

KRAFTHEINZ
FINAL ASSESSMENT OF BMS CALL TO ACTION SIGNATORIES



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Hereby enclosed is the response of The Kraft Heinz Company (KHC) to "Breastmilk Substitutes Call to Action" (CTA) launched on 25 June 2020 from WHO, UNICEF, together with six civil society organizations.

Introduction:

The World Health Organization (WHO) and the United Nations International Children's Emergency Fund (UNICEF) recommend exclusive breastfeeding (EBF) for the first six months of life, followed by the introduction of complementary foods (CF) along with continued breastfeeding up to the age of two years and beyond (1).

KHC contribution:

- In line with the WHO recommendations, the European Food Safety Authority (EFSA) and Scientific societies including the European Society for Pediatric Gastroenterology, Hepatology and Nutrition (ESPGHAN) (2,3,4), The Kraft Heinz Company supports EBF for the first six months as an ideal goal.
- KHC recognizes the importance and the superiority of breast-milk in feeding infants and the importance of exclusive breastfeeding for the first 6 months, and continued breastfeeding for two years or more.
- KHC recognizes their longstanding obligations to adhere to the International Code of Marketing of Breast-milk Substitutes passed by the World Health Assembly in 1981 and updated through several subsequent resolutions.
- As a first step in line with the CTA, on 16th Sept 2020 KHC published the internal policy-charter of practice for marketing breast-milk substitutes already adopted for all countries and for products marketed as suitable for infants between birth and 12 months of age.
- As stated in the policy, KHC has been and continues to be committed to compliance with the World Health Organization (WHO) International Code for Marketing of Breast-milk Substitutes and subsequent relevant WHA resolutions as implemented by national legislation or codes of practice.
- KHC will comply with the policy including in all jurisdictions where regulations are absent or less stringent than our policy. In countries where national law is more stringent than our policy, adherence to national law always takes precedence.
- Our commitment to support self-regulative initiatives includes support for the adoption and implementation of national legislation aligned with the Code.

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Signatories' assessment

Ask 3: Commit to support the adoption and implementation of national legislation fully aligned with the Code in order to create a level playing field for all companies.

The company states its commitment to support the adoption and implementation of national legislation aligned with the Code. To fully meet this request, the company would need to add that it supports national legislation fully aligned with the Code.

- As part of the KHC plan to contribute to the CTA, KHC will continuously review its BMS policy relative to the WHO Code to reinforce the importance of responsible marketing practices globally, as well as implementation at the local level.
- KHC supports the aim and principles of the CTA and commits to FULL compliance by 2025 with the World Health Organization (WHO) International Code for Marketing of Breast-Milk Substitutes and subsequent relevant World Health Assembly (decision-making body of WHO) resolutions. KHC will submit a concrete roadmap plan for achieving this goal by 31 January 2021.

Signatories' assessment

Ask 1: Publicly commit your company to full compliance with the International Code of Marketing of Breast-milk Substitutes and subsequent resolutions (the Code) globally (including covering of breast-milk substitutes up to 36 months of age), and disclose a concrete plan for achieving this goal by 2030 at the latest, with delineation of clear incremental steps.

The company makes the requested commitments. The signatories strongly welcome KHC's commitment to full Code compliance by 2025, five years earlier than the deadline set. The signatories will evaluate and publish a separate assessment of the plan when it is submitted.

The KHC has furthermore publicly formalized these positions by publishing its [Global Charter on the Marketing of Breastmilk Substitutes](#) (5). KHC remains open to dialogue with the signatories to support the mission of protecting breastfeeding as an important public health priority and to provide safe and adequate nutrition for infants and young children, when breastfeeding cannot be (or cannot be entirely) provided. Furthermore, KHC welcomes the collaboration with ATNI to help in the company assessment throughout this long-term journey.

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Signatories' assessment

Ask 2: As a first step towards full Code compliance, by the end of 2020, for a company that has a BMS marketing policy in place, ensure that your current policy and practices (including promotion to consumers and healthcare providers) are Code-aligned and for products marketed as suitable for infants between birth and 12 months of age, extend them to all countries, and commit to upholding your policy in all jurisdictions even where regulations are absent or less stringent than your policy. In countries where national law is more stringent than your policy, adherence to national law always takes precedence.

The company appears to make the requested commitment. KraftHeinz states that as a first step in line with the CTA, on 16th Sept 2020 KHC published the internal policy-charter of practice for marketing breast-milk substitutes already adopted for all countries and for products marketed as suitable for infants between birth and 12 months of age. The Signatories welcome the publication of the company's Global Charter on the Marketing of Breastmilk Substitutes. Further evaluation is needed to determine whether the company commits to upholding this policy even where regulations are absent.

We await the results of ATNI's forthcoming 2021 BMS Marketing Index to determine the extent to which the company's policy and practices for these products align with the Code and all subsequent relevant WHA resolutions. The results of the 2018 Index indicated that they did not do so.

Signatories' assessment

Ask 4: Agree to provide information on your company's policies and practices to the Access to Nutrition Initiative (ATNI) as requested, recognizing ATNI as an independent actor responsible for monitoring companies' progress toward their plans for achieving Code compliance.

The company makes the requested commitment.

KraftHeinz Company is included in ATNI's forthcoming 2021 BMS Marketing Index.

References

1. World Health Organization. Global Strategy for Infant and Young Child Feeding. Geneva: WHO; 2003
2. ESPGHAN Committee on Nutrition. Breast-feeding: A commentary by the ESPGHAN Committee on Nutrition. J Pediatr Gastroenterol Nutr. 2009;49(1):112-25. <https://doi:10.1097/MPG.0b013e31819f1e05>
3. EFSA Panel on Dietetic Products, Nutrition and Allergies (NDA). Scientific Opinion on the appropriate age for introduction of complementary feeding of infants. EFSA J. 2009;7(12):1423[1–38 pp.]. <https://doi.org/10.2903/j.efsa.2009.1423>
4. EFSA Panel on Nutrition, Novel Foods and Food Allergens (NDA), Scientific Opinion on the appropriate age range for introduction of complementary feeding into an infant's diet. EFSA Journal 2019;16(9): e05780. <https://doi.org/10.2903/j.efsa.2019.5780>
5. Kraft Heinz Environmental Social Governance report; Sept, 2020

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Sincerely,



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Secretary

The Kraft Heinz Company