



Hilary McGrady,
Director General National Trust
Kemble Drive,
Swindon,
SN2 2NA

May 20th 2021

Dear Ms McGrady,

As the secretariat of the Baby Feeding Law Group UK I am writing to share the concern of all of our 30 member organisations on hearing of the National Trust's new partnership with the baby milk and baby food company HiPP Organic, which was made public on Friday 14th May. Our member organisations listed below represent tens of thousands of people from across the UK, including health professionals and young families.

The Baby Feeding Law Group UK work to protect infant, young child and maternal health by calling for an end to marketing practices which commercialise infant feeding, mislead consumers and threaten breastfeeding. Whilst we seek to protect breastfeeding, we do not want to limit the accessibility of safe and appropriate infant formulas for those families who need or choose them. **Ultimately, we believe all parents should be enabled to make informed decisions on what, when and how they feed their babies and young children without being subjected to undue and misleading commercial influence.**

Whilst we acknowledge the financial challenges that the National Trust faces given recent covid-related restrictions, and do not doubt the partnership is well-intentioned, we feel your choice of partner is deeply problematic and hope you can reconsider. **By entering in to a partnership with a company that exists to make profits from the sales of baby milk and baby foods, you will be allowing your partner to influence the feeding practices of the hundreds of thousands of young families that support you, in ways which will threaten the health of their babies and toddlers. At the same time, and perversely given your aim, you are supporting a company in an industry that has major negative effects on the environment.**

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In more detail, we believe your partnership with HiPP Organic is problematic for two main reasons:

- 1. HiPP Organic (and all baby milk and baby food companies) market their products inappropriately. This means they violate the WHO Code of Marketing of Breastmilk Substitutes¹, which offers the best framework to limit the harm of industry influence on babies and young children and their mothers.**

By entering into this partnership you are allowing HiPP Organic, a company that violates the WHO Code, to build trust and extend their marketing reach to National Trust members and supporters. They are doing this in two ways; indirectly through their association with the National Trust, and directly through your publicised links to their branded HiPP Little Explorers initiative, on the same website through which they sell their products and promote their baby club.

Just being associated with the National Trust allows them to increase brand awareness with your members and supporters. Linking their brand name with a reputable organisation like yours buys them a halo of goodness and enhances their reputation with your common target audience – young families. Partnering with an organisation that is well respected by this demographic will allow HiPP Organic to increase their sales and consumer loyalty and improve their corporate image. If an organisation like yours is trusted by parents, then they are also likely to trust the products of any partners of that organisation; i.e. HiPP Organic. This is even more the case when you are actively endorsing them, e.g. on your website you state “[HiPP Organic have been] feeding babies nutritious, organic food for more than 100 years”.

We note that you are in the process of removing any requirement for members and supporters to sign up to the HiPP Organic baby club in order to plant a tree and are thankful that the concerns that have been raised around this are being listened to. We are also hopeful you are reconsidering allowing a discount to be levied against any purchases from your shop for members or supporters who sign up to the HiPP Organic baby club. This is important because signing up to the baby club requires them to consent to being sent ‘*information about our organic milks including infant formula*’, among other ‘*tips, advice, offers*’ etc. which may relate to their products. Baby clubs are a key vehicle employed by companies to build relationships with parents, enabling manufacturers to gather personal information and maintain regular contact with parents through email or post, increasing brand awareness and engagement whilst building individual relationships, as described in

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this recent paper: *'Selling second best: how infant formula marketing works'*ⁱⁱ. Baby milk companies use baby clubs to circumvent the UK law which prohibits the marketing of infant formula to the public, so as to protect breastfeedingⁱⁱⁱ.

You have shared on social media that you are partnering with HiPP Little Explorers. This continues to be problematic given the promotion of the HiPP brand and the fact this content is hosted on the HiPP Organic website with links to their baby milk and baby food products and the baby club visible on the webpages. This is **'cross promotion'**^{iv}, a proven marketing tool which is at the heart of how baby milk and baby food companies aim to circumvent UK legislation barring the promotion of infant formula.

As well as not being WHO Code compliant, HiPP Organic marketing does not support UK public health recommendations on optimal infant and young child feeding; for example, HiPP Organic:

- Labels its baby food pouches for 4 months + when UK public health recommendations are to introduce solids at around 6 months^v
- Markets expensive and too sweet so-called 'growing-up' milks for children over 1 year of age, when these unregulated products are deemed unnecessary by the NHS^{vi}
- Names product in ways which mislead consumers in to thinking that the ingredient balance is different to the reality (e.g. more vegetables than fruit) and uses unfounded nutrition and health claims and 'health halo' statements like '1 of your 5 a day', which are untrue^{vii viii ix}
- Has used unsubstantiated claims on its formulas which break UK laws, e.g. comparing its formula to breastmilk, and suggesting that its organic ingredients can prevent allergy^x

To conclude on this first point, the UK currently has the lowest breastfeeding rates in the world^{xi}, and this has enormous implications for the physical and mental health and wellbeing of mothers and their children. With 8 out of 10 women stopping breastfeeding before they want to^{xii} breastfeeding success is not just down to individual choice. The food environment powered by messaging from the food industry and lack of support from government leaders together play a major role in our society's failure to protect breastfeeding. Inappropriate marketing by HiPP Organic and all baby milk and baby food companies undermines breastfeeding, as well as appropriate formula feeding, and appropriate complementary feeding.

