNI could not conduct on-the-ground data collection and instead relied on service providers, which led to discrepancies in data availability across different markets. Specifically, ATNI encountered more comprehensive product information, especially regarding labeling, in more developed markets, such as Germany and the US. However, this meant that ATNI's assessment may not have included an exhaustive list of products in other markets, like China, Indonesia, and Viet Nam. With regard to online monitoring, it is possible that some observations may not have been captured by the social listening method. Limitations may be attributed to the keywords used or website access restrictions, which were commonly encountered when monitoring social media platforms in China and the online retailers across all five countries. Therefore, the channels monitored may not be representative of all local companies/brands, retailers, and

March 2024

parenting websites and social media platforms, as full representation depends on the sources the social listening tool was able to collect data from in each of the five countries for each of the companies. In addition, the social listening tool was only able to capture newly published content during the research period. Therefore, it is possible that not all observations of non-compliance from the websites and social media platforms monitored were captured. Considering these limitations, the findings may not accurately reflect the actual level of compliance of the assessed companies.

Other limitations worth noting pertain to products that did not have images for every side of the package, or had blurry images, which limited the completion of the label assessments for these products and made it impossible to confirm if certain requirements were met or not. Furthermore, due to the intricacies and various forms of contractual relationships that can exist between the companies and online retailers or parenting websites, the extent to which these relationships could be confirmed was limited. ATNI had limited capacity and resources in this research to perform additional and thorough external validation checks.

Additional information on the limitations of the country studies is presented in more detail in the country reports, available [here](#).

## 6. Detailed results: CF corporate profile

This section presents a summary of the Corporate Profile assessment conducted by ATNI for the commercial Complementary Foods (CF) Marketing Index 2024. The purpose of this assessment is to determine the extent to which the 10 largest producers of CF products for older infants and young children (6-36 months) own policies, and whether their associated management systems and disclosure are aligned with the Code and all subsequent and relevant guidelines defined by WHA resolutions, up to and including WHA 71.9.

The companies are assessed on nine topics within the Code. Most topics include both policy commitments and management systems (guidance and procedures provided by companies to their employees to ensure the implementation of the CF commitments), except for 'Guiding principles underpinning IYCF', which only considers policy commitments, and 'Implementation and monitoring', which considers policy commitments, management systems, and disclosure indicators. The last two topics – 'Lobbying and influencing' and 'Disclosure' – describe the level of disclosure and transparency practiced by companies on the different topics. For specific company results, please refer to the company [scorecards](#).

This assessment is conducted using publicly available information and – in some cases where companies chose to engage during the research – unpublished internal documentation, which companies submit under a non-disclosure agreement to ATNI's online research platform.

Companies' findings from the Corporate Profile assessment are described in further detail on each company's scorecard (available [here](#)).

### 6.1 Companies' policies

None of the companies had CF marketing policies covering CF products intended for infants aged 6-36 months. *Nestlé* and *Danone* mention CF for infants under six months in their breast-milk substitute (BMS) policies. However, according to the guidance associated with WHA Resolution 69.9, CF should not be marketed to infants under six months. Therefore, these policies were not assessed for the CF assessment because the product scope is not aligned with the Code.

*Danone*, *Kraft Heinz*, and *Nestlé* were previously assessed in the 2021 BMS/CF Index, more details about the differences between 2021 and the current assessment can be found in the companies' scorecards (available [here](#)).

### 6.2 Companies' engagement

Once ATNI researchers have compiled publicly available information (such as CF marketing policies and company reports) to assess companies, companies are invited to review preliminary assessments and provide feedback and additional supporting material (first round of engagement). After the first round of engagement, ATNI carefully evaluates the comments and evidence (if provided) and adjusts the assessment, if applicable. Companies then receive a second opportunity (second round of engagement) to review their assessment and/or answer clarification questions raised by ATNI analysts. ATNI then evaluates comments to finalize the assessment.

As seen in **Table 13**, four out of 10 companies engaged in both rounds leading to an improved corporate profile score after engagement. Compared to *Kraft Heinz* and *HiPP*, *Danone* and *Nestlé* were found to engage more extensively with supporting documents. ATNI was unable to establish communication and actively engage with the other companies: *Beingmate*, *Hain Celestial*, *Hero*, *Lactalis*, *Progress*, and *Vinamilk*. As a result, the

assessments for these companies were based solely on information found in the public domain.

**Table 13. ATNI CF Index 2024, engagement during the research by company**

Company	First round of engagement	Second round of engagement	Improved score after engagement
<b>Beingmate</b>	Did not engage	Did not engage	No
<b>Danone</b>	Yes	Yes	Yes
<b>Hain Celestial</b>	Did not engage	Did not engage	N/A
<b>Hero</b>	Did not engage	Did not engage	N/A
<b>HiPP</b>	Yes	Yes	Yes
<b>Kraft Heinz</b>	Yes	Yes	Yes
<b>Lactalis</b>	Did not engage	Did not engage	N/A
<b>Nestlé</b>	Yes	Yes	Yes
<b>Progress</b>	Did not engage	Did not engage	N/A
<b>Vinamilk</b>	Did not engage	Did not engage	N/A

All companies showed no commitment to at least two topics. *Danone* showed the most commitments, with evidence found on six out of nine topics. *Nestlé*, *Kraft Heinz*, and *HiPP* showed commitments in four out of nine topics. It was observed that *Beingmate*, *Hain Celestial*, *Hero*, *Lactalis*, *Progress*, and *Vinamilk* did not score on several topics because no relevant information or policies (neither related to BMS) were found in the public domain or were shared by the companies. These companies also did not engage, and therefore had lower scores across all topics compared to companies that did engage and/or have published relevant documents in the public domain.


