

BFLG statement on Iceland's special sale on branded commercial milk formulas

On 15th August 2023, the retailer [Iceland announced](#) it was reducing the retail price of “*all branded formula milks to make it the cheapest on the market*”. This was in response to their polling of 500 UK families which raised widespread concerns about how they are going to feed their babies.

On the 15th of August, [Iceland's retail website](#) advertised price reductions on 14 commercial milk formula products across four brands (Aptamil and Cow & Gate, produced by Danone; SMA produced by Nestle and Kendamil produced by Kendal Nutricare): eight first infant formulas (suitable for use from birth to 12 months), four follow on formulas (marketed for use from 6-12 months of age, and not suitable for use under 6 months of age) and two growing up and toddler milks (marketed for use from 12 months +).

Their CEO, Richard Walker, stated “*we have a responsibility to [reduce formula prices]*”. He said that they were “*cutting the price of all of it because it's really necessary*” adding that “*90% of young mums will use formula at some point in their kid's first year of life*”.

The Baby Feeding Law Group UK shares concerns that high and rising prices of infant formula pose a threat to the food security of formula fed infants in families for whom it is unaffordable. However, there are several important issues with Iceland's actions, as detailed below. Our recommendations for alternative actions to improve the accessibility of infant formula to all who need it, are listed at the end of this statement.

The key issues:

Special sales on infant formula are against UK law

The law states: ‘*There shall be no point-of-sale advertising, giving of samples or any other promotional device to induce sales of infant formula directly to the consumer at the retail level, such as special displays, discount coupons, premiums, special sales, loss-leaders and tie-in sales*’ (Commission Delegated Regulation (EU) 2016/127; The Food for Specific Groups Regulations, 2020).

It is our perception that highlighting price reductions against formerly higher prices, and guaranteeing the price reduction for a limited time ([until December](#)), are indicative of a special sale.

Marketing restrictions on infant formula are intended to protect parents/carers from undue commercial influence on what and how they feed their babies in light of a wealth of evidence that marketing undermines breastfeeding and safe and appropriate formula feeding (Rollins et al, 2023; WHO, 2022; WHO & Unicef 2023). The regulations are not designed to limit accessibility to infant formula; it is the commercial milk formula manufacturers and retailers who set prices, and who do so in a manner which ensures high profit margins (FSNT, 2023a).

Special sales on infant formula leave parents and carers vulnerable to supermarket whims



First infant formula is essential for infants under 12 months of age who are not breastfed, or who are only partially breastfed (NHS, 2023a). It is a vital and non-substitutable food for these babies. Indications that increasingly unaffordable prices are leading to unsafe feeding practices highlight the need for the Government to implement price caps that would bring down and better regulate the widely variable price of nutritionally comparable products¹, and safeguard the nutritional intake of all formula fed babies in an equitable manner.

Iceland have promised to reduce the price of all commercial milk formulas until December, during which period parents/carers may become loyal to a premium brand (despite all infant formulas being nutritionally equivalent), or have increased their purchasing and use, potentially leaving them vulnerable to price rises when the special sale ends.

Special sales on follow on formula and growing up/toddler milks promote avoidable spending on unnecessary products

The NHS recommend that first infant formula is used until 12 months, when parents can introduce whole cows' milk; follow on formulas (marketed for use from 6-12 months of age) and growing up and toddler milks (marketed for use from 1 year +) are unnecessary (NHS, 2023a)². This means that any actions to support infant food security should focus on timely, consistent access to affordable infant formula. The use of growing up and toddler milks, whose nutrition composition, marketing and labelling are not subject to any specific regulations, should be discouraged. These products are entirely discretionary and place an avoidable burden on family budgets. They may also contribute high levels of sugar to young children's diets, at an age when public health recommendations advise that children drink cows' milk or an unsweetened, calcium-fortified milk alternative, which are often cheaper (FSNT, 2021).

Special sales prices on follow on formula and growing up/toddler milks which are lower than brand equivalent prices of infant formula could be harmful

Iceland's pricing of the Cow & Gate and SMA brand products is particularly concerning because their toddler milks and follow-on formula are cheaper than their first infant formula³. This pricing strategy could mislead those parents/carers on the tightest budgets who are trying to make the best choice for their children, into buying a less suitable product for their baby. The NHS states: "Follow-on formula should never be fed to babies under 6 months old" (NHS, 2023a).

¹ Up to date costs of all infant formula on the UK market can be found here: [Costs | Infant formula | follow-on formula & milks marketed in UK \(infantmilkinfo.org\)](#) (FSNT, 2023b). As well as prices varying between nutritionally comparable products, there is large variation between retailers, see: [Kids Food Guarantee Update: Infant milk formula - July 2023 | Food Foundation](#)

² "Research shows that switching to follow-on formula at 6 months has no benefits for your baby. Your baby can continue to have first infant formula as their main drink until they are 1 year old". "Growing-up and toddler milks are marketed as an alternative to whole cows' milk for toddlers and children over 1 year old. There's no evidence to suggest that these products provide extra nutritional benefits for young children. Whole cows' milk is a suitable choice as a main drink for your child from age 1. Semi-skimmed cows' milk is a suitable main drink for children over 2 who are eating a balanced diet".

