

# IBFAN CONCERNS ABOUT N4G

Global Breastfeeding Collective

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# Why is IBFAN so concerned about this issue?

- IBFAN is grateful for the opportunity to explain why we are so concerned about N4G'
- As a founder member of the GBC, much of our work centres around the need to protect the infant and young child feeding arena from undue commercial influence .
- We appreciate the efforts made by WHO and UNICEF to ensure that this principle is upheld, and offer these comments in an effort to find a safe way forward.

# Code implementation needs political will – funding from the wrong sources is problematic

- N4G claims to be a unique opportunity to '*accelerate progress on malnutrition*'
- At a time when poverty rates, economic disparity, conflicts and hunger are rising, we believe that allowing processed food and agri industry associations to contribute funding to '*humanitarian*' causes is problematic.
- These Industries benefit in many ways from the image transfer from the UN and prestigious NGOs but the most important benefit is the right to sit at the policy-making table.

# Why the N4G is a threat to child health

- IBFAN shares the concerns of many people's organisations about N4G providing the food and agri-business in national health policy setting as national governments attempt to regulate harmful practices, including marketing.
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## Other concerns about N4G

- N4G criteria mirror the Conflict of Interest rules used by the Scaling Up Nutrition Initiative, the BMS Call to Action and the Access to Nutrition Index. IBFAN has opposed these initiatives from the beginning.
- N4G promotes short-term treatment models with little attempt to create sustainable changes in food systems.
- Market-led approaches and export-oriented trade of ultra-processed products inevitably leads to increased deforestation, land-grabbing, mono-cropping etc.
- Babies are the perfect entry point for market-driven solutions.

# Should malnutrition be a business?

- The high-sugar Ready to Use Therapeutic Foods (RUTFs) and supplements currently being discussed at Codex, can be important for malnourished children if more appropriate foods are not available. However, it is critically important that their use and distribution is not commercially influenced. N4G envisages greater involvement of the private sector in their provision and the baby food industry is eager to partner with humanitarian agencies on this.
- IBFAN continues to work to ensure that they are not sold on the open market or promoted with claims or other methods.

# Fears that industry will infiltrate the policy space



IBFAN appreciates that WHO and UNICEF are both clear that the policy making should be free from commercial influence.

However, the N4G [Commitment Guide](#) remains on the N4G website. Table 1 gives a model for a Smart Commitment related to infant feeding.

*‘National industry associations’* are listed as being *‘responsible’* for policy.

**Table 1: Examples of SMART Commitments<sup>1</sup>**

Commitment type	Commitment	Specific action	Responsible party	Measurable	Baseline	Timeline
<b>Impact</b>	Reduce stunting in children under age five from 28% in 2020 to 20% by 2030.	Accelerate scale up of National Nutrition Action Plan and nutrition-specific and-sensitive interventions.	Ministries of Health and Agriculture from country government.	Prevalence of stunting, underweight, low birth weight, anemia in children age under five.	28%.	9-10 years.
<b>Financial</b>	Commit and invest \$600 million by 2030.	Multi-Phase Project approach focusing on the first 1,000 days and most vulnerable population groups.	Ministries of Finance and Planning, Health and Agriculture from country government.	Allocation and disbursement of funds across line ministries and programs.	Current nutrition budget – including nutrition sensitive budget line if available.	9-10 years.
<b>Programmatic</b>	To treat acute malnutrition in children under five in all areas of the country.	Ensuring 100% of treatment centers are equipped with management kits. Roll out communications plans in community health centers.	Donor or philanthropic organization in partnership with local civil society organizations.	Number of acute malnutrition cases successfully treated.	Acute malnutrition prevalence rates.	All cases to be treated within 9-10 years.
<b>Policy</b>	Develop a multi-sectoral breastfeeding policy in line with the Code.	Strengthen existing policies and plans, set up regional breastfeeding committees, budget line analysis, and implementation plan.	Ministry of Health, Ministry of Women and Social Affairs, Ministry of Education, with input from National Industry Associations.	Does the policy align all key sectors? Is it costed? Does it have an implementation plan? Include breastfeeding targets.	Current breastfeeding policies and regulation.	To be fully implemented in 9-10 years.



- **The Responsible Party for ‘Policy’:**
- *Ministry of Health, Ministry of Women and Social Affairs, Ministry of Education, with input from National Industry Associations.*
- **The Responsible Party for Programmes:**
- *Donor or philanthropic organization in partnership with local civil society organizations.*

# Suggestions for a way forward:

- Is N4G the best place for Countries to make commitments?
- Concerns about N4G are clearly stated on the website.
- The N4G Commitment Guide is removed
- If GBC members decide to make Commitments through this process need regular reporting back on impact, including whether associations benefit from the image transfer and increased access to policy setting processes.
- GBC sends a statement calling for association to be excluded to the GOJ.

# Proposed GBC N4G statement

*“The GBC is profoundly concerned about the persistent predatory marketing of the manufacturers and distributors of baby feeding products in direct violation of the International Code of Marketing of Breastmilk Substitutes and the subsequent World Health Assembly resolutions (the Code). Such marketing misleads parents, undermines breastfeeding and optimal complementary feeding, leads to increased under five mortality, malnutrition and illness, drains national resources and exacerbates the climate crisis.*”

- *We commend the Tokyo Nutrition for Growth Summit (N4G) decision to withhold invitations to individual baby food companies. However, we note with concern that the business associations of these same companies, and funded by them, will be invited to attend, to speak on their behalf and donate to the N4G fund. This creates unacceptable conflicts of interest and opportunities to unduly influence N4G proposed actions.*

- *We agree that a multi-sectoral approach is needed for governments to legislate, monitor and enforce the Code. However, any policies aiming to protect child health must be independent of commercial influence from industries targeting children. We call on the Government of Japan, and all participating governments, to reconsider this issue and ensure that these associations are also excluded.*

Thank you!



*The top strategic priority of the food industry is to change traditional food patterns and cultures in lower and middle-income countries.”*

Prof Philip James, the founder of the Obesity Task Force,  
commenting on Scaling Up Nutrition

*“The benefit to corporates would be threefold ... Firstly, contributing firms would be more attractive to the growing band of Environmental, Social and Governance (ESG) investors ... studies show that strong corporate social responsibility adds to return on assets after the first two to three years.”*

Lawrence Haddad, Executive Director of GAIN