



Blackmores Marketing of Breastmilk Substitutes Disclosure

Blackmores sells products considered breastmilk substitutes including Blackmores Newborn Formula S1 (from 0 to 6 months) and Blackmores Follow-On Formula S2 (from 6 to 12 months). These products are manufactured by the company's contract manufacturing partner to Blackmores' specifications in Australia, sold in Australia under the Blackmores brand, and exported to Vietnam.

Blackmores has a Breastfeeding Policy that covers the Marketing of Breastmilk Substitutes. The company's policy includes a commitment to align with the principles of the WHO Code by 2030.

"We are committed to responsible marketing of these products and affirm that by 2030, we will 1) align with the WHO's International Code of Marketing Breastmilk Substitutes, and subsequent resolutions, 2) disclose how the company manages compliance to the Code, and 3) be transparent about potential areas of non-alignment."

Further to this, Blackmores commits to comply by this date with all relevant subsequent World Health Assembly (WHA) resolutions as implemented by governments all over the world.

As determined by B Lab's independent Standards Advisory Council, companies involved in the Marketing of Breastmilk Substitutes are eligible for B Corp Certification if they meet specific requirements for the industry, including disclosure of their practices. These requirements vary by type of company, including whether the company's practices related to the marketing of breastmilk substitutes are assessed in the Access to Nutrition Index (ATNI).

Non-ATNI-listed companies are required to meet the immediate expectations of the BMS Call to Action (listed below), at a minimum, at the time of certification, to be eligible to certify and achieve full Code compliance by 2030, to maintain the certification.

The immediate expectations of the BMS Call to Action are as follows:

- Have a policy in place that at a minimum meets the following criteria:
 - i. Covers products designed for use 0-12 months after birth
 - ii. Is applied globally
 - iii. Is upheld in jurisdictions with less stringent or no regulations, and adheres to national law when those laws are more stringent than the policy.

All manufacturers of BMS/CF that meet the above eligibility requirements are required to disclose their marketing practices and areas of non-compliance with the Code. Manufacturers of BMS/CF should additionally disclose their lobbying policies and practices in reference to the RLF, including industry association affiliations, in the specific context of BMS/CF.



For more information on B Lab's position on the marketing of breastmilk substitutes, please refer to B Lab's statement on the breast milk substitute industry and B Corp Certification [here](#).

Blackmores Policies and Practices on Marketing of Breastmilk Substitutes

Blackmores recognises that breastfeeding is the best source of nutrition for babies and the health benefits of breastfeeding for mothers and babies are irrefutable.

Blackmores has long been and will continue to be, an advocate for breastfeeding, with products to support the nutritional needs of breastfeeding mothers.

Not every mother is able to breastfeed and it's important those mums have access to high-quality products and advice. The reasons women are not able to breastfeed are for each mother to discuss with her healthcare professional. The company's role is to support the mothers, carers, and healthcare professionals with formulations developed by experts and at a quality they can trust.

Commitment to work towards full alignment of our policies with the WHO Code

In offering formula products for families, Blackmores is committed to responsible marketing and communications and affirms that by 2030, it will 1) align with the WHO's International Code of Marketing Breastmilk Substitutes, and subsequent resolutions, 2) disclose how the company manages compliance to the Code, and 3) be transparent about potential areas of non-alignment.

Steps taken to achieve this include a full review of activities and code principles, strengthening policies, procedures, and education, and deepening the understanding of its ambition with its distribution partners. The company shared that will also build continuous improvement into its plan to align its activities to full code compliance. This will include updating the Group Responsible Marketing Guidelines.

This commitment is included in Blackmores' Breastfeeding Policy, it covers all products designed for use 0-12 months after birth, is applied globally, and is intended to be upheld in jurisdictions with less stringent or no regulations, adhering to national law when those laws are more stringent than the policy. During its B Corp certification process, the company shared that in September 2024 a revised regulation of infant formula products came into effect in Australia ([P1028 - Infant Formula | Food Standards Australia New Zealand](#)). As with any regulation change, this will trigger an internal review and recommendations at Blackmores.

Blackmores does not conduct any lobbying in relation to BMS products and has no industry association affiliations relating to this category of products.

