



The Asia-Pacific Infant and Young Child Nutrition Association (APIYCNA) is a not-for-profit organization set up with the mission of improving the nutritional well-being of infants and young children throughout the Asia Pacific region.

APIYCNA believes that ensuring optimal infant and young child nutrition is a shared responsibility: Government, NGOs, civil society, and the private sector all have essential roles to play in this effort and should work together.

Our members share the goal of improving nutrition for infants and young children, and commend Save the Children for its intent to raise the awareness of the challenges of breastfeeding and realities of child malnutrition through the report *“Superfood for Babies: How overcoming barriers to breastfeeding will save children’s lives”*.

APIYCNA concurs with the recommendation of the World Health Organization (WHO) for exclusive breastfeeding for the first six months of life and continued breastfeeding with timely, safe, and appropriate complementary feeding thereafter. Like Save the Children, we share a strong commitment to supporting improved nutrition for infants, young children and their mothers.

Our members are fully committed to ensure that marketing policies and practices are (i) transparent and consistent with the aims and principles of the WHO International Code of Marketing of Breast-Milk Substitutes, and (ii) in line with any legislation to implement the WHO Code, as enacted by national governments in the region. While the WHO Code itself is not a legally-binding instrument, it is useful to note that the regulations and legislative measures that have been implemented by national governments in the Asia Pacific are in fact much stricter than anywhere else in the world. This reality is often distorted as legislative mechanisms/processes in the region are presented as severely laissez-faire.

APIYCNA stands ready to work in partnership with all stakeholders to support public health goals to protect and promote breastfeeding and the proper use of infant formula where necessary. We acknowledge that there is room for further improvement in the area of governance and ensuring ethical marketing practices - this is in fact a key priority for APIYCNA this year.

It is imperative that we recognise that the global challenge of infant, young child and maternal nutrition is complex and multi-faceted, and identifying and implementing solutions requires multi-stakeholder collaboration. Breastfeeding is but one important component of infant and young child nutrition, and a number of other critical factors must also be considered. The WHO puts it well when it says, “(an) optimal strategy to ensure rapid improvement of nutrition requires the implementation of a set of specific nutrition interventions and the integration of nutrition into health, agriculture, education, employment, social welfare and development programmes.”<sup>1</sup>

Given the complexities of the issues at hand, we are concerned that this report does not paint a comprehensive and balanced picture as it features selective information, contains factual inaccuracies and scientific errors, and fails to utilise the most current national and regional data.

APIYCNA welcomes the opportunity for dialogue and engagement with Save the Children and others interested in improving the health and nutritional well-being of infants, young children and their mothers. We look forward to working in partnership with all stakeholders to develop a focused, holistic and actionable plan in the near term.

(For more information, kindly contact [venetta.miranda@apiycna.org](mailto:venetta.miranda@apiycna.org) )

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<sup>1</sup> *Maternal, infant and young child nutrition: comprehensive implementation plan*  
(World Health Organization)



## Danone – Statement of Response

Danone commends Save the Children on the publication of this report – “Superfood for Babies; how overcoming the barriers to breastfeeding will save Children’s lives”. It addresses a very important subject and one that is very aligned to the mission of Danone’s Infant Nutrition business, defined as “Stand by Mums to Nurture New Lives”.

Central to this mission is the recognition that breast milk is the best source of nutrition for infants. We support the WHO’s global public health recommendation calling for exclusive breast feeding for the first six months of life and continued breast feeding along with the introduction of timely, safe and appropriate complementary feeding for children up to two years of age and beyond.

The report highlights four key barriers to breastfeeding that need to be addressed if any significant progress is to be made. It also recognizes that overcoming these barriers is complex and difficult and will require action and cooperation from multiple stakeholders including Governments, the World Health Organization, NGOs and the private sector if real success is to be achieved.

As a global leader in infant nutrition, Danone recognizes that we have an important role to play, both through our support of breast-feeding, as well as contributing to the good health and nutrition of mothers, infants and young children by providing appropriate nutritional education and products.

We accept that in some cases more work needs to be done with regard to industry marketing practices. Danone is taking a leading role in this area and as a priority we are committed to working with industry partners to establish a global code of ethics for the infant nutrition industry. In the absence of a global code of ethics, Danone has established clear internal marketing policies and procedures that will shortly be made public, as well as having our practices audited, both in country and at head office level by independent auditors.

