Why Government should end online infant formula marketing to protect children from overweight.

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In this report we use the term ‘infant formula’ for all infant milk products, including infant formula, follow-on formula and milks marketed for children over one year of age.

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First Steps Nutrition Trust
www.firststepsnutrition.org
Reg. charity 1146408
Executive Summary

It is established that breastfeeding protects from overweight (Harder et al, 2005, Azad et al, 2018; Rito et al, 2019) and the UK Government promotes exclusive breastfeeding for the first 6 months of life and continued breastfeeding to at least one year as a cornerstone of health for mums and babies. Despite regulation restricting the advertising of first infant formula to families, aggressive marketing of follow-on formula and unnecessary milks for children over 1 year of age means that most families believe they have seen advertising for infant formula. Despite regulation clearly stating that the labels on infant formula packaging must be distinctly different to those for follow-on formula, this is ignored by manufacturers and brands are prominently promoted.

Online marketing of infant milks targets young women, provides no beneficial information (since there are regulations that control infant formula composition that all companies must abide by) and undermines messages from health professionals. Influencers and celebrities promote products and lifestyles that young women may aspire to and pop-ups and links to websites, blogs, vlogs and other social media content create an online world which undermines Government and health worker efforts to protect breastfeeding and protect families from spending money than they need to on more expensive formula brands.

To help prevent obesity and to protect the health of mums and babies, online marketing of all infant milks marketed for children under 3 years of age should be totally restricted in the UK at the same time as a total online marketing restriction for high fat, salt and sugar foods.

Why we need to end infant formula marketing online

- **Infant formula advertising negatively impacts efforts to protect and support breastfeeding**
  Marketing of formula has been shown to encourage formula use and negatively counters public health efforts to protect and support breastfeeding (Rollins et al, 2016; Piwoz, 2015).

- **Infant formula advertising is ubiquitous**
  Parents with infants under one year are frequently exposed to advertising for infant milk products regardless of whether they are breastfeeding or using infant formula, with many having seen advertising online (Brown et al, 2020). A recent survey of UK mothers found that 80% reported contact from formula companies, mainly on social media (Brown, unpublished).

  Baby clubs and carelines promoted through social media, online pop-ups and website links are tools used by formula brands to help build relationships with consumers, positioning themselves as ‘supportive friends’ to parents (Hastings et al, 2020).
Infant formula advertising is misleading and offers no benefit to families

It has been shown that messages used in the marketing of infant milks to health workers are frequently misleading (First Steps Nutrition Trust, 2020). All infant formula are required by law to meet the same compositional criteria and marketing costs simply increase the price of products for families.

A recent study of the effect of formula marketing on families found that 40% of parents surveyed believed that more expensive formula contains better ingredients and 39% believed that some products were better than others as they contained more ingredients (Brown et al, 2020). All infant formula and follow-on formula must meet the same compositional regulations, and additional ingredients added by some brands have not been agreed to have any benefit and are a burden on a baby’s metabolism (EFSA, 2014).

Infant formula manufacturers have been communicating misleading information to parents through online advertising during the Covid-19 pandemic, contradicting WHO and RCPCH advice and potentially sabotaging efforts to support breastfeeding (van Tulleken et al, 2020).

Recommendations

1. Government should include infant milks marketed for children up to three years of age in any work restricting online advertising of foods and drinks that can contribute to obesity.
2. Manufacturers should follow guidance to stop the inappropriate marketing of infant milks marketed for children up to 3 years as specified in the WHO International Code of Marketing of Breastmilk Substitutes and all subsequent World Health Assembly resolutions.
3. Digital platforms should voluntarily prohibit the advertising of infant milks marketed up to 3 years of age.
4. Everyone should be made aware of how to protect themselves from unwanted marketing and public awareness increased of how to use privacy functions to block parenting related advertisements from infant formula brands or use advertisement blocking software.
1.0 How social media is used to promote formula brands

The internet has changed the way we interact with each other and with the world. The majority of people in the UK have access to the internet and, on average, adults spend over three and a half hours a day online, with more than a third of this time spent on Google or Facebook sites (which includes Instagram and YouTube) (Ofcom, 2020).

As the SEEN Connects Parenting Trend Report 2020 highlights ‘the digital revolution has had a huge impact on the world of parenting.’ (SEEN, 2020). This is particularly evident with the rise of social media and influencer marketing. Influencer marketing is a newer form of social media marketing involving endorsements and promotions from people who claim to have extensive knowledge within their field, and consequently have amassed large followings based on this. A global analysis of Instagram content found that the baby industry was the fourth most popular topic for influencer activity (Hubstop.net, 2018).

With more people relying on influencers to make purchasing decisions (SEEN, 2020), companies are increasingly employing influencers as part of their marketing strategies. However, as the influencer industry is so new, advertising regulation is struggling to keep up (OHA, 2020). Whilst the Advertising Standards Agency (ASA) and Competition and Markets Authority (CMA) are responsible for monitoring and managing online advertising, the guidelines are still quite broad and focus mainly on ensuring that influencer posts are disclosed as adverts, rather than managing the content of these adverts. Notably, the summation of the latest copy of their guidelines finishes with ‘Make it clear...there isn’t much more to it than that’ (ASA, 2020). Regulation around influencer sponsorship is a grey area. According to Committees of Advertising Practice (CAP) and ASA guidelines the brand has to pay for the post (this can include gifting a product) and maintain control over the post, such as stipulating the post content with a hashtag, or a date when posts must be made. If the brand sends a gifted product but does not directly control the post, even if they have sent gifted product with underlying intention that it should be posted on the influencers page, then this does not count as advertising and is not covered by ASA guidelines.

Additionally, there is the issue of inappropriate marketing by the brands themselves. One study investigating parents’ perceptions of formula advertising found that more than 70% of parents had seen infant formula advertising on Facebook (Brown et al, 2020). Additionally, a recent article in The Lancet highlighted inappropriate promotional practices by infant formula manufacturers during the Covid-19 pandemic on social media platforms in the UK and across the world (van Tulleken et al, 2020). Infant milk manufacturers are known to use a variety of tactics in the promotion and marketing of their products which circumvent global and local regulations (Baby Milk Action, 2017).
1.1 How was infant formula promotion on social media assessed?

