



Dear Mr Watkins,

Thank you for the opportunity to share Danone's views about the report "Don't push it".

Given the critical importance of breastfeeding and good child nutrition for global health, Danone stands ready to engage constructively with civil society, UN organizations, WHO, governments and other stakeholders.

At Danone, we are committed to contributing to sustainable diets as we strongly believe that the health of people and the health of the planet are interconnected and both should be preserved and nourished. Building a health-driven portfolio is therefore not a new notion for us: we have shifted the share of our portfolio that classifies as 'healthy categories' from 39% in 1996 to 88% in 2016. This powerful idea is at the heart of Danone's Alimentation Revolution; it drives us to co-create a movement towards one planet, one health.

We support the World Health Organization (WHO)'s global public health recommendation calling for exclusive breastfeeding for the first six months of age and continued breastfeeding up to two years and beyond, combined with the safe introduction of appropriate complementary foods. In June 2016, we published our "Commitment to health and nutrition in the First 1000 days", further outlining these convictions and our contribution to good nutrition and presenting our company policies on the topic.¹ Therefore, all our messages as a company about breastfeeding are clear and in line with the requirements of the WHO Code, following our pledge which defends breastfeeding as the best possible start in life.

We also pioneer science-based nutritious products, supporting healthy growth and development of infants and young children, and our science is rooted in over forty years of researching the composition of human breast milk. This research is at the foundation of our infant milk formula products.

We are fully committed to ensuring that marketing of our products does not negatively affect the choice and ability of mothers to breastfeed. Several times over the years, we have strengthened our BMS marketing policy², and we are pleased that Save the Children recognizes the fact that our policy is extensive and applies even when it is stricter than local regulations.

¹ Please see: <http://www.danone.com/en/for-all/our-4-business-lines/early-life-nutrition/supporting-breastfeeding/>

² Please see: http://danone-danonecom-prod.s3.amazonaws.com/PUBLICATIONS/Danone_Policy_for_the_Marketing_of_BMS.pdf



Indeed, we are the first and so far, the only company which does not advertise or promote infant formula for children aged 0-6 months, anywhere in the world, even if permitted by local laws. In addition, compliant with the FTSE Criteria for countries classified as higher-risk, we have voluntarily extended our Policy to 12 months of age, which may go beyond local legislation. In these higher-risk countries, Danone also prohibits the promotion of complementary foods and drinks for use by infants up to 6 months.

We took note of the recommendations of Save the Children regarding high-risk/low-risk distinction in our policy. While we recognize that such distinction results in a more complex matrix, we remain fully supportive of this approach developed by FTSE in collaboration with consultants, investor groups, NGOs and other stakeholders: it ranks higher risk countries according to the risk of infant mortality and malnutrition³, ultimately the most important public health challenges we all aim to address.

We believe that external monitoring raises the compliance and integrity of marketing practices of the entire industry. The FTSE4Good BMS criteria are already very strict, and currently only two companies comply with them, including taking into account the results of local audits in Thailand and Nigeria. By using our collective efforts, we can encourage more manufacturers of breast milk substitutes to develop stronger policies and seek inclusion in the FTSE4Good Index and we can thus already have a tremendous impact on infant and young child nutrition and health.

At the same time, we are conscious of the fact that we are on a continuous journey of improvement. Despite our extensive policy framework and compliance mechanism it is possible that isolated instances of non-compliance with our policy and instructions at local level may occur which we actively remediate. In our global business, we are operating in a very complex retail environment which includes a vast number of distribution points including small outlets and fast growing independent e-commerce businesses. In this respect, we consider reports such as “Don’t push it” or ATNI audits as helpful alerts as they support our efforts to detect any instance of non-compliance, and we are committed to taking corrective measures if the alleged infringement is found to be valid.

As regards on the ground compliance, we have already identified some areas of improvements. Following our own in-house and 3rd party auditing, for example, we are working with our local trade partners to increase the awareness and understanding of our Policy, by formalizing our communication about our Policy.⁴ We look forward to working with civil society and independent auditors of our policies and practices like FTSE and ATNI to understand their concerns and potential areas of improvements. We would appreciate if you could share with us any additional data that you may have collected as part of your investigation so that we can review this and include it into our improvement process.

Finally, let me underline that we are willing to work with local authorities and contribute to a policy framework and level playing field protecting breastfeeding and ensuring adequate complementary feeding.

³ Please see: http://www.ftse.com/products/downloads/FTSE4Good_BMS_Criteria_and_the_WHO_Code.pdf

⁴ Our response to FTSE monitoring is available at: <http://www.ftse.com/products/downloads/danone-response-f4g-bms-2017.pdf>



We would also welcome an opportunity to dialogue more broadly with you and others around the potential role Danone can play in addressing issues of malnutrition globally. We are especially interested in working with civil society to help advance the Sustainable Development Goals two and three.

I very much look forward to continued dialogue and welcome your insight nurturing our ambition to operate in a responsible and sustainable manner.

Yours sincerely,

Bridgette Heller
EVP, Early Life Nutrition