

MEAD JOHNSON

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

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BRANDS

COVERED BY THIS REPORT

Enfagrow
Enfamil
Enfapro
Nutramigen
Lactum

LOGOS



GENERAL INFORMATION

Mead Johnson Nutrition Company (MJN) has a singular focus on paediatric nutrition with its flagship “Enfa” line throughout the world. Although business has been declining for the past two financial years, net sales for 2016 were approximately USD3.7 billion (down from USD4.1 billion in 2015)

MJN markets its 70 over products to mothers, health care professionals and retailers in more than 50 countries in Asia, Latin America North America / Europe which represented 50%, 17% and 33%, respectively, of MJN’s net sales for the year ended December 31, 2016.

MJN’s financial results in 2016 were affected by weaknesses in many economies throughout Asia and Latin America and the strong U.S. dollar.

By any means necessary, MJN tries to reach all potential buyers with its products types.

1. *Routine infant* - for healthy, full-term infants without special nutritional needs both for use as the infant’s sole source of nutrition and as a supplement to breastfeeding. This range of formula products include **Enfamil Premium**, **Enfamil A+**, **Enfalac Premium** and **Enfapro A+**. In certain countries, MJN have introduced a premium-priced product (**Enfinitas** in China and **Enspire** in the United States).
2. *Solutions* - for infants with common feeding tolerance problems, including spit-up, fussiness, gas and lactose intolerance such as **Enfamil Gentlease** (for fussiness and gas), **Enfamil A.R.** (to reduce spit-up), **Enfamil ProSobee** (a soybased formula) and **Enfamil LactoFree** (for lactose intolerance).
3. *Specialty* – for infants with special nutritional needs. To address certain conditions or special medical needs like **Nutramigen** (for cow’s milk protein allergies)
4. *Children’s nutrition* - to meet the nutritional needs of children at different stages of development such as **Enfagrow**, **Sustagen** and **Lactum**.
5. *Other* - maternal nutrition products, vitamins, supplements and oral electrolyte solutions for infants and children

The *Enfa* family of brands, including **Enfamil** infant formula, accounted for approximately 80% of net sales. A recurring theme for MJN’s promotion is **360° Mind Plus** which focuses on the brain as the command centre for the development of intellectual, motor, emotional and cognitive skills.

On February 10, 2017, MJN announced that it reached an agreement to be acquired by *Reckitt Benckiser Group plc (RB)*, a UK based consumer health and hygiene company.

As a result of this transaction, MJN will become a new division of RB with its *Enfa family* and **Nutramigen** brands joining RB's portfolio of consumer health brands.

The transaction valued at approximately USD 17.9 billion was unanimously approved by the MJN Board of Directors. Closing of the transaction is subject to approval by shareholders of both MJN and **RB** and regulatory authorities. It was expected at the time of the announcement to occur during the third quarter of 2017.

The merger may now be stalled because of a pending law suit by an MJN stockholder claiming breach of fiduciary duties by MJN's board of directors in brokering the deal.

How much MJN spent in advertising and promotion

The figures below show it is not cheap to break the rules but the returns are worth the expense.

Advertising costs incurred were USD223.8 million, USD218.7 million, and USD206.2 million respectively, in the years 2016, 2015, and 2014, .

There was increased spending of USD28.0 million in Asia, as investments were made to increase consumer awareness of **Enfinitas**. Another amount of USD37.2 million was spent on enhanced digital presence and support of channel investments in China alone. This increased expenditure on advertising and promotion was offset by lower investments across other Asian markets, Latin America and North America/Europe.

Update on 2017

While MJN continues to face challenges across the business, it remains on track in China in the first quarter of 2017. New products sell well there with more online marketing.

The Code is bad for business

In its 2016 Annual Report filed with the US Securities and Exchange Commission, MJN was candid in assessing its business risks in the face of declining sales. It states - "*Our business is subject to anti-infant formula policies and legislation in various jurisdictions, many of which may impact our operations and effectiveness*".

The Report explains that certain governmental and non-governmental organisations in Hong Kong, Mexico, the Philippines, Thailand, Malaysia, Vietnam, Indonesia, Colombia and Singapore have advocated for heightened controls on promotion, labelling and sale of products. Restrictions on trademarks, interactions with health care providers and bans on claims are identified as business risks.

The 2016 WHO Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children was also seen as restricting promotion. MJN together with other industry participants were unable to persuade WHO to modify its guidance to favour industry positions.