Six different formula brands were selected for analysis using three different platforms to analyse their social media use.

<table>
<thead>
<tr>
<th>Brand</th>
<th>Twitter</th>
<th></th>
<th>Instagram</th>
<th></th>
<th>Facebook</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Handle</td>
<td>Followers</td>
<td>Handle</td>
<td>Followers</td>
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<tr>
<td>Aptamil</td>
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<td>@aptaclubuk</td>
<td>16,800</td>
<td>@aptaclubuk</td>
<td>216,700</td>
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<td>Cow &amp; Gate</td>
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<td>@cgbabyclub</td>
<td>10,100</td>
<td>@cgbabyclub</td>
<td>227,635</td>
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<tr>
<td>My Little Piccolo</td>
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<td>@mylittlepiccolo</td>
<td>39,100</td>
<td>@mylittlepiccolo</td>
<td>34,092</td>
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<tr>
<td>HiPP Organic</td>
<td>@hipporganic</td>
<td>13,000</td>
<td>@hipporganicuk</td>
<td>14,900</td>
<td>@hippuk</td>
<td>72,221</td>
</tr>
<tr>
<td>Kendamil</td>
<td>@kendamiluk</td>
<td>6,931</td>
<td>@kendamiluk</td>
<td>6,166</td>
<td>@SMABabyClubUKIreland</td>
<td>359</td>
</tr>
<tr>
<td>SMA Baby</td>
<td>N/A</td>
<td></td>
<td>@smababyclubuki</td>
<td>3,836</td>
<td></td>
<td>22,586</td>
</tr>
</tbody>
</table>

In order to create a snapshot of the activity taking place, the content of these brand social media accounts were searched between 12th-18th October 2020. For brands that did not post within the 7-day window, the previous 6 posts across social media accounts were assessed.

In addition, influencer posts linked to the five brands, brand hashtags and brand social media campaigns were searched during the same time period. With 89% of marketers identifying Instagram as the most important channel for influencer strategies the focus was given to the brands Instagram influencer posts. (Hootsuite, 2019). Influencers were identified by tagged posts on the social media pages for the brands and re-posted content from the brands.

Two brands were selected as case studies and analysis of their activity on social media was recorded, providing a picture of brand marketing strategies. Additional information was also gathered from reports by volunteers during a monitoring event organised by the Baby Feeding Law Group (BFLG) in October 2020, as well as some information collected by First Steps Nutrition Staff to illustrate the breadth of activity happening across social media channels.
1.2 Promotional activity for formula brands found on social media

Whilst most of the brands have Twitter, Facebook and Instagram, across all of the brands analysed Instagram was the most popular social media platform with higher engagement rates based on likes and comments as a percentage of followers and more frequent posting.

Despite having a substantial number of followers on Facebook, both Cow & Gate and Aptamil had little or no engagement on Facebook for posts they made. Their most recent content was either re-posting Instagram content or sharing articles from other sources rather than original content.
1.3 How were infant formula brands represented on social media?

Cow & Gate, Aptamil and SMA all styled their social media pages as ‘Baby Clubs’ and actively encouraged contact using their hotline numbers or through social media messaging services for any parenting queries, not just product information. Cow & Gate also used their social media pages to promote their online ‘parent to parent’ virtual groups, offering parents a chance to meet with each other during Covid-19.

Only 50% of the brands monitored posted about formula during the specified time period.
The content of posts differed between brands, depending on their target audience and position within the market. Neither Cow & Gate nor Aptamil posted about their products, instead using their social media channels to reach different target audiences. Cow & Gate focused on their #LoveDontJudge campaign and Aptamil predominantly posted about pregnancy and new mum support, establishing themselves as the supportive brand for mothers.

SMA Baby launched their #MotherOfAllChecklists campaign using social influencers and My Little Piccolo mainly posted about their food range, relating back to their campaign #JustTheRightBalance. Kendamil posted extensively during this period about their re-branding including numerous posts about their infant milk products.

Hipp focused their posts on their non-food products, with the majority of recent posts about their new hand wash range. Although no posts promoting their infant milk products were recorded during our monitoring period, Hipp have previously and since posted about their follow-on formula, including making claims about the addition of Vitamin D (which all infant formula and follow-on formula products include).
My Little Piccolo included this messaging with every single post about infant milk, suggesting that follow-on formula is not a breastmilk substitute despite clear guidance from all global and national health departments that breastfeeding should continue throughout the first year of life.

‘Important Notice: Breastfeeding is best for your baby. Piccolo Follow On Milk is only suitable for babies over 6 months, as part of a mixed diet. It should not be used as a breastmilk substitute before 6 months. Use on the advice of a healthcare professional.’

SMA Baby also included similar messaging on formula-based posts from their social influencer, again suggesting that follow-on milk is not a breastmilk substitute, which it clearly is.

‘IMPORTANT NOTICE: Breast milk is best for babies and breastfeeding should continue for as long as possible. LITTLE STEPS® Follow-on Milk is for babies over 6 months and is part of a varied weaning diet. Not intended to replace breastfeeding.’
1.4 How do influencers promote infant formula on social media?

A large part of engagement on social media for the brands is based on influencer posts, whether paid advertisements, gifted products or informal brand promotion. The engagement rate for influencer posts was higher than that for brand posts across Instagram with influencers providing access to an average of 137,815 additional followers.

Of the brands analysed, almost all used influencers to promote their products, whether through paid adverts and partnerships or gifted product to promote on their pages. The only brand that did not appear to pay for influencer promotion was Aptamil, however there were influencers who promoted the product as part of their own routine.

Beyond direct influencers, Cow & Gate, My Little Piccolo and SMA Baby have all sent out branded gifts to parents which align with their social media strategies and encourage parents to share photos on their own Instagram pages. Under current guidelines, this would not count as #Gifted product and therefore wouldn’t need to be declared on social media as a partnership. With the rise of nano-influencers (those with 1000-5000 followers) this certainly muddies the waters between influencer advertising for the brand and a sign-up gift.

