IBFAN welcomes the opportunity to comment on the Director General’s report and the proposed decision it contains. 2020 is a reporting year for the International Code and a new Resolution or a Decision is needed to alert Member States to new marketing tactics that are threatening children’s health and survival. We know that after nearly 40 years, some would like to see this issue taken off WHO’s agenda, so we were alarmed that the Draft Decision implies that biennial reporting should end by 2026.

It seems that two quite separate issues have been mixed up under the wish to ‘streamline’: The Implementation plan - which has a natural end date of 2025 - and the reporting on the International Code – which in Article 11.7 calls for reporting back in even years - with no end date.

To use a blanket approach to fundamentally change one of WHO’s most important Resolutions - is far too risky and must be stoppe.

Since promotional marketing will not stop until every country has strong laws that are enforced and since too many countries still lack such laws, how can anyone believe that safeguards to protect breastfeeding and independent information will no longer needed soon? Are we now seeing the impact of WHO’s NSA business partners on WHO’s governance?

IBFAN calls on this EB to adopt a Decision or Resolution that addresses the following threats to child health:

- Baby food industry-funded digital marketing and data collection
- Increased global trade of unhealthy products that exacerbate global warming. Breastmilk substitutes contribute to environmental degradation and replace environment friendly breastfeeding.
- Inappropriate emergency responses that fail to respect women’s autonomy or safeguard breastfeeding and appropriate infant and young child feeding;
- Over-emphasis on micronutrients and fortified supplements rather than biodiverse, minimally processed, culturally appropriate foods
- The marketing of products targeting malnourished children
- multi-stakeholder partnerships and lack of sound conflict of interest policies
- Inappropriate interpretation of WHO’s exclusive breastfeeding targets

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