According to MJN, its success depends largely on its ability to effectively communicate its "*science-based benefits*" to its consumers. Any restrictions or prohibitions in that respect could have an adverse effect on MJN sales, profitability and market share.

It is refreshing to see a company admit that the Code and the Guidance do impact its business. Too often, companies only talk about how they support breastfeeding when the evidence shows them working to undermine the Code which seeks to protect breastfeeding.

At least, the above risk assessment is honest. In a statutory filing to US regulators and investors who are averse to being misled, MJN cannot lie.

PROMOTION TO THE PUBLIC AND IN SHOPS / LABELLING

- **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.
- **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 other points.
- **WHA 58.32 [2005]** and **63.23 [2010]** prohibit nutrition and health claims unless allowed in national legislation.
- **The Guidance on Inappropriate Promotion of Foods for Infants [A 69/7 Add.1]** requires that labels include a message about the appropriate age of introduction of the food which must not be less than 6 months of age.

- In Canada,
 - Coupons offering savings between CAD 5 - 10 for the purchase of **Enfamil** & **Enfapro** formula products are download-able from a Canadian online shop. Customers can redeem the coupons at selected stores in Canada. These coupons are effective in attracting customers looking for bargain.

Canadian Coupons: Save \$10 On Enfamil A+ Ready to Feed Formula *More Rewards Printable Coupon*



Not cash but saving money. Printable Coupons available for **Mead Johnson**

- A mother's personal information was shared with Mead Johnson without her knowledge or consent, when she signed up with a clothing shop. A gift package was then delivered by Mead Johnson Nutrition to her home with the following messages on the package - "from our family to yours"



The BIG deal is a gift from **Enfamil's** family.

and "Learn the BIG deal about DHA". The package contains a copy of "Your New Baby" **Enfamil** magazine, which features a write-up on DHA (Omega-3, found in **Enfamil** formula products). Also in the box are **Enfamil A+** and **Enfamil A+ Gentlease** formula samples and coupons for purchase of more of these products.



This **Enfamil** baby guide promotes DHA, an ingredient in **Enfamil** products.

Small samples: as easy as it can be - Getting baby hooked on formula one feed at a time.

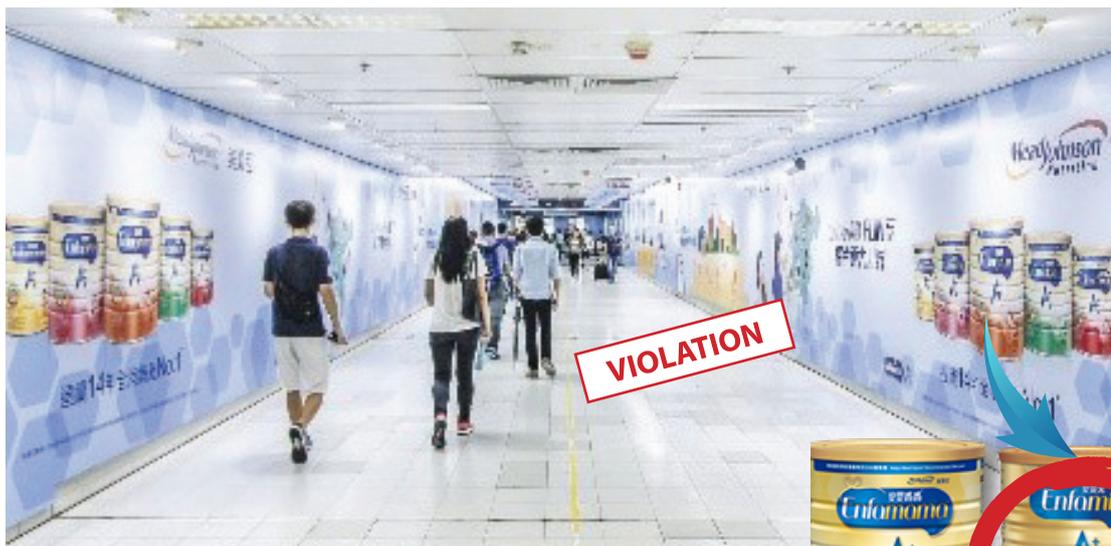
- In Germany, an advertorial in the pharmacy magazine "Baby and Family", glowingly introduces MJN's **Nutramigen LGG Lipil** as an ideal special food that "will help your child to overcome cow's milk allergy faster". Instead of explaining that breastmilk would prevent cow's milk allergy, the ad stresses the prevalence of cow's milk intolerance and the difficulty of feeding children lactose-free milk in nurseries.