Importantly, when it comes to unpaid promotions of brands it is clear that some influencers may not be familiar with UK regulations on the marketing of infant formula and follow-on formula (Department of Health, 2013), with ‘nano-influencers’ and ‘mummy bloggers’ writing about their infant formula experiences without realising they are breaking the law.
1.5 Case Study - Cow & Gate #LoveDontJudge

Cow & Gate launched their social media #LoveDontJudge campaign on 1st July 2020 following a succession of posts regarding parental guilt and tapping into the feelings of parents being stigmatised for their various choices. The campaign relied heavily on influencer posts, with over 12 different influencers providing content for the campaign. Whilst these were clearly signposted as ‘Ad’ content on the influencers’ pages, there was no clear distinction on Cow & Gate’s own pages whether these were paid posts from influencers or shared images from consumers.

Beyond these paid influencers, Cow & Gate also designed and sent out branded baby vests with the ‘Love Don’t Judge’ messaging to parents within their baby club encouraging them to post their own judgement stories on social media. A key issue with this campaign is that it circumvents regulations that say that formula advertising must not ‘promote a range of formula products by making the brand the focus of the advert, rather than specific products’. (Department of Health, 2013).
As the graph above highlights, engagement for influencer content significantly outperforms the same content for level of engagement compared to being posted on Cow & Gate’s own Instagram page. These six influencer posts alone increased Cow & Gate’s reach by almost 5000%.

1.6 Case Study - Kendamil

Through the latter half of 2020 Kendamil has been running extensive influencer partnerships, sending a variety of Instagram influencers gifted products. Unlike the influencer marketing strategy seen by Cow & Gate which aligned the influencers with the wider campaign idea, Kendamil appear to be targeting any influencers that exist in the ‘Mummy Blogging’ sphere.

Since August 2020, Kendamil have sent out over 140 gifted products in return for social media posts about their brand. At least 26 of the gifted product bundles contained follow-on formula which is contrary to guidance from The International Code of Marketing of Breast Milk Substitutes (WHO, 1981) which clearly prohibits ‘free samples or supplies to pregnant women or mothers of infants and young children’.

Over the last few months Kendamil, through either their own channels or their influencer partners, have repeatedly broken or bent the rules surrounding formula advertising. In one example on their own page, Kendamil posted a photo of follow-on Milk but the review in the post description referenced a 4-month-old baby with issues around tolerance and weight gain, claiming that the use of Kendamil’s product solved these problems. This goes directly against the rules for advertising formula which dictate that brands should not ‘focus on carers emotions in relation to the feeding or care of infants under six months’ and the advertisement of infant formula to the public, which is prohibited (Department of Health, 2013).
These issues were compounded when analysing the content made by influencers who were gifted the product. An example post from @sophia_and_williams_wo demonstrated the ambiguity of influencer posts about formula brands, with no clear statement of AD/Gifted making it unclear that this isn’t a direct personal recommendation of the product. This was an issue that repeatedly came up when looking at influencer posts, with scores of them not including a clear ‘Ad/Gifted’ labelling.

Influencer posts including follow-on formula were also found to contain photos of babies who appear to be younger than six months. Given that images are a powerful force in social media, this may cause confusion for parents, aside from the fact that UK regulation specifies
that adverts must not ‘feature babies which consumers may perceive as being under six months (even if they are over six months)’ (Department of Health, 2013).

Additionally, in social media posts it can be unclear that the product advertised is follow-on formula, not infant formula. There is little distinction between tins of infant formula and follow-on formula and as the photo below highlights, the labelling can be covered. This highlights the reason why UK guidelines recommend that manufacturers ensure clear differentiation between packaging of infant formula and follow-on formula and explains why it may be beneficial for manufacturers to use similar packaging for all products to increase brand awareness.

Among these paid influencer posts are similar unpaid content posts promoting the brand. These posts are created to look like the ‘ad’ posts however there is no direct affiliation with the brand. The aim of these posts is for aspiring influencers to leverage paid sponsorships from brands, building their status. The outcomes can be confusing for consumers who are unsure whether these posts are personal recommendations or paid for advertisements, however ultimately the brand benefits by gaining additional advertising.
1.7 Additional social media platforms

Although our report only covers three social media platforms, promotional activity has been observed and reported on additional social media platforms. As part of the BFLG monitoring event volunteers also reported that Cow & Gate’s #LoveDontJudge campaign was promoted on both Pinterest and YouTube.

Several of the other brands also have YouTube channels, which they use to promote their messages.

Volunteers reviewing the marketing of infant milks highlighted that the posts they had seen on a variety of platforms were unsolicited. These sponsored posts appear as part of advertising campaigns and target specific users’ profiles, based on the content they search or view. Volunteers reported sponsored posts seen on a variety of different social media channels.
2.0 How infant formula is promoted on parenting websites

Advertising is the main source of revenue for most websites (Ofcom, 2020), and is therefore present on the majority of parenting websites. Parenting websites fall into two different categories; those aimed at connecting parents and enabling them to share thoughts and ideas with each other, and those providing information for parents in the form of articles and reviews written by journalists and website staff. Obviously, these websites are an attractive prospect for advertisers promoting products that appeal to parents and prospective parents, given the high numbers of users accessing them on a daily basis, as these figures from the Netmums advertising page demonstrates.

Parenting websites actively encourage collaboration with brands, offering a variety of ways for them to connect with parents, including offering free samples in ‘gift packs’, providing advertising space, enabling sponsored content and creating product awards.

