Armenia

Code Violations • 2011

How companies violate the International Code of Marketing of Breastmilk Substitutes and subsequent WHA Resolutions

Code Overview

The International Code of Marketing of Breastmilk Substitutes aims to promote safe and adequate nutrition for infants and young children, by protecting breastfeeding and ensuring appropriate marketing of products under its scope.

The Code applies to all products marketed as partial or total replacement for breastmilk, such as infant formula, follow-up formula, special formula, growing-up milk, cereals, juices, vegetable mixes and baby teas. It also applies to feeding bottles and teats.

The Code:

• Bans all advertising and promotion of products to the general public.
• Bans samples and gifts to mothers and health workers.
• Requires information materials to advocate for breastfeeding, warn against bottle feeding and NOT to contain pictures of babies or text that idealise the use of breastmilk substitutes.
• Bans the use of the health care system to promote products.
• Bans free or low-cost supplies.
• Allows health professionals to receive samples but only for research purposes.
• Demands that product information be factual and scientific.
• Bans sales incentives and contact with mothers.
• Requires labels NOT to discourage breastfeeding and to inform fully about the correct use of infant formula and the risks of misuse.

In Armenia, breastfeeding can save 60 babies each year

The information in this report was compiled by "Confidence" Health NGO, based on monitoring carried out by volunteers in Yerevan in June 2011.

This leaflet was made possible by the support of Counterpart International Armenia Representation and the generous support of the American people through the United States Agency for International Development (USAID) through "Confidence" Health NGO.

Contents, views and opinions expressed herein are those of the authors, and the responsibility of "Confidence" Health NGO, and do not necessarily reflect the views of Counterpart Armenia, USAID or the United States Government.

An advertisement on TV promotes Hipp juices starting from 4 months.

This Nestlé booklet shows the 4 stages of protection provided by NAN. For each page which explains the benefits of breastfeeding the opposite page claims the same benefits when using NAN.

This Celia infant formula named EXPERT 1 makes outrageous claims like "smart growth" and "proper development."

This cute baby is used to promote Malutka 2, a formula from 6 months, and a Malutka milk porridge from 5 months in a magazine advertisement.

Humana fails to label products in Armenian but sticks instead to German, the language of its country of origin. These teas are labelled for babies from the first week.

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Country Profile

Total population: 3,249,500
Population under 1 year: 44,000
Population 1-4 years: 154,200
Annual number of births: 44,825 (2010)
Infant mortality rate (per 1,000 live births): 10.4
Exclusive breastfeeding at 6 months: 57.8%
Predominant breastfeeding at 4 months: 80.65%
Continued breastfeeding at 1 year: 44%

Source: Statistical Yearbook of Armenia 2010
Ministry of Health official statistics 2009

Breastfeeding rates in Armenia are relatively high compared to other countries but the practice is under constant threat from unethical promotion of commercial baby foods and related products. To eliminate commercial pressure from the field of infant feeding, the Government of Armenia has developed a draft law on breastfeeding promotion and regulation of infant food marketing. The draft law, in circulation in Parliament and Government since July 2011, will replace earlier measures which have been shown to be ineffective.

Promotion to the public

Product promotion to the public comes in various forms: billboards in streets and supermarkets, advertisements in the mass media including TV, radio, magazines and the internet. Compared to previous monitoring exercises, the evidence of promotion of products by companies to the public has increased.

You just can’t miss them! Big Hipp billboards on show outside supermarkets and on the streets in Yerevan.

TV advertisements

Although Armenia has a law on advertising that clearly bans food advertisements for babies below 6 months, such ads are commonly seen on Armenian TV. The situation is made worse by the availability of Russian TV which shows a lot of ads for infant formula and other baby foods.

Ads in baby magazines

Similarly, Russian magazines abound in Armenia and are widely read by mothers. In just one magazine – My Baby – ads on infant formula, complementary foods and feeding bottles were splashed all over. The ads contain prohibited claims and misleading information.