This advertorial in a local pharmacy magazine promotes **Nutramigen LGG Lipil** as "smart nutrition from the beginning".

■ In Hong Kong

- The full range of **Enfa** products is advertised along the corridors of a metro station.



(TOP) Commuters are invaded by MJN products from both sides of this passageway. Products circled and enlarged are breastmilk substitutes and should not be promoted

- Apart from the **Enfa** family of products Hong Kong subways are also flooded with the premium price **Enfinitas** formula products that MJN just recently introduced to the Chinese market.



Promotional blitz on MJN's latest formula brand - **Enfinitas** - goes underground into metro stations. These products are "inspired by moms".

- A new initiative recruited "360 supermoms" to form chat groups on specific parenting topics through the mobile WeChat app. The chatrooms are hosted by company representatives and 'brand ambassadors' known as 360 mums who share tips on their feeding concerns. The main product advertised is **Enfagrow A+** but other formula products like **Enfamil** and **Enfapro** are also featured. These chat rooms are popular because members enjoy a number of perks and benefits.



- Calling for 360 star mummy or celebrity
- If you like sharing parenting tips, register immediately
- Interactive chat on parenting tips
- Mummy transformation bloggers
- Free milk powder
- BB Birthday surprise
- No.1 sales for 12 consecutive years in Hong Kong



This all-in-one platform brings user engagement to a whole new level as it builds up a team of 'brand ambassadors' for MJN products. Occasionally these 360 mums get together to party.

- In India, the label of **Enfamil** promotes other formula products.



Even in India where there is a strong law, promotion is on the label.

- In Poland, MJN partners with “*Bezpieczny Maluch*” (Toddler Safe), a nation-wide Polish educational campaign which offers workshops on child safety in major Polish cities. These events target pregnant women, young parents and medical workers and incorporate topics around first aid. The **Enfamil** brand name is prominently displayed at Toddler Safe events.



Paramedics teaching first-aid on a stage with **Enfamil** as a backdrop.

- In Singapore,
 - A motherhood magazine advertises **Enfamil A+ Stage 2** as containing “*360° DHA Plus*” that are “*important building blocks for brain and eye development*”.



The product is described as containing a unique patented blend of Polydextrose (PDX) and Prebiotics (GOS) which stimulates the growth of intestinal flora to maintain a healthy digestive system.

- Yet another ad promotes its “*Ready-to-Use*” **Enfamil A+ Stage 2** with the slogan “*Precise Nutrition in Every Drop*”. The emphasis here is on how the product is scientifically formulated with DHA & ARA, important building blocks for brain and for eye development and choline for overall mental function. The ad claims, that children can get “*the same nutritional goodness every time at home and on the go*” as no reconstitution necessary and variation in feed preparation is minimised.



This special display counter, shaped like a feeding bottle, not only promotes **Enfamil** but normalises bottle feeding.

Emphasising the convenience of “*just shake, pour and feed*” of **Enfamil A+ Stage 2 Ready-To-Use**.

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 Colombia, **Enfamil Premium 2** samples are given to a mothers in health institutions in Bogota. Stickers on the samples state that the products are for professional evaluation and are not for sale but feedback from mothers is not required. Product labels contain claims about components that support mental development in **Enfamil**.



Unsolicited samples with promotional labelling for mum; given on the pretext of professional evaluation.



Spoilt for choice - **Mead Johnson** comes courting (right) when **Abbott** is already fully installed by mum's bedside.

- MJN places the logo of **Enfamil A+ Stage 2** on nursing covers given to mothers upon their discharge from a hospital. The name of the name and logo of the hospital also appear on the cover and this can be inferred by patients to be an endorsement of **Enfamil** which may prompt new mothers to go for the brand should they consider switching from breastfeeding to bottle feeding.



Cover-up. A hospital and a baby food company using a nursing cover for breastfeeding to promote formula products.

■ In Singapore,
 - Like all other companies, MJN products make their presence felt in the maternity wing of a private hospital by providing gift hampers to new mums and their babies. The hamper includes toys and gifts bearing the **Enfa A+** logo found on all formula products. It does not matter if the mother has already receive gifts from other competitors to celebrate the arrival of her bundle of joy. A photography session usually follows with baby, parents and hospital staff proudly posing with the harvest of hampers from MJN and other companies.

