

Mr. Brendan Cox
Director, Policy and Advocacy
Save the Children

28th January, 2013

Dear Mr Cox,

Save the Children's breastfeeding campaign and *Superfood for Babies* report

The Asia-Pacific Infant and Young Child Nutrition Association (APIYCNA) is a not-for-profit organization set up with the mission of improving the nutritional well-being of infants and young children throughout the Asia Pacific region.

APIYCNA believes that ensuring optimal infant and young child nutrition is a shared responsibility: Government, NGOs, civil society, and the private sector all have essential roles to play in this effort and should work together.

We read with interest your letter and the attached draft report, *Superfood for Babies*. We share the goal of improving nutrition for infants and young children, and commend your organization's intent to raise the awareness of the challenges of breastfeeding and realities of child malnutrition. On behalf of our members, APIYCNA welcomes the opportunity for dialogue and engagement with Save the Children, and we are grateful for the opportunity to submit an initial response.

APIYCNA concurs with the recommendation of the World Health Organization (WHO) for exclusive breastfeeding for the first six months of life and continued breastfeeding with timely, safe, and appropriate complementary feeding thereafter. Like Save the Children, we share a strong commitment to supporting improved nutrition for infants, young children and their mothers.

Our members are fully committed to ensure that marketing policies and practices are (i) transparent and consistent with the aims and principles of the WHO International Code of Marketing of Breast-Milk Substitutes, and (ii) in line with any legislation to implement the WHO Code, as enacted by national governments in the region. APIYCNA stands ready to work in partnership with all stakeholders to support public health goals to protect and promote breastfeeding and the proper use of infant formula where necessary. We acknowledge that there is room for further improvement in the area of governance and ensuring ethical marketing practices - this is in fact a key priority for APIYCNA this year.

It is imperative that we recognise that the global challenge of infant, young child and maternal nutrition is complex and multi-faceted, and identifying and implementing solutions requires multi-stakeholder collaboration. Given the complexities of the issues at hand, it is vital to ensure that a comprehensive and balanced picture is painted. As such, we have some concerns that the draft report features selective information and some inaccuracies. For example:

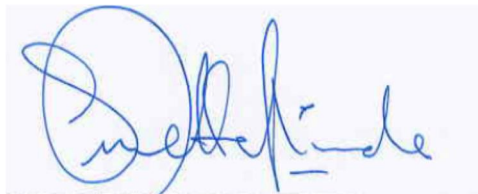
- Survey methodology and data sources are critical in ensuring that reports are factually accurate and current.
 - (i) Specific end-note citations 5, 89, 117, 187, 204, 205 and 211 refer to Save the Children surveys carried out in China and Pakistan over the last 6 months. We would appreciate copies of these cited surveys in advance of the report's publication. Given the short timeframe, APIYCNA's strong preference is that all references to these surveys, which are not in the public domain, be removed as the findings cannot be authenticated.
 - (ii) The report fails to use the latest available data from countries in the Asia Pacific. To cite the example of Indonesia, recent data from the Indonesia Demographic & Health Survey 2012 shows that the exclusive breastfeeding rate in 2012 is notably higher than in 2007. Specifically, 27% as compared to 17% which is effectively a 10% increase. We would strongly recommend that Save the Children utilises the most current data and information on breastfeeding rates, under-nourishment and stunting, and from credible sources such as national governments/research institutes, as this will present a true reflection of trends across the region.
- The WHO Code itself is not a legally-binding instrument. However, the regulations and legislative measures that have been implemented by national governments in the Asia Pacific are in fact much stricter than anywhere else in the world. The draft report suggests however that the legislative mechanisms/processes in the region are severely laissez-faire; a case in point is Vietnam. This is a misrepresentation of the actual state of play in the region.

- The draft report questions the legitimacy of APIYCNA describing it as “industry in disguise”.
- (i) Firstly, we would like to clarify that APIYCNA is a legal entity governed by the Registry of Societies Act in Singapore. The governance procedures as mandated by the Act require full disclosure of membership, a comprehensive constitution/ by-laws that include a well-defined scope of interests/objectives, audited financial statements and filing of tax returns. In addition, APIYCNA members and the association’s activities are fully compliant with the Competition Act of Singapore. We would request that this section be either removed or reworded to correctly reflect the status of the association.
- (ii) More importantly, policy making in every area is a culmination of inputs from a wide community of stakeholders. Industry’s views, along with all other voices, are valid and should be taken into account. Engagement of national governments, regulatory agencies and international/regional organisations by APIYCNA and our members is responsible, transparent and in accordance with local laws. The sector in itself is highly regulated, ensuring stringent standards in safety and quality- above those required for all other types of food. It is thus essential that there is communication between the companies who develop these products and institutions which regulate them.

In order to address these issues, we would welcome the opportunity to meet with your organization to further discuss the draft report in detail prior to publication. Like Save the Children, APIYCNA hopes that the final report can serve as a catalyst in bringing together all stakeholders to develop a focused, holistic and actionable plan in the near term.

Once again, thank you and we look forward to a constructive dialogue.

Yours sincerely,



Venetta Miranda
Executive Director