# **ABBOTT**

Evidence of violations of the International Code of Marketing of Breastmilk Substitutes and subsequent resolutions

Abbott Laboratories 100 Abbott Park Road Abbott Park, Illinois 60064-3500 USA

www.Abbott.com

#### **BRANDS**

Eleva Isomil Similac **PediaSure** 

#### **LOGOS & ICONS**



#### **GENERAL INFORMATION**

Abbott divides its core businesses into four major areas – nutrition (including paediatric nutrition), diagnostics, medical devices and pharmaceuticals. The company derives its revenue equally from developed economies as well as emerging markets and it takes the long view that there is potential in emerging markets where billions of people spell high volume needs and opportunities. Abbott is growing its presence in these markets to capture and build on emerging technological, demographic social and economic trends.

In its 2015 Annual Report, Abbott announced that it has -

- delivered the second highest total shareholder return of all the companies on the S&P 500 Index (212%) since 1957;
- 2. been named to the Dow-Jones Sustainability Indexes, the world's top recognition for leadership in responsible economic, environmental, and social performance, for the 11th consecutive year;

3. been named as industry's Most Admired Company in Fortune magazine's annual ranking for the third year in a row.

No where in the 2015 Annual Report was there any mention of its bad track record in Code compliance. All past editions of **Breaking the Rules**, **Stretching** the Rules (BTR) show Abbott to be a systematic and continuous Code violator. In the Access to Nutrition Index(ATNI) Global 2016 Report (https:// www.accesstonutrition.org/sites/2015.atnindex.org/ files/atni-global-index-2016\_2.pdf; p.150), Abbott achieved only 14% compliance with the ATNI BMS methodology while Abbott's Infant Formula Policy is no longer available online. Requests sent to Abbott directly for its infant formula policy went unanswered. Past assessment of Abbott's policy shows that it applies to infant formula globally. Only in 'higher-risk' countries does it apply to follow-on formula and complementary food. Its policy does not apply to growing-up milks. It also does not pledge to follow its own commitments in countries where regulations are weaker than those commitments.

In 2015, a campaign for Abbott's premier brands was launched seemingly to support pregnant women. Driven by a powerful tagline - The Sisterhood of Motherhood - the campaign ad satirises the different parenting issues dividing moms and dads. It portrays formula feeding as just another choice on which there should be zero judgment.



Seemingly, a call to end 'mommy wars' but Abbott is out there to sell formula.

The ad implies that anyone who takes a different position is combative and sanctimonious. Thus, the way is paved for acceptance of formula feeding which undermines public health recommendations about the importance of breastfeeding.

Campaign statements on the **Similac** websitehttps://similac.com/why-similac/sisterhood-ofmotherhood – unabashedly states that **Similac** is "committed to helping moms and dads parent their own way, by providing products and services that support you no matter how you feed your baby." Subsequent pages all promote **Similac**.



The sisterhood of motherhood "campaign makes no bones about what it is selling here. It tells mums and dads, "like parenting, there's no one formula fits all". Parents can choose between **Similac Advance** and **Similac Sensitive**.

In 2016, global sales of Abbott's paediatric nutritional segment totalled USD 2.2 billion, down from USD 2.4 billion in 2015. The decrease in sales was caused by challenging market conditions in China including the impact of new food safety regulations which will require the re-registration by 2018 of all formula products contributing to oversupply in the market.

The sales decrease in China was partially offset by continued strong performance in several markets across Latin America and Southeast Asia. Paediatric nutritional sales in the US increased in 2016 reflecting above-market performance of the PediaSure toddler brand as well as the launches of Similac Advance Non-GMO and Similac Sensitive Non-GMO.

Abbott's 2016 Annual Report describes these two products as breakthrough, first-to-market innovations that come closer to breastmilk than ever before. It added that these formulas contain a special prebiotic, like those found naturally in breastmilk.

#### Riding on breastmilk

In 2016, the results of an Abbott study conducted on 200 babies over a 6-week period was published. The study concluded that multiple immune markers of breastfed babies and babies using a new prebiotic formula were nearly identical. The prebiotics described as human milk oligosaccharide (HMOs) are found in two of the company's brands - Similac Pro Advance and Similac Pro Sensitive which are advertised as closest to breastmilk.



This online ad states that "what was once available just to breastfed babies is now available to formula fed infants."

In a statement made to the newspaper, USA Today, ("Breakthrough infant formula protects immune system like breastmilk" - Oct 27, 2016), Abbott announced that the formulation is "the biggest breakthrough in the last decade" but was quick to add that the product is not identical to breastmilk and that the HMOs used in the new formula are not from breastmilk.

They are created like vitamin supplements to have similar properties which are absorbed into the baby's circulation to boost health.

This qualification is not apparent on the product level or on its promotional materials.

Editorial note: Multiple long-term studies have been analysing the positive influence of HMOs found in human breastmilk and research is still being conducted to strengthen the established results. One single short-term study, designed, analysed and interpreted by researchers working for Abbott is not conclusive enough for the company to make the promotional statements the company has made about its products. They constitute claims which are forbidden by subsequent World Health Assembly Resolutions. (WHA 58.32 [2005] and WHA 63.23 [2010])

### PROMOTION TO THE PUBLIC AND IN SHOPS

- Article 5.1 of the Code prohibits advertising and all other forms of promotion of products under the scope of the Code.
- Articles 5.2 and 5.4 of the Code prohibit companies from giving samples and gifts to mothers.
- Article 5.3 of the Code bans promotional devices at the retail level.
- Article 5.5 of the Code prohibits marketing personnel from seeking direct or indirect contact with pregnant women and mothers.

#### PROMOTION TO THE PUBLIC

■ In 2014, Armenia adopted a new law that covers all provisions of the Code and relevant WHA resolutions, and in some aspects the law is even stronger. Due to lack of enforcement, Abbott like many of its competitors, are violating the law as well as the International Code. For instance, on the Abbott website and on Facebook, one is able to access promotion of **Similac** products which feature cute, active and healthy looking babies alongside the Rosco Bear mascot that appears on **Similac** labels.