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 MJN, both before and after the Guidance was issued.

- In Canada, the description next to the **Enfagrow A+** toddler milk packshot on the **Enfamil** website starts by telling parents - "85% of brain growth is completed by age 3." **Enfagrow A+** is then promoted as "an everyday toddler nutritional drink with DHA, an important building block of the brain. Now with more DHA".



MJN tells parents not to miss the important time for DHA, a type of Omega-3 and an important building block of the brain.

- In Costa Rica, a billboard shows how **Enfagrow 3** goes straight to the child's brain and the claim for this "exclusive formula" is that it "**promotes complete mental development**". The same promotion is also found in magazine ads. In shops the promotional slogan is advertised inside shopping trolleys: "continues to support their mental development, now as well as in the preschool stage" and that it is "the number one brand recommended by paediatricians".



Enfagrow 3 goes straight to the child's brain ... never mind the stomach. The outrageous ads were removed after complaints.

- In Ecuador, among the promotional items found in health facilities are **Enfagrow** samples, stationery, calendars, height charts and baby mats. They all bear the **Enfagrow** product name and owl mascot. In pharmacies, discounts are often given.



MJN leaves a trail of **Enfagrow** promotion in health facilities and in shops.

- In Guatemala,
 - A ring bind booklet on assessment of development milestones found in a health facility explains, through a number of claims, how the **Enfa** range of products provides “*Nutrition by Stages*”.



Many of MJN's promotional strategies are found in this booklet.

- The familiar **Enfagrow** ad on brain development are prominently displayed in shops.



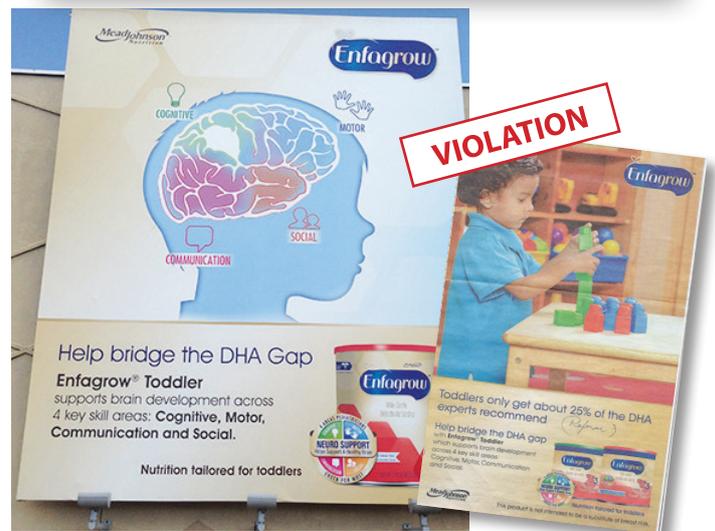
In one shop, tags attached to MJN's enfa products state, “Equal Nutrition but lower price”.

- In Puerto Rico, MJN set up a tent to promote **Enfagrow** outside a children's theatre. As parents were queuing to enter the theatre, they were given samples of the product.



There is even a place for children to play at this booth while MJN captures their parent's attention on how to nurture their little ones.

- In Trinidad and Tobago
 - MJN's multi media promotional campaign for **Enfagrow** includes ads on billboards, in shops and in magazines. The common theme in these ads is that **Enfagrow** will “*help bridge the DHA Gap*” by supporting brain development across 4 key skill areas - “*cognitive, motor, communication and social*”.



In an **Enfagrow** ad appearing in the magazine supplement of local newspaper in Trinidad & Tobago warns parents that “toddlers only get about 25% of the DHA experts recommend” implying that Enfagrow is the answer.

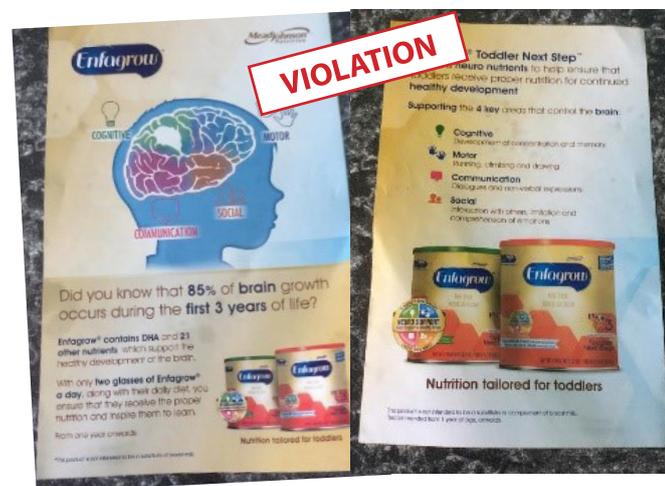
- In Malaysia, a “*health talk*” hosted by MJN in a private hospital is themed “*Mummies Know Best*”.



