

Andrea Leadsom MP Houses of Parliament, Westminster, London, SW1A 0AA.

December 12th 2023

Cc Victoria Atkins, Secretary of State for Health and Social Care

Dear Andrea,

Re: Urgent actions needed by Government to guarantee access to infant formula for low income and vulnerable families with formula fed babies

We are writing with the below 23 co-signatories as individuals, charities and organisations working to support families to feed their babies optimally, safely and appropriately, to raise our concerns about the findings of the Competition and Markets Authority (CMA) investigation into the UK infant formula market, published on November 30^{th1}. These include:

- 1. Profiteering by infant formula brands leading to record high retail prices which cannot be justified by recent rises in input and product costs
- 2. Large variations in the prices of available infant formula products which are also unjustifiable given that all products are nutritionally comparable

The very high price of infant formula is putting the health of non-breastfed and partially breastfed babies at risk. In April, the Independent Food Action Network reported the results of a survey among 85 organisations running 154 food banks in 81 local authorities, finding that 45% of organisations had seen a rise in the number of parents asking for support to feed their babies compared to the year before². Since 2022 there have been regular news reports detailing cases of families using harmful coping strategies in order to feed their babies^{3,4,5}.

We acknowledge the CMA's plan to undertake a further detailed investigation into consumer behaviours and their drivers, and the role of the regulatory framework and its enforcement in influencing the market. This will inform appropriate action, and several of us are already supporting them in this undertaking. However, given that this next report is not due until mid-2024 and many families are

¹ Price inflation and competition in food and grocery manufacturing and supply - GOV.UK (www.gov.uk)

² <u>Reducing food insecurity in UK households with infant children (foodaidnetwork.org.uk)</u>

³ Soaring cost of baby formula is leading to unsafe feeding practices | UK News | Sky News

⁴ Money is tight, but I won't buy a cheaper baby formula' (msn.com)

⁵ Desperate parents are stealing baby formula to keep their children fed | UK News | Sky News

struggling now, we are writing to request that the Government takes appropriate actions urgently to improve access to infant formula to those families that need it and are finding it unaffordable.

As well as your ongoing commitment to delivering effective, evidence-based and accessible infant feeding support for parents, our recommendations are:

- Improve the Healthy Start scheme, by increasing the monetary allowance given in line with food inflation, including ensuring that it covers the cost of the cheaper infant formulas on the market, and improving coverage⁶. It should be noted that taking action on Healthy Start would also better support women to breastfeed, and pregnant women and young children whose diets have been negatively impacted by food price rises.
- 2. Launch a public health messaging campaign to raise awareness among parents that all first infant formulas are nutritionally equivalent, and price differences do not translate into health or nutrition benefits.
- 3. Enforce existing restrictions on the marketing of formula milks, to provide some protection to parents against misleading and exploitative marketing which undermines breastfeeding AND safe and appropriate formula feeding, as well as pushing up infant formula prices⁷.
- 4. **Investigate pricing policies and practices** to bring infant formula prices down across the board in the long term, including the potential to implement a price cap.

We hope you will give careful consideration to this urgent matter and arising recommendations, and would be grateful if you would be able to make time to meet with us to discuss in the new year.

Yours sincerely

Dr Vicky Sibson, Director, First Steps Nutrition Trust

Máire Alexander, CEO, Breastival

Dr Robert Boyle, Reader in Paediatrics and Consultant Paediatric Allergist, Imperial College London

Professor Amy Brown, Director, Centre for Lactation, Infant Feeding and Translation, Swansea University

Linda Brownlie, Trustee and Chair, Lactation Consultants of Great Britain

Efrat Burman, Chair of the Council of Directors, La Leche League of Great Britain

⁶ Healthy Start Working Group Policy Positions. March 2023.

https://www.foodfoundation.org.uk/sites/default/files/2023-

^{04/}Healthy%20Start%20Working%20Group%20Policy%20Positions_2023.pdf

⁷ In the medium term we advocate for the laws governing the marketing of formula milks to be strengthened in line with the International Code of Marketing of Breastmilk Substitutes and all subsequent World Health Assembly Resolutions, and anticipate that the second phase CMA investigation will support this recommendation.

Eleanor Campbell, Chair, Association of Breastfeeding Mothers

- Professor Flora Douglas, Professor of Public Health, Robert Gordon University, School of Nursing,
- Midwifery and Paramedic Practice
- Sally Etheridge, Programme Lead, Leicester Mammas
- Dr Ernestine Gheyoh Ndzi, Associate Dean Law and Police Studies, York St John University
- Sabine Goodwin, Director, Independent Food Action Network
- Helen Gray and Clare Meynell, Joint Coordinators, WBTi UK Steering Group
- Dr. Maria Herron Administrator on Code Monitoring Northern Ireland
- Catherine Hine, CEO, the Breastfeeding Network
- Gwen Hines, CEO, Save the Children UK
- Angela McConville, Chief Executive, NCT
- Alison Morton, CEO, Institute of Health Visiting
- Jonathan Pauling, Chief Executive, Alexandra Rose Charity
- Patti Rundall, OBE, Policy Director, Baby Milk Action
- Dr Helen Stewart, Officer for Health Improvement, Royal College of Paediatrics and Child Health
- Anna Taylor, Executive Director, The Food Foundation
- Dr Victoria Thomas, Co-chair, Hospital Infant Feeding Network
- Gill Walton CBE, Chief Executive and General Secretary, Royal College of Midwives
- Vera Zakharov, Sustainable Food Places Campaign Coordinator, Sustain