2.1 How was infant formula advertising on parenting websites assessed?

Assessment of parenting websites was conducted by First Steps Nutrition Trust staff from Monday 5th October to Friday 30th October. Monitoring was guided by a set of questions designed to determine if the website content promoted formula and if so, what style of promotional activity was used. Additionally, websites were searched for any information relating to their advertising policy.
Six parenting websites were identified for monitoring:

<table>
<thead>
<tr>
<th>Parenting Website</th>
<th>Website address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Babycentre</td>
<td><a href="https://www.babycentre.co.uk/">https://www.babycentre.co.uk/</a></td>
</tr>
<tr>
<td>Mumsnet</td>
<td><a href="https://www.mumsnet.com/">https://www.mumsnet.com/</a></td>
</tr>
<tr>
<td>Netmums</td>
<td><a href="https://www.netmums.com/">https://www.netmums.com/</a></td>
</tr>
<tr>
<td>Mother &amp; Baby</td>
<td><a href="https://www.motherandbaby.co.uk/">https://www.motherandbaby.co.uk/</a></td>
</tr>
<tr>
<td>Bounty</td>
<td><a href="https://www.bounty.com/">https://www.bounty.com/</a></td>
</tr>
<tr>
<td>Emma’s Diary</td>
<td><a href="https://www.emmasdiary.co.uk/">https://www.emmasdiary.co.uk/</a></td>
</tr>
</tbody>
</table>

2.2 Promotional activity for infant formula on parenting websites

The table below shows which type of marketing was used to promote formula on parenting websites:

<table>
<thead>
<tr>
<th>Parenting Website</th>
<th>Custom advertisements</th>
<th>Sponsored content (BMS exc. formula)</th>
<th>Affiliate links, (through pop ups)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Babycentre</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mumsnet</td>
<td>✓</td>
<td>(✓)</td>
<td>(✓)</td>
</tr>
<tr>
<td>Netmums</td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mother &amp; Baby</td>
<td>✓</td>
<td>(✓)</td>
<td>✓ (✓)</td>
</tr>
<tr>
<td>Bounty</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emma’s Diary</td>
<td></td>
<td>(✓)</td>
<td></td>
</tr>
</tbody>
</table>

Advertisements

- None (0%) of the parenting websites carried infant milk advertising on the home page
- 3 out of 6 (50%) parenting websites carried custom advertisements for follow-on formula on pages other than the home page (Mumsnet, Mother & Baby, Bounty)

Sponsored content

- 1 out of 6 (17%) parenting websites carried content clearly sponsored by a formula manufacturer (Netmums, Aptamil)
- 3 out of 6 (50%) parenting websites carried content sponsored by manufacturers of BMS products other than infant milks (Mother & Baby, Mumsnet, Emma’s diary (Chicco or MAM))

Affiliate links

- 2 out of 6 (33%) parenting websites have affiliate links to formula manufacturers websites which are not associated with a formula advertisement (Mother & Baby to Boots 1st milk, Netmums to Aptamil)
• 2 out of 6 (33%) parenting websites carry a follow-on formula advertisement that links directly to all Hipp Organic formula (Mother & Baby, Mumsnet)
• 1 out of 6 parenting websites have an affiliate link directly to all infant formula on Boots the Chemist website

2.3 How is infant formula advertised on parenting websites?

All the parenting websites carried some form of promotional activity tailored to appeal to the needs of their target audience. This is usually what enables websites to provide free to view editorial content. The parenting websites included in our assessment varied significantly in the type and quantity of promotional activity they carried. Although none of the websites promoted formula on their home page, pop up ads for follow-on formula appeared on subsequent pages of 50% of the websites we visited. These pop ups appeared either as banners at the top or to the side of editorial content and were not limited to pages featuring formula feeding information. Hipp Organic Combiotic follow-on milk, Kabrita goats milk follow-on and growing up milk and Kendamil follow-on and growing up milks were promoted in this way during the assessment period. No advertisements appeared for infant formula, however the Hipp Organic Combiotic follow-on milk pop up advertisement which appeared on parenting websites featured a ‘discover more’ button which linked effortlessly through to all formula products including infant formula on the Hipp website.

It is important to remember that pop up advertisements change in relation to various aspects of the users browsing history or their predicted demographic based on their browsing history. They may also be coded to appear at a certain time interval after the user has landed on the website. Different users may therefore be exposed to different advertising when they land on a website.

2.4 Parenting websites advertising policies

Four out of six of the websites visited (Babycentre, Mumsnet, Netmums and Mother & Baby) either published their advertising policy or responded to emailed questions relating to their advertising policy. Of these, 3 out of 4 (Babycentre, Netmums and Mother & Baby) permitted advertising for follow-on formula and milks marketed for children over one.

Mumsnet was the only website that clearly stated that they do not accept infant formula advertising.
However, having an advertising policy that prohibits infant formula advertising does not necessarily prevent the website user from experiencing advertising. Mumsnet, like many other websites, contains custom advertisements built into the site and the content of these is heavily influenced by the users browsing history and not the website owners’ advertising policy.

2.5 Infant formula brands and sponsored content

Only one of the websites visited clearly featured sponsored editorial content. Sponsored content enables manufacturers to provide articles for editorial features for websites. Features sponsored in this way should clarify that that they are sponsored and who they are sponsored by to ensure that users are aware of the commercial influence on the feature.

The degree to which the sponsor has control of the content of sponsored articles and features is not always clear, however the following comment from one website clarifies that the dominant voice will be that of the manufacturer:

‘All our articles and reviews are written independently by the Netmums editorial team’

‘Netmums extends the trust our audience has in us to our advertising partners by creating content that reads, looks and feels like Netmums content, while landing your brand’s message.’

Nutricia sponsored editorial content featuring Aptamil follow-on formula was identified on the Netmums website.
Some websites featured articles authored by ‘experts’ who are employees of infant formula manufacturers. One out of six of the websites we visited (Mother & Baby), featured an article on infant feeding authored by an ‘expert’ who has been employed as an advisor to Aptamil. It is unclear whether this article is sponsored, yet where a brand is named it can be considered promotion and may have been paid for content.

2.6 Infant formula brands and online customised advertisements

Customised advertisements were noted on three of the six parenting websites (50%). Websites sell part of their space to custom advertisement providers and the adverts each user sees will differ dependent on their search or purchasing history and online profile. Custom adverts for formula brands might target a wide demographic and not just families using formula.

As custom adverts are specific to each user, it is difficult to determine the prevalence of formula adverts. However, availability of advertisement space on parenting websites enables the possibility for parents to encounter formula adverts regardless of the website’s policy on advertising.
3.0 Infant formula promotion through parent facing websites

It is essential that product information is available to consumers and most manufacturers provide this information through websites. Some infant formula manufacturers have different websites for health professionals and the general public, but some only provide one source of information.

