



Mr Ross McMahon
Kendal Nutricare Ltd
Mint Bridge Road
Kendal
Cumbria LA9 6NL

16th September 2020

Dear Mr McMahon,

Baby Feeding Law Group works with its 27 member groups to protect infant feeding in the UK and to bring the WHO Code of Marketing of Breastmilk Substitutes into UK law. We are writing in response to a blog post on Kendamil's parent-facing website entitled 'Top 10 Formula Myths' dated Feb 2020. <https://www.kendamil.com/blog/top-10-formula-myths/>

The blog post makes several claims regarding use of infant formula, comparing it to breastmilk and actively encouraging its use by introducing the idea of combination feeding and promoting its benefits without any mention of the potential negative impact on breastfeeding.

There are a number of inaccuracies in this blog:

1. It states that it is a myth that using formula reduces breastmilk and claims this is "Completely false". NHS guidance, as well as information from UNICEF and WHO, clearly states that introducing infant formula can have a negative impact on milk supply and exclusive breastfeeding is recommended.
<https://www.nhs.uk/conditions/pregnancy-and-baby/breastfeeding-is-baby-getting-enough-milk/>
2. It states that it is a myth that formula fed babies grow at a faster rate than breastfed babies. The WHO Growth Standards were rewritten in 2009 because they had been based on formula fed infants and the growth of breastfed babies significantly deviates from this <https://www.who.int/childgrowth/en/>. It has also been established and accepted by WHO and other health bodies that breastfeeding reduces a baby's risk of overweight and obesity: https://www.who.int/elena/titles/bbc/breastfeeding_childhood_obesity/en/
3. The blog discredits the evidence that breastfeeding supports optimal brain development. It is accepted by WHO and UNICEF that regardless of social circumstances, breastfeeding provides infants with the best start in life and improves IQ:

Baby Feeding Law Group UK Members:

Association of Breastfeeding Mothers (ABM), Association for Improvements in the Maternity Services (AIMS), Baby Milk Action, Best Beginnings, Breastfeeding Network (BfN), Community Practitioners and Health Visitors Association (CPHVA), Doula UK, Fatherhood Institute, First Steps Nutrition Trust, GP Infant Feeding Network (GPIFN), Hearts Milk Bank, Hospital Infant Feeding Network (HIFN), Human Milk Foundation, Institute of Health Visiting, Lactation Consultants GB (LCGB), La Leche League GB (LLLGB), Leicester Mammias, Local Infant Feeding Information Board (LIFIB), Midwives Information and Resource Service (MIDIRS), National Breastfeeding Helpline, NCT, Save the Children, UK Association of Milk Banking (UKAMB), Unicef UK Baby Friendly Initiative, Unison, World Breastfeeding Trends Initiative UK, Women's Environmental Network. *Secretariat 2020: helen@firststepsnutrition.org.*



[https://www.thelancet.com/journals/langlo/article/PIIS2214-109X\(15\)70002-1/fulltext](https://www.thelancet.com/journals/langlo/article/PIIS2214-109X(15)70002-1/fulltext)

Section 10 of the current Infant Formula and Follow on Regulations states:

Article 10

1. Advertising of infant formula shall be restricted to publications specialising in baby care and scientific publications.

Member States may further restrict or prohibit such advertising. Such advertising shall contain only information of a scientific and factual nature. **Such information shall not imply or create a belief that bottle-feeding is equivalent or superior to breast feeding.**

The current UK Guidance Notes are clear that information presented on websites is advertising (Appendix II, page 27)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/204314/Infant_formula_guidance_2013_-_final_6_March.pdf

We would be grateful if you would review the wording you use in this blog post as we believe it is not in line with current regulations as it suggests equivalence between formula feeding and breastfeeding, and undermines appropriate infant feeding in the UK.

Best wishes

Natalie Hickman

On behalf of the Baby Feeding Law Group.

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