

# Building coalitions for advocacy and action to promote and protect breastfeeding through HKI's Assessment and Research on Child Feeding (ARCH) Project

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## Background and Objectives

As of April 2018, 136 out of 194 countries have some form of legal measure in place covering the 1981 World Health Organization's *International Code of Marketing of Breast-milk Substitutes*. Nevertheless, only 32 countries have a monitoring mechanism in place to regulate promotional practices, and of those, few are fully functional.

The Cambodian government adopted the Code in 2005 through Sub-Decree 133 on the Marketing of Products for Infant and Young Child Feeding. However, research conducted in 2014 revealed that violations were widespread and enforcement mechanisms did not exist. Moreover, although concerted national efforts had increased the rate of exclusive breastfeeding from 11% in 2000 to 74% in 2010, by 2014 it had fallen back to 65%. A survey that year found that 86% of mothers of children <2y had observed commercial promotions for breastmilk substitutes (BMS).

In response, the government formed a multi-sectoral Oversight Board in 2014, comprised of four Ministries (Health, Commerce, Information and Industry), and developed detailed guidance to strengthen implementation and enforcement of the Code. They established a Control Committee to review and approve all labels and packaging for infant and young child feeding (IYCF) products and to approve marketing materials and promotional activities. An Executive Working Group (EWG) monitors compliance and enforcement, reviewing and acting on reports of violations submitted by government staff, civil society, and regular citizens.



## Methods

A seven-month pilot was conducted to trial this reinforced monitoring system in four urban areas of Cambodia. This involved training monitors from the Ministries of Health and Commerce, adapting checklists from NetCode (a global network to support Code enforcement) to screen for violations at retail locations and health facilities, testing reporting mechanisms, and penalizing violators.

Ministry of Commerce officers were responsible for monitoring for point-of-sale promotions at supermarkets and small shops and reviewing IYCF product labels for violations. Ministry of Health, Department of Drug and Food officers were to monitor promotional activities at pharmacies and specialty baby shops, and review product labels for violations. Ministry of Health, National Nutrition Program staff monitored advertising and promotion in health facilities, including free or subsidized samples of BMS. All officers used checklists to guide their inspections and were expected to submit violation reports directly to the EWG.

Table 1. Monitoring and Adherence to Checklist Guidelines

| Monitoring location                                      | Type of checklist        | Number of checklists (n) |           |               |
|--|--------------------------|--------------------------|-----------|---------------|
|  |                          | Completed                | Compliant | Non-compliant |
| <b>Government Department</b>                             |                          |                          |           |               |
| Ministry of Health<br>Department of Drug and Food Safety | Pharmacy                 | 6                        | 2         | 4             |
|  | Baby shop                | 12                       | 0         | 12            |
| Ministry of Commerce<br>CAMCONTROL                       | Supermarket              | 433                      | 181       | 252           |
|  | Small shop/<br>mini-mart | 4                        | 4         | 0             |
|  | Health facility          | 449                      | 207       | 242           |
| National Nutrition Program                               | Health facility          | 28                       | 1         | 27            |
| <b>Total in Trial</b>                                    | Retail location          | 768                      | 368       | 400           |
|  | Retail location          | 158                      | 94        | 64            |
|  | Health facility          | 50                       | 7         | 43            |
|  | Retail location          | 2,169                    | 1,019     | 1,150         |
|  | Health facility          | 158                      | 94        | 64            |

\*POS= Point-of-sale

## Results

Under the pilot, 85 national and sub national-level monitors were trained, 392 site-visits were made, and 2,377 monitoring checklists were completed. Half of the completed checklists (52.9%) indicated Code violations, the most numerous being point-of-sale, yet monitors failed to submit either monthly reports or violation reports. The EWG did issue 11 warning letters on labeling violations to companies/distributors and imposed modest fines.



In 2018, the Cambodian Government fined 11 companies for inappropriate promotion of breastmilk substitutes

## Conclusions

Training must be more thorough and allow for practice with simplified checklists to identify non-compliance; monitoring must be more systematic; reporting responsibilities and channels must be clarified; and funding is needed to support sufficient personnel. The current "soft approach" to violations should be reconsidered and the role of civil society expanded and formalized. Financial penalties could be reinvested to support more robust monitoring.

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