Although parents or prospective parents may access infant formula brand websites initially for information on products, the websites are often designed to keep parents connected using tools such as ‘baby clubs’ or ‘carelines’. Posts on social media link through to the websites, leading people back to them. These techniques are purely for marketing purposes, promoting the brands and using website content to build relationships with parents (Hastings et al, 2020).

3.1 How was infant formula promotion on parent facing websites assessed?

Monitoring of brand websites was conducted by First Steps Nutrition Trust staff during October and November 2020. Six different brand websites were searched, and the information was recorded on a variety of aspects of the websites including:

- Information on baby club membership (what is involved and what benefits there are to joining).
- Carelines and contact information: Information on different ways to contact the manufacturer and in what ways people are encouraged to contact them.
- Website content: website headings, pop ups and banner messaging, main messaging, product information

Six brand websites were identified for monitoring:

<table>
<thead>
<tr>
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<th>Website address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aptamil</td>
<td><a href="https://www.aptaclub.co.uk/">https://www.aptaclub.co.uk/</a></td>
</tr>
<tr>
<td>Cow &amp; Gate</td>
<td><a href="https://www.cgbabyclub.co.uk/">https://www.cgbabyclub.co.uk/</a></td>
</tr>
<tr>
<td>Kendamil</td>
<td><a href="https://kendamil.com/">https://kendamil.com/</a></td>
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<td>Hipp</td>
<td><a href="https://www.hipp.co.uk/">https://www.hipp.co.uk/</a></td>
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<td>Piccolo</td>
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</tr>
</tbody>
</table>

Kendamil launched a new website on 1st November 2020, so both the new and old websites were monitored.
3.2 What are the key features of infant formula parent facing websites?

All of the brand websites had similarities, which included the following elements:

- **Baby Clubs**
  - 5 of the 6 (83%) websites included a club that parents could join

- **Provision of parenting advice**
  - All of the websites (100%) provided ‘parenting information’ through articles or blogs
  - 3 of the 6 (50%) websites had headings on their main homepage for different stages of development (e.g. Conception, pregnancy, baby, toddler)

- **Carelines**
  - All (100%) websites provided the facility to contact the company
  - 5 of the 6 (83%) websites encouraged parents to contact them regarding issues other than product information
  - 3 of the 6 (50%) websites promoted their ‘careline’ on their main homepage

- **Information on breastfeeding and the benefits of breastmilk**
  - 4 of the 6 (67%) websites provide information on breastfeeding, including articles on how to breastfeed, information on the benefits of breastmilk and common breastfeeding problems.

- **Articles by experts**
  - All (100%) websites contained either articles or advice written by ‘experts’.

- **Product information**
  - All (100%) websites also contained information about their formula products.

3.3 Consent to provide information

All websites require consumers to give consent in order to access the website. For all brands this appeared as a pop up confirming that you understand and have read the information provided. This is the ‘important notice’ specified in UK regulations regarding the superiority of breastmilk and the potential health and financial implications of introducing infant formula. For some of the brands, the notice only appeared when accessing product information or (for those carrying other products) when you accessed the infant formula part of the website. For other brands this appeared when accessing some of the articles or information on the website.
3.4 Infant formula brand parent facing websites and baby clubs

Baby clubs are a key vehicle employed by companies to build relationships with parents and caregivers (Hastings et al, 2020). Five of the brand websites (Aptamil, Cow&Gate, Hipp, Piccolo & SMA) encourage parents to join their baby club. Both Aptamil & Cow & Gate’s parent-facing websites contain the word ‘club’ (Aptaclub & C&GBabyClub), although information on the website is freely available without having to join. Hipp was the only company which had some website content available exclusively to Baby Club members, accessible only after joining and signing in.

Promotions for the baby clubs were positioned in a prominent place on the website homepages, encouraging parents to join up.

In order to join any of the baby clubs parents are required to enter their name, email address and postal address. Parents are also asked to complete details about their pregnancy (expected due date) and/or children’s names and dates of birth. All baby clubs required parents to provide consent to enable the company to send information to them about feeding infants under 6 months. SMA’s Baby Club also included a tick box for parents to select if they were happy to receive information ‘about weaning and Nestlé CERELAC products.’

Kendamil was the only website we looked at that did not have a baby club, however there is the facility to create an account in order to purchase products online.
3.5 Infant formula parent facing websites offer parenting advice

All of the brand websites searched provided information on different aspects of parenting through articles, blogs and FAQs. Three of the brand websites included links to different stages of the parenting journey, from conception through to toddlerhood, on their main homepage. Each main heading covers a wide range of topics relevant to the development stage. In these websites, the information appears to be the focus. It is well organised and easy to navigate to find the information needed and a wide range of topics are covered, for example:

- **Cow & Gate:**
  - ‘Sex and relationships after having a baby’
  - ‘Good nutrition during pregnancy’

- **Aptamil:**
  - ‘What to eat to conceive’
  - ‘Tummy time: why does my baby need it?’

- **SMA:**
  - ‘What do my maternity notes mean?’
  - ‘Dealing with toddler tantrums’

The other three brand websites provided parenting information through one heading on their website, for example on Piccolo’s website there is a main heading titled ‘Parenting Hub’ containing a variety of articles, blog posts and information on all aspects of parenting, including ‘5 things you need to know about childcare’ and ‘Baby sleeping: Do’s and don’ts’
Both Kendamil’s old and new websites include information on different aspects of parenting in the form of articles or blogs. On the new website, this information is placed under the heading ‘Learn’ and includes articles such as ‘Coping in early labour’ and ‘New parent survival tips’. On the old version of the website, the main heading ‘Blog’ provided a selection of articles on a variety of topics.

Hipp’s website does not contain as much ‘parenting’ information as the other brands, however they do have a section on ‘pregnancy advice’ where there are articles on pregnancy and life with a newborn including ‘Checks for you and your baby’ and ‘Helping your baby to sleep well’.

By providing information about all aspects of parenting, not just information about their products, brand websites can create additional reasons for parents to visit their sites. Providing different information may also reinforce the idea that the brand can be trusted by parents and is a good source of information.

