



Point-of-Sale Promotion and Labeling Violations of Breastmilk Substitutes in Cambodia

OBSERVATIONS IN SIX PROVINCES | SECOND PHASE, 2018

Helen Keller International (HKI) and World Vision International (WVI) in Cambodia undertook joint research in 2018 to collect information on implementation of Sub-Decree 133 on Marketing of Products for Infant and Young Child Feeding (SD133) in six provinces outside of Phnom Penh. The study collected data on the availability, promotional practices, and labeling of breastmilk substitutes (BMS) in 66 stores and pharmacies in Battambang, Kandal, Kampong Thom, Siem Reap, Preah Vihear, and Takeo provinces. Data were compared to similar research carried out in 2015 in the same provinces by HKI and WVI, to describe changes in the adherence and enforcement of SD133.

The following findings show that BMS availability, promotions, and labeling violations continue to be widespread outside of Phnom Penh.

- The availability of BMS products for sale grew from 110 different products in 2015 to 165 in 2018. In the 66 stores visited, the research found 66 different infant formula products (to be used starting from 0-5 months of age), 53 follow-up formula products (to be used starting from 6-11 months), and 46 growing-up milks (to be used starting from 12-23 months) for sale.
- BMS availability increased in all six provinces, with the greatest number of unique products found in Siem Reap and Battambang (117 available in each province).
- BMS promotions were widespread, with 50 of the 66 stores visited (76%) promoting at least one BMS product.
- Compared to 2015, more stores were found with BMS promotions in 2018. Stores with promotions also increased by province, type of store, and type of town/city. The greatest increases were seen in district towns (39% to 67%, respectively) compared to provincial cities (80% to 87%), and in supermarkets, baby shops, minimarts (61% to 94%) compared to pharmacies (47% to 53%).
- In total, 144 promotions were found for BMS products in 2018, which is similar to the 137 promotions observed in 2015.
- Growing-up milks for children 12 months and above appeared in the most promotions (70%) in 2018, even though there were fewer of these products found for sale. The percentage of promotions including growing-up milks also doubled from 2015 and 2018 (34% to 70%).
- There was a larger number of manufacturers with BMS products for sale (36) and BMS products being promoted (29) in 2018 compared to 2015 (27 and 18, respectively). Only one manufacturer showed a noticeable decrease in the percentage of promotions found in 2018 compared to 2015, but this company was still the manufacturer with the second highest number of promotions in 2018.

Exclusive breastfeeding is decreasing in Cambodia

Despite efforts to promote exclusive breastfeeding, rates declined in Cambodia, from 73.5% in 2010 to 65% in 2014 (NIS, 2011; NIS, 2015). In the same period, bottle feeding for babies 0-5 months grew from 13.6% in 2010 to 19.8% in 2014. Research in Phnom Penh found 43.1% of children 0-5 months received a breastmilk substitute in the previous day (Pries et al, 2016).

- Seven types of promotional practices were assessed in the stores in 2015 and 2018. The most common type of promotion found changed from information materials in 2015 to displays in 2018
- As in 2015, no single BMS product found across the six provinces in 2018 fully complied with SDI33 or the International Code of Marketing of Breastmilk Substitutes regarding labeling practices (WHO, 1981). However, on a scale of 0 to -24, with 0 indicating full compliance and -24 indicating no compliance, the average score improved from -16.2 in 2015 to -9.1 in 2018. Improvements were seen for all age categories of BMS.
- The most common violation of the SDI33 labeling criteria in 2018 was that 98% of the products did not have a full label in the Khmer language; 45% of products had partial Khmer and 53% had no Khmer language.
- The other four most common SDI33 label violations included: 92% contained text that idealized the use of BMS or discouraged/undermined breastfeeding; 76% had images other than ones to illustrate how to prepare the product or to identify the product as BMS; 72% did not have a statement indicating the total cost of feeding an infant with formula for the first six months; and, 63% did not have a statement saying that cup feeding is more hygienic than bottle-feeding.

What does Sub-Decree 133 say about marketing of breastmilk substitutes in Cambodia?

Sub-Decree 133 regulates promotions, advertisements, samples, donations, gifts, sponsorships, labels and packaging of breastmilk substitutes for children up to 24 months of age. Any manufacturer or retailer found in violation of the Sub-Decree shall be fined up to 2.5 million riel (RGC, 2005).

These findings highlight the critical importance of monitoring and enforcement of SDI33. BMS manufacturers and stores in the six provinces are widely violating SDI33. Actions by the Royal Government of Cambodia are critical for ensuring adherence to regulations that protect breastfeeding and child health in Cambodia. Continued commitment and implementation of the Cambodia National Maternal, Infant and Young Child Nutrition Social and Behavior Change Communication Strategy 2019-2025 (MOH, 2018) is also critical for raising awareness on optimal breastfeeding practices. The actions of the Executive Working Group for SDI33, the Ministry of Health, and the Ministry of Commerce are vital to ensuring adherence to the Sub-Decree and protecting child health in Cambodia.

The Ministry of Health and Ministry of Commerce have been working to improve monitoring of BMS promotions and labeling in points-of-sale, and in early 2019 the government issued financial penalties to a number of companies in violation of SDI33. We encourage the Royal Government to continue holding manufacturers and stores accountable and to institute widespread routine monitoring for SDI33 in retail locations throughout Cambodia. We also encourage the government to review and revise SDI33 to include all provisions of the International Code of Marketing of Breastmilk Substitutes and to be in line with WHO's Guidance on Ending the Inappropriate Promotion of Foods for Infants and Young Children (WHO, 2016).

References

- Ministry of Health (MOH). (2018). Cambodia National Maternal, Infant and Young Child Nutrition (MIYCN) Social and Behavior Change Communication (SBCC) Strategy 2019-2025. MOH: Phnom Penh, Cambodia.
- National Institute of Statistics, Directorate General for Health, and ICF Macro. (2015). Cambodia Demographic and Health Survey 2014 National Institute of Statistics, Directorate General for Health, and ICF Macro: Phnom Penh, Cambodia.
- National Institute of Statistics, Directorate General for Health, and ICF Macro. (2011). Cambodia Demographic and Health Survey 2010 National Institute of Statistics, Directorate General for Health, and ICF Macro: Phnom Penh, Cambodia
- Pries AM, Huffman SL, Mengkheang K, Kroeun H, Champeny M, Roberts M, et al. (2016). Pervasive promotion of breastmilk substitutes in Phnom Penh, Cambodia, and high usage by mothers for infant and young child feeding. *Maternal & Child Nutrition*, 12 (Suppl. 2), 38-51.
- Royal Government of Cambodia, No. 133, A Nor Kra Bor. (2005). Sub-Decree on Marketing of Products for Infant and Young Child Feeding Royal Government of Cambodia: Phnom Penh, Cambodia.
- World Health Organization (WHO). (1981). International Code of Marketing of Breastmilk substitutes. Guideline. WHO: Geneva, Switzerland.
- World Health Organization (WHO). (2016). Article 69.9 Guidance on ending the inappropriate promotion of foods for infants and young children. Report by the Secretariat. Sixty-Ninth World Health Assembly. A69/7Add.1 2016. Available at: http://apps.who.int/gb/ebwha/pdf_files/WHA69/A69_7Add1-en.pdf?ua=1