The following paragraphs present the results and give a detailed comparison of the companies' performances per topic, together with examples of best practices.

### 6.3 Are companies' policies aligned to the Code across topics?

As seen in **Table 14**, the average scores across the nine topics ranged between 0% and 21%. Companies did not show commitments on 'Marketing messages' (0%) and 'Avoidance of cross-promotion' (0%). However, they performed relatively better on 'Guiding principles underpinning IYCF' (21%), 'Implementation and monitoring' (14%), and 'Lobbying and influencing' (14%). Scores for other topics varied between 0.7% and 6%.

**Table 14. Average score (before penalty) of companies' commitments per topic**

	Guiding principles	Product formulation	Marketing messages	Avoidance of cross-promotion	Conflict of interest	Donations	Implementation and monitoring	Lobbying and influence	Disclosure	CF score Average
<b>Beingmate</b>	15%						17%			1.8%
<b>Danone</b>	55%	10%	0%	0%	30%	7%	17%	63%	0%	10.1%
<b>Hain Celestial</b>	5%						17%			1.2%
<b>Hero</b>										0.0%
<b>HiPP</b>	40%	45%	0%	0%	0%	0%	25%	8%	0%	6.6%
<b>Kraft Heinz</b>	25%	10%	0%	N/A	0%	0%	17%	27%	0%	4.9%
<b>Lactalis</b>							17%			0.9%
<b>Nestlé</b>	69%	0%	0%	0%	0%	0%	17%	48%	8%	7.8%
<b>Progress</b>				N/A			17%			1.0%
<b>Vinamilk</b>							17%			0.9%
<b>Average section score</b>	21%	7%	0%	0%	3.0%	1%	16%	15%	1%	3.5%
<b>Highest score</b>	69%	45%	0%	0%	30%	7%	25.0%	63%	8%	10.1%

 No score because no relevant information/policies were found in the public domain or shared by the company with ATNI

**Legend**

0%

100%

## I. Guiding principles underpinning IYCF

This topic consists of policy commitment indicators only.

To obtain a full score, the company is strongly recommended to show explicit commitment to specific WHO, UNICEF, and Pan American Health Organization (PAHO) guidelines, supporting breastfeeding for the first six months and continued breastfeeding for up to two years or beyond, and the appropriate introduction of CF from the age of six months. Additionally, the company should acknowledge the Code and WHA resolutions up to WHA 71.9 and apply these commitments to joint ventures and subsidiaries.

As seen in **Table 14**, the total average score for this topic was ~21%, with four out of 10 companies scoring 0%. Nestlé was found to have the most commitments on this topic (69%), followed by Danone (55%) and HiPP (40%). None of the companies showed explicit commitment to the optimal IYCF principles (based on applicable guidelines). In addition, none of the companies showed explicit commitment not to market CF for infants under six months of age (WHA 69.9 guidance). Danone, Nestlé, and HiPP were the only ones found to fully support exclusive breastfeeding for the first six months and continued breastfeeding for two years or more, and explicitly stated their support for the introduction of appropriate CF from the age of six months. Danone, Kraft Heinz, and Nestlé were the only companies found to acknowledge the Code (but not explicitly up to WHA 71.9).

## II. Product formulation

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% to the topic score.

To obtain a full score, the company is strongly recommended to show explicit commitment to the applicable Codex standards and guidelines, as well as national, global, and regional regulations regarding product formulation for

March 2024

infants aged 6-36 months. Additionally, the company is strongly recommended to be able to demonstrate procedures are in place to implement all guidelines applicable to product formulation.

As seen in **Table 14**, the total average score for this topic was ~7%, with seven out of 10 companies scoring 0%. Six of these did not score because no information or CF policies were found. While Nestlé provided evidence, the documents shared by the company did not explicitly mention commitments for CF 6-36; so, for this reason, they did not score on this topic.

HiPP was found to have the most commitments in this topic (45%), followed by Kraft Heinz and Danone both scoring 10%. HiPP showed explicit commitment to two of the four relevant Codex guidelines, while Danone showed explicit commitment to one of the four. Kraft Heinz only showed commitment to local legislation for formulating CF for infants aged 6-36 months. For management systems, HiPP was the only company that had procedures in place to implement some of the guidelines listed relating to product formulation.

Interesting example: It was found that only HiPP had developed procedure manuals to implement two of the five listed guidelines relating to product formulation; i.e., the Codex standard for processed cereal-based foods for infants and young children (Codex/STAN 074-1981, revised in 2006) and the Codex advisory list of vitamin components for use in foods for infants and children (CAC/GL 10-1979, revised in 2009).