Promotion in shops

A plethora of discounts and freebies are available in Armenian supermarkets, shops and pharmacies. Free gifts and tied-in sales are common to entice mothers to buy products which are not only expensive but unnecessary.

Examples of ads in My Baby:
- From Abbott – ‘the expert in health’, an ad claiming its Similac formula contains nutrients similar to those in breastmilk, improves immunity, promotes growth, brain and visual development and is easily digestible.
- More of the same - an Agusha ad about the multitude of claims for its medley of products, including easy digestibility, allergy prevention, brain and visual development, immunity and growth.
- From Dr. Brown - a feeding bottle ad proclaiming (wrongly) that the product is ideal for combining feeding with breast and bottle.

My Baby magazine in Russian and what lies behind the seemingly innocent cover.
Promotion in healthcare facilities

Visits to health care facilities reveal that even baby friendly hospitals are being used by companies to reach mothers and babies. Violations were found in more than 70% of health facilities visited. Although the visits were aimed at monitoring company practices, not to check on hospitals or health workers, those who collaborate with companies tend to be less cooperative.

Brand endorsement

Company presence is obvious from the multitude of company materials and equipment seen in health facilities. Gifts to hospitals and doctors such as uniforms, clocks, stationery, bearing company and brand logos, are common. When they are prominently displayed and widely used in health facilities, they are perceived by mothers as a form of medical and professional endorsement for a particular product. This is a most effective form of promotion.

Information or promotion?

It may seem a harmless – this generous gesture of giving ‘information’ materials and posters of cute babies and loving mothers to health facilities and doctors. The production quality are impressive, surpassing the materials produced by international agencies, governments and health facilities. It is the images and contents which violate the International Code. Very often, these materials contain idealising images and text including claims about products which are not only promotional but cannot be supported by scientific evidence. In WHA58.32 [2005], claims are banned unless allowed by national laws. Armenian laws do not specifically allow for claims.
**Recommendations**

In view of the above findings, the draft law on breastfeeding promotion and regulation of infant food marketing in Armenia should contain provisions to eradicate the following:

- **Promotion for baby food products**, including **ALL formula products and complementary foods**. The ban should cover all media channels, retail outlets, public places and health facilities.
- **Nutrition and health claims regarding baby food products**. This would include misleading and idealising statements, logos and other promotional devices on labels.
- **Sponsorship and any other forms of inducement to health workers.**

To be effective, the proposed law should contain clear provisions on information and education to ensure that parents are enabled to make infant and young child feeding decisions free from commercial influence. There should also be strong penalty provisions to act as deterrent against errant companies.

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**Labelling**

As with information materials, health and nutrition claims have emerged as a disturbing trend on baby food labels. Under the Code, product labels should not discourage breastfeeding but the idealising statements and logos have the effect of undermining breastfeeding. Many labels are in foreign languages particularly products imported from Germany and Russia. Although Armenia’s national strategy of infant feeding recommends complementary feeding from 6 months, several labels on complementary food indicate that these products are suitable from an earlier age. In some cases this could be as early as 1 week. (see cover page bottom right)

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**Sponsorship**

During the monitoring period, Armenian health professionals were invited to two conferences, one in Moscow on perinatal medicine, sponsored by companies such as Abbott, Bayer, Friso, Nestlé and Nutricia; another in Armenia organised by the Armenian Association of Pediatricians on medical nutrition of young children and sponsored by Lactalis, makers of Celia.

Conference materials included brochures (see end of pg 3) and memory sticks containing product promotion.

Sponsorship by its very nature creates a conflict of interests. It creates a sense of obligation and a need to reciprocate in some way. It influences the attitude of health professionals to the sponsoring companies and their products. The goodwill that is generated will often result in endorsement of company products1. This is in conflict with the duty of health professionals to promote breastfeeding. There are two WHA resolutions: 49.15 [1996] and 58.32 [2005] which warn against conflicts of interest. Health professionals should be wary about endorsing products that may cause damage to the health of children.

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1Wright C.M., Watersston A.J.R., “Relationships between paediatricians and infant formula milk companies”, Archives of Disease in Childhood, 2006; 91: 383-385