Similac on a rampage on Facebook

■ In Cambodia, the law governs marketing of products for children up to 24 months. Although Abbott's commercial for **Similac Total Comfort2** is purportedly aimed at children above that age, the Rosco Bear mascot shown at the start of a commercial is the same one which appears on labels of **Similac** infant formula products.







This commercial for **Similac Total Comfort 2** is not only full of prohibited claims but reaches out to young babies as well.

The ad clearly implies that there are **Similac** products suitable for younger babies even though the law prohibits promotion of products below 24 months.

The multitude of claims in the commercial blatantly violate Resolutions WHA 58.32 [2005] and WHA 63.23 [2010] which prohibit claims. For example, Similac Total Comfort is described as containing Tummi Care system - "an easy-to-digest super premium formula, gentle on tummies and formulated with Intelli-Pro and Eye Q-Plus to support brain and eye development, promote strong immune system with IMMUNIFY system for growing-up children."

#### **Minimum Requirement**

#### Code Article 11.3

Independently of any other measures taken for implementation of this Code, manufacturers and distributors of products within the scope of this Code should regard themselves as responsible for monitoring their marketing practices according to the principles and aim of this Code, and for taking steps to ensure that their conduct at every level conforms to them.

#### WHA 34.22 [1981]

Final preamble

- "...Adoption of and adherence to the International Code of Marketing of Breastmilk Substitutes is a minimum requirement"
- In Singapore, industry participation in the Sale of Infant Foods Ethics Committee ensured that the Code is reduced to its lowest common denominator. The ban on promotion is limited to infant formula and Abbott violates even that Code in distressing ways.
  - Through the Abbott Strong Mums Club, mothers are courted with samples of **Similac Total Comfort 2**, which are marketed in Singapore for babies after 6 months. Coupons offering price reductions, gifts such as mittens, face towels and baby slings featuring product names and logos are also offered as incentives.



Infant mittens and towels printed with **Similac** name and logo.

- Gifts including samples of **Similac** follow-up formulas are sent directly to homes of mothers who signed up online with the Strong Mums club. Even though follow-up formulas are not covered by the scope of the narrow Singapore Code, samples of these products are sent to mothers before their babies are old enough to be fed these products. This is a dangerous practice as follow-up formulas are not suitable for babies below 6 months.



Mothers will find such gifts hard to resist.

- Through Abbott Strong Mums, mothers are also enticed to make minimum purchases of **Similac** products to the tune of SGD150-180 to get a choice of gifts which include discount coupons or toys. These offers are made through ads on Abbott's Facebook page.



"Nourish the mind" and "stimulate the senses" ... of parents to purchase **Similac** products.

- Other Strong Mums Facebook bargains offer a "buy 6 get 1 FREE special". Participating products include Similac Follow-on Stage 2, Similac Total Confort Stage 2 and Isomil Stage 2. Purchases can be made through a major supermarket chain.



Buy 6 cans get 1 can FREE when you shop at Cold Storage Online! Participating products: Similac Follow-on Stage 2, Gain IQ Stage 3, Gain IQ Kid Stage 4, Total Comfort Stage 2 & 3, Isomil Stage 2 & 3, PediaSure, Grow Preschool 3+ and Grow School 6+ (820g-900g). Terms apply.



**Buy 6 Get 1 FREE Special** Cross promotion! coldstorage.com.sg

The image of mum and baby, not just the special, is effective in promoting products on social media.

- Apart from the continuous courtship of mothers through its Strong Mums club, Abbott also organises highly anticipated 'First Mums' & Dads' congresses where parents are promised valuable tips from health care experts on pregnancy, nutrition, confinement practices and baby developmental milestones. Speakers at the event include company personnel.

The call for registration for the 2017 event actually mentions the inclusion of breastfeeding topics!. Why a formula company which stands to benefit from failure of breastfeeding would want to talk about breastfeeding is entirely fishy but by doing so, it is likely that the company will enlarge its pool of potential customers, those who intend to breastfeed and who would otherwise not attend the event. In this way, should breastfeeding fail for any reason whatsoever, Abbott products are poised to step in.



**Editorial note:** Many events in these annual First Mums' and Dads' Congresses are mother craft services prohibited by Article 5.2 the Singapore Code. Being a public forum, these Congresses also fail to comply with the requirements of Article 5.5 which prohibit industry members from being main organisers, speak at these events or feature brand names or logos in presentation slides.

Across the causeway in Malaysia which has a stronger national Code, Abbot is careful not to promote its infant formula or follow-up formula products and focuses instead on the promotion of growing-up milks.

Although **Similac Gain Plus 3** is marketed for young children between 1 - 3 years of age and the product is not yet covered by the Malaysian Code, Abbott still violates the Malaysian Code with tactics that target mothers with young babies.

This is evident from a baby photo competition held at a Malaysian hypermarket where the competition banner is strategically placed on a shelf holding the full range of **Similac** milk formulas. Pictures of babies obviously below 12 months of age are pasted on the banner, indicating that the competition is also a clear form of cross-promotion for **Similac** infant formula and follow-up formula products.



This **Similac Gain Plus 3** baby photo contest is a cover for promotion of all **Similac** formula products... similar name and mascot.

#### PROMOTION IN SHOPS

- In Armenia,
  - Similac Premium2 posters in supermarkets announce the results of a survey which shows that 60% of mothers prefer formula without palm oil, like Similac Premium. The posters bear unsubstantiated claims about the product's formulation that help in the formation and maintenance of a healthy intestinal flora, brain development and vision. It purportedly also offers comprehensive support of the immune system.



The round sign on the poster represents the system of protection for the tummy. It also appears on product labels

- Company literature on a full range of **Similac** products, all in Russian, can be found in pharmacies for distribution to shoppers in violation of the law in Armenia. These materials suggest similarity with breastmilk and claim to promote growth and benefits for the digestive and immune systems.



These company materials are illegally brought in from Russia. They do not exist in Armenian as such materials are prohibited by law.

■ In Trinidad & Tobago, Abbott draws special attention to its **Similac** formula products at a local supermarket by offering "triple points (x3)" reward to card holders of the supermarket's loyalty programme.

The reward offered weekly on "blue price tag" items, is a sales device to encourage customers to earn extra points which can be exchanged for gifts. This offer is valid for the full range of formula products and growing-up milks.