### **Box 1: Assessment of commercial CF products using WHO Europe's NPPM (2022)**

In November 2022, WHO's Regional Office for Europe published the [Nutrient and Promotion Profile Model \(NPPM\)](#). Currently, this is the only 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. The NPPM follows Recommendation 3 of the guidance associated with WHA 69.9, which advises that "Nutrient profile models should be developed and utilized to guide decisions on which foods are inappropriate for promotion".

Using an adapted version of the WHO Europe's NPPM, ATNI conducted an assessment of CF as part of a series of research activities conducted by the Consortium for Improving Complementary Foods in Southeast Asia (COMMIT)<sup>e</sup> initiative in seven Southeast Asian countries. Additionally, to complement this research in other geographies, ATNI assessed CF products sold in 10 other countries by the six largest CF companies', using WHO Europe's 2022 NPPM.

Although this assessment and its results are not directly included in the assessment and scoring of this CF Marketing Index 2024, the results are released in the same period and considered when updating the CF methodology for new Indexes.

### **III. Marketing messages**

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% to the topic score.

To obtain a full score, the company is encouraged to ensure all products have the required statements protecting and promoting continued breastfeeding and specifying the appropriate age for introducing CF 6-36. Additionally, their marketing materials must be easy to understand and legible. The company is encouraged to not use content (including imagery) suggesting the use of the product for infants under six months, discouraging breastfeeding, or comparing it with breastmilk. For management systems, the company is strongly recommended to show the provision of clear instructions to staff regarding required and prohibited information and demonstrate procedures in place to ensure compliance with all applicable commitments.

As seen in **Table 14**, the total average score for this section was 0%. While Danone, HiPP, Kraft Heinz, and Nestlé provided evidence, they did not receive a score because commitments were not explicitly mentioned for products aimed at children aged 6-36 months (Kraft Heinz and Nestlé), or because they shared examples of product (6-36 months) designs but no commitment was found in the companies' official documents or was sent to ATNI (Danone and HiPP). The other companies (six) did not score because no information or CF policies were found related to the marketing messages topic. Considering that no commitments were found, no management systems were found, either.



#### IV. Avoidance of cross-promotion

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% to the topic score.

To obtain a full score, the company is encouraged to avoid cross-promotion by ensuring that packaging design, labeling, and promotional materials for CF are distinct from those used for BMS. Additionally, the company's staff, especially marketing personnel, are strongly recommended to avoid conflicts of interest by refraining from engaging in direct or indirect promotion of CF through caregiver relationships. For management systems, the company is strongly recommended to show clear instructions to staff and procedures to implement commitments related to cross-promotion.

Kraft Heinz and Progress were not assessed on the BMS Marketing Index 2024, and therefore the topic of cross-promotion does not apply to them.

As seen in **Table 14**, the average score for this section was 0%, meaning none of the companies scored on this topic. No explicit commitments were found indicating that any company takes various measures to avoid promoting its BMS indirectly via the promotion of its CF for older infants and young children aged 6-36 months, also known as cross-promotion. Some companies, such as Nestlé, provided evidence, but commitments were not explicitly mentioned for products targeting those aged 6-36 months. While HiPP shared during the assessment that the packaging design, labels, and promotional materials for its CF products are different from the ones used for its BMS products, no information was found in the public domain nor did the company provide any evidence. For Danone, ATNI acknowledges that the company stated it is working towards guidelines for cross-promotion. The other companies did not score because no information or CF policies were

found related to the marketing messages topic. Considering that no commitments were found, no management systems were found, either.

#### V. Conflict of Interest in health facilities and throughout the healthcare system

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% to the topic score.

To obtain a full score, the company is strongly recommended to refrain from hosting events, contests, or campaigns in health facilities, as well as to abstain from giving gifts or coupons directly to caregivers. The company is encouraged to not provide any educational materials directly or indirectly to caregivers in healthcare facilities, and ensure that all information provided to health workers regarding CF is restricted to scientific and factual matters. Additionally, the company is encouraged to not provide any form of contribution to health workers or members of their families, nor sponsor any meetings for health professionals or scientific gatherings. Regarding management systems, the company is encouraged to provide clear instructions to their staff and procedures on how to interpret and implement all relevant commitments related to this topic.

As seen in Table 14, the average section score was ~3%, with nine out of 10 companies scoring 0%. Danone was found to have some commitments on this topic (30%), showing explicit commitment to not giving gifts or coupons to caregivers, and restricting the information provided to health workers to factual matters. Danone confidentially shared some general global and local guidance on compliance in healthcare systems that had been developed by the company, showing clear instructions to staff on how to interpret and apply relevant commitments related to the provision of gifts/coupons to caregivers

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within health facilities and information provided to health workers. HiPP, Kraft Heinz, and Nestlé engaged but scored 0%, as the evidence provided did not substantiate the assessment. [These and all](#) other companies did not show any commitments, nor any procedure to implement commitments, on how to avoid conflict of interests with caregivers and within the healthcare system.

