Assessment of Baby Food Companies’ Compliance with the International Code of Marketing of Breastmilk Substitutes and Local Regulations in Thailand
Funded By:
Access to Nutrition Foundation (ATNF)

A non-governmental organization established in the Netherlands in 2013

For more information:  www.accesstonutrition.org
Agenda

• Introduction to Westat, ATNF and IHPP
• Breast Milk Substitutes (BMS) Marketing
• Study Objective and Definitions
• Methodology and Fieldwork
• Analysis of Baby Food Companies’ Marketing Policies/Practices
• Conclusions and Recommendations
• Questions
• Employee-owned health and social science research organization
• Based in Rockville, Maryland, USA
• Founded in 1963
• 2000 salaried employees
• Internationally recognized survey statistical firm
• Conducted in-country assessments in Vietnam, Indonesia and India previously for ATNF
• No conflicts of interest with infant food companies
• Independent of industry: funded by Bill & Melinda Gates Foundation and The Dutch Ministry of Foreign Affairs

• Key Publication — Global Access to Nutrition Index (ATNI)

• Covers both forms of malnutrition: obesity/overweight and undernutrition — and marketing of BMS

• Advised by international Expert Group

• Next publication anticipated in April 2018
• Established in 1998
• Semi-autonomous program
• Conducts research on the national health priorities related to health systems and policy in Thailand
• Relevant experience in surveys and qualitative breastfeeding policy research
• Confirmed no commercial links to the infant food companies
Breastmilk Substitutes (BMS) Marketing is a Critical Issue
Breastfeeding in Thailand

Exclusively breastfed
Breastfed and plain water only
Breastfed and non-milk liquids
Breastfed and other milk/formula
Breastfed and complementary foods
Weaned (not breastfed)

Breastfeeding in Thailand

97.4% children breastfed at one point in time

23.1% children exclusively breastfed <6 months, (global goal is 50%)

3 months the age exclusive breastfeeding rate rapidly decreased

13% children receiving breastmilk at 2 years of age
ATNF Standpoint on Marketing Baby Foods

- Supports WHO recommendations for exclusive breastfeeding up to 6 months of age, with continued breastfeeding, along with appropriate complementary foods (CFs), 2 years and beyond.

- Companies’ marketing of BMS is guided by the 1981 International Code of Marketing of Breast Milk Substitutes (the Code) and subsequent World Health Assembly (WHA) resolutions, and national regulations, where stricter
Study Objective and Definitions
Study Objective

Determine whether those companies whose BMS products and/or CFs for sale in Bangkok conform fully with the provisions of the Code and subsequent WHA resolutions, as well as national regulations controlling the marketing and labeling of these products, in order not to undermine optimal infant and young child nutrition, a significant contributor to combating undernutrition and infant deaths.
Study Definition of Products Included

BMS Products

- Infant Formula (IF) for infants <6 months
- Follow-on Formula (FOF) for infants from 6 months
- Growing up Milk (GUM) for children from 12 months up to 36 months

CF Products

- Less than 6 months
- 6-36 months
Methodology and Fieldwork
Methodology for Thailand Assessment


- Amended forms to incorporate WHA 69.9 recommendations
- Expanded research to capture marketing and promotion of online retailers/websites
- Adapted to Thailand context and national label regulations
Thailand National Regulations

Thai FDA Label Regulations Stronger than the Code

- Advertising IF and FOF products per Section 41 of Food Act B.E. 2522 (1979)

Control of Marketing of Infant and Young Child Food Act

- Passed by Thailand National Legislative Assembly April 4, 2017
- Most provisions effective as of September 8, 2017; labeling provisions come into force one year later.
- Offers baseline against which to measure future effectiveness
Fieldwork Preparation

Contacted Ministry of Health and Bangkok Metropolitan Administration (BMA)

• Submitted study objectives and data collections forms
• Secured approval from Institutional Review Boards (IRBs)

Contacted Each Private and Public HCF

• Requested approval to conduct study
Sample Selection

- 2-stage sample design
- 10 geographical areas (districts or clusters of districts)
- 33 HCFs + 23 replacement HCFs (Total = 56 HCFs)
- Additional sample of 23 HCFs from BMA
- Final sample = 30 public and 3 private HCFs
IHPP Field Team

Program Manager
Provided in-country insights, managed institutional relationships and resources