Abbott joins forces with T&T supermarket to induce sales.

■ In Singapore, gifts of food cutters, mashers and cutleries are offered with the purchase of Similac Total Comfort at the stage when babies start complementary feeding. Additionally, Similac IQ Plus are sold in twin pack offer packs that tells shoppers that the products "nourish the mind and stimulate the senses."



For some shoppers, what's inside the package matters; for others what's on offer outside counts more.

#### ■ In USA,

- Abbott sends out gift boxes containing coupons and samples of Similac Advance Non-GMO and Similac Sensitive Non-GMO infant formulas to expectant mothers through its Similac Strong Moms Club. Idealising text and claims cover the inside of the box. **Similac Advance** is described as "closest formula to breastmilk" while Similac Sensitive is promoted for reduction of "fussiness and gas due to lactose sensitivity". Even the fact that the product is "Non-GMO" becomes an advertising platform. The box sets out "3 easy steps" instructions on how to use coupons to earn points for free Similac. A letter provides recipients with their personal membership ID which can be used for additional savings and tips. A "New Similac Tummy Care Guarantee" enables mothers to try a different product if the sample given is not suitable for her baby.



"Free **Similac** product samples and great savings" packed into a beautiful box and delivered to the doorstep.



Promotion inside the gift box includes a guarantee for a replacement product if the ones given are not suitable.



**Similac** Non-GMO labels are fussed over as the "first and only".

- In another campaign, mothers are asked to sign up with Similac Strong Moms Club to get a goody bag containing a *Newborn Nutrition Kit* which will be delivered to their doorsteps.

The Newborn Nutrition Kit normally contains the following items:

- Similac Infant Nipple
- Similac Infant Formula 4 pack
- Similac Advanced Complete Nutrition 12.4oz
- Similac Sensitive 8oz
- Four Save \$5 Similar Checks

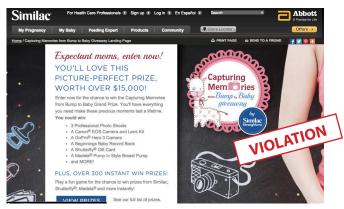
Recipients also receive other membership rewards such as weekly emails focusing on health and wellness of babies, nutritional guidance for a healthy pregnancy, access to the Feeding Expert team, partner offers such as free Shutterfly Pregnancy Journal photo book and more!

This unethical form of promotion, given to pregnant women or new mothers at a time when they are making crucial decisions between breastfeeding and formula feeding, will tip the scale in favour of formula feeding.



- To ensure a captive customer base, the Similac Strong Moms Club also runs contests for expectant mothers. This includes "*Memories from Bump to Baby*" contests where over 300 lucky mums will instantly win prizes comprising formula products and breast pumps.

The grand prize includes professional photo shoots, camera and lens kit and a Macbook.



Picture perfect prizes for winning entries.

- Of course, mums must get some real offers to make sure they are really hooked into buying. Apart from extra formula, mums will see Abbott's self proclamation that it is the number #1 brand from the ad below. The label of **Similac Sensitive** and **Similac Advance** also carries the statement that it is the "#1 brand fed in hospitals". This accolade confers dubious medical endorsement on the products.



The slogan - "#1 brand fed in hospitals", will make parents think that product must be safe while more for the same price is always an enticement.

- There are also ads that carry coupons which offer price reductions and make statements to outsell Abbott's main competitor, Mead Johnson. For example, the ad overleaf compares **Similac Advance** as having better value than **Enfamil Premium**.



How to get 3 more weeks of **Similac** free over the course of one year vs **Enfamil Premium.** 

- In the Fit Pregnancy magazine (Oct / Nov 2014), a full page ad from Abbott entitled "You know his stomach only holds a few ounces. Let's make them count" advertises Similac with OptiGRO. The OptiGRO formulation, represented by a logo on the product label, is described as "blend of DHA, Lutein and Vitamin E" which Abbott claims helps with the baby's "brain, eyes and development" growth especially during their "first year". There is a statement at the bottom of the ad which claims that the product, like all Similac formulas, has been "reformulated to better match the average caloric density of breastmilk."



The fine text in this ad tells mums who "are in tune" with their babies and who want their babies to thrive to recognise that Similac with OptiGRO is "closer to the nourishing power of breastmilk than ever before."

It ends with the statement - "but knowing you, you already knew that. Knowing means growing." - A check on just one range of **Similac** products shows how prolific claims are - https://similac.com/why-similac/optigro- (accessed 23 February 2017)

Similac with OptiGRO is touted as containing a 'unique' blend of DHA, Lutein and Vitamin E, to help "support your baby's overall growth, brain, eye, and immune system development" in the following ways -

- DHA : An ingredient that supports brain development
- Lutein : A nutrient found in breastmilk that supports eye health
- Vitamin E : An important nutrient to support developing cells
- Nucleotides: Building blocks for cells to support your baby's developing immune system
- Antioxidants: Help protect cells. Includes nutrients such as vitamins C, E, and selenium
- Prebiotics : Promote digestive health to support your baby's immune system

Nowhere on the web-page is there any mention about the importance of breastfeeding or the risks of formula feeding.



Described as America's #1 Brand, **Similac Optigro** is said to provide nutrition beyond DHA alone.

**Editorial Note:** The Code is implemented neither at state nor at federal levels in the US. It receives a cursory reference in the Surgeon General's Call to Action to Support Breastfeeding (2011) https://www.surgeongeneral.gov/library/calls/breastfeeding/index.html (accessed 23 February 2017), where there are calls, interalia, to hold marketers of infant formula accountable for Code compliance and for steps to be taken to ensure that claims about formula are truthful and not misleading. In 2016, the U.S. Food and Drug Administration issued non-binding recommendations for industry to comply with certain labeling requirements for infant formula products. However, promotion of breastmilk substitutes is still unregulated and Abbott is accountable to no one for the way it promotes it products in the US.