## VI. Donations

This topic consists of policy commitment indicators and management system indicators. Each set of indicators contributes an equal weight of 50% to the topic score.

To obtain a full score, the company is encouraged to refrain from directly providing free, sample, or reduced-price CF to caregivers through health workers and/or health facilities. The company is also encouraged to commit to avoid using donations as sales inducements; distributing donations outside institutions; or donating equipment, materials, or services to any part of the healthcare system. In addition, in humanitarian settings, the company must ensure that donations are explicitly restricted while following applicable provisions and guidelines for infant feeding in emergencies. For management systems, the company is encouraged to provide clear instructions and demonstrate procedures to their staff on interpreting and applying this topic's commitments.

- As seen in **Table 14**, the average section score is 0.7%, with nine out of 10 companies scoring 0%. Companies did not score on this topic since no explicit commitments were found to indicate that:
  - The company does not donate nor provide samples of CF for older infants and young children aged 6-36 months to caregivers and children through health workers or health facilities.
  - The company does not donate or distribute any equipment, materials (including educational materials), or services to any part of the healthcare system.

- The company does not donate CF 6-36 products in humanitarian settings, unless officially requested by a competent government authority of the country affected by the emergency or by the designated emergency response coordinating body acting on behalf of the government.
- The company does not use donations of CF 6-36 products to children who require them in social welfare institutions as a sales inducement, nor distributes them for use outside these institutions.

Danone was the only company to score on this topic, showing some explicit commitments in its guidance on donations (shared under a non-disclosure agreement). The company was found to commit to not using donations or low-price sales of CF 6-36 products as a sales inducement if provided in emergencies or to social welfare institutions where older infants and young children require these products. Danone confidentially shared some general global guidance on compliance in healthcare systems and donation procedures developed by the company; however, since not all relevant commitments were found, no relevant management systems were identified either, meaning the company did not score in this aspect.

For the companies that engaged, HiPP shared some information and stated that they only donate CF to officials or charitable organizations upon request and these products are not used as sales inducements. However, the company did not provide evidence to substantiate the assessment as requested. Nestlé and Kraft Heinz have policies that cover some of these requirements in regard to donations of its BMS products, but commitments on donations of its CF 6-36 products are not explicitly mentioned. Therefore, these companies also scored 0%.

The other companies did not score because no information or CF policies were found related to the marketing messages topic. No procedure to implement commitments on donations was found for any company (except for Danone), either.

## VII. Implementation and monitoring

This topic consists of management system indicators only.

To obtain a full score, the company is encouraged to show explicit procedures for implementing and monitoring all relevant commitments made by the company. The company must ensure clear allocation of responsibility at executive levels, communicate policies globally to all relevant employees, and provide evidence of executive awareness and training. The company is encouraged to also monitor accountability, which extends to national business units and third-party contractual agreements, with procedures in place to ensure awareness among distributors and retailers. In addition, the company should show evidence that it follows globally recognized food safety and quality standards to certify its CF products.

As seen in **Table 14**, the average score was 15.8%. Companies that showed commitments had scores ranging between 16.7% and 25%. Hero was the only company that did not have any commitment to this topic (0%). Most companies (except Hero) showed evidence that they use at least one globally recognized food safety and quality standard to certify their CF. HiPP was found to have the most commitments in this topic (25%), as it confidentially shared a document with guidelines and trainings describing the process provided to its employees to implement some of the company's commitments related to CF marketing. However, these documents appear to only apply to some markets.

## VIII. Lobbying and influencing governments and policymakers

This topic consists of policy commitments, management systems, and disclosure indicators. Each set of indicators contributes an equal weight of 33.3% to the topic score.

This topic is assessed on policy commitments, management systems, and disclosure. To obtain a full score, the company is encouraged to have a clear policy in place which sets out the following:

- Under what circumstances and how the company will engage with governments and policymakers with regards to CF issues.
- A clear statement that the purpose of its lobbying, in addition to meeting the company's objectives, is to support public health interest.
- A commitment not to undermine existing public policy frameworks, the work of WHO or similar agencies, or government efforts to develop regulations to implement the Code.
- Statements prohibiting conflict of interest applying to lobbying.
- A comprehensive statement that it will periodically review its trade association memberships and the extent to which the organization's positions on policies align with the company's own. Further, that it will put in place controls over all lobbyists to ensure they understand and adhere to organizational policies.

The company is also strongly recommended to indicate that they have the following management systems in place to control its lobbying activities with regards to CF-related policy:

- Clear accountability and responsibility procedures, including assigning to the Board oversight of its lobbying policy commitments, lobbying positions, and activities. The company is also expected to designate implementation and regular follow-up to a specific Executive function. Additionally, the company is encouraged to publish information on each of its public policy positions, as well as any documents it submits to governments as part of public consultations (while respecting confidentiality when necessary).