It is unfortunate that in some instances, the final report did not include the most recent statistics available. For example, data from the Indonesia Demographic & Health Survey 2012 which shows a significant increase of breast feeding rates, as opposed to the decline in breast feeding rates documented in the report.

In summary, Danone is committed to improving both the health and nutrition of mothers, infants and young children. We recognize this report is an important document to highlight one key area where much more effort by all parties, including ourselves, is still required - support of breast-feeding. We wholeheartedly support the aims of this initiative and urge all parties to seize the opportunity to work more closely together to make them a reality.

Felix Martin

President  
Danone Baby Nutrition

## **International Life Sciences Institute**

“The current state-of-the-science supports the American Academy of Pediatrics’ position on Breastfeeding and the Use of Human Milk, which reads in part ‘The American Academy of Pediatrics reaffirms its recommendation of exclusive breastfeeding for about 6 months, followed by continued breastfeeding as complementary foods are introduced, with continuation of breastfeeding for 1 year or longer as mutually desired by mother and infant.’

ILSI applauds Save the Children’s efforts to help families worldwide achieve this important goal.”

**Infant and Pediatric Nutrition Association of the Philippines (IPNAP)** thanks Save the Children for sharing with us the *“Superfood for Babies”* report. Our members, who are manufacturers of children’s nutritional products and are invested in the science of nutrition share in the objective of improving nutrition for infants and young children.

IPNAP believes that a report such as this should aspire to be a catalyst in bringing together all the stakeholders from Government, NGOs, civil society, and the private sector who all have important roles to play in this effort and should work together in a transparent process towards a single, coordinated, focused and holistic strategy and action plan.

IPNAP supports the recommendation of the World Health Organization for exclusive breastfeeding for the first six months of life and continued breastfeeding with timely, safe, and appropriate complementary feeding thereafter, consistent with the aims and spirit of the WHO International Code of Marketing of Breast-Milk Substitutes.

The intent of the report at promoting breastfeeding to address malnutrition is laudable, yet given the complexity of the issues under discussion; IPNAP believes a more comprehensive and balanced picture is needed in order to ensure the integrity of the report. We have observed that the draft report is selective in the information being featured, and contains a number of inaccuracies. **In the Philippines, exclusive breastfeeding rate for the recommended 0-6 months period has surged dramatically and as of 2011<sup>1</sup> is already 46.7 percent and is quite near the WHO target of 50 percent by 2025.** Despite this, the challenge of infant, young child and maternal nutrition in the country continues to be complex and multi-faceted. This is manifested in a significant way by the most recent government report that underweight, stunting and wasting have remained a public health problem among children 0-5 years old.<sup>2</sup> Clearly, identifying and implementing solutions require multi-stakeholder cooperation. Breastfeeding is but one important component of infant and young child nutrition, and a number of other critical factors must also be considered.

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<sup>1</sup> The Nutritional Status of Filipino Children and Selected Population Groups Survey: 2011, Food and Nutrition Research Institute, Department of Science and Technology

<sup>2</sup> The Nutritional Status of Filipino Children and Selected Population Groups Survey: 2011, Food and Nutrition Research Institute, Department of Science and Technology

Furthermore, regarding the status of “legislation on paid breaks for lactating women at the work place;” contrary to what is reflected in the report, there exist in the Philippines Republic Act 10028 or the “Expanded Breastfeeding Promotion Act of 2009.” The law requires **“lactation periods” for breastfeeding employees**, in addition to time-off for meals, to allow them time to express their breast milk. This period should be no less than a total of 40 minutes for every eight-hour working period.

We can provide up-to-date, verifiable facts on the Philippine situation to parties who may be interested by emailing [alexvcastro@ipnap.org.ph](mailto:alexvcastro@ipnap.org.ph) or log on to [www.ipnap.org.ph](http://www.ipnap.org.ph).

**Mead Johnson Nutrition  
Statement on *Superfood for Babies* Report**

Mead Johnson Nutrition is a global leader in pediatric nutrition with a longstanding commitment to nourish the world's children for the best start in life. Our goal is to produce the best possible nutrition products for children who cannot or do not receive breast milk, because all children deserve the best nutrition available for the best possible start in life. Given the acknowledged benefits received by children who breastfeed, our research and development efforts are focused on making our infant formulas as close to breast milk as possible.

