

IMPROVING CHILD NUTRITION

BY ENFORCING SUB-DECREEE 133

ON MARKETING OF PRODUCT
FOR INFANT AND YOUNG
CHILD FEEDING



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Highlight

Exclusive breastfeeding practices in Cambodia have significantly improved over the last decade. This is extremely important for a child's optimal nutrition, development and growth. However, current violations of legislation on marketing of breast milk substitutes threaten exclusive and continued breastfeeding practices and contribute to increased usage of infant formula as a substitute for breast milk, which can have lifelong negative impacts for Cambodia's next generation.

Exclusive breastfeeding for the first six months of life and initial breastfeeding during the first hour after birth is vital to the health and well-being of newborns and infants. A child exclusively breastfed for the first 6 months is 14 times less likely to die than a non-breastfed child.¹

18 brands were observed, but none followed the legislation entirely. In addition, many complementary foods (food introduced to infants after six months) also violated the legislation. The brands observed were widely available in many stores and are popularly purchased by mothers, according to informal interviews with the store owners.

The line between accurate product information and advertising that is misleading can be very unclear and confusing for parents and caregivers. However, in Cambodia there is a fundamental line drawn by Sub Decree 133 on the Marketing of Products for Infant and Young Child Feeding, which was developed and endorsed by the Cambodian government to support good nutrition for infants and children.

The legislation supports, protects and promotes optimal breastfeeding practices including early initiation of breastfeeding, exclusive breastfeeding for 6 months and continued breastfeeding for 2 years and beyond.

Key findings

Based on the observations, key findings include:

The response of brands to labelling rules is generally good, but there is no product which completely follows the legislation.

The commercial promotion of infant formula is widely accompanied by promotion posters and marketing representatives employed by companies who stand at the formula display in shops, which is directly prohibited in the law.

Of particular concern is the high number of imported brands that do not have instructions or information written in Khmer. This, along with misleading pictures and messages that idealize formula, may be contributing to low levels of community understanding.



Key recommendations

World Vision calls for the Royal Government of Cambodia to:

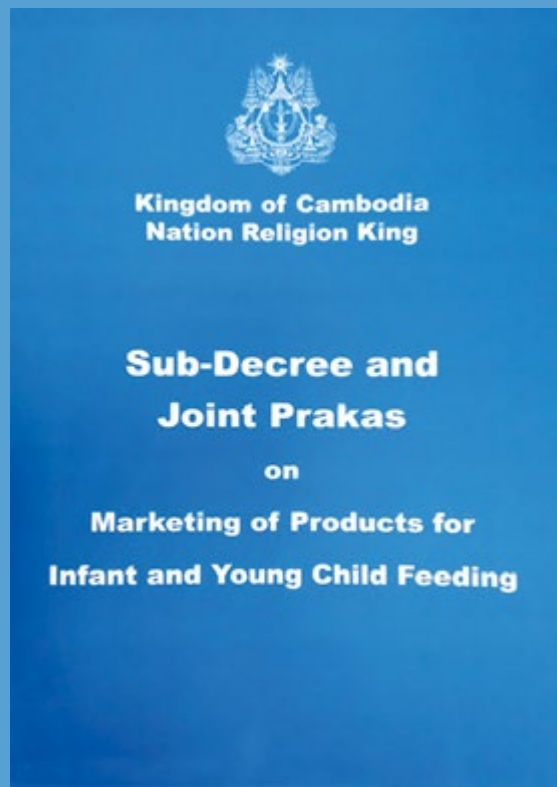
- Better enforce Sub-Decree 133 by appointing a strong authority to better monitor imported products and marketing practices that violate the legislation.
- Provide a more supportive environment for mothers to practice optimal breastfeeding practices by supporting activities that educate citizens of the benefits of breastfeeding and the risks related to breast milk substitutes use.

Infant and young child feeding policy in Cambodia:

Sub-decree 133 on the Marketing of Products for Infant and Young Child Feeding was passed in 2005 following reflection on the World Health Assembly's 1981 International Code of Marketing of Breast-milk Substitutes. In 2007, the Joint Sub Decree (Joint Prakas) on Implementation of the Sub-Decree among the Ministries of Health, Commerce, Industry and Information was finalized and aims to provide "adequate and safe nutrition for infants and young children by protecting and promoting the breast-feeding and by encouraging appropriate and timely complementary feeding to ensure breast milk substitutes are properly used only when they are necessary and based on adequate information." (Article 1, page 2)

The legislation is a thorough effort to support, protect and promote optimal breastfeeding and reduce the improper usage of breast milk substitutes. Below, Child Health Now has summarised some of the central aspects of the legislation that can be easily identified on product labels and in shops.