To promote **Enfagrow**, one of the talks is about “*Essential Nutrition for Child in the first 3 years*” by a consultant pediatrician.

Enfagrow nutrition heads the list of topics discussed at this health talk.

- At a baby fair in Port of Spain, the **Enfagrow** name and logo appears at the back of the entrance ticket and on a carrier bag distributed to patrons upon entering the fair. **Enfagrow** flyers distributed at baby fair reminds parents that “85% of brain growth is completed by age 3” implying that they should not let the opportunity pass to feed their children **Enfagrow** to ensure they receive “proper nutrition and inspire them to learn”.



All done in the name of supporting key areas that control the brain – with DHA and 21 other nutrients found in **Enfagrow**.

- At a private hospital, the **Enfagrow** name and logo is ever present, this time on a mounted baby changing table.



On the table, targeting mothers with young babies.

- A special package with a free cereal bowl is given for every purchase of **Enfagrow** while a shelf-talker promotes **Enfagrow** as providing “Neuro Support” to help support a healthy brain.



Under the Neuro Support shelf-talker, shoppers are encouraged to buy **Enfamil** infant formula to get two refill packs.

■ In Thailand, four different sets of **Enfagrow A+** 'non stop learning symphony fairy tale', each valued at 685 Baht per set, is given for free with the purchase of any **Enfagrow** product worth 1,650 baht.



Imagine the price mark-up if MJN can afford to give away such valuable gifts – valued at 40% of the price of the product.

■ In Vietnam, MJN's campaign includes 'Brain Expos' with exhibits on the workings of the human mind to show how the traits of a genius could be unlocked with the help of **Enfagrow A+**.



The Genius brain can be built with Enfa's 360 degree Brain Plus.

Editorial Note: In May 2016, the World Health Assembly in WHA resolution 69.9 [2016] welcomed the Guidance on ending inappropriate promotion of foods for infants and young children. The Guidance confirms 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.

LOOK WHAT THEY'RE DOING IN CHINA



Apart from its usual **Enfa** line of products, MJN has introduced, in 2016, its premium **Enfinitas** range in China. This range is to strengthen the company's competitiveness in the fastest-growing segment of its business in that country. **Enfinitas** is pitched as a high-end product with a new formulation said to be backed by extensive scientific research. MJN mounted an expensive promotional campaign which focusses on the *lactoferrin*, *milk fat globule membrane (MFGM)* and *DHA* content in the **Enfinitas** range. With celebrity power, ingenious claims, gifts and other incentives on offer, MJN's business in China is reported to be on track despite falling sales elsewhere.

Using health claims to induce fear

MJN makes much of the fact that **Enfinitas** contains Lactoferrin and MFGM which are naturally present in breastmilk. Together with the company's "gold" standard level of DHA, these critical components, claims MJN, will help support brain development, immune system function and digestive health.

For example, the MJN China website insinuates that the DHA in its infant formula products can benefit "the multiple aspects of the little brain". There is a statement that MJN products "support the DHA level that is recommended by international health authorities (WHO, FAO, and EFSA)". Meeting international standards is a basic requirement but MJN is playing on parents' fear and concern when it asks, "is your baby taking in enough DHA?"



The MJN website uses a breastfeeding picture to idealise the DHA content in its products and to create a false impression that infant formula is comparable to breastfeeding. Such idealisation confuses parents and will undermine breastfeeding.

Promotion of premium product

One of the most important messages used to promote the **Enfinitas** range of products (infant formula, follow-up milk and growing-up milk) as premium products is that the range offers "Excellent Intelligence", due to additives such as DHA, MFGM, and Lactoferrin. This 'intelligence' theme resonates with Chinese parents who are willing to pay more for high end products to give their children added advantage.



Promoting **Enfinitas** and its additives as the "complete excellent intelligence choice".



Enfinitas follow-up formula and growing-up milks ride on the premiumisation wave, with promotion claiming the products to be the “First Source Nutrition Combination, close to your baby’s natural needs”.