Mead Johnson Nutrition supports the aims and principles of the World Health Organization (WHO) International Code of Marketing of Breast Milk Substitutes (The Code), which is intended to ensure safe and adequate nutrition for infants, whether they are breast-fed or formula-fed, by providing adequate information and appropriate marketing and distribution. In fact, in 1983, Mead Johnson Nutrition became the first U.S. infant formula manufacturer to enact specific policies and directives in support of the WHO Code.

We share Save the Children's goal of improving pediatric nutrition to ensure infants and children around the world have every opportunity for proper growth and development. We are concerned however, that the report contains several inaccuracies and overstates the benefits of breastfeeding and infant health. Specifically, the report contains non-factual statements regarding the ability of breastfeeding to prevent disease. There is no consistent scientific data to support such a claim.

The Save the Children report cites research that has shown many mothers who decide not to exclusively breastfeed do so for reasons they felt were beyond their control to change – such as social pressures and medical and health reasons, returning to work or school shortly after giving birth, not producing enough breast milk and feeling that the baby was not getting enough milk.

Mead Johnson Nutrition believes that addressing these barriers through a combined effort among governments, the World Health Organization, Non-Governmental Organizations, medical experts, industry, the private sector and mothers is the best way to help ensure that parents are able to provide the best nutrition for their children and their individual circumstances. We welcome a dialogue with all these stakeholders, including Save the Children, so that together we can develop a path forward that provides the best nutritional start to life for all children.

## Nestlé on Save the Children report “*Superfood for Babies*”

We commend Save the Children for taking the initiative to produce this report on overcoming the multiple barriers to breastfeeding, and appreciated the opportunity to comment on the draft. However, we are disappointed that our comments were only marginally taken into account.

We support the WHO recommendation of six months exclusive breastfeeding, and we comply with the WHO Code as implemented by national governments everywhere in the world. In 152 High Risk countries we apply the WHO code, the Nestlé Policy and national legislations, whichever is stricter. We are the only infant food manufacturer to have met the FTSE4Good criteria as a result of our policy implementation.

Like Save the Children, we agree that breastfeeding is the best start a baby can have in life, and we actively promote the practice. For example, we provide workshops on breastfeeding to healthcare professionals in collaboration with health societies, and we run pro-breastfeeding campaigns using leaflets, posters, videos, and websites. We also promote breastfeeding within the company by providing support for our employees, including breastfeeding rooms, counsellors, and flextime for mothers. We also share our research on the benefits of breast milk.

It is unfortunate that specific companies are singled out for criticism, yet none are given credit where it is merited. Your report states, *“Some BMS companies have taken steps in the right direction by creating their own internal management procedures for monitoring and reporting Code violations, including whistleblowing policies and online reporting forms. Furthermore, the corporate social responsibility activities of some of the parent companies of BMS manufacturers are highly developed and play a valuable role.”*

We have in place [strict WHO Code compliance policies and procedures](#), and we continue to review, revise and strengthen them based on results of our [internal and external monitoring systems](#), and stakeholder input. We have asked Save the Children for more information on concerns raised in the report, so that we can investigate and take appropriate action if violations are found.

In our view, Nestlé already has in place the main elements recommended in the report for improving the breast milk substitute (BMS) industry practices. We also believe that a new labeling initiative is not necessary based on Article 9.2 of the [WHO Code](#), which spells out appropriate messaging for infant formula labels. We comply with this as well as with all the requirements of national labeling standards.

We agree that there is still work to be done to improve infant feeding practices and promote breastfeeding around the world. We also agree with Save the Children that the process developed by FTSE4Good holds promise as a useful element in a global action plan to help put an end to examples of WHO Code violations.

We are committed to working constructively with all stakeholders to improve the [health and nutrition of mothers](#) and their infants. This is core to our [Corporate Business Principles](#), which are at the foundation of our commitment to [Creating Shared Value](#). We call on Save the Children and others to improve the dialogue among all stakeholders to achieve the mutually desired goal of breaking down the barriers to successful breastfeeding.