3.6 Infant formula brand parent facing websites offer breastfeeding advice

Four of the six (67%) websites contain information and articles on breastfeeding. SMA advertises information about breastmilk on its homepage as one of several scrolling header images.

Aptamil, Cow & Gate and SMA provide extensive information on breastfeeding, including nutritional information and benefits of breastmilk as well as general information on how to breastfeed and common breastfeeding problems. Both Aptamil and SMA also suggest that parents should call their careline for support with breastfeeding problems.

None of the websites offered links to accurate, evidence-based sources of information on breastfeeding, such as Unicef UK Baby Friendly Initiative, NHS, Start4Life or other regional Government health department websites. Nor did they provide the details of breastfeeding support organisations, instead suggesting that parents should contact their own carelines or use their resources for further information and support with breastfeeding.
3.7 Infant formula parent facing websites offer ‘expert’ information

Some of the articles and information available on websites are attributed to ‘experts’. These are often identified as health professionals including midwives, health visitors and doulas. Aptamil’s website advertises advice from Dr Sarah Jarvis, offering videos where Dr Jarvis gives information about pregnancy and breastfeeding. Dr Jarvis also answers questions on the Cow & Gate website.

Piccolo’s website contains a variety of articles by Piccolo’s ‘Family friends’, a selection of influencers and bloggers, some of whom have qualifications (midwife, personal trainer, etc). It isn’t made clear on the website that the articles are personal perspectives, but implies that because the authors are given the title ‘expert’ that their advice is accurate.

Several of the blog articles on Kendamil’s website are attributed to Katie Hilton, ‘Kendamil’s Feeding Expert’. In one blog, Katie is described as a ‘Midwife, Health Visitor and Parenting Coach’.

Katie Hilton is no longer on the NMC register and is no longer practicing as a midwife or health visitor. She has been an industry spokesperson for MAM and Lansinoh and, according to her LinkedIn profile, has not been employed as a Health Visitor since 2013. It is misleading to parents to suggest that they are receiving information from a registered health professional when this is not the case.
### 3.8 Infant formula brand carelines

Five of the six websites searched had ‘carelines’, a mechanism encouraging parents to contact the company for information about any aspect of parenting, not just about their products. The brands advertising carelines actively promoted the availability of midwives, health visitors or other professional staff to answer queries that parents might have.

A variety of different communication methods are advertised by different brands.

<table>
<thead>
<tr>
<th></th>
<th>Live Chat</th>
<th>WhatsApp</th>
<th>Messenger</th>
<th>Phone Careline</th>
<th>Phone number</th>
<th>Email Form</th>
<th>Postal Address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aptamil</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cow&amp;Gate</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SMA</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Kendamil</td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Piccolo</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td></td>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hipp</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

Three of the six (50%) websites have a live chat facility on their website, with the icon advertising this function visible on every page whilst browsing the site. The same three brands also advertise freephone telephone numbers for parents to contact, with two of these available 24 hours a day. All other brands also have contact phone numbers, however these are not advertised in the same way and are local numbers, not freephone, and are listed in the ‘contact us’ section of the websites.

Three of the six (50%) websites enable parents to contact them through WhatsApp and Facebook Messenger. Four of the six (67%) websites enable customers to contact them by email, through an online form. Email addresses are not provided on any of the websites. Only two of the brands list their postal address clearly in the ‘contact us’ section of their websites, with only one encouraging written communication.

Three of the six (50%) websites (SMA, Aptamil and Cow & Gate) advertise their contact information on the main homepage in prominent positions, actively encouraging parents to connect with them through these channels for any reason, not just for product information.
For the other three websites (Kendamil, Hipp and Piccolo), in order to access the contact information customers have to navigate to the ‘contact us’ section of the website.

3.9 Case Study: Aptamil

Through their website, Aptamil position themselves as parent supporters and advisors. They focus on their ‘scientific expertise’ and research. The website provides information on all aspects of parenting, from conception through to early years.

The website has a professional feel. It is orderly in its layout and has a clear focus on the research and science aspect of parenting. The colours on the website are subtle and understated.

Aptamil’s main message referred to their ‘scientific expertise’, how they can provide support to parents and encouraged them to join their Baby Club. There was also a pop-up banner at the bottom of the page encouraging parents to get additional support and information around COVID-19. Clicking this link takes you to an area of the website claiming to support parents through the pandemic via videos and FAQs with ‘experts’, information and a variety of ways for parents to contact the company.
Scrolling further down the main homepage there was a message saying...

‘The Gift of Future Health. The first 1000 days of your baby’s life provide a unique opportunity to influence an entire lifetime of development. From conception and pregnancy through to birth and toddlerhood, our stage-based articles and resources offer expert advice that can help you to lay the foundations for a healthy life’.

3.10 Case Study: Cow & Gate

Cow & Gate’s website is bright and colourful. The layout of the website and the photos used appeal to the reality of parenting, showing the joy and the challenges. The website is filled with information for parents, which is presented in a friendly, familiar way. The font used for text is rounded and soft, making it feel relaxed.

The main homepage was dominated by Cow & Gate’s #LoveDontJudge campaign. The wording below the picture states

‘We’re calling time on parental judgement, because a happy parent means a happy baby. That’s why we’re here to support you while you do what you do best: parent!’

and was followed by a link to the section of the website giving further information about the campaign. There was also an additional pop-up appearing on the main homepage which led to information on the campaign.

The campaign has been running over social media and has focused on judgement of parents for their parenting style. The idea is framed as an advocacy campaign, showing statistics about parents feeling judged for their choices and features the celebrity Stacey Solomon as a spokesperson. All the videos and information talk about a variety of aspects of parenting where parents may feel judged (dummy use, weaning, etc), but with no mention of formula.

When signing up to the baby club, families are sent a red baby vest with the slogan on and encouraged to ‘Help us tell the world to #LoveDontJudge’. They are also encouraged through
the website and promotion of the campaign, to share their story on social media using the hashtag.