# PROMOTION IN HEALTH FACILITIES AND TO HEALTH WORKERS

- Article 6.2 bans the promotion of products within the health care system.
- Article 6.3 prohibits the display of products, placards and posters or the distribution of company materials unless requested or approved by the government.
- Article 7.3 provides that there should be no financial or material inducement to health workers to promote products.
- WHA resolutions 58.32 [2005] and WHA 65.60 [2012]
  call on countries to ensure that financial support and other
  incentives for programmes and health workers do not create
  conflicts of interest.
- In Canada, Abbott sends packages of unsolicited samples of Similac infant formula directly to homes of birth workers. These packages contain different Similac brands both in powdered or liquid form the latter comes complete with nipples that can fix onto the plastic ready-to-use bottles). Accompanying the products are information booklets that declare Similac as providing "Nutrition for every milestone: our closest formula ever to breastmilk." Mothers are encouraged at the same time to join the Similac Club to help them nurture their baby's dreams while Similac nurtures the baby's growing body.



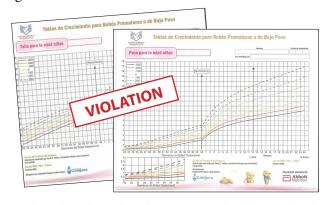
■ In Lao PDR, a signboard displayed in a hospital nutrition ward showed the Abbott and **Similac** names together with other Abbott brands. By displaying the name of the company and that of its products, Abbott is able to align itself as a sponsor of the nutrition ward and project itself as a health partner.



The glaring sponsorship of nutrition ward signboard implies that Abbott products are endorsed by the hospital and will, no doubt, bring very good returns.

■ In Colombia, Abbott goes even further. It donates growth, weight and height charts originating from WHO 0-24 months to healthcare institutions in Bogota. Not only do all charts contain idealising images of the **Similac** brand mascots alongside the Abbott Nutrition name and logo, the names and logos of health and social services also appear on each chart. This indicates some form of collaboration with governments giving rise to conflicts of interest. Some of the charts bear the statement - "printed by courtesy of **Abbott** Nutrition."

What is more alarming is the fact that the name and logo of WHO are prominently displayed on some of the charts. That implies that WHO endorses the company and its products, something the organisation is not known to do.



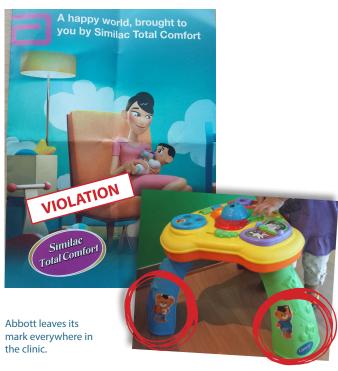
**TOP:** These charts do not show the WHO name or logo but state that they are "courtesy of WHO" implying that Abbott is WHO's partner in health.

**BOTTOM:** These charts show the WHO name and logo. There is a statement that the charts are being "printed by courtesy of Abbott Nutrition". There is promotional value in the 3 bears.



- In Singapore,
  - Abbott's promotional materials are clearly visible at every corner of a private child clinic in Singapore. They include brochures, stickers and murals, most of which promote **Similac** and **Gain Total Comfort**.

One brochure entitled, "A happy world, brought to you by Similac Total Comfort" tells mothers that the "small gentle proteins" in the product offers complete "nutrition with a gentle touch" so that they can focus on the joys of parenthood with the assurance that they are giving their babies the very best. A claim made in the brochure states - "Similac and Gain Total Comfort bring your little one the best of both worlds - with Lutein, AA & DHA to support his brain & eye development; while gently caring for his tummy".





A poster in the clinic tells mothers they can submit a request to Abbott to get a free big tin of Total Comfort formula and an exclusive gift set.

- Abbott promotion gets worse in hospitals providing maternity services. One private hospital allows the company to provide elaborate gifts to new mothers soon after delivery. These gifts,

marked with the **Similac** brand logo, are normally delivered in a small ceremony with the company representative in attendance. With mum and the new born baby as the centre of attention, a photo session follows with dad and hospital staff.

The fact that Abbott is being given the best available opportunity to reach out to new parents with various marketing strategies is lost on the hospital. Parents and family members appear to be oblivious that they are targets of unethical promotion.



Sometimes there is double manipulation when another company, enters into the picture bearing similar gifts. (Mead Johnson)



Abbott **Nutrition** makes an early appearance in the lives of newborn babies. Gifts include milk for mothers, soft toys for babies, toiletry items and other gadgets.

**Editorial Note:** The Singapore Code is silent on this promotional activity even though it is a violation under the International Code of Marketing of Breastmilk Substitutes.

■ In USA, Abbott uses waiting rooms at paediatric clinics to display and promote **Similac** infant formulas. A ready-to feed bottle of Abbott's **PediaSure** for young children is also neatly placed next to **Similac** products. Such practice enables Abbott to create the belief that the doctors in the



clinic endorse its products and brands and even support the use of breastmilk substitutes.

Display of products at the doctor's undermines mothers' decision to breastfeed and is a blatant violation of Article 6.3 of the Code.

### LABELLING

FDA guidelines on labelling.

- Article 9 of the Code requires labels to NOT discourage breastfeeding and inform about the correct use of the product, the risk of misuse and abide by a number of other points.
- Abbott appears to have forsaken little Rosco in favour of new promotional. Labels in the US now sport logos of new fancy formulations with claims which lack peer-reviewed, independent evidence. Such claims are not permitted by subsequent World Health Assembly Resolutions or indeed by the US



The label of **Similac Advance** with **Optigro** claims to support your baby's brain and eye development while that of **Similac PRO Advance** with **Optigro PLUS Human Milk Oligosaccharide** claims to help strengthen baby's immune system to be more like the breastfed infant's than ever before.

■ Elsewhere in the world ranging from Canada to Latin America, Europe and Asia, faithful Rosco in different positions and configured to resemble infants and young children at different stages of development, continues to be the favoured product mascot. Labels bearing Rosco as mascot are also filled with claims about the different components of the product.

Claims found on **Similac** product labels usually focus on their galactooligosaccharides, lutein and DHA content. The following statements or variations are common.

- WHA resolution 54.2 [2001] advises exclusive breastfeeding for 6 months which means that the recommended age for use of complementary foods cannot be under 6 months.
- WHA 58.32 [2005] prohibits nutrition and health claims unless specifically provided for in national legislation.

#### Galactooligosaccharides

- May support the growth of good bacteria in your baby's digestive system.
- Help promote softer stools, similar to breastfeed babies.