Key standards of Sub-Decree 133



1. Information must be written in Khmer. (Article 6, p10)
2. Labels must include an easily readable statement that exclusive breastfeeding is best for first 6 months and continued breastfeeding to 2 years or above. (Article 9, p12)
3. Labels must include a warning with the words "Important notice" of the health hazards of inappropriate use. (Article 9, p12)
4. Must include easily readable instructions for appropriate use and preparation. (Article 9, p12)
5. Must include a warning message about the risks of introducing formula before an infant reaches the recommended age. (Article 9, p12)
6. Must not include misleading or attractive pictures, photos or graphics that idealise formula milk, other than to explain preparation methods. (Article 9, p12)
7. Must include a statement indicating the total cost of feeding an infant with formula for the first 6 months. (Article 9, p13)
8. No promotion or advertisement that promotes consumption, such as special stands, coupons, free samples, sale prices or prizes. (Article 13, p15)
9. Infant feeding with complementary food must include health hazards of having it before 6-month old, and state the benefits of maintaining breastfeeding until two year age or above. (Article 8, p11)
10. Condensed milk or similar products must include a clear warning that these types of product are not used to feed infants and young children. (Article 12, p14)

Observation Record of Infant Formula Products

Table 1 Summary of Infant Formula Observation

A total of 18 Infant formula products were observed. Below is a summary of the findings, plus an example of products meeting the sub-decree standards, and an example of products in violation of the standards.

Key Standards of Sub-decree 133	Number of compliant companies	Number of non-compliant companies
Khmer language	11	7
Statement on exclusive breastfeeding	10,4(50%*), 1(80%*)	3
Health hazard warning	13	5
Readable instructions for appropriate use	18	0
Age warning	2	16
Misleading pictures	2	16
Statement of total cost of consumption	8	10
Additional promotion	12	6

50%* means that the statement of exclusive breast-feeding is best for infants is written but specific period of time is not included.
 80%* means that the statement of exclusive breast feeding is best for first 6 months and sustained to 2 years or above is clearly written but it mixed up with other information about formula's benefits.

Advantages of breastfeeding

Infant formula can never replicate the benefits of breast-milk. Breastfeeding is the best way to ensure a good nutritional start for babies. Breast milk is safe, clean and contains antibodies which help protect the infant against many common childhood diseases.



Benefits for Mothers

- Lower risk of post-partum haemorrhage, the top maternal killer
- Lower risk of breast, uterine, ovarian cancers
- Less post-partum depression
- Less likely to become pregnant in early months following child birth
- Faster post-partum recovery
- Increased bonding with baby

Benefits for Baby

- Improved growth, nutrition, and immunity status
- Improved motor and cognitive development
- Less risk of death due to infections
- Increased bonding with mother
- Less respiratory and diarrhoea infectious
- Lower risk of chronic diseases (diabetes, heart disease, asthma and some cancers) later in life
- Lower risk of overweight and obesity²

Examples of correct and incorrect labelling

Examples of correct labelling*	Standard in Sub-Decree 133	Number of non-compliant companies
 <p>Khmer instruction is available</p>	<p>Article 6: Information must be written in Khmer.</p> <p>In Cambodia, most infant formula is imported and many do not have information in Khmer language.</p>	 <p>No Khmer instruction</p>