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2. HiPP Organic (and all baby milk and baby food companies) market unnecessary products which exacerbate environmental damage

You are inappropriately presenting HiPP Organic as a 'green' company, stating that they have a 'strong commitment to sustainability', sharing their sales pitch '*[HiPP organic] are passionate about tasty and fresh ingredients that are always grown responsibly and sustainably*' and your joint pledge '*to help tackle climate change, protect nature and create a healthier environment for future generations*'.

However, and as highlighted above, this masks the reality that HiPP Organic and all baby milk and baby food companies market unnecessary products, including drinks marketed as 'growing-up' milks for children from 1 year old. Despite these unhealthy, ultra-processed drinks providing 400-500g of extra free sugar a month if used daily, and costing 2-3 times more than cows' milk, they are hugely popular among parents. These products are the fastest growing sector of the infant milk market and are heavily advertised. In 2019, 'growing-up' and toddler milks accounted for 48% of total infant milk sales by volume globally, compared with 24% for first milk, 22% for follow on formula and 5.6% for specialised milks^{xiii}. The manufacture of these products (noting that 1kg milk is needed for 200g milk powder), the logistics to support their supply chain, their preparation (in the case of boiling water to reconstitute powdered formula) and the need to dispose of their packaging contributes to greenhouse gas emissions that cause global warming and climate changes^{xiv}.

In addition, as we are sure you know, in 2015 the Environment Agency issued a press statement on an enforcement undertaking of almost £415,000 against HiPP Organic, following their failure both to meet their requirements to register as a producer of packaging and to recover and recycle packaging waste between 2004 and 2011 under the Producer Responsibility (Packaging Waste) Regulations 2007^{xv}.

To conclude on this second point, both because they market unnecessary products which contribute to climate change and have a poor track record of respecting the environment, we cannot see how HiPP Organic are a partner which can credibly support the National Trust's aims to protect nature.

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Within the UK we are working hard to ensure that all families are supported with appropriate advice on infant and young child feeding through programmes such as Unicef Baby Friendly that endorse the WHO Code (and which is included in the NHS long term plan^{xvi}) and through national and local actors and activities that are independent of commercial involvement. As explained above, HiPP Organic is a multi-national company that violates the International Code of Marketing of Breastmilk Substitutes in the UK and globally. We have provided further reasons they seek partnerships with organisations such as the National Trust, that has a wide supporter base including hundreds and thousands of young families, and a review of how their marketing has been evaluated and enclose a copy of this short report for your reference.

For the reasons outlined above, we are writing to you to urge you to reconsider any partnership with HiPP Organic. As an influential organisation that has a broad member base you have an opportunity to demonstrate powerful leadership in an area of policy that looks to limit industry influence on parents and that upholds infant, young child and maternal health as well as striving to realise true environmental benefits. We can only achieve these goals if we all work together to protect families from undue commercial influence from companies which ultimately exist only to make a profit.

If you would like to discuss any of these issues further, or find out any more about the BFLG-UK, do please get in touch with me at vicky@firststepsnutrition.org.

Yours sincerely

Dr Victoria Sibson

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ⁱ <https://www.bflg-uk.org/the-code>

ⁱⁱ <https://globalizationandhealth.biomedcentral.com/track/pdf/10.1186/s12992-020-00597-w.pdf>

ⁱⁱⁱ <https://www.legislation.gov.uk/ukxi/2020/43/made>

^{iv} <https://www.who.int/nutrition/publications/infantfeeding/information-note-cross-promotion-infant-formula.pdf?ua=1>

^v <https://www.nhs.uk/start4life/weaning/ready-or-not/>

^{vi} https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/608a66ccaaed640a6dd4bc4c/1619683021502/Drinks+marketed+as+toddler+and+growing+up+milks+in+the+diets+of+1-4+year+olds_April2021.pdf

^{vii}

<https://pubmed.ncbi.nlm.nih.gov/30530844/#:~:text=Confused%20health%20and%20nutrition%20claims%20n%20food%20marketing,and%20claims%20used%20on%20product%20packaging%20are%20confusing.>

^{viii}

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/812204/Foods_and_drinks_aimed_at_infants_and_young_children_June_2019.pdf

^{ix}

https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/5a93f885085229b264ff6086/1519646858256/Baby_Food_in_the_UK+_2017.pdf

^x

https://static1.squarespace.com/static/59f75004f09ca48694070f3b/t/5eba3eac6a3b687667d9891e/1589264046551/Claims_made_for_infant_formula_and_ingredients_May2020_final.pdf

^{xi} <https://ukbreastfeedingtrends.files.wordpress.com/2017/03/wbti-uk-report-2016-part-1-14-2-17.pdf>

^{xii} <https://files.digital.nhs.uk/publicationimport/pub08xxx/pub08694/infant-feeding-survey-2010-consolidated-report.pdf>

^{xiii} <https://onlinelibrary.wiley.com/doi/10.1111/mcn.13097>

^{xiv} http://waba.org.my/v3/wp-content/uploads/2019/10/bmj.I5646.full_.pdf

^{xv} <https://www.circularonline.co.uk/news/baby-food-company-pays-415000-to-charities-for-non-compliance/>

^{xvi} <https://www.unicef.org.uk/babyfriendly/nhs-long-term-plan-recommends-baby-friendly/>

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