

LAW OF TRADING IN BREASTFEEDING SUBSTITUTES AND ITS (UPDATED) IMPLEMENTING REGULATIONS

Ministerial Resolution

The Minister of Health

Pursuant to the powers vested in him;

Having perused the Royal Decree No. M/49 dated 12/9/1425H, approving the Law of Trading in Breastfeeding Substitutes;

Having perused paragraph (1) of Article (26) of the Implementing Regulation, which stipulates that the Minister of Health is entitled to issue the necessary amendments to the Regulation; and

Based on the requirements of the public interest.

Hereby decides as follows:

First: Approval of the Implementing Regulations of the Law of Trading in Breastfeeding Substitutes, as attached to this Resolution.

Second: This Resolution shall come into force upon issuance thereof and shall be published in the Official Gazette and the Ministry's website.

Minister of Health

Tawfiq bin Fawzan Al-Rabiah

Law of Trading in Law (