When lobbying, the company is expected to explicitly state if any of the following public policy frameworks and relevant laws and standards are respected:

- The International Code of Marketing of Breast-milk Substitutes, and subsequent WHA resolutions making significant additions or clarifications to the original Code
- The WHO Framework of Engagement with Non-State Actors

- The Organisation for Economic Co-operation and Development Principles for Transparency and Integrity in Lobbying
- The Transparency International Standards for Lobbying Regulation
- Industry initiatives, such as the International Federation of Biosafety Associations (IFBA) Guiding Principles for Stakeholder Engagement
- The Responsible Lobbying Framework

As seen in **Table 14**, the average score is 14%, with six out of 10 companies scoring 0%. Danone was found to have made the most commitments on this topic (63%), followed by Nestlé (47%), Kraft Heinz (27%), and HiPP (8%). Danone, Kraft Heinz, and Nestlé were found to have a lobbying policy, with Danone and Nestlé clearly stating that the purpose of their lobbying is to support the public interest, while also including a comprehensive statement prohibiting conflicts of interest applying to lobbying. Meanwhile, Kraft Heinz committed to disclose any identified conflict of interest (but not applicable to lobbying).

In terms of management systems, Danone was found to have the most extensive procedures in place, followed by Kraft Heinz and Nestlé. For example, Kraft Heinz states that its Board has oversight of its lobbying positions, and that it has clear control mechanisms in place, such as regular reporting to the Board and conducting internal audits of its lobbying activities. Nestlé, meanwhile, states that its Board has oversight of its lobbying policy, and has assigned responsibility for implementing its policy on lobbying and engagement to an Executive function.

Regarding disclosure, Danone shares public policy positions supporting *some* provisions of the Code. Danone and Nestlé disclose that they adhere to IFBA Guiding Principles for Stakeholder Engagement, but not the other four frameworks/standards, when lobbying.

Interesting example: Danone showed evidence of the highest number of procedures in place for their lobbying policy by having the Board oversee the policy, its positions, and activities, as well as having an Executive level function

with responsibility for implementing the policy on lobbying and engagement. In addition, Danone provides clarity on control mechanisms, with regular reporting to the Board and internal audits.

## IX. Disclosure

This topic consists of disclosure indicators only.

To obtain a full score, the company is strongly recommended to explicitly disclose its commitments to IYCF practices in reference to WHO and applicable WHO/UNICEF and PAHO guidelines. In addition, the company is encouraged to publish all its policies/commitments that apply according to WHA 69.9 guidance.

As seen in **Table 14**, the average score is 0.8%, with nine out of 10 companies scoring 0%. None of these companies were found to publicly disclose their commitments in line with the relevant guidelines and recommendations associated with WHA 69.9. Nestlé scored 8% because it publicly disclosed its policy relating to lobbying and influencing governments and policymakers; i.e., policy on transparent interaction with authorities and organizations.

## 6.4 Geographic penalty and final scores

### Box 2: Changes in the 2024 CF Index corporate profile methodology compared to the 2021 BMS/CF Index

Compared to the 2021 BMS/CF methodology, a key scoring change at the indicator level has been applied to the CF corporate profile survey. Topic 1 'Guiding Principles Underpinning IYCF' includes a new indicator (indicator 4) that determines whether companies market CF for infants under six months of age. This indicator weighs 50% into the total CF survey score such that:

- If a company markets CF intended for infants <6 months, the score on this indicator is 0 and therefore the maximum possible CF corporate profile total survey score is 50%.
- If a company does not market CF for infants < 6, the score on this indicator is 10 and therefore the maximum possible CF corporate profile total survey score is 100%.

As described in the findings on the topic "Guiding Principles of Infant and Young Child Feeding" below, all companies were found to market CF products for infants under six months of age, therefore their initial overall Corporate Profile score was halved. The final Corporate Profile score considers how the company's marketing commitments are applied across different markets for CF products intended for older infants and young children between six months up to three years of age (CF 6-36 months).

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<sup>f</sup> Retail sales estimates were derived from the data available on the Euromonitor database for CF based on Euromonitor 2021 data.  
March 2024

The next section 'Geographic application of CF commitments by product type' shows how the company's application of commitments for CF 6-36 months was evaluated. The scores and findings on each topic are described in further detail in the section below on 'CF Commitments by Topic'.

