

## InnoFaso SA Marketing of Breastmilk Substitutes Disclosure

InnoFaso SA is a Burkinabe company specializing in the manufacture and distribution of nutritional products for the prevention and treatment of malnutrition, particularly in infants and young children. Its products are RUTF<sup>1</sup> used for the treatment of cases of malnutrition, particularly moderate or severe acute malnutrition.

To date, InnoFaso manufactures 3 RUTF (Ready to Use Thérapeutic Foods) products to treat malnutritions:

- Plumpy'Nut® : therapeutic feeding, designed to treat severe acute malnutrition from 6 months .
- Plumpy'Sup™ : nutritional supplement to treat moderate acute malnutrition in children aged 6 months to 5 years .
- Enov'Nutributter ® (+) : nutritious lipid paste for children from 6 to 24 months, aimed at supporting growth, motor and cognitive development, and preventing growth retardation.

Products not manufactured but distributed by InnoFaso:

- F100 Therapeutic Milk: specially designed for the nutritional recovery phase.
- F75 Therapeutic Milk: specially designed for the stabilization phase of the management of severe acute malnutrition.
- Grandibien® is a peanut-flavored paste nutritional supplement, specially designed for children aged 6 to 24 months, intended to prevent vitamin and mineral deficiencies.
- Grandibien® Enfant is a chocolate-flavored paste nutritional supplement, specially designed for children from 2 years old, and intended to prevent vitamin and mineral deficiencies.

Plumpy'Nut and Plumpy'Sup are destined to humanitarian stakeholders and NGOs working in the malnutrition field in the West African sub-region (Mali, Niger, Togo etc.). In 2024, these two products represented 100% of the company's production and accounted for 82% of overall turnover.

As a manufacturer, InnoFaso has created a Marketing of Breastmilk Substitutes Policy. The company's policy includes a commitment to the principles of the WHO Code:

- *"In accordance with the principles of the World Health Organization (WHO), Burkinabe regulations and our B Corp certification process, we are committed to upholding the highest standards in terms of breastfeeding protection, appropriate use of breast milk substitutes, and responsible communication"*

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<sup>1</sup>ATPE: Ready-to-Use Therapeutic Food/ RUTF: Ready-to-Use Therapeutic Food

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 is 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 in order to maintain the certification.

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

- Have a policy in place that at 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 Responsible Lobbying Framework, 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](#).

## **InnoFaso's Policies and Practices on Marketing of Breastmilk Substitutes**

### **Areas of Non-Alignment with the WHO Code**

In addition to the commitment to the WHO Code, a number of InnoFaso's policies align entirely with the provisions of the WHO Code. The company has identified and acknowledges the following areas where InnoFaso's policies may not align with the WHO Code, or where there may be differing interpretations in how the WHO Code and WHA Resolutions should apply:

### **Definition/Scope of Products Included in WHO Code and InnoFaso's Policy**

InnoFaso'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.”

InnoFaso’s policy applies to its manufactured and distributed products (Plumpy’Nut, Plump’Sup, Enov’Nutributter, F100 and F75 Therapeutic Milk, Grandibien and Grandibien Infant). InnoFaso follows national regulations where they are stricter than its policy, in addition to its own policy.

In InnoFaso’s policy, products not included within the scope of the policy, but that are produced or sold by InnoFaso, include:

- Plumpy’Mum and Enov’Mum: intended for pregnant and breastfeeding women (not children).

*Company Comments:*

InnoFaso’s products are designed to supplement infant nutrition in cases of malnutrition, but they can in no way be considered equivalent to or a substitute for breast milk. Plumpy’Nut is a temporary therapeutic solution for treating malnutrition, whereas breast milk remains the optimal food for an infant’s growth and long-term health. The company also raises awareness of the need to adopt exclusive breastfeeding for at least the first 6 months.

Despite the fact that InnoFas’s products are recommended only in cases of malnutrition and do not replace breastfeeding, the company maintained the same distribution protocol as that used for products classified as breast milk substitutes. Indeed, the distribution circuit complies with the WHO International Code of Marketing of Breast-milk Substitutes, as it is neither sold over the counter nor promoted to the public. Its distribution is strictly supervised by healthcare professionals within a therapeutic context. No advertising materials target mothers, and the labeling clearly states that it is not a replacement for breast milk. Moreover, it is intended exclusively for malnourished children over six months of age, in line with WHO recommendations.

**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. InnoFaso’s policy reference or state support for the recommendations made in the guidance associated with [WHA69.9](#) (2016)

### **Other Areas of Potential Misalignment:**

In addition to the above categories regarding the Scope of Product Definitions and WHA Resolutions, there are other components of **InnoFaso's** 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.

Examples include:

InnoFaso has added Grandi Bien products to the scope of its BMS Policy. These products are not currently marketed but will likely be by mid-2026. However, the company won't be fully compliant with Article 5.1. Specifically for these products (GrandiBien), the goal is to participate in nutrition education and help prevent malnutrition.

### **Management Practices of the Company**

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

- In accordance with InnoFaso's policy on the marketing of breastmilk substitutes, InnoFaso has the following management practices in place to manage compliance to their policy globally:
  - The company trains all employees in its mission, including the importance of good nutrition and breastfeeding;
  - New staff undergo mandatory induction training covering nutrition and sensibilization, raising awareness about exclusive breastfeeding for at least 6 months;
  - Product packaging, labelling, and communication materials are subject to internal validation to ensure they contain no promotional elements, and no consumer-facing marketing is authorized for products intended for infants under 12 months;
- In addition, the company states on all its packaging that a child should be exclusively breastfed for the first 6 months. Also the company states on all its packaging that therapeutic foods should only be taken under medical supervision.

### **Lobbying**

InnoFaso advocates for the inclusion of nutrition in health programs. The company is a member of the Scaling [Up Nutrition \(SUN\)](#) movement and a founding member of the SUN private sector network in Burkina Faso. InnoFaso is fully compliant with OMS requirement on RUTF and all local requirement



## Next Steps

As stipulated by the requirements for B Corp Certification, InnoFaso 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.