#### Lutein

- An antioxidant naturally found in breastmilk and concentrated in your baby's brain and eyes.
- Your baby can only get lutein from his diet so, until he starts solid foods like leafy greens, corn and eggs, he can only get lutein from breastmilk or Similac® Advance®.

**DHA**, an omega-3 fat that supports the normal physical development of your baby's brain and eyes.

- 'Unique' blend of nucleotides (72 mg/L).
- No palm olein oil.
- Easy to digest.



The symbols on the labels of these **Similac** products marketed in Armenia, describe what different components can do for the growth and development of the baby. Claims are not allowed under Armenian law.



(accessed 27/2/2017)

In Canada, as in US, the focus is on non-genetically modified products which Abbott claims to be its closest formula to breastmilk. For less developed countries, this range of products is just too expensive and hence not marketed.





In Panama, labels are still fronted by good old Rosco. They contain claims about **IQ Plus** and **Immunify** which are not just suggestive but promotional. The national law does not allow idealising picture or text on labels.

#### Revisiting old wine in new bottles

In BTR 2010 (Abbott Report p. 2), the company was reported to be slapping on labels with different age indications on its **GAIN IQ** growing-up milk product. The practice allowed the company to remove the product from the scope of the Cambodian Law which covers marketing of products used for babies up to 24 months.

This practice is still happening today. This time around, the product involved is **Similac Total Comfort1**, an infant formula product that is marketed for the most vulnerable infants.

The Cambodian father who discovered the relabelling highlighted the practice on his blog and asked why the age recommendation for **Similac Total Comfort 1** is 0-24 months instead of 0-12 months on the original label. The local distributor for Abbott explained that the change was approved by both the manufacturer and the Ministry of Health in Cambodia and assured the father that the product is suitable for his child who was then 13 months old. \*

As a blogger (See http://www.khmerbird.com/similac-cambodia/ (accessed 21 February 2017), the father generated quite a lot of comment about this labelling practice. This prompted Abbott **Nutrition** in Singapore to contact the father. Again, he was reassured that the product he purchased was suitable for babies up to 24 months and that the relabelling was carried out to comply with the law of different countries.



The father subsequently discovered that **Similac Total Comfort 2** is actually cheaper than **Similac Total Comfort 1**. So at end of the day, Abbott's labelling practices is aimed at holding parents of babies 1 year and older captive and paying a higher price than they really need to.



**Left:** The Khmer sticker indicated the stage 1 product is suitable for babies aged from 0-24 months. The original label, from Malaysia, states that the product is for babies 0-12 months.

Right: In violation of the law in Cambodia, Similac Total Comfort 1 is put on special offer.

**Editorial note:** Manufacturers have a certain degree of discretion in deciding on who their target consumers are. This proves our point that follow-up formulas are not necessary, something affirmed already in 1986 by resolution WHA 39.28.

### PROMOTION OF GROWING-UP MILKS

The Guidance on ending the inappropriate promotion of foods for infants and young children issued by WHO in May 2016 reaffirms that breastmilk substitutes should be understood to include any milks that are specifically marketed for the feeding of infants and young children up to the age of 3 years including follow-up formula and growing-up milk.

Through this Guidance, it becomes clear that growing-up milks are covered by the scope of the Code and should not be promoted, something industry has been disputing for many years. This part of the report documents the way growing-up milks have been promoted by Abbott, both before and after the Guidance was issued.

■ In Cambodia, pre-schoolers can be seen lugging backpacks bearing the slogan, "brain strong, school ready with Gain IQ." The Intelli-pro logo representing a system of nutrients found in Gain IQ also appears on the bag. It is described on the Abbott website as a combination of Lutein (an intergral part of the eye's retina) and DHA (a building block for brain and eye development) http://www.abbottfamily.com.kh/ similac-gain



This bag with the Rosco bear wearing a mortar board will be a star attraction in kindergarten.

■ In Latin American countries like Guatemala, posters in shops with the slogan "Barriguitas en armonia (Tummies in Harmony)" are used to promote Similac 3. This catchy slogan is used by Abbott on its Similac 3 website to highlight common gastrointestinal problems among young children and how to deal with them. Abbott's obvious answer is by using Similac 3.



Cherish your baby's tummy; control diarrhoea with Similac 3.

- In Malaysia,
  - **SIMILAC Gain Plus** is continuously placed on offer in supermarkets. Ads about price reduction and special offers normally appear in supermarket flyers for customers to refer when they shop.
  - On the Abbott website (https://abbottnutrition. com.my/products/similac-gain-plus. Similac\* Gain Plus is described as containing the EYE/IQ Nutrition System which is enhanced with Intelli-Pro to support mental development. Visitors to the website can apply for free sample by becoming an Abbott family member.



The Intelli-Pro formulation is said to contain DHA, Lutein and unique vegetable oil blend for better absorption of key nutrients - an unsubstantiated claim

■ In Moldova, a large banner promoting Abbott's **Similac Premium 3** growing-up milks is displayed the entrance of a pharmacy.



A mother cuddling with her baby idealises the use of **Similac 3**.

■ In Myanmar, a shelf talker does its bit to attract shoppers by promoting **Similac Gain IQ** with an image of a child's brain absorbing the brand's *Intelli-pro* formulation.



Sucking in the heady stuff - IQ stands for Intestinal Quality too.

■ In Singapore, this **Isomil** *Intelli-pro* product is put on special promotion around the same time that growing-up milks are confirmed to be breastmilk substitutes by WHO.



Choice of different gifts for every purchase worth \$220.

- In the UAE,
  - Abbott participated in Mothers' Day celebration at a school by distributing gift boxes with samples of **Similac Gain Plus.** Inside are presents for children to play with or give to their mums. The gifts boxes are printed with advertisements for **Similac Gain Plus** with a special focus on the *Intelli-pro* formulation of the product.



Greeting cards, paper crowns featuring Rosco bear for children with art and craft materials for them to create their own 'avatar' mums.

- The gift boxes also contain announcements for the new name for **Gain Plus** and Gain Kid. They are now called **Similac Advance** (and, Similac when it began was named after would-be 'similarity' with breastmilk) The slogan "Advance nutrition for growing children- For all the first yet to come" holds a false promise for mums on Mothers' Day.