³ Cow & Gate 'Stage 3' 800g £9.50 compared to Cow & Gate 'Stage 1' 800g £9.75. SMA Pro 'Stage 2' 400g £5.75 compared to SMA Pro 'Stage 1' 400g £6.50.



What should be done?

The high and rising prices of infant formulas are a grave concern for low-income families with formula fed babies (FSNT, 2023c) and first and foremost it is the Government's responsibility to take urgent action to ensure the food security of all infants.

Accordingly we make the following 5 recommendations to Government, and highlight what we believe would be more appropriate actions for retailers than special sales on commercial milk formulas.

Recommendations for Government:

1. Improve the Healthy Start scheme

It is vital that pregnant women, infants, and young children in households on the lowest incomes are supported to access nutritious diets. The Healthy Start scheme is meant to do this by providing vitamin supplements and a monetary allowance to buy fruit, vegetables, pulses, cows' milk, and first infant formula if needed (NHS, 2023b). However, this programme needs urgent improvement, including: increasing the value of payments in line with food inflation (including rising prices of infant formula), expanding eligibility, improving access and uptake, and taking actions to ensure that the scheme can meet its nutrition objectives (Sustain & Food Foundation, 2023).

2. Institute a price cap on infant formula

Given that infant formula is an essential food for many infants, and its composition is tightly regulated, we believe it is the Government's responsibility to intervene to bring infant formula prices down across the market, and that imposing a price cap applicable to all infant formulas produced by all manufacturers would be one means of achieving that. Price reductions and special sales by individual retailers are designed to give them a competitive advantage, while benefitting their shoppers. Bringing down prices across the market with an intervention such as a price cap, would mean no competitive advantage to any given retailer, but a benefit to all consumers, wherever they choose or are able to shop. We await the result of the ongoing investigation into the 'baby formula' category by the Competition and Markets Authority, which we believe should be relevant to inform action on this recommendation (CMA, 2023).

3. Raise awareness of the nutritional equivalence of all infant formulas

Unambiguous public health messaging is needed which makes clear that there is no significant nutritional difference between brands of first infant formula and that they must all conform to the same compositional regulations. We recommend the DHSC launch a specific campaign to share this message urgently.

4. Ensure emergency pathways for infant feeding support

Local Authorities have a statutory responsibility to provide a range of essential services to their communities, including children's safeguarding, children's, and adult's social care (i.e., family support) and public health services (House of Lords Library, 2019). This should include inclusive and accessible infant feeding support. In the cost-of-living crisis, with many families experiencing food insecurity, Local Authorities and Health Boards should provide appropriate financial and practical support for infant and young child feeding in a way



that protects, promotes, and supports optimal infant and young child nutrition and health, as outlined in available guidance (Unicef UK BFI, FSNT & NIFN, 2022).

5. Prevent inappropriate marketing of commercial milk formulas

Such marketing undermines breastfeeding as well as safe and appropriate formula feeding, including misleading parents/carers into purchasing unnecessary and expensive commercial milk formulas. Current laws are poorly enforced, and this should be urgently rectified. There are also many legal loopholes which need closing; the laws should be upgrade in line with the International Code of Marketing of Breastmilk Substitutes and all subsequent World Health Assembly resolutions.

Recommendations for retailers

The most appropriate action that retailers of infant formula could take to alleviate the impact of the cost of living crisis on families using formula to feed their babies would be to offer an own-brand first infant formula. Own brand products are typically priced below branded products due to the fact they often have simpler packaging and fewer non-mandatory ingredients than branded equivalents. The only retailer to do this at present is Aldi, whose Mamia first infant formula remains among the cheapest products on the market (FSNT, 2023b). We support other recommendations for retailers made by the Food Foundation in their Kids Food Guarantee (Food Foundation, 2023).

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Association of Breastfeeding Mothers (ABM), Association for Improvements in the Maternity Services (AIMS), Baby Milk Action, Best Beginnings, the Breastfeeding Network (BfN), Breastival, Code Monitoring Northern Ireland, Community Practitioners and Health Visitors Association (CPHVA), Doula UK, The Fatherhood Institute, First Steps Nutrition Trust, GP Infant Feeding Network (GPIFN), HENRY, Hospital Infant Feeding Network (HIFN), the Human Milk Foundation, Institute of Health Visiting, Lactation Consultants of Great Britain (LCGB), La Leche League GB (LLLGB), Leicester Mammias, Centre for Lactation, Infant Feeding and Translational research (LIFT), Local Infant Feeding Information Board (LIFIB), Midwives Information and Resource Service (MIDIRS), National Breastfeeding Helpline, NCT (the National Childbirth Trust), Royal College of Midwives (RCM), Save the Children, UK Association of Milk Banking (UKAMB), Unicef UK Baby Friendly Initiative, Unison, Women's Environmental Network (WEN), World Breastfeeding Trends Initiative (WBTi) UK, Dr Robert Boyle and Natasha Day (independent members)



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