Examples of correct labelling*	Standard in Sub-Decree 133	Number of non-compliant companies
 <p data-bbox="157 594 492 625">Statement of breastfeeding is best</p>	<p data-bbox="557 289 908 436">Article 9: Labels must include an easily readable statement that exclusive breastfeeding is best for first 6 months and sustained to 2 years or above.</p> <p data-bbox="557 468 908 583">Clear information about breast milk must be provided, because it helps raise awareness to parents about breastfeeding.</p>	 <p data-bbox="973 594 1308 625">No statement about Breastfeeding</p>
 <p data-bbox="157 1024 492 1087">Warning for health hazards of inappropriate use</p>	<p data-bbox="557 684 908 800">Article 9: Labels must include a warning with the words “Important notice” of the health hazards of inappropriate use.</p> <p data-bbox="557 831 908 1073">The children will be vulnerable to disease and risk in facing health hazard when mothers do not appropriately use the formula. In addition, no formula company can guarantee that the formula is uncontaminated by bacteria during processing at factory.</p>	 <p data-bbox="973 1024 1308 1087">No warning for health hazards of inappropriate use</p>
 <p data-bbox="157 1455 492 1486">Appropriate use indication</p>	<p data-bbox="557 1136 908 1230">Article 9: Must include easily readable instructions for appropriate use and preparation.</p> <p data-bbox="557 1262 908 1440">Without clear and easy instruction of use and preparation, improper use will increase and directly affect an infant's health. For example, unboiled water, unboil bottle or incorrect dilution can make the baby ill.</p>	 <p data-bbox="973 1455 1308 1518">Instructions for preparation are too small and difficult to read</p>
 <p data-bbox="112 1896 537 1959">Warning message about recommending formula before reaching recommended age</p>	<p data-bbox="557 1608 908 1724">Article 9: Must include a warning message about introducing formula before an infant reaches the recommended age.</p> <p data-bbox="557 1755 908 1871">It is very critical to use the formula out of recommended period, the early use or later use of formula will have bad effects on infant's health.</p>	 <p data-bbox="943 1896 1338 1959">No warning message and Recommended for 0-6month old child</p>

Examples of correct labelling*	Standard in Sub-Decree 133	Number of non-compliant companies
 <p data-bbox="1712 594 1929 625">No misleading picture</p>	<p data-bbox="2056 268 2407 384">Article 9: Must not include misleading or attractive pictures, photos or graphics other than to explain preparation methods.</p> <p data-bbox="2056 415 2407 594">Misleading photos or pictures can increase misconceptions and encourage parents to buy infant formula for benefits that are better achieved through breastfeeding.</p>	 <p data-bbox="2531 594 2748 625">Misleading picture</p>
 <p data-bbox="1712 1024 1929 1056">Total cost indication</p>	<p data-bbox="2056 720 2407 835">Article 9: Must include a statement indicating the total cost of feeding an infant with formula for the first 6 months.</p> <p data-bbox="2056 867 2407 1045">Parents will be discouraged not to spend much money on infant formula with clear total cost indication, while realizing the benefit of natural breast milk without spending any money.</p>	 <p data-bbox="2531 1024 2748 1056">No cost indication</p>
 <p data-bbox="1712 1455 1929 1486">No additional incentive</p>	<p data-bbox="2056 1157 2407 1314">Article 13: No promotion or advertisement that promotes consumption, such as special stands, coupons, samples, sale prices or prizes.</p> <p data-bbox="2056 1346 2407 1482">Most products are not just discounted in price, but also sold in twin packs with a cheaper price or get a free soap, water kettle, handkerchief, etc.</p>	 <p data-bbox="2531 1455 2748 1518">Promote consumption through incentives</p>
 <p data-bbox="1712 1896 1929 1927">Appropriate age for use</p>	<p data-bbox="2056 1577 2407 1755">Article 8: infant feeding with complementary food must include health hazards of having it before 6-month old, and state the benefits of maintaining breastfeeding until two-year age or above.</p> <p data-bbox="2056 1787 2407 1923">Most substitute products are seriously violating the law. For example, labelling rich in iron and recommended for baby under 6 months old.</p>	 <p data-bbox="2531 1896 2748 1927">Inappropriate age for use</p>

Examples of correct labelling*	Standard in Sub-Decree 133	Number of non-compliant companies
 <p data-bbox="228 651 472 680">Clear warning message</p>	<p data-bbox="612 286 970 443">Article 12: condensed milk or similar products must include a clear warning that these types of product are not used to feed infants and young children.</p> <p data-bbox="592 477 987 689">Condensed milk feeding is an issue in Cambodia, especially for the poor families who could not afford the formula and do not received accurate information about breastfeeding and breast milk substitute.</p>	 <p data-bbox="1034 651 1426 680">Warning message in foreign language</p>

* Showing a product as an “Example of correct labelling” is not an endorsement of the product. World Vision always recommends protects, promotes and supports breastfeeding and safe and appropriate infant and young child feeding practices and upholds the provisions of the International Code of Marketing of Breast Milk Substitutes.

¹ UNICEF (2013) Breastfeeding, retrived from http://www.unicef.org/nutrition/index_24824.html

² UNICEF (2012)Benefits of breastfeeding

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