Unintended Consequences of Regulating Messaging
• Nutrition plays the most critical role in a narrow window of time.
• The first 1,000 days - begins at the start of a pregnancy and continue through the second year of life.
• The quality of nutrition is critical in determining:
  o Pregnancy outcome;
  o Whether a child will contract a common childhood disease;
  o or experience enough brain development to go to school and hold a job as an adult.
  o Long term adult health outcomes.
Fill the nutritional gap of the traditional complementary foods

Sustainable public & market-based approaches
Up to 75% of Asian children and 46% of African children consumed sugary snacks in the second year of life. The proportion of children consuming sugary snack foods was generally higher than the proportion consuming fortified infant cereals, eggs or fruit.

Huffman et al.

Optimal Infant & Young Child Feeding

Promoted Protected

Adequate Available Affordable
Marketing Controls

The Code
Marketing Controls

**WHA Resolution 63.23:** Urged member states “to end inappropriate promotion of foods for IYC and to ensure that nutrition and health claims not be permitted for foods for IYC, except where specifically provided for, in relevant Codex standards OR national legislation”.

**WHA Resolution 65.6** requested the DG “to provide clarification and guidance on inappropriate promotion of foods for infants and young children...”.

67th WHA decision requests work be completed by end of 2015.
WHO STAG proposed criteria for inappropriate promotion of foods for IYCF

“...promotion of foods for infants and young children is inappropriate if

1. It **undermines** recommended breastfeeding practices;
2. It **contributes to** childhood obesity and non-communicable diseases;
3. The product does not make an **appropriate contribution** to infant and young child nutrition in the country;
4. It **undermines** the use of suitable home-prepared and/or local foods;
5. It is **misleading, confusing**, or could lead to inappropriate use.”

Nutrient content claim:
“High in iron”; “Source of calcium”; “Low in fat”

Nutrient function claims
"Vitamin A is important for the maintenance of good vision and normal growth"
Possible Implications of NO CLAIMS

Companies reluctant to develop innovative / evidence based CPCF and distribution systems

No claims on labels/in promotion of complementary foods

Companies unable to market their products effectively

Low demand for product

Products fail - removed from the market

Limited access by vulnerable populations to good quality products

Limit consumer’s ability to identify /select good quality and appropriate products

Road-block to ensuring the scale-up of optimal IYCF practices
• Describe the extent to which the labels of commercially produced foods marketed for, or commonly fed to, infants and young children < 2 years in 4 countries (Senegal, Tanzania, Nepal, Cambodia) comply with local and international guidance on the marketing of such foods.
• Describe and assess practices observed.
• Report on nutrient composition.
• Test the WHO Scientific Technical Advisory Group initial criteria.

*ARCH – Assessment and Research in Child Feeding
Commercially produced complementary foods (CPCF):
- Cereal/porridge (incl. fortified)
- Homogenized/pureed food
- Tea/water/juice
- Snacks/finger food
- LNS/MNP.

Foods commonly fed to, but not marketed specifically for, children <2 years of age (CPF):
- Soda/sweetened beverages
- Biscuits/cookies
- Chips/crisps
- Cakes/doughnuts, candy
- Other country-specific products.
Number of CPCF labels carrying claims

Senegal (n=84)
- Nutrient content claims: n=73
- Nutrient function/other function claims/implied health claims: n=21
- Nutrient comparative claims: n=3
- Non-nutrition claims: n=77

Tanzania (n=26)
- Nutrient content claims: n=18
- Nutrient function/other function claims/implied health claims: n=19
- Non-nutrition claims: n=23
% of CPCF and CPF carrying nutrition claims

<table>
<thead>
<tr>
<th>Area</th>
<th>CPCF (n)</th>
<th>CPF (n)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dakar, Senegal</td>
<td>84</td>
<td>22</td>
</tr>
<tr>
<td>Dar es Salaam, Tanzania</td>
<td>26</td>
<td>17</td>
</tr>
</tbody>
</table>

Iron, Vitamins, Vit C, Salt, Sugar
% of CPCF and CPF labels carrying health claims

<table>
<thead>
<tr>
<th>Area</th>
<th>CPCF</th>
<th>CPF</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dakar, Senegal</td>
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<td>17</td>
</tr>
</tbody>
</table>
# Cost comparison between CPCFs & CPFs in Senegal

<table>
<thead>
<tr>
<th>Product origin</th>
<th>Commercially produced complementary foods (n=84)</th>
<th>Commercially produced foods for general consumption commonly fed to children &lt;2 years of age (n=22)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Cereals / Porridge</td>
<td>Puréed food</td>
</tr>
<tr>
<td>Local</td>
<td>0.13 (0.08 - 0.19)</td>
<td>-</td>
</tr>
<tr>
<td>Imported</td>
<td>0.45 (0.21 - 1.37)</td>
<td>1.60 (1.20 - 2.77)</td>
</tr>
</tbody>
</table>

Currency: USD
Food for thought...

- A variety of nutrition and health claims are found on foods consumed by children <2 years.
- Some claims may be useful and easily substantiated, others are potentially misleading or unsubstantiated.
- To improve IYCF practices and provide mothers with relevant information, more detailed guidance is required on:
  - The use of nutrition claims (STAG only refers to health claims).
  - The appropriateness of various nutrition and health claims.
**Food for thought...**

- In addition to complementary foods, consideration needs to be given to **commercially produced foods not marketed for, but commonly fed to children <2 years (CPF)**.
- **Nutrient content of selected CPF**: Relatively low in protein and micronutrients; high in fat.
- **CPF imply that they are suitable for IYC/children** in general, as they:
  - Can make nutrition and health claims.
  - Are less regulated in terms of images and other marketing techniques used on labels.
- **Restrictions on promotion of appropriately formulated CPCF may result in unintended negative consequences**:
  - Mothers selecting CPF over CPCF.
  - Manufacturers removing the age recommendation on CPCF.
A potential bottle-neck to scaling up nutrition:
• ‘Hen and Egg’ situation.
• Complete ban on claims:
  o Appears to be a quick and easy solution.
  o Deals with misleading/unsubstantiated claims.
• Unintended consequences:
  o Easily substantiated claims prohibited.
  o Poor quality foods may appear more appropriate for IYC than good quality foods designed for IYC.

Recommendation:
Instead of prohibiting all claims, specific guidance is required from WHO on:
• Which claims are appropriate / Appropriate wording.
• Under which conditions.
Full reports on the **ARCH Project** are available at:

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**Thank You**

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