Unveiling a new name for an old product.

#### **Product Recall**

- In July 2016, Abbott recalled two batches of **Pediasure** that were shipped to UK, Ireland, Russia, Spain, Turkey, Bahrain, Malta and the UAE. The products meant for nutritionally at risk children over one year age were recalled following complaints such as diarrhoea.



Abbott attributed the cause to insufficient sterilisation which it considered to be isolated and non serious.

- In June 2017, the Ministry of Health of Chile ordered the withdrawal of Abbott's **PediaSure** for containing the dangerous *Cronobacter* bacterium in June 2017. The contaminated products, suitable from one year old, were recalled to protect vulnerable young children. The Chilean population was warned as consumption of the infected products puts young children at a high risk of fever and serious infections.



WARNING to consumers about the dangerous Cronobacter bacterium.

#### PediaSure - Not So Sure



**PediaSure** belongs to Abbott's food range for children from 1 up to 13 years. The milk-based product is available in powdered and liquid form and is promoted as a "nutritional drink that can be used as part of a healthy diet with a kids-approved taste". It is also said that it "supports children's growth and immune system". This paper assesses the veracity of those claims.

The product label highlights its composition of high protein along with 26 vitamins and minerals. There is no information on the bioavailability (whether easily absorbed) of the micronutrients. The high sugar content is not displayed on the front but safely kept on the back label. (Canada)

Abbott uses claims such as "Clinically proven to help kids grow" and "Growth you can be sure of" to convince consumers of the product's questionable benefits. These claims are supposedly based on several studies, however, in many ads, the latest intervention study [1], given to the public as the main reference, is designed, analysed and interpreted by Abbott Nutrition and hence hardly an independent study. This study serves as scientific evidence for promoting a positive and visible outcome on growth for nutritionally at-risk children that have consumed **PediaSure** for 8 weeks. This assessment\* to verify the scientific validity of the study results concludes that the marketing of Abbott's **PediaSure** rides on claims that are not scientifically significant and without independent substantiation. Some shortcomings of the study results are summarised below:



HEIGHT, WEIGHT, NATURAL DEFENCE SYSTEM



Assurance of weight gain with two servings of PediaSure... extra calories come mainly from sugar. (Malaysia)

#### • Age range of study participants

The study participants were 3-4 years old and had passed the critical growth spurts which take place during the first 1000 days after conception. Yet, **PediaSure** is promoted as suitable for children aged one year and above. The study concludes that there is "some evidence on the merit of extending the window of intervention beyond 1000 days". However, suggesting "some evidence" without stating references to support this compromises the study results and stretches the claims made.

#### • Lack of sample size and control group

The study had a sample size of only 200 children from one single country (Philippines\*) without a control group. This relatively small number of participants is not representative of the target population and statistically insufficient to provide reliable study results. Yet, **PediaSure** is promoted with all its misleading claims in more than 80 countries.

 $^1$  Huynh DT et al. (2015) Longitudinal growth and health outcomes in nutritionally at-risk children who received long-term nutritional intervention. J Hum Nutr Diet. doi: 10.1111/jhn.12306.

\* Editorial Note: The 8th National Nutrition Survey in the Philippines conducted by the National Food and Nutrition Research Institute (2016) illustrated that, out of a population of almost 12 million children 0-5 years old, 2 out of 10 (20%) were underweight and 3 out of 10 (30%) were stunted (short height-for age). Compared with such a large representative sample of the population, the sample size of only 200 non-representative children without a control group is not sufficient to provide valid or reliable results.

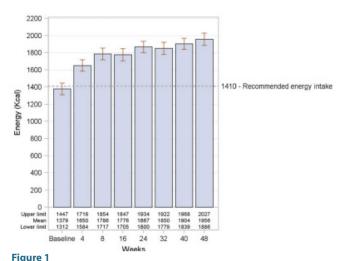
<sup>\*</sup> This assessment was done by Hacer Tanrikulu, a student for a Bachelor degree in Global Nutrition and Health, with the support of Dr. Aileen Robertson (Metropolitan University College Copenhagen) and Elisabeth Sterken (INFACT CANADA).

#### • Nutritional status of study participants

The study participants received two servings of **PediaSure** daily for a total of 450ml which claimed to support optimal growth. However, the children were between the 5th and 25th WHO weight-for-height percentiles, which means that they had a normal nutritional status and were not undernourished or "nutritionally atrisk". The study also states that "in general" children suffered weight rather than height-faltering. However, short-term weight loss generally after an illness and a short term loss of appetite is not considered a serious therapeutic problem and catch up growth is quick when a normal family food based diet resumes. Children who consume the recommended quantity of **PediaSure** will gain weight. However, their nutritional status will be compromised when one third of the caloric intake is provided by a non-nutritive ingredient – sugar.

#### • Eating patterns of study participants

The 450ml of **PediaSure** provide 450 calories per day, which corresponds to almost one third of the daily recommended energy intake of a 3-4-year old child and almost half of that of a one year old (1000 calories/day). Figure 1 also indicates that prior to supplementation with **PediaSure**, the average daily energy intake of participants was close to the recommended 1410 calories per day. This suggests that study participants are neither in need of increased calorie intake or are fussy eaters and therefore a therapeutic intervention with **PediaSure** was not necessary. Besides, the replacement of family foods with the artificially flavoured and high sugar product will most certainly compromise children's future eating habits and health outcomes.



Of course the study subjects put on weight: At the end of the study, children were consuming 600 calories more than recommended.

#### Nutritional composition of PediaSure

**PediaSure**'s main ingredients after water are sugar (sucrose) and corn syrup (maltodextrin\*). The sugar content of two servings of **PediaSure** is so high that it provides a child's daily average energy intake from carbohydrates without consuming anything else. As a flavoured product, **PediaSure** programmes children to favour sweet and flavoured foods from a young age, perpetuating preferences for low-nutrient and highly processed foods in future. In short, the regular intake of sugar-loaded products such as **PediaSure** increases a child's risk of developing both poor eating habits and non-communicable diseases such as obesity, diabetes and heart diseases.