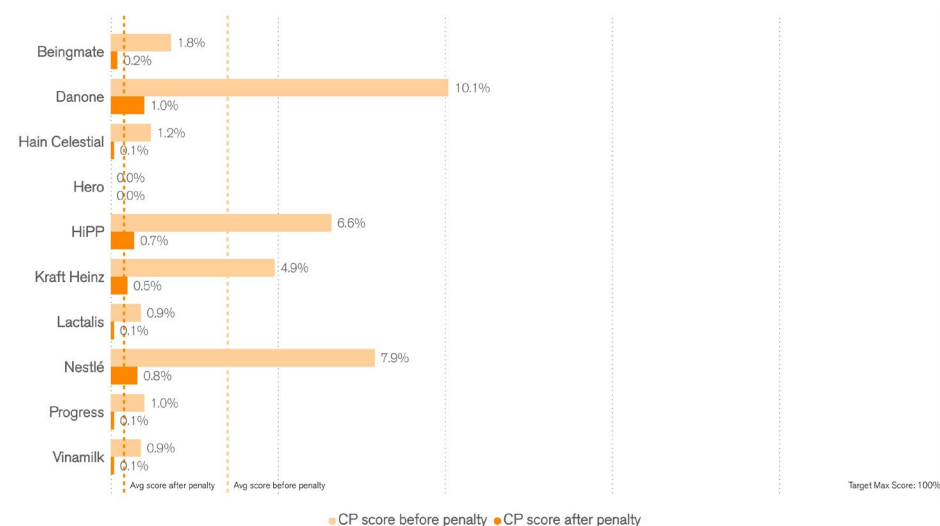
### Box 3: CF Geographic penalty

The initial score for the corporate profile element of the CF Index is based on companies' CF marketing commitments across nine topics that cover different aspects of the Code. To fully comply with the Code, companies should apply their CF products' (6-36 months) marketing commitments to all relevant products in all markets where they operate. To fully comply with the Code, companies should uphold (i.e., apply without restrictions) these commitments in all the markets where they sell<sup>f</sup> their CF products, otherwise a geographic penalty ranging from 0% to 90% is applied (see [Methodology](#) pages 16-17). Euromonitor retail sales estimates (2021 data) were used to calculate the proportion of companies' global product sales covered per product type. It is important to note however that the underlying data used for the calculations may not be fully representative of the company's markets.

Figure 2 shows the companies' corporate profile score before and after the geographic penalty is applied. Companies scored an average score of 3.5% before penalty. Initial scores ranged from 0% to 10%, with Danone showing the most commitments on the topics assessed (10%), followed by HiPP (7%), Nestlé (8%), and Kraft Heinz (5%). The rest of the companies were

found to have scores ranging between 0% and 1.8%. A geographic penalty of 90% was applied to all companies, as it could not be established if and where (in what markets) specific commitments are upheld. After applying the geographic penalty, the average final score was 0.4%, with scores ranging between 0% and 1%. The final Corporate Profile score considers how the company's CF commitments are applied across different markets.

**Figure 2.** Companies' CF Corporate Profile scores before and after the geographic penalty is applied



## 6.5 Conclusions on CF corporate profile

None of the 10 companies were found to have a CF 6-36 marketing policy that incorporates **all** commitments from the Code; i.e, the 1981 Code and all subsequent relevant WHA resolutions and related guidance and standards, up to and including WHA Resolution 71.9. Nestlé and Danone included CF

for infants aged under six months in their BMS policies. However, according to the guidance associated with WHA Resolution 69.9, CF should not be marketed to infants under six months. Therefore, these policies were not assessed for the CF assessment because the product scope is not aligned with the Code. Of the 10 companies, six were found to have at least one commitment in line with the Code, according to evidence found and/or shared by the company.

Four out of 10 companies engaged with ATNI during the research process by providing additional documents, leading to an improved corporate profile score. The remaining companies were assessed solely on (often limited) public information available. The companies that did not engage were found to have lower scores across all topics compared to those that engaged. The companies' scores across the nine topics ranged from 0% to 21%. None of the companies showed commitments on 'Marketing messages' (0%) and 'Avoidance of cross-promotion' (0%), whereas on 'Guiding principles underpinning IYCF' (21%), 'Implementation and monitoring' (14%), and 'Lobbying and influencing' (14%), companies showed more commitments. Danone, HiPP, and Nestlé showed more commitments across the nine topics compared to the other companies.

Results from this research reveal that none of the companies showed explicit commitment to not market CF for infants under six months of age (WHA 69.9 guidance). In topics in which commitments were found, most companies failed to show management systems, including provision of guidance and procedures to their employees to ensure the implementation of the CF commitments.

All companies obtained a penalty of 90% because no policy was found in the public domain (or was sent to ATNI); therefore, there was no information on where commitments are upheld. The average corporate profile score was 3.5%, dropping to 0.4% after the geographic penalty was applied. Danone received the highest score (1%), followed by Nestlé (0.8%), HiPP (0.7%), and Kraft Heinz (0.5%). The other companies each scored less than 0.2%. It is worth noting that, in the case of limited or no engagement by companies,

the results of this assessment may not represent the full extent of their policies and practices.

## 7. Conclusions and recommendations

ATNI's assessment of companies' global complementary food (CF) policies and marketing practices in five countries showed that none of the 10 companies assessed in the CF Marketing Index 2024 fully comply with the Code, specifically the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9.

Three of the 10 companies were previously assessed in the breast-milk substitute (BMS)/CF Index 2021: Danone, Kraft Heinz, and Nestlé.

Following the BMS/CF Index 2021, Danone, Kraft Heinz, and Nestlé have still not incorporated the recommendations of the 2016 WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children, supported by WHA Resolution 69.9, in policy or practice. The guidance introduced marketing requirements for commercial CF that are marketed as being suitable for infants and young children aged six months up to three years of age.

None of the 10 companies were found to have policies and guidelines dedicated to the responsible marketing of CF for infants and young children between six months and three years of age. In addition, none of the 10 companies showed an explicit commitment to not market CF for infants under six months of age, in line with WHO recommendations.

