

SIGNATORIES' EVALUATION OF AUSNUTRIA 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.

Ausnutria submitted an initial response on 24th December 2020 and within it the company had also submitted the plan (which is treated as the roadmap in this evaluation) it intends to follow to achieve full compliance with the WHO Code by 2024, although no such formal commitment had been made in its response.

In terms of Call to Action specific steps:

	Ausnutria'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	In its submission on 24 th December Ausnutria stated issuing its own policy for the marketing of infant foods in mid 2020 which covers milk-based formulas for infants from 0-6 months and for infants 6-12 months.	<p>The roadmap indicates that this policy was set to be issued in mid-2020 and that it would be implemented in 'the different markets (in all regions)' in 2021. The roadmap also indicates that by the end of 2021 the plan is to review the policy and adjust it where necessary noting that <i>'this may be the case if there is for example no equal level of playing field in a specific country/region'</i>.</p> <p>The plan also outlines that in 2023 the need for extending the scope of the policy to include formulated milk powders for young children (12-36 months) and complementary foods for infants > 4 months would be re-assessed. By the end of 2023 the 'Global Ausnutria Policy' would be revised and implemented in all regions in 2024.</p>	<p>Ausnutria's initial response, which includes the associated roadmap, is not clear about the company making a unilateral commitment to implement the Code in full for ALL products marketed as suitable from birth up to 36 months of age in ALL countries by 2030.</p> <p>The global Ausnutria policy which the initial response along with the roadmap indicate to have been published in mid-2020 seems to continue to be missing from the public domain and it was not shared with the company's response to the Call to Action at any stage. Ausnutria is also not part of ATNI's BMS/CF Marketing Index 2021. It has therefore not been possible to evaluate this policy. The current policy along with any planned revised policies would need to be publicly available and further evaluated to understand the company's commitment</p>

			<p>to full Code compliance in all its dimensions particularly in product scope given that formulas intended for 12-36 months and complementary foods marketed as suitable for introduction prior to 6 months of age are not regarded by the company as breast-milk substitutes (BMS). (WHO defines complementary foods intended for infants under six months of age as BMS).</p> <p>In order for Ausnutria to deliver full Code compliance, the company needs to align its policy to the wording of the 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. Full Code compliance also means that ALL products defined as BMS by the WHO must be covered by the company's policy and be part of the implementation plans. These products include formulas for 12-36 months of age as well as complementary foods marketed as suitable for introduction prior to 6 months of age.</p> <p>We urge Ausnutria to publicly share its policy and all subsequent revised policies and clarify its intention on achieving full Code compliance in terms of product scope, geographic scope and Code provisions.</p>
Ask 2	Ausnutria stated taking the first step of putting a	See information above.	Based on the response provided, including the plan ('roadmap'), the company's

	<p>policy in place by the end of 2020 which covers milk-based formulas for infants from 0-6 months and for infants from 6-12 months. However further evaluation is needed to determine if the company fully meets the requirements of Ask 2.</p>		<p>commitment is unclear on several points as noted above.</p> <p>Given that Ausnutria is not part of the 2021 BMS/CF Marketing Index, and its BMS marketing policy has not been found in the public domain, ATNI was unable to assess the alignment of this policy to The Code as stipulated in Ask 2 of the Call to Action and based on the plan and response submitted, it is clear that not all BMS products fall within the scope of the policy namely formulated milk powders for young children (12-36 months) and complementary foods for infants under 6 months of age.</p> <p>Apart from sharing its global policy, the company is urged to also publicly confirm its intention in fully aligning its marketing with the Code even where there are no legal measures in each of its markets or where they are weaker than its own policy and irrespective of whether its competitors take similar steps.</p>
Ask 3	<p>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.</p>	<p>See information above – there is also no plan of action on achieving the requested commitment.</p>	<p>We urge the company to outline an approach to support the adoption and implementation of national legislation which is fully aligned with The Code.</p>

Ask 4	Ausnutria agreed to provide information on its policy and practices to ATNI. Given the company was not included in the BMS/CF Marketing Index 2021, no information has been requested/ submitted within that process.		The Signatories welcome the company's willingness to engage with ATNI.
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