The campaign helps the brand to align itself with parents and although it never mentions either formula or breastfeeding, it attempts to unite parents for the common good. In a similar way to the ‘Sisterhood of Motherhood’ campaign by Similac in the US which was hugely successful for the brand and its sales, as well as attempting to change ‘..the narrative about infant feeding, which is no longer a matter of scientific evidence, but lifestyle choices and beliefs.’ (Hastings et al, 2020)

How different marketing strategies lead to differences in product price

Produced by the same manufacturer, both Aptamil and Cow & Gate produce a similar range of products and their standard first infant formula products are very similar in nutritional composition (see https://infantmilkinfo.org/ for more information). However, despite their nutritional similarity, Cow & Gate’s First Infant Formula costs 13p per 100mls and Aptamil’s First Infant Formula costs 19p per 100mls. Aptamil also promotes two premium brands ‘Profutura’ and ‘Sensavia’ at even higher prices. This, alongside the clear difference in marketing through their websites highlights the strategies used by manufacturers to target different types of parent and use pricing to suggest brand superiority.

For an up to date list of the prices of all infant milks on the UK market see www.infantmilkinfo.org
4.0 Infant formula promotion through baby club emails

As noted in the previous section, baby clubs are commonly used by infant formula brands and promoted on their parent-facing websites. Baby clubs enable brands to collect information on parents and ensure that they can provide continued regular contact with them by email or post, enabling them to build and maintain relationships.

4.1 How was monitoring of baby club emails assessed?
Monitoring of baby club emails was conducted by First Steps Nutrition Trust staff in November 2020 using baby club emails received during October 2020.

Five baby clubs were identified for monitoring:

<table>
<thead>
<tr>
<th>Brand</th>
<th>Club Name</th>
<th>Website address</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aptamil</td>
<td>Aptclub</td>
<td><a href="https://www.aptaclub.co.uk/register.html">https://www.aptaclub.co.uk/register.html</a></td>
</tr>
<tr>
<td>Cow &amp; Gate</td>
<td>C&amp;GBabyClub</td>
<td><a href="https://www.cgbabyclub.co.uk/register.html">https://www.cgbabyclub.co.uk/register.html</a></td>
</tr>
<tr>
<td>Hipp</td>
<td>Hipp Baby Club</td>
<td><a href="https://www.hipp.co.uk/babyclub/join-the-hipp-babyclub/">https://www.hipp.co.uk/babyclub/join-the-hipp-babyclub/</a></td>
</tr>
<tr>
<td>SMA</td>
<td>SMA Baby Club</td>
<td><a href="https://babyclub.smababy.co.uk/registration">https://babyclub.smababy.co.uk/registration</a></td>
</tr>
<tr>
<td>Piccolo</td>
<td>Family Club</td>
<td><a href="https://www.mylittlepiccolo.com/join-the-family/">https://www.mylittlepiccolo.com/join-the-family/</a></td>
</tr>
</tbody>
</table>

In order to capture a variety of email content, baby clubs were joined and registered with babies of different ages or different stages of pregnancy to capture information received during October on the following stages:

- Early Pregnancy
- Late Pregnancy
- Newborn
- 2 months
- 4 months
- 6 months
- 9 months
- 12 months

All emails received during October 2020 were assessed and the following information was recorded:

- Email title
- Main message
- Additional messages
- Information about links in the email and where they lead to
- Information on carelines promoted in the emails
4.2 How brands use baby club emails to communicate with parents

During October 2020, a total of 37 emails (excluding any welcome emails) were received through eight baby club memberships with each of the five brands. Fourteen emails in total were received from Aptacub and twelve from C&GBabyClub, with members receiving between 0-3 emails each, an average of two emails per membership over the month. SMA sent ten emails, between 0-3 per member with an average of one email per membership. No emails were received from Hipp and only one from Piccolo.

<table>
<thead>
<tr>
<th>Club Name</th>
<th>Frequency of email contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aptacub</td>
<td>Every 1-2 weeks</td>
</tr>
<tr>
<td>C&amp;G Babyclub</td>
<td>Every 1-2 weeks</td>
</tr>
<tr>
<td>SMA Baby</td>
<td>Weekly during pregnancy, then monthly after birth</td>
</tr>
<tr>
<td>Piccolo Family Club</td>
<td>Monthly</td>
</tr>
<tr>
<td>Hipp</td>
<td>Occasionally</td>
</tr>
</tbody>
</table>

4.3 How do baby club emails encourage parents to make contact with the infant formula brand?

Thirty five of the thirty seven emails received contained information about the brand ‘careline’ and encouraged parents to contact the company.

“Our expert team of midwives, nutritionists and feeding advisors are available 24 hours a day, 7 days a week”

“Our Careline is here for you”

“Want to know more? If you have any questions, or you’re unsure about anything, get in touch. Give us a call…”

“Need a bit of friendly advice or reassurance?”
The suggestion is that, through the carelines, brands can provide information about all aspects of parenting, not just their products. Carelines are a common tool used by formula companies to build relationships with consumers (Hastings et al, 2020).

**4.4 Titles and content of infant formula baby club emails**

The email title is the first thing that parents see when opening their inbox and gives an indication of what to expect from the email. The titles of the emails received were generally short and often included the stage of pregnancy or development stage tailored to the recipient (e.g. week 24, 8 months), providing personalised communication and enabling the brand to continue building a relationship with parents.

Five of the email titles were framed as questions including some that could lead to an increase in parental anxiety, such as:

‘Week 2: Is my baby getting enough milk?’
‘Week 3: Tears or tummy troubles?’

Other titles also had the potential to raise concern for parents, for example:

‘Week 3: Coping with colic’
‘Week 9: Tips for hungry babies’
‘Week 20: Understanding milk allergies’
‘11½ months: Maintaining your toddler’s healthy immune system’

Only one of the thirty seven emails promoted a product in the email title (and content). The main messages in the emails were generally an expansion of the email title, giving a little more information on the subject. Twenty six of the emails had messaging relating to parenting issues and baby or pregnancy development, again reinforcing the brands’ identities as ‘supportive friends’ for parents.
Many of the main messages suggested that parents should contact the company for more information, such as the email from C&GBabyClub suggesting that parents contact their team for one to one support on weaning. Emails also contained additional messaging related to the developmental stage or topic covered in the main email. Both the main message and any additional messages consisted of very limited text, mainly headlines, accompanied by photos and links directing parents to the brand website for further information.