These gaps continue to be reflected in practice, as none of the companies' CF products and promotions were found to fully comply with the recommendations of the WHA Resolution 69.9 supported guidance. The most common incidences of non-compliance identified were the inclusion of different types of claims (health, nutrition, and marketing claims) and the

absence of statements on the importance of continued breastfeeding for up to two years or beyond and the importance of not introducing complementary feeding before six months of age.

Many of the CF products and promotions assessed did not show a clear recommended age of introduction. In the US, more than half of the products and promotions found for CF were missing a clear age of introduction. This was also commonly observed in China and Indonesia. In addition, companies were found to market products that undermine exclusive breastfeeding for infants until six months of age. In total, there were 27 findings (21 product labels and six online promotions) across five companies (*Danone, Hain Celestial, Hero, HiPP, and Kraft Heinz*) of CF products intended for infants below six months of age, contravening WHO recommendations. The majority were found in Germany, and a few in Indonesia, the US, and Viet Nam. No such products were observed in China, where over half of the CF were missing a clear age of introduction.

The combined research of the CF Marketing Index 2024 and CF product profile assessments together present the most comprehensive overview by ATNI so far of the role of industry in baby foods.

ATNI hopes that the assessments conducted help the companies understand which areas they can improve on to strengthen their marketing practices in line with the Code.



#### **Box 4: Conclusions related to assessment of commercial CF products using WHO Europe's NPPM (2022)**

Following Recommendation 3 of the WHA 69.9 supported guidance, which called for the development of nutrient profile models to guide decisions on which foods are inappropriate for promotion, in 2022, WHO's regional office for Europe published the NPPM, which is currently the first and only official model specific to profiling commercial CF. Another characterizing feature of the NPPM, compared to other nutrient profiling models, is the inclusion of not only a nutritional assessment component, but also an additional component that considers requirements for the appropriate labeling, marketing, and promotion of CF products. ATNI did not conduct a CF product profile assessment as part of the CF Marketing Index 2024. Nonetheless, as part of ATNI's action research, recent assessments have been conducted on the nutritional quality and labeling practices of commercial CF using the NPPM. A total of 1,297 products by six of the 10 companies assessed in this Index (Danone, Hain Celestial, Hero, HiPP, Kraft Heinz, and Nestlé) were assessed across 10 countries (Austria, Brazil, Canada, Egypt, Germany, India, Ireland, Italy, Saudi Arabia, and the UK). Similar to the findings in the CF Marketing Index, which uses the NetCode protocol to assess responsible marketing of CF, the assessment using the NPPM confirms that none of the companies' CF products are appropriately marketed and labeled in line with WHO recommendations to protect optimal IYCF practices. In terms of nutritional quality, only 35% of the companies' CF products were found to meet the nutritional requirements of the NPPM. Between 14% and 33% of the CF products assessed for these six companies were found to have excessive levels of sugar, salt, or inappropriate energy density. Similar research was also conducted as part of COMMIT, using a model that was adapted to closely align with the NPPM. All CF products found for local and international companies in seven Southeast Asian countries (Cambodia, Indonesia, the Lao People's Democratic Republic, Malaysia, the Philippines, Thailand, and Viet Nam) were assessed for the COMMIT research, which revealed similar findings. None of the CF products were found suitable for promotion to infants and young children between six months up to three years of age, as they did not meet the requirements of the model; none of the CF met all labeling requirements and only 32% met the nutritional requirements.

# Recommendations

## Recommendations to CF companies

- Companies should prioritize efforts to enhance and harmonize compliance with the Code, specifically the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9, across all countries they operate in, to protect optimal nutrition for infants and young children globally.
- Companies are urged to follow WHO guidance relating to complementary feeding and uphold globally recognized public health guidelines, with a key requirement being not to produce and sell commercial CF for infants aged under six months, which directly interferes with exclusive breastfeeding up to six months.
- Companies are urged to especially follow recommendations 3, 4, 5, and 6 of the WHA 69.9 supported guidance, to ensure the appropriate promotion of their CF products across all marketing channels.
- To comply with the recommendations of the WHA 69.9 supported guidance, companies should ensure that CF products are of appropriate nutritional quality in line with the latest WHO guidelines, such as the NPPM.
- Based on the results of the country studies, companies are especially encouraged to state the appropriate recommended age of introduction (this should not be under six months), include messages that protect breastfeeding and appropriate complementary feeding practices, and refrain from using claims when marketing CF products. Companies should also refrain from

cross-promotion, whereby BMS are indirectly promoted through the promotion of CF.

