

Dr Hans Henri P. Kluge,  
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By e-mail only

## Open letter: Request to remove WHO Europe website content putting breastmilk substitutes on a level with unhealthy products

Brussels, 7 July 2023

Dear Dr. Kluge,

I am writing to you as Secretary General of Specialised Nutrition Europe, representing Europe's specialised nutrition industry, and copying my association's president and executive committee. We noticed the new AI tool embedded in WHO Europe's website, which invites the public to "upload images which you think promote unhealthy products".

We are alarmed that the following list of product categories includes breastmilk substitutes as "unhealthy products"?:

Please upload images which you think promote **unhealthy products** like unhealthy foods and drinks, alcohol, cigarettes/novel tobacco products such as vaping devices, **breast milk substitutes** offered for infants (0-6 months) etc.

We would kindly request that you immediately remove this mention of breastmilk substitutes, as infant formulae are specifically designed to provide infants with the right balance of nutrients to support a healthy start in life, when breastmilk is not available as an option. Characterizing breastmilk substitutes in this list of unhealthy products, alongside these other examples, is incorrect and misleading.

You will be aware that food regulators across the world have quite consistently concluded that infant formula, prepared in accordance with applicable Codex Alimentarius standards, is a safe and suitable breast milk substitute. And indeed, so has the WHO itself:

- *"If babies are not breastfed, for whatever reason, the Code (The International Code of Marketing of Breastmilk Substitutes – explanatory addition by SNE) also advocates that they be fed safely on the best available nutritional alternative."*<sup>3</sup>
- *"For those few health situations where infants cannot, or should not, be breastfed, the choice of the best alternative – expressed breast milk from an infant's own mother, breast milk from*

<sup>1</sup> Copied: F. Branca, Director of the Department of Nutrition & Food Safety; Anshu Bannerjee, Director, Dpt. of Maternal, Newborn, Child and Adolescent Health and Ageing; Allisyn Moran, Unit Head, Maternal Health; Helga Fogstad, Partnership for Maternal Newborn and Child Health – all WHO Geneva; Martin Weber, Team lead, Quality of Care; Kremlin Wickramasinghe, Regional Adviser on Nutrition, Physical Activity and Obesity – both WHO Regional Office for Europe

<sup>2</sup> This screenshot was taken on 6 July 2023 from the 'WHO AI marketing tool' here: <https://ai.ncd.digital/> - which is advertised on the WHO Europe website here: <https://www.who.int/europe/news/item/23-06-2023-new-who-ai-tool-invites-people-to-counter-online-promotion-of-unhealthy-products>

<sup>3</sup> The International Code of Marketing of Breastmilk Substitutes - Frequently Asked Questions 2017 Update, WHO 2017, p. 2: <https://apps.who.int/iris/bitstream/handle/10665/254911/WHO-NMH-NHD-17.1-eng.pdf>


*a healthy wet-nurse or a human-milk bank, or a breast-milk substitute (...) depends on individual circumstances*<sup>4</sup>.

The new WHO Europe communication diametrically contradicts this scientific consensus and puts infants at risk, as mothers who cannot or choose not to breastfeed may resort to feeding their infants with substitutes other than safe infant formula.

On behalf of the specialised nutrition industry across Europe, I therefore urge you to have this content removed from your website immediately and thank you in advance for your timely reply to this letter, which we will also publish on our website: [www.specialisednutritioneurope.eu](http://www.specialisednutritioneurope.eu).

For the future, we would also look forward to exchanging constructively with the WHO and many other stakeholders involved in the debate about infant and young child nutrition.

Thank you and best regards,



**Beat Späth**  
Secretary General

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<sup>4</sup> WHO 2001: Infant and young child nutrition Global strategy for infant and young child feeding (document number EB109/12): [https://apps.who.int/gb/archive/pdf\\_files/EB109/eeb10912.pdf](https://apps.who.int/gb/archive/pdf_files/EB109/eeb10912.pdf)