Providing information to the Access to Nutrition Initiative (ATNI)

Blackmores will provide as much cooperation to the ATNI in monitoring activities concerning the Code compliance.

Areas of Non-Alignment with the WHO Code

Blackmore's policy regarding the marketing of breastmilk substitutes applies to a scope of products that differ from the complete scope of the WHO Code.

Article 2 of the WHO Code states "The Code applies to the marketing, and practices related thereto, of the following products: breastmilk substitutes, including infant formula; other milk products, food and beverages, including bottle-fed complementary foods, when marketed or otherwise represented to be suitable, with or without modification, for use as a partial or total replacement of breast milk; feeding bottles and teats. It also applies to their quality and availability, and to information concerning their use." Breastmilk substitutes are defined as "Any food being marketed or otherwise presented as a partial or total replacement for breast milk, whether or not suitable for that purpose."

Blackmores' policy applies to the Newborn Formula (from 0 to 6 months) and the Follow-on Formula (from 0 to 12 months). The company follows national regulations where that are stricter than its policy, in addition to its own policy.

As part of the improvement plan that will ensure full code compliance by 2030, Blackmores will progress an evaluation to identify any areas where the company policy may not align with the WHO Code, or where there may be differing interpretations in how the WHO Code and WHA Resolutions should apply.

Blackmores' current sale of these products is limited to Australia and Vietnam. Though Australia is noted in the [2020 Status Report on the Marketing of Breastmilk Substitutes](#) as higher risk as they have no legal measures for enforcing code compliance, Blackmores' marketing is aligned to code compliance in this region. Vietnam is cited in that report as being moderately aligned to the code and compliance with legal requirements is upheld by Blackmores and their distribution partner in that country. For both countries, further controls will be implemented to uphold best practices and meet our 2030 commitments.

Vietnam is considered a [Higher Risk Countries](#), which is defined as those countries that meet either of the following criteria: (i) More than 10 per 1000 under 5 mortality rate (ii) More than 2% acute malnutrition (moderate and severe wasting) in under 5 years. Blackmores reported that, at present, they do not have additional measures in place to mitigate potential risks associated with the consumption of BMS in higher-risk countries. The company is determining its pathway for future improvements.

In Blackmores' policy, products not included within the scope of the policy, but that are produced or sold by the company, include:

- (1) Toddler Milk (for infants +12 months)

WHA Resolutions Subsequent to the WHO Code:

Since the adoption of the WHO Code, a number of World Health Assembly resolutions have either added to, revised or clarified the content of the original WHO Code. Though Blackmores' policy does not reference or state support for the recommendations made in the guidance associated with [WHA69.9](#) (2016)

Company Comments:

Blackmores is committed to ensuring its inclusion when the policy is reviewed in the next 24 months.

Other Areas of Potential Misalignment:

The company shared that there are no known other areas of misalignment in Blackmores' policy that stakeholders may or may not interpret as aligning (materially or immaterially) with the letter or intent of the WHO Code, including potential variances in language, level of detail, or exceptions.

Additionally, Blackmores reported that an in-depth review of any potential misalignments with the WHO Code may be identified as part of the company's improvement plan, along with a commitment to address and resolve these potential issues.

Management Practices of the Company

In accordance with Blackmores' policy covering the marketing of breastmilk substitutes, Blackmores has the following management practices in place to manage compliance to their policy globally:

- Company trains all employees in our infant nutrition business on the importance of supporting and protecting breastfeeding, including the WHO Code. In higher-risk countries, we also provide regular training to help third parties, with whom we have a direct service relationship, to enable compliance with relevant Policies and Procedures and national legislation implementing the WHO Code.

**Lobbying:**

Blackmores does not conduct any lobbying in relation to BMS products and has no industry association affiliations relating to this category of products.

Next Steps

As stipulated by the requirements for B Corp Certification, Blackmores will remain eligible for B Corp Certification as long as they work towards and achieve full WHO Code compliance, with respect to the elements of the Code that apply to distributors, by 2030.

B Lab's Public Complaints Process

Any party may submit a complaint about a current B Corp through B Lab's Public Complaint Process. Grounds for complaint include:

1. Intentional misrepresentation of practices, policies, and/or claimed outcomes during the certification process, or
2. Breach of the core values articulated in our Declaration of Interdependence within the B Corp Community.