This premium range is marketed as being close to breastmilk and functioning like it.

Using celebrity power

At a public promotion event featuring a famous Chinese celebrity, samples of formula were packaged as gifts with the **Enfinitas** name and logo on them. MJN executives gave talks and introduced the company’s research and resulting products which are “in line with the natural gold standard to support the healthy growth of your baby”.



Vision in blue - Actress Yao Chen (right) provides celebrity power to promote the blue hued **Enfinitas** formula products.



Gift packs with formula inside.

Cross promotion down the line

The **Enfinitas** series also includes a supplement – **Enfinitas Mama Algae Oil DHA**, which is promoted as essential for pregnant and lactating women. Ads for this product carry statements such as “originally-generated nutrition, from a mother’s love”, “originally-generated DHA”; “key nutrient to babies that supports the development of brain and immune system”.

Although the product is not covered by the scope of the Code, cross-promotional tactics using the same **Enfinitas** brand name and logo create brand loyalty for formula products in the same series. Pregnant women and mothers using this product will be tempted to transfer their loyalty to **Enfinitas** formula products, thus the tactic undermines breastfeeding.



Packaged, branded and promoted in a way that will result in recognition of the entire **Enfinitas** range.

LOOK WHAT THEY'RE DOING IN USA



In the US, the Code is implemented neither at state nor at federal level. It was referred to 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, inter alia, 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 labelling requirements for infant formula products, in particular, relating to claims. Promotion of these products, however, is still unregulated and MJN is accountable to no-one for the way it promotes its products in the US.

It is against this background that we see MJN promoting its formula products in the US in ways that are no longer seen anywhere else.

Making way for Enfamil...

- MJN's full-page advertisements in a magazine for pregnant women explain how the "brain-nourishing *Enfamil* now has a smart new look". One ad makes the unsubstantiated claim that the product is "neuro complete" to help support brain development in the 4 areas pediatricians check most - cognitive, motor, communication, social. The ad also claims that **Enfamil** is the #1 infant formula brand recommended by pediatricians. Another ad tells parents, "When you feed your baby *Enfamil* today, you nourish milestones now - and for years to come. In fact, *Enfamil Infant* is proven to foster learning through age 5". A third ad talks about how "*Enfamil* helps nourish milestones - from pointing at pictures to reading full pages". Empty promises but... they sell.



Brand new look but same empty promises - #1 **Enfamil** infant formula brand recommended by paediatricians.



Both ads carry the slogan "Nourishing milestones at every stage". They claim **Enfamil** routine infant formulas have nutrients like DHA which are important for brain development and are inspired by breastmilk. Such claims are not permitted according to WHA resolution 63.23 (2010).

...at home

- MJN introduces pregnant women to a range of products available to feed their babies at the point when they're making infant feeding decisions, This box was delivered to an expectant mother at her home 3 weeks prior to her delivery date. It is inscribed with the message, "Hello, Baby. As you begin your life together, *Enfamil* can help nourish your baby's amazing development".



Unsolicited samples delivered to the house 3 weeks before baby's birth.

Inside the box, the following idealising statements are made about the **Enfamil** range of formula products:

- **Enfamil for Supplementing** - for breastfeeding moms who choose to incorporate formula. Describe as a gentle complement to breastmilk having DHA and Choline—brain-nourishing nutrients also found in breastmilk
- **Enfamil Newborn** - for formula feeding mums... it has protein blend patterned after breastmilk.
- **Enfamil Infant** - the closest formula to mature breastmilk.
- **Enfamil Gentlease** - for babies with feeding issues, it helps reduce fussiness, gas and crying within 24 hours. Like all **Enfamil** formulas, it has DHA and choline, nutrients found in breastmilk.

...at the clothing outlet

- A mother's personal information was shared with Mead Johnson without her knowledge and consent through a maternity clothing outlet. Mails containing promotional materials such as free coupons and **Enfamil** samples were delivered by MJN to her home in Texas over a course of a few months. To ensure that mothers open these unsolicited mails, the envelopes contain statements such as, "Great savings inside", "Nourishment is important for her development - save on brain-nourishing nutrition inside" and "Free samples, extra savings, more information". The headings of each promotional leaflet that is included in the mail contain claims about **Enfamil** such as "**Enfamil Infant** is shown to support his cognitive development", "With **Enfamil Infant**, the impact of the nourishment will still benefit him when he start preschool" and "**Enfagrow Toddler Transitions** has 30 nutrients such as brain-nourishing DHA, to help her growth and development".