4.5 Breastfeeding information and advice in baby club emails

The promotion of breastfeeding is used as a tool to build trust with parents (Hastings et al, 2020). Only one of the emails mentioned breastfeeding in the email title, but six had breastfeeding advice or information in the additional messages in the body of the emails.

Relevant emails show images of breastfeeding with questions like ‘Is my baby getting enough milk?’ and ‘Breastfeeding problems solved’, suggesting that parents engage with them in order to understand more about breastfeeding. None of these emails signpost families to independent expert breastfeeding support helplines or NHS advice.
5.0 Conclusion

As this report shows, formula brands use a variety of online platforms and marketing strategies to communicate with parents and prospective parents. Although regulation restricts advertising of infant formula, both follow-on formula and milks marketed for children over one year of age continue to be advertised online. The promotion of follow-on formula enables formula brands to use cross promotion through product packaging design, thus inevitably promoting infant formula.

Using social media formula brands are able to ensure a constant stream of advertising, infiltrating even the accounts of those who are breastfeeding by using sponsored posts. The relatively new influencer market provides an opportunity for formula brands to increase their reach on social media, gaining the benefit of posts styled as personal recommendations from celebrities and influential people who present use of formula brands as part of their aspirational lifestyles. It is evident that companies need to find a brand identity to differentiate themselves and social media allows them to do so in a way that instantly connects them with consumers. Some brands are actively promoting their products, however some are positioning themselves as supportive friends to parents, offering information and support for all aspects of parenting.

By integrating themselves into key parenting moments, such as pregnancy for Aptamil and early baby groups for Cow & Gate, and aligning themselves with popular parent influencers, brands can ensure that they are seen by a large proportion of parents. Regardless of whether they choose to engage with the brands by following their pages, parents using social media are likely to be exposed to infant formula advertisements. A recent Daily Mail article reported the results of an unpublished study by Professor Amy Brown showing that, regardless of whether they were using infant formula or breastfeeding, new mums were deliberately targeted by sponsored advertisements on Facebook (Taylor, 2020).

The impact of influencers cannot be underestimated: it has been claimed that 49% of people rely on influencers for their purchasing decisions (Twitter, 2016). Products or ideas promoted by influencers may carry more weight with parents by providing a peer to peer recommendation or promoting ways to replicate an idealistic lifestyle. With regulation struggling to control the fast-moving pace of this new form of marketing, and the many ambiguities of the use of gifted or sponsored posts, there are frequent examples where the rules have been broken.

Parenting websites provide another opportunity for infant formula brands to gain access to parents seeking information and support, using sponsored articles which appear similar to the non-sponsored articles. By collaborating with infant formula brands, parenting websites build relationships with them resulting in conflicts of interest. Their ability to provide evidence-based information may be affected by their relationship with infant formula brands.

*Online infant formula marketing: page 36*
Infant formula brand websites, styled as parenting or information websites, encourage parents to connect and engage with brands through baby clubs and carelines, enabling companies further access to them through email and post communication. Frequent communication through baby club emails enables companies to create and maintain relationships with families, establishing themselves as trustworthy and supportive friends. Infant formula manufacturer’s brand websites, although different in style, share commonalities. By using tools such as baby clubs, carelines and providing a wealth of information on different aspects of parenting, brand websites encourage parents to access their website and trust the information provided, creating brand recognition and loyalty.

Baby clubs enable manufacturers to gather personal information and maintain regular contact with parents through email or post, increasing brand awareness and engagement whilst building individual relationships (Hastings et al, 2020).

“...the first two things you do are set up your [baby club and telephone advice line]; you can then do other things, but those are the two direct relationship building [tools] with mothers; those are the two ace cards to play”. And it is still very much a soft sell: “there is no mention of formula on the [telephone advice line], it’s just about insinuating the products as your friend”. (Hastings et al, 2020)

Carelines, offering a variety of means of communication, encourage parents to make contact with the brand for information on any aspect of parenting, with several brands promoting their carelines as being staffed by midwives, health visitors or ‘experts’.

Brands use their websites to promote their credentials as reliable sources of information, using messaging about breastfeeding that appears to align with NHS or WHO guidance enables parents to trust them and the advice they offer, positioning them as a supportive friend (Hastings et al, 2020).

The differences in website style, specifically highlighted by the two brands produced by the same manufacturer (Aptamil and Cow & Gate), demonstrate how brands divide the market and target specific types of parents. None of the brand websites signpost parents to evidence-based, reliable sources of information, which is particularly notable when offering breastfeeding support.

Messaging in emails sent to parents has the ability to create unnecessary anxiety, placing subtle hints which may make parents question their choices. Parents are then prompted to make contact with the company through their website, on social media and through carelines, increasing parents’ exposure to the brand.

The supposed benefit for parents, receiving regular emails containing information about development and parenting, is misleading as this information is not independent. Parents are not well served by receiving these emails as they may cause more anxiety and increase their exposure to advertising by formula brands. We therefore recommend that companies are restricted from communicating directly with parents by email and that all of the
provisions in the WHO International Code of Marketing of Breastmilk Substitutes and all subsequent World Health Assembly resolutions are put into UK law and that companies also voluntarily abide by these.

Efforts to protect breastfeeding and provide support for women to ensure that they are able to instigate and continue breastfeeding for as long as they want to, are countered by infant formula advertising which serves no purpose other than to promote products. Current UK regulation permits advertising of follow-on formula, a product that is not recommended for use and can be mistaken for infant formula by families. This causes confusion and enables formula brands to promote their full range of products using similar product branding. Regulations for the composition of infant formula and follow-on formula renders brand advertisements unnecessary and they only serve to add confusion for families. Parents deserve to receive unbiased, evidence-based information in order to make informed decisions around infant feeding.

Breastfeeding contributes to the physical and mental health of infants and young children, and prevents overweight and obesity. Therefore, in light of the UK government’s consultation for a ban on online junk food marketing as part of their approach to reduce obesity, we suggest a complete ban on all online promotion of infant formula, follow-on formula and milks marketed for children up to three years of age.
6.0 References