\* Editorial Note: Maltodextrin is a sugar with a very high glycemic index that can spike blood sugar levels and predispose one to diabetes. Starting a young child on such a highly processed sugar is not a path to good nutrition.

Abbott's promotional claims of "complete, balanced nutrition" "especially designed to help kids grow" are designed to create loss of confidence in normal healthy family foods and create a dependence on an expensive, high sugar and artificially flavoured product with industrial nutrients and additives. The company has long attempted to circumvent the scope of the Code by promoting **PediaSure** as a therapeutic supplement. However, it blatantly ignores the fact that so long as a product is marketed or represented as suitable for infants and children up to three years, promotion is not allowed under the Code. Additionally,



making scientifically unsubstantiated claims, is not only irresponsible and puts children's health at a risk, it also violates subsequent World Health Assembly resolutions 58.32[2005] and 63.23 [2010].

It looks like 2 years of growing, can be achieved with PediaSure in 8 weeks. Believe it? (Malaysia)

# LOOK WHAT THEY'RE DOING IN

# **CHINA**



In China, Code legislation is weak and outdated. Enforcement of restriction on promotion is virtually non existent and a 2015 Law of Advertisement that curbs advertising of breastmilk substitutes in the mass media and public places has yet to unfurl its power.

• A check on Abbott websites shows that the company uses idealising text and images to advertise its **Similac Qinti** (close to body) and **Eleva** products online. Promotion banners on the website proclaim the endorsement "officially approved, quality guaranteed". Since all products for sale in China have to go through a registration process, describing the products in those terms is nothing short of promotion.



**Similac Qinti** I is represented by the Rosco Bear and the entire range, promoted through images of healthy, happy babies is described as in "in close affinity to and in harmony with the constitution of the baby, making it easier to absorb, and providing babies with superior double protection."

 Visitors to the Abbottmama website can access information of Similac 1 by clicking on the bear and will be led to a webpage that shows clearly that Abbott does not subscribe to the global public health recommendation on continued and sustained breastfeeding to 24 months and beyond.

Imagine the number of Chinese babies Abbott is able to capture with a message that limits the recommendation to breastfeed to 6 months and undermines mother's ability to breastfeed.



(accessed 28/2/2017)

The information on this page states "For infants 0-6 months, the most ideal food is breastmilk. **Abbott** fully supports breastfeeding. We suggest that mothers who do not have enough breastmilk or when there is no breastmilk available, to follow doctor's advice on feeding methods."

Abbott employs the services of a famous actress, Sun Li, to be the ambassador for Eleva, an Abbott
premium formula launched in China in 2014. Promotional materials bearing her image in the background
are widely distributed and she has been invited to speak about the product in a number of events and
forums.



Launch of **Eleva** in China by top actress Sun Li and an ad with her as brand ambassador.

• On the parenting section of a website that targets housewives and mothers, Sun Li announced that she was introduced to Abbott products by her friends during a trip to the US, when she ran out of formula for her child. Because her son was an "Abbott baby", when Eleva was created, she felt she had to recommend these excellent products to all mothers. As Abbott's mouth piece for Eleva, she said, "Eleva's 'intelligence absorption' and 'liquid milk one-time feed' technology can effectively enhance the overall absorption of nutrients that are key to brain and eye development and to strengthen the development of babie's senses. The milk source of this formula comes from the purest natural farm in Europe, and the formula meets numerous safety standards of the EU. I believe Eleva can provide babies with the purest, safest, and most scientific nutrients."



• The round **Eleva** logo found on **Eleva** labels is adorned with the words: "Intelligence absorption" (literal translation). Targeting the "nouveau riche" class that has emerged in China, **Eleva** is promoted as the product for parents who are looking for a fully imported premium infant milk formula that uniquely supports a child's senses through the latest "Intelli-Absorption Structure technology." This technology purportedly promotes absorption of key eye and brain nutrients while supporting the child's senses during the most critical time of its development.



Described as belonging to a "Premium and pure line", this formula is supposedly "designed to promote absorption of key eye and brain nutrients for infants in China"



Other than promotional text offering various enticements, there is also a professional infant feeding hotline open to mothers

• Abbott employs various means of reaching mothers in this **Similac 3** ad. Mothers are firstly invited to join the "*Protect Baby*" mummy club to earn 4999 travel points and to have the opportunity of being chosen to become a celebrity mum. They are also encouraged to scan the QR Code in the ad and to "like" the Abbott Dearest Baby Love project on Facebook to enjoy professional infant feeding advice. The ad also describes **Similac 3** as a "golden milk sourced from Ireland", and "affinity and double harmony protection shield formula" with "beneficial absorption technology".

# LOOK WHAT THEY'RE DOING IN FINE RUSSIA



Abbott has been operating in Russia since the late 1970s and the country has become increasingly attractive for the company as Russia evolved into one of the fastest growing markets for baby food products in Eastern Europe. Rising disposable incomes coupled with higher birth rates spell growing demand and higher spending on milk formula, especially premium brands. According to market researchers, new product launches and promotional campaigns have increased significantly while poor Code implementation means that companies like Abbott are free to exploit the situation to promote their products.

• Conventional media such as TV channels and print media are still being used by Abbott to advertise products covered under the scope of the Code. However, the internet and social media platforms are increasingly being relied upon by the company to reach wider audiences, not only in Russia but also neighbouring countries where Russian is spoken.



**Similac Premium** is promoted on national TV.

This offer of an interactive teddy with the purchase of Similac Premium products finds its way from Russia to neighbouring Kazakhstan. **Similac Premium 3** is promoted for young children from 12 to 18 months while **Similac 4** is aimed at those above 18 months. These are milks for older babies and come within the scope of the Code.

**Editorial note:** A comparison of the nutrient composition table of Similac Premium 3 (12-18 months) versus Similac Premium 4 (18-36months) shows no significant difference even though the two products are targeting different age groups. It is only a way to hold mothers captive to a product line as their children grow older.

The violations that are the easiest to detect are in retail outlets and online shops. Even though the Code
prohibits promotional devices to induce sales of products covered by the scope of the Code, Abbott keeps
having special offers and discounts in stores.



Chain store advertisement for discount on Abbott's follow-up milks



10% discount on Abbott's infant-formula found on online shop.



According to this online store promotion, it is cheaper together.

