

Introduction:

Ella's Kitchen is a baby food company with the mission of improving children's lives through developing healthy relationships with food. Ella's Kitchen sells 82 products labelled four months plus that qualify as breast milk substitutes (BMS), with operations in the United Kingdom and sales across Europe, China, Hong Kong, Singapore and South Korea, United Arab Emirates, Egypt and the Caribbean. These products account for 43% of overall company turnover. The company does not sell any other products that qualify as breastmilk substitutes.

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 (1) have a formal policy endorsing the [WHO's International Code of Marketing of Breast-milk Substitutes](#), and subsequent WHA resolutions, (2) disclose how the company manages alignment to the code, and (3) is transparent about potential areas that do not align with the code. Companies who are listed in the Access to Nutrition Index are also required to meet minimum score requirements (TBD) on the breast milk substitute scorecard in order to be eligible for B Corp certification.

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](#).

Ella's Kitchen has created a Responsible Marketing of Breastmilk Substitute Policy which is based off and includes a commitment to the principles of the WHO Code.

"Ella's Kitchen acknowledges the importance of the WHO International Code of Marketing of BreastMilk Substitutes (WHO Code or Code), supports it and commits to the principles within it."

Company Comments:

Ella's Kitchen is a member of The British Specialist Nutrition Association (BSNA).

Definitions / Scope of Products included in WHO Code and Ella's Kitchen Policy:

Ella's Kitchen'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: breast-milk substitutes, including infant formula; other milk products, foods 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."

Ella's Kitchen policy does not apply to any "Covered Products" as they are not an infant formula company. They also acknowledge that "some countries that sell their products do have national health and dietary recommendations that may recommend the introduction of safe and appropriate complementary foods after 4 months of age. For those countries they may market complementary foods in line with their national guidelines as a complement to breastmilk and are never promoted as a replacement to breastmilk."

Company Comments:

We comply with European guidance based on the European Food Safety Authority (EFSA) Scientific Opinion, which reviews studies specifically on European babies. This recommends starting to wean between 4 and 6 months, when a baby is showing the appropriate signs. UK public health guidance is based upon WHO and SACN recommendations, which consider studies on babies carried out all over the world, living in very varied communities. We also have to ensure that we comply with the relevant food and labelling regulations for baby food relevant to each country e.g. Directive 2006/125 EC Processed cereal-based foods and baby foods for infants and young children. Under these regulations all of our products are classified as Complementary Foods and we do not market any of our Complementary Foods as breast milk substitutes.

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. A list of resolutions that may be deemed relevant to individual company practices, but that have not been incorporated into Ella's Kitchen's own policy at this time, including [WHA 54.2 \(2001\)](#), which set a global recommendation of exclusive breastmilk feeding for the first six months..

Management Practices of the Company:

In accordance with Ella's Kitchen's Policy on the marketing of breastmilk substitutes, the following management practices in place to manage compliance:

- Ella's Kitchen ensures that the partners they work with around the world follow Ella's Kitchen guidance on the introduction of complementary foods for both online and on pack communication.
- Ella's Kitchen distributor agreement template ensures that:
 - Section 8: Advertising and Promotion - Distributors globally are contractually bound to follow their directions and instructions for how goods are promoted or advertised in market.
 - Section 9: Local Regulations - Goods must be compliant with local regulations.