- Based on ATNI's findings, companies should have explicit commitments and guidelines on responsibly marketing their CF products in digital environments, in line with the latest digital marketing guidance by WHO. Recommendation 4 of the digital marketing guidance specifically recommends restricting in digital environments the promotion of CF that do not meet relevant nutrition standards and that are marketed as suitable for infants less than six months of age.
- In addition, the appropriate promotion of CF in digital environments requires that the marketing messages criteria outlined in the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children are followed, to ensure that messages supporting optimal IYCF are present and that inappropriate messages which could undermine recommended practices are not included.
- Considering the above recommendations, companies are urged to develop and/or publish policies dedicated to the responsible marketing of CF that fully align with the Code, specifically the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9.
- Companies should bolster their management systems to deliver consistent compliance with their stated commitments, once brought into full alignment with the Code.
- Companies should promptly take corrective actions upon receiving reports of incidences of non-compliance with the Code.
- ATNI urges companies selling CF to take responsibility for monitoring their marketing practices beyond local regulations,

according to the principles and the aim of the Code and subsequent relevant resolutions, namely WHA Resolution 69.9.

- Companies should publish more information on their CF marketing policies and practices to increase transparency, and make key documents easily accessible to stakeholders.

### **Recommendations to investors**

As shareholders, investors play a significant role in shaping food companies' governance, strategy, and disclosure practices.

- Investors should make use of existing models, such as WHO's NPPM, to integrate compliance with WHO guidelines on the appropriate promotion of CF products into responsible investment strategies.
- Investors can use the findings of this Index to drive companies' progress on responsible CF marketing practices through various investment strategies, calling for transparency and compliance to the Code, specifically the WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children supported by WHA Resolution 69.9.
- Investors can use the data from this report to develop materials to support engagement with companies.
- Investors are urged to employ their influence to encourage companies to take steps towards full Code compliance.

### **Recommendations to policymakers**

- Following WHO guidance supported by WHA Resolution 69.9, governments should put in place measures to end the inappropriate promotion of food for infants and young children and promote enabling environments that support parents and caregivers to make well-informed feeding decisions.

- Governments can make use of existing models, such as the [Compendium of international standards and guidelines for the improved composition and labelling of commercially produced complementary foods in Southeast Asia](#), developed by UNICEF East Asia and the Pacific Regional Office for the COMMIT Initiative, which helps guide the development of new, or update existing, national regulations on the nutrient composition and labeling practices of commercial CF, in line with international guidance.
- We suggest that particular focus be placed on restricting parallel imports to countries and recommend consideration of stricter rules to prevent the entry and marketing of parallel import products that do not comply with national regulations. The authorities could, perhaps, look at how the importation of these products might be more strictly controlled.

### **Recommendations to civil society and non-governmental organizations (NGOs)**

- Educational campaigns targeting consumers should be conducted to raise awareness on appropriate complementary feeding practices, and the potential risks associated with the inappropriate marketing of CF products <sup>35</sup>.
- NGOs, civil society, and academia can contribute to expanding the research and body of evidence on the marketing of CF, to support the development of comprehensive guidelines that address concerns over the marketing of these product.

### **Recommendations to third-party monitoring groups**

- Third-parties can make use of ATNI's comprehensive CF marketing assessments to monitor companies' progress in achieving Code compliance, including initiatives such as [B Lab's certification criteria for BMS companies](#).

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<sup>26</sup> Ibid.

<sup>27</sup> Schmied et al., “Feeding My Child.”

<sup>28</sup> United Nations Children’s Fund (2023) ‘Infant and Young Child Feeding (IYCF) Data,’ UNICEF DATA. Available at: <https://data.unicef.org/resources/dataset/infant-young-child-feeding/> (Accessed: 9 February 2024).

<sup>29</sup> Walls, H. (2023) ‘Health First, Convenience Second: Caregiver Perspectives of Commercially Produced Complementary Foods in Five Southeast Asian Capital Cities,’ *Maternal & Child Nutrition* 19, no. S2: e13600, <https://doi.org/10.1111/mcn.13600> (Accessed: 31 January 2024)..

<sup>30</sup> United Nations Children’s Fund (UNICEF) (2020) Improving Young Children’s Diets During the Complementary Feeding Period – UNICEF Programming Guidance, 2020. Available at: <https://www.unicef.org/documents/improving-young-childrens-diets-during-complementary-feeding-period-unicef-programming> (Accessed: 29 January 2024).

<sup>31</sup> World Health Organization, *Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children*.

<sup>32</sup> World Health Organization (2022) Nutrient and Promotion Profile Model: Supporting Appropriate Promotion of Food Products for Infants and Young Children 6–36 Months in the WHO European Region. Geneva: WHO. Available at: <https://www.who.int/europe/publications/i/item/WHO-EURO-2022-6681-46447-67287> (Accessed: 31 January 2024).

<sup>33</sup> Nutrient and Promotion Profile Model (n.d.) “How to Guide | Nutrient and Promotion Profile Model,” NPPM, accessed January 19, 2024, <https://babyfoodnppm.org/>.

<sup>34</sup> World Health Organization (2023) Guidance on Regulatory Measures Aimed at Restricting Digital Marketing of Breast-Milk Substitutes. Geneva: World Health Organization. Available at: <https://www.who.int/publications-detail-redirect/9789240084490> (Accessed: 31 January 2024).

<sup>35</sup> “Choosing the Right First Foods for Your Child | UNICEF East Asia and Pacific,” accessed March 22, 2024, <https://www.unicef.org/eap/choosing-right-first-foods-your-child>.