Never just once..
 These violations are not isolated incidences. Marketing schemes roll out thousands of gift boxes, hundreds of thousands of samples so each one we find means there are thousands of others.



An assortment of promotional materials that came through the post. Texts inside are full of unsubstantiated claims and idealising statements and images.



Free \$5.00 coupons in a form of personal cheques with mother's name readily printed and made payable to any **Enfamil** retailer. Different sets of coupons are issued over several months but each set offers a different range of **Enfamil** product to correspond with the age of the growing child.

...at the supermarket check-out counter

- Upon check-out, shoppers are issued receipts with **Enfamil** coupons printed on them. Shoppers are able to save \$8.00 on any **Enfamil** large size powders. The brands on offer are **Enfamil for Supplementing**, **Enfamil Gentlease**, **Enfamil Infant** and **Enfamil ProSobee**. Mothers, regardless of their infant feeding decision, are encouraged to buy this range of **Enfamil** products with message, "Start Gently with **Enfamil** - and help nourish your newborn's potential, whether you choose to supplement or formula-feed".



These coupons printed on receipts have a dual purpose - they are advertising and discount tools that effectively induce purchases. Retail outlets also benefit from the schemes.

...at the doctors



- A pregnant woman making a regular visit to her doctor was given a "new mom" package which include an 8oz container of **Enfamil Newborn** formula. After the birth of her baby, she received two "Save \$5.00" coupons from MJN for the purchase of **Enfamil Infant** formula. The coupons were personalised with the name of the recipient and an assigned identification number. The advertisement attached to the coupons show a picture of a baby and the unsubstantiated statement - "With **Enfamil Infant**, the impact of his nourishment will still benefit him when he starts preschool". Another statement declares that "**Enfamil Infant** is proven to support early and long-term learning ability in babies up to age 5".

These coupons are personalised. The name of the recipient is hidden in this report.

...at Conferences

- MJN was among the companies prominently present at the 2015 National Conference and Exhibition organised by the American Academy of Pediatrics (AAP). There were special displays, exhibition booths and hospitality counters with the MJN name clearly displayed. Apart from posters promoting a full range of **Enfamil** products, there were free gifts for conference delegates at MJN's booth. The company also sponsored an internet cafe with multiple stations complete with printer, as a service to delegates attending conference.



Servicing conference delegates.

Editorial Note: In March 2016, following concerns raised by AAP's Section on Breastfeeding, an agreement was reached within AAP to restrict company promotion and to prevent any implication that AAP's breastfeeding educational activities are sponsored by formula companies. It remains to be seen how effective this arrangement will be at the next conference.

...and online

- The **Enfamil** website lists a range of formula products, all of which are “individually tailored to help nourish brain development and help support infant milestones”. Among them are routine infant formula, infant formula for tummy troubles, formula for special dietary needs and toddler nutrition. One product from the routine formula range is **Enfamil Enspire** described as “our closest to breastmilk” because the product has *Milk Fat Globule Membrane* (MFGM) and Lactoferrin, two components also found in breastmilk. Claims about the product include –
 - MFGM to foster cognitive development
 - Lactoferrin to support the immune system
 - DHA and Choline — brain-nourishing nutrients also found in breastmilk
 - PDX and GOS — prebiotics to support immune system development

Enspire is also described as having “the nutrients you would expect from **Enfamil** including vitamins D, C and E — and nucleotides which are associated with immune health and development.”

The banner on the left features the Enfamil Enspire logo and the text: "DISCOVER OUR CLOSEST FORMULA TO BREAST MILK". Below it, it states: "The only formula* that has two innovative components found in breast milk—MFGM and Lactoferrin." A red stamp with the word "VIOLATION" is placed over the banner. To the right, a Facebook post snippet says: "The **Enfamil** Facebook page invites visitors to “take advantage of everything Enspire has to offer — join **Enspire Family Beginnings**™ by **Enfamil**®. You’ll enjoy special values, free gifts, informative emails”". Further right, a woman is shown kissing a baby, with an Enfamil Enspire product canister in the foreground. The text "Enfamil Enspire™ Family Beginnings™" is visible in the background of this image.

- Visitors who join the regular **Enfamil Family Beginnings** Club are promised up to USD 325 in free gifts including free samples, discounts, informative articles, booklets, expert advice and nutrition tips.

