

SIGNATORIES' EVALUATION OF KRAFTHEINZ'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.

KraftHeinz submitted an initial response on 11th December 2020, in which the company stated its commitment to FULL compliance by 2025 and to submit a roadmap for achieving this goal by 31 January 2021. The roadmap was submitted on 22nd April 2021.

In terms of Call to Action specific steps:

	KraftHeinz'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	<p>In its submission on 11th December KraftHeinz committed to full Code compliance by 2025.</p> <p>The signatories acknowledged this commitment – one of only two companies to make it – in their published assessment and public statements of 23rd March 2021.</p>	<p>KraftHeinz's roadmap includes five sets of actions to deliver its (apparent) commitment to full Code compliance by 2025. The areas covered include: i) review global BMS policy; ii) complete age of introduction change for CF (from 4 to 6 months by 2025); iii) packaging (differentiate packaging of BMS and other categories by 2025); iv) update management system by 2025; v) increase transparency and disclosure (2023/in line with ATNI deadlines).</p> <p>The company also states: <i>'The KHC Global BMS Policy applies globally for BMS products marketed as suitable for infants between birth and 12 months of age, specifically infant formula suitable from birth to 12 months and follow-on formula suitable from 6 months to 12 months. Based on latest publication of Bognaz et al 2020, complementary foods for older infants and toddlers, as well as formulas for young children should be offered along with continued</i></p>	<p>The signatories welcomed the company's initial commitment to fully comply with the Code by 2025. The signatories also welcome the submission by KraftHeinz of a roadmap.</p> <p>In relation to the first action 'Review Global BMS Policy', there are four steps.</p> <p>1. Assess current KHC Global BMS Policy versus ATNI BMS/CF Marketing Index (2021): ATNI found that KHC's policy is minimally aligned with the Code. The company scored 11% on BMS/CF 1, which measures alignment (including wording, product scope and geographic scope).</p> <p>2. Review KHC Global BMS Policy to align with WHO Code as implemented by national governments' legislation across the globe and upholding KHC Global BMS Policy in all countries, including those where regulations are either absent or less stringent (W69.9 excluded) (2023): The company is committing only to review its policy but does not appear to consider full Code compliance to encompass</p>

		<p><i>breastfeeding, but should not replace breastfeeding.'</i></p> <p><i>"Complementary foods are meant to be provided alongside breastfeeding and not as a replacement for breastfeeding, and hence, these are not considered as BMSs. Formulas for young children aged 1 year or older are meant to be offered as an alternative to cows' milk in a diversified diet to improve nutrient provision, along with continued breastfeeding, but not to replace breastfeeding."</i></p>	<p>the recommendations of the guidance associated with WHA Resolution 69.9.</p> <p>3. Re-assess products in scope in Global BMS Policy (2025): ATNI found in its research for the BMS/CF Marketing Index 2021, KHC's current policy extends only to infant formula and follow-on formula in all markets and not to growing-up milks. It also omits a commitment to label all CF as suitable only from 6 months of age.</p> <p style="text-align: center;">*****</p> <p>ATNI understands from the citation of the article by Bognaz et al. in KraftHeinz's roadmap that the company is also taking the position that growing-up milks are not BMS and as a result will not be included in future BMS Marketing policies.</p> <p>The WHO defines such products as BMS. Full Code compliance means that these products must be included in the company's policy and implementation plans. As a result, it appears that the company does not in fact intend to achieve full Code compliance as defined within the Call to Action.</p> <p style="text-align: center;">*****</p> <p>4. Extend application of the Global BMS Policy to trade partners operating across KHC distribution channels (2025): An important step, but Global BMS Policy applied to trade partners should fully align to The Code.</p> <p>In order for KraftHeinz to deliver full Code compliance, the company needs to align its policy to the wording of original 1981 Code and the wording in ALL relevant subsequent resolutions and associated guidance, including the recommendations set out in the guidance associated with WHA resolution 69.9. We also note with concern that the review of the KraftHeinz Global BMS Policy scheduled for 2023 excludes WHA 69.9.</p>
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Ask 2	KraftHeinz did not commit to take the first step by the end of 2020 of ensuring that its policy and practices were Code aligned and applied in all jurisdictions even where regulations are absent or less stringent than its policy. (The policy does cover infant formula and follow-on formula globally).		
Ask 3	The company does not make the requested commitment as it does not explicitly commit to supporting FULL implementation of the Code for all products 0 – 36 months.		
Ask 4	KraftHeinz agreed to provide information on its policy and practices to ATNI.	KraftHeinz is a constituent of the BMS/CF Marketing Index 2021. The company shared with ATNI its BMS Marketing Charter, which is the basis for its BMS/CF 1 score. That score was only 11%, as the policy falls well short of The Code.	The Signatories welcome the company’s willingness to engage with ATNI as it did for the BMS/CF Marketing Index 2021 research process. We urge the company to take note of ATNI’s analysis of the gaps between the company’s policy and The Code and to close those gaps as soon as possible.