Project Manager
Provided overall coordination, contacted HCFs

Field Supervisors (4)
Observed promotions in HCFs and retail outlets

Data Collection Staff (8)
Interviewed mothers and health workers
Fieldwork Preparation and Training

Train-the-Trainer training with Westat via Skype

• Question-by-question review of the NetCode forms
• Open Data Kit (ODK) and tablet training

Media Monitoring Training with Westat via Skype

4-Day Training in Bangkok

• Conducted in Thai
• Reviewed each data collection form and use of tablets
• Practiced using role plays
• Conducted field tests at clinic and large and small retail outlets
Data Collection at Multiple Levels to Assess Different Aspects of Code Compliance

June/July 2017

• Evaluate marketing and promotions in 43 traditional retail outlets (10 large and 33 small)
• Monitor product promotion in online media
• Purchase 182 unique BMS and CF products (not necessarily all products available on the market)

July/August 2017

• Interview 330 mothers and 99 health workers in 33 HCFs
• Evaluate promotional and educational materials, and equipment items found in 33 HCFs
Fieldwork

Tokens of Appreciation for Mothers and Health Workers
Analysis of Baby Food Companies’ Marketing Policies/Practices
Media Monitoring | Online weekly monitoring

12 company websites

15 popular websites related to mothers & babies

4 social media company-specific platforms (Facebook, Instagram, YouTube, Twitter)

7 popular Thai online retail websites
Media Monitoring | Traditional

4 | terrestrial channels
65 | print magazines
25 | newspapers
2 | radio channels
Label Analysis

Purchased largest and smallest size of each BMS/CF product when available

- **224** total labels
  - **119** BMS labels included in data analysis
  - **105** CF 6- to 36-month products excluded

- **182** unique BMS/CF products
- **25** baby food companies
Baby Food Companies

• Data collected from 25 companies with products found in Thailand
• Report focused on 5 of 6 largest global baby food manufacturers
• Companies ranked by ATNF:
## Characteristics of HCFs

<table>
<thead>
<tr>
<th></th>
<th>Private</th>
<th>Total</th>
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<tbody>
<tr>
<td>Hospitals</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Outpatient</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Public</td>
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<td></td>
</tr>
<tr>
<td>Hospitals</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Outpatient</td>
<td>28</td>
<td>28</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>33</strong></td>
<td><strong>33</strong></td>
</tr>
</tbody>
</table>
## Characteristics of Mothers

<table>
<thead>
<tr>
<th>Category</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mothers with child &lt;6 months</td>
<td>115</td>
</tr>
<tr>
<td>Mothers with child 6-24 months</td>
<td>215</td>
</tr>
<tr>
<td><strong>Total mothers interviewed</strong></td>
<td><strong>330</strong></td>
</tr>
</tbody>
</table>
### Characteristics of Health Workers

<table>
<thead>
<tr>
<th>Profession</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Center Director</td>
<td>1</td>
</tr>
<tr>
<td>Department Head</td>
<td>5</td>
</tr>
<tr>
<td>Doctor</td>
<td>2</td>
</tr>
<tr>
<td>Nurse</td>
<td>77</td>
</tr>
<tr>
<td>Midwife</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>14</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>99</strong></td>
</tr>
</tbody>
</table>
### Characteristics of Retail Outlets

<table>
<thead>
<tr>
<th>Type of Retail Outlet</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Small retail outlets (proximate to HCF)</td>
<td>33</td>
</tr>
<tr>
<td>Large retail outlets</td>
<td>10</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>43</strong></td>
</tr>
</tbody>
</table>
Results & Recommendations
Article 4. Information and Education

Information to Mothers

- 8 informational or educational materials observed (3 HCFs and 5 retail outlets)
- Referenced 13 unique BMS products
- Produced by 3 ATNF focus companies

Equipment Donated to HCFs

- 38 observations at 14 HCFs
- 36 displayed brand names/logos
- ~67% Danone
- ~25% RB/MeadJohnson Nutrition
Article 5. General Public and Mothers

Advertising and Promotions

- 83% mothers reported seeing promotion in past 6 months (797 advertisements)
- 65% television and ~19% social media promotions

Traditional Media

- 31 ads on traditional media repeated 1066 times
- 84% for GUMs from RB/Mead Johnson Nutrition, Danone and Nestlé

Online Media

- 104 promotions on companies’ own media (websites/social media)
- 33% Danone
- Facebook most prominent medium
Gifts and Samples