The graphic shows a close-up of a baby's face. To the right, the text reads: "Valuable off and on for you." Below this is the Enfamil logo and "Enfamil Family Beginnings®". A red stamp with the word "VIOLATION" is placed over the text.

A package containing a feeding guide and **Enfamil** samples is issued to mums when they join **Family Beginnings**. The package is meant for mums to use if they are already formula feeding or supplementing BUT if they are breastfeeding, mums are told “why not keep them for another time if your feeding plans change?”

This block contains three images. On the left is a booklet titled "Hello, mom" with the text: "From 3 infant formula samples for now or later... Inside, you'll find an informative feeding guide and Enfamil® samples to use now if you're formula feeding or supplementing. If you're breastfeeding, why not keep them for another time if your feeding plans change?". In the center is an open box containing various Enfamil formula samples, including a canister of Enfamil Newborn and several sachets. On the right is a baby lying on a bed wearing a striped onesie with a yellow circular logo that says "I'm an Enfamil Baby". A red stamp with the word "VIOLATION" is placed over each of these three images.

In case feeding plans change, there is a box of formula available for mum.

Branding on baby signifies endorsement from mum.

STRETCHING THE RULES

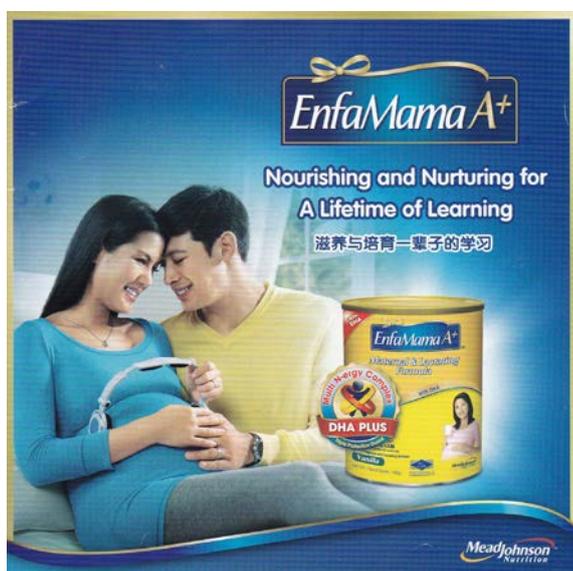
- This section highlights marketing practices which undermine or discourage breastfeeding especially when relating to products which may not come under the scope of the Code.
- Sponsorship activities which may give rise to conflicts of interest are also reported here. These activities are intended to promote breastmilk substitutes and violate Resolutions on conflicts of interest.

- In Malaysia,
 - Carton loads of **EnfaMama** were made available to staff of a private hospital for distribution to mothers. So much was given one mom got a full carton.



Formula for mothers!
MJN really means business - another boxes for distribution by health care facilities.

- A pamphlet accompanying **EnfaMama** samples is headed: “*Nourishing and Nurturing for a Lifetime of Learning*”. Inside the pamphlet, text explains how the product is formulated to support the nutritional needs of mother and baby during pregnancy and throughout lactation. The product is said to contain *Triple Protection Guard*, a unique blend of nutrients including folate to “*help maintain the growth and development of the foetus*”. On another pamphlet with the same image, the heading reads, “*a stronger foundation for our developing body begins with me*” and the slogan, “*nourishing mothers, nurturing futures.*”



Triple Action Guard to support nutritional and energy needs of mother and baby.

New Initiatives

A study by the Global Breastfeeding Collective - a new initiative to improve breastfeeding rates - showed only 40 percent of young babies were exclusively breastfed for six months, as recommended by the World Health Organization (WHO). Boosting the rate to 50 percent by 2025 would save the lives of 520,000 young children and potentially generate \$300 billion in economic gains over 10 years, the report said.

Anthony Lake, head of the U.N. children's agency UNICEF, said promoting breastfeeding was one of the most cost-effective investments nations could make in the future health of their economies and societies.

WHO chief Tedros Adhanom Ghebreyesus described breastmilk as “a baby's first vaccine”, protecting them from potentially deadly diseases.

Reuters, 1 Aug 2017

Editorial Note: Company promotion of milk for mothers (MFMs) often conveys the message that pregnant and lactating women need them 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 such products. 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.

These formula for mothers are not covered by the scope of the International Code and thus their promotion does not violate the letter of the International Code. They do stretch the spirit of the International Code by seriously undermining breastfeeding.