Information materials, advertorials and free samples are other strategies Abbott employs to induce sales
and hence violate the Code. Products are often promoted in health conducive environments such as
hospitals which confer valuable medical endorsement on products. Indirect medical endorsement of
products is inappropriate as health facilities have a clear duty to provide independent, objective support.





This leaflet entitled, "Sleepless nights for young family" promotes **Similac Premium Intelli-pro**. It not only draws similarity with breastmilk but also boasts about the product's power to promote growth and benefits for the digestive and immune system.



Information or Promotion? Neonatology Guideline for doctors and medical students shows **Similac** ad on its cover. The title says that **Similac** provides a wide range of choices for smooth digestion. "Expertise from doctor, care from parents, solution from **Similac**".

Abbott promotes its **Similac Premium 1** infant formula through healthcare workers at maternity hospitals. Working together with Abbott, they provide samples and promotional brochures to parents. The product is promoted with the slogan, "for a good digestion."

The brochure includes a space for parents to attach their baby's photo and biodata.



Labelling violations are common. These include idealising claims and promotional logos for different product formulations on premium products. Such inappropriate labelling strategies add up to discourage breastfeeding and to influence parents when they make infant feeding decisions.



Abbott capitalises on its famous teddy's power to trigger peaceful, happy and joyful emotions. The "IQ-Intelli-Pro" symbol representing improved brain development can also be found on **Similac Premium**. The newest logo is the yellow circle implying the protective effect on the digestive system as a result of fortification with prebiotics (blue), bifidobacteria (green) and the absence of palm oil.

## **JUST IN FROM RUSSIA!**

- This page contains evidence received after the company report layout was finalised.
- Abbott is top among more than 1000 advertisers on www.baby.ru, an online forum specialising in children's topics.
  - Through this link http://www.baby.ru/adv/ Abbott found the ideal platform to reach 13 million future and young mothers who are members. Advertisements of different lines of **Similac** products appear under various sections that provide information about feeding practices.



A full array of formula products for mothers to choose from. Abbott's 90 years experience in nutrition, science and advanced technology is used to convince mothers of the company's trustworthiness.

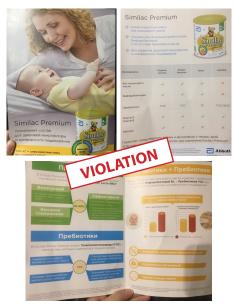
- In the "*Milk Kitchen*" section, the entire **Similac Premium** line is promoted with the unproven claim that its unique composition deliver comfortable digestion and the development of healthy microflora.



 Working with MEDSI, the largest Russian private network of medical and preventive care institutions, Abbott gives away toys and one week's stock of Similac Premium infant formula samples to parents through a prize draw.



 Brochures that promote Similac Premium2 as a milk formula with a unique composition for a healthy digestive system are given to students of a university in Smolensk. They contain idealising text and images about the product.



Medical students should get scientific and factual materials, not this!

 In a children's polyclinic at a medical center in Novosibirsk, Abbott displays a poster which advertises all lines of Similac formula products.



This children's clinic should be promoting breastfeeding not Similac

 Subscribers of Doctors-at-Work (the world's largest professional network for Russian-speaking doctors) were sent an email claiming that casein infant formula is effective to treat food allergies. The e-mail contains a picture of a baby with a Similac name imprinted on its forehead.



### STRETCHING THE RULES

- This section highlights marketing practices which undermine or discourage breastfeeding especially when relating to products which may not come under the scope of the Code.
- Sponsorship activities which may give rise to conflicts of interest are also reported here. These activities are intended to promote breastmilk substitutes and violate Resolutions on conflicts of interest.
- In Singapore, the promotional tag attached to the Similac Mum pack explains why shoppers choose the product. The product is said to offer the most complete nutrition for pregnancy and breastfeeding with 24 essential vitamins and minerals as well as prebiotics, all purportedly to help meet increased nutritional needs for mental development and foetal growth.

There is cross promotion of Abbott's formula products because the promotional devices appearing on both ranges of products are the same -I/EQ Plus and Immunify ingredients.



Exposing pregnant women and lactating women to costly ingredients and a brew of chemicals when calories derived from normal healthy food would do.

■ In the US, Abbott markets supplements in soft gel form to provide "nutrients for mums to support *breastfeeding*". To promote the product, Abbott says, "Even when you try to eat well, it may be hard to get the desired levels of nutrients found in Similac Breastfeeding Supplement from your diet." This scares mothers into thinking that they need supplements or their breastmilk will be inadequate even though the dietary intakes for lactating women for DHA and lutein have not been established yet. The promotion of this expensive yet unnecessary product (30 supplements for \$10.00) hides the fact that nutrient utilisation from food is far more efficient than from industrial supplements. There is an element of cross promotion here because the Optigro logo seen on the label of Abbott's formula products is also shown on the logo of the breastfeeding supplement.



http://abbott.mediaroom. com/2014-07-24-Abbott-Introduces-New-Similac-Breastfeeding-Supplementwith-DHA-Lutein-and-Vitamin-E

Undermining women's confidence in their natural ability to breastfeed successfully.

**Editorial Note:** Company promotion of milk for mothers (MFMs) often conveys the message that pregnant and lactating women need MFMs to have a safe pregnancy and to be able to breastfeed successfully. These women and their families are led into thinking they need a special diet which would be fulfilled by MFMs. These messages are far from the truth and they compete unfairly with breastfeeding campaigns that work hard to show women that breastfeeding comes naturally and that given the right support, every woman can breastfeed.

MFMs are not covered by the scope of the International Code and the promotion of MFMs does not violate the letter of the International Code. They do stretch the spirit of the International Code by seriously undermining breastfeeding.

Abbott invests in national projects to improve the nutritional status of local communities. These projects like the one below in Vietnam serve public relations. Abbott, will be seen a health partner with the government and such joint ventures generate a lot of free publicity. The goodwill generated with policy makers will also make it harder to regulate the company for marketing violations.



Signing of MOU between MOH Viet Nam and Abbott for two projects to improve the quality of clinical nutrition at hospitals and among pregnant and nursing women. The project provides Abbott access to two very important channels of promotion – health workers and mothers themselves.