14% mothers received BMS sample from company representative. The majority of the samples were:

- 33% = IFs
- 33% = GUMs
- 2 samples from Nestlé and RB/MeadJohnson Nutrition
Article 5. General Public and Mothers

Point-of-Sale & Promotions

Retail Outlets

- 154 promotions
- 186 products
  - 151 = GUMs
  - 18 = FOFs
  - 17 = IFs

Online

- 2,673 promotions
  - 69% = GUMs
  - 88% price-related
  - 12% free gifts

Across Retail & Online Promotions

- 927
- 824
- 490
- 247
Article 5. General Public and Mothers

Gifts or Coupons to Mothers

- 16% mothers reported receiving gift
- 19 from company representative and 7 from shop personnel
- 2 gifts from Nestlé, 2 from RB/Mead Johnson Nutrition, and 1 from Danone
- 17 reports of receiving coupons from company representative/shop personnel
- 1 coupon from RB/Mead Johnson Nutrition
Article 5. General Public and Mothers

Company Contact with Mothers

• **10** mothers reported contact

• **12** total contacts from company representative or shop personnel

• 1 report from Nestlé

• 2 reports from ‘Other’ companies
Article 6. Health Care Systems

Promotional Activity within HCFs

• 8% mothers reported health worker suggested use of BMS
• 35 total reports
• 15% health workers reported contact from company representative
• 16 total contacts
• ATNF focus companies:
  • RB/Mead Johnson Nutrition 3
  • Danone 2
  • Abbott 1
  • Nestlé 1
Article 6. Health Care Systems

Promotional Materials within HCFs

• Observed in 8 of 33 HCFs
• 17 items with brand names/logos
• 19 total promotional items observed
• ATNF focus companies:
  • Danone 7
  • RB/Mead Johnson Nutrition 7
  • Nestlé 2
  • Abbott 1
Article 7. Health Workers

Informational and Educational Materials for Health Workers

- No eligible materials observed in HCFs
Article 7. Health Workers

Financial or Material Inducements

- 6% reported contact by company to provide personal gift
- 3 contacts from Nestlé, 3 from “other” companies
- 11% reported 13 contacts with offers to sponsor event/workshop

Contacts:
- Nestlé 4
- Abbott 1
  - RB/Mead Johnson Nutrition 1
  - Others 6

- Self-reports and inappropriate so possible underreporting
Article 7. Health Workers

Gifts and Samples

• 15% health workers reported company representatives contacting them to provide BMS samples to mothers

• 16 total reports

• 15% mothers reported receiving free BMS sample from health worker

• 55 total reports
Article 9. Labeling

Inclusion of Important Message and Statement of Breastmilk Superiority

• All 44 IF and 30 FOF labels included important message statement and statement of superiority of breastfeeding

• 60% IFs and 63% FOF missing statement to use under recommendation of health worker

• All 44 IFs had information on appropriate preparation

• None of 44 IFs included pictures of infants/idealize use of IF
Article 9. Labeling

Inclusion of Required Information

- All **119** labels included ingredients, composition and batch number
- **59%** labels included language with nutrition/health claims:
  - **22%** IFs
  - **12%** FOFs
  - **25%** GUMs
- **None** of powdered formulas (IFs, FOFs, and GUMs) included warning about pathogenic microorganisms
Conclusions and Recommendations

Widespread Point-of-Sale Promotions, Particularly on Online Retail Sites

Baby food companies and Thai government should:

- Ensure that distributors and retailers are aware of responsibilities under the Code
- Ensure that distributors and retailers do not discount or promote BMS products
- Rigorously enforce restriction of digital media to promote BMS products
Conclusions and Recommendations

Advertising and Promotion

Baby food companies should:

• Be aware of responsibilities under the Code
• Strengthen corporate policies inconsistent with intent of the Code and Thai regulations
Conclusions and Recommendations

Labeling

Thai government should:

- Increase enforcement of BMS companies’ compliance with existing national label regulations
- Reference our results to prepare for enforcement of ‘Milk Act’ in 2018 – certain required information consistently missing on products
Conclusions and Recommendations

Equipment Donated to and Promotional Materials in HCFs

Baby food companies should:

• Cease all donations of equipment
• Cease distribution of promotional materials with brand names/logos
Conclusions and Recommendations

Company Contact with Mothers

Baby food companies and the Thai government should:

- Ensure that future efforts focus on restricting use of social media to contact mothers
Questions?