

SIGNATORIES' EVALUATION OF DANONE'S CALL TO ACTION ROADMAP

The Signatories' intention was that companies would first commit to all of the asks set out in the Call to Action and deliver a roadmap to outline how and when each of the commitments would be implemented.

Danone submitted its Roadmap relating to its Call to Action response on 18th December 2020. The Roadmap is set out on one slide, illustrating in which year each element of Danone's plan will start and end. The Roadmap includes 11 elements, some of which broadly map to the Call to Action asks.

In terms of Call to Action specific steps:

	Danone's commitments in relation to the Call to Action	Related action as set out in roadmap	Signatories' evaluation of roadmap <i>ATNI provides input in assessing the planned actions against the 4 Asks of the Call to Action</i>
Ask 1	While Danone committed to pursue full Code compliance, the company did not commit to achieving full Code compliance by 2030.	2023: Publish interim progress report on its Call to Action commitments 2020 - 2030: Through unilateral steps and industry wide change, Danone is committed to pursuing full compliance with the International Code of Marketing of Breast-milk Substitutes globally by 2030. Danone also calls for a new level of public private engagement.	While the signatories welcome and encourage greater corporate transparency around Code compliance, as the company did not make any unilateral Call to Action commitments, it is unclear how the 2023 progress report will advance the company's action. The second statement simply reiterates the company's response to the original Call To Action
Ask 2	Danone did not commit to take the first step of extending its current global policy for IF0-6 to FoF. ATNI's 2021 BMS/CF Marketing Index indicates the extent to which the company's	In 2021, Danone will continue to update its policy, starting with a new updated Health Care systems policy. (however there is no indication of extending the current global policy for IF 0-6 to FoF 6-12)	The roadmap does not include any plan that addresses Ask 2 of the Call To Action, particularly with regards to extending its current global BMS marketing policy for infant formula 0-6 months to follow-on formulas 6-12 months.

	<p>current BMS Marketing policy aligns to The Code.</p>		<p>ATNI's assessment of the company's policy in the 2021 BMS/CF Marketing Index indicates that gaps remain between Danone's existing BMS marketing policy and The Code. One of the recommended areas of improvement as outlined in the company's scorecard is Danone's marketing commitments within the healthcare system. Therefore, the signatories encourage the development of a new Health Care Systems policy that aligns fully to Articles 6 and 7 of The Code as well as to Recommendation 6 of WHA 69.9, i.e. not sponsoring any meetings of healthcare professionals or scientific meetings and only providing to health workers information that is scientific and factual.</p> <p>The signatories urge Danone to ensure all relevant company policies are Code-aligned and extend these BMS marketing policies to cover all breast-milk substitutes marketed as suitable for infants between 0-12 months of age globally to fully meet Ask 2 of the Call to Action.</p>
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<p>Ask 3</p>	<p>Danone states that it will willingly and actively collaborate on the design and implementation of new advocacy initiatives, in every country where they operate, that will contribute to creating the right environment for Code compliance.</p> <p>This fell short of Ask 3: as the company did not state that it will support the adoption and implementation of national legislation <u>fully</u> aligned with the Code.</p>	<p>2021 -2030: Danone to actively collaborate with UN, national governments, civil society organizations and paediatric societies to build and promote an evidence based, shared policy agenda towards full compliance. Danone will help catalyze broader industry engagement with this process.</p> <p>2021 – 2030: Danone to champion advocacy initiatives in all its markets supporting restrictions on the marketing of products for 0 - 12 months as a new global regulatory standard.</p>	<p>The signatories welcome Danone’s efforts in supporting the adoption and implementation of national legislation to achieve full compliance with The Code through means that do not involve an active collaboration with the signatories or any form of conflict of interest.</p> <p>Though advocacy efforts are welcomed to achieve <u>full</u> Code compliance, we are concerned that in “supporting restrictions on the marketing of products for 0-12 months as a new global regulatory standard” Danone is not supporting the adoption and implementation of national legislation <u>fully</u> aligned with the Code which restricts the marketing of ALL formulas for infants and young children from birth up till <u>36 months</u> of age - i.e. not limited to 0-12 months – and including all formulas for special medical purposes.</p> <p>We urge Danone to revise its plan accordingly and ensure that it will support national legislation that fully aligns to the provisions and scope of The Code (including all formulas marketed as suitable from birth up to 36 months of age).</p>
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Ask 4	Danone has engaged actively with ATNI and pledged to continue to do so.	2020 -2030: Danone will continue to provide information on policies and practices to the Access to Nutrition Initiative (ATNI), while continuing to submit to auditing by FTSE4Good and Bureau Veritas and to publish yearly reports on BMS Marketing Practices .	The Signatories welcome the company's willingness to engage with ATNI.
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Danone outlined additional actions not related to the Call to Action including that by 2025 Danone aims to become a B-Corp, and that between 2021 - 2030 Danone will use its Ecosystem Fund to collaborate, invest in and co-fund activities to increase breastfeeding rates and improved infant and young child health status.

Further, the company stated it plans to do the following:

1. To address cross-marketing:

2021: Develop Packaging guidelines

2022-25: Progressive global implementation of new differentiated packaging better distinguishing between BMS (as defined by local law or Danone policy, where this goes beyond it) and other product categories.

2025-30: Ongoing monitoring and updating

The signatories would welcome Danone differentiating the packaging of its different categories of formula milks for ages 0 up to 36 months (all defined by WHO as breast-milk substitutes) and advise the company to also differentiate their packaging from its foods for older infants and young children, in alignment with Recommendation 5 of WHA 69.9.

2. HCN Adviser certification:

2021: Danone to co-develop new HCN adviser certification.

2022-23: Danone will implement new certification program for our Danone Health Care Nutrition advisors.

As of 2024-25: Certification Program shared with other food companies.

2023-30: Ongoing monitoring and updating

The signatories advise Danone not to move forwards with this action. It is the role of governments, HCP governing bodies and UN agencies to provide such certification. Taking this step creates a conflict of interest, as Danone's financial interest in selling breast-milk substitutes conflicts with the interest of health care providers in promoting and supporting breastfeeding.

3. Educational platform for HCPs:

2021 - 2030: Danone to develop and launch a new open educational platform for HCPs to share our latest scientific and factual nutritional learning.

The signatories advise Danone not to move forwards with this action. It is the role of governments, HCP governing bodies and UN agencies to provide such education, based on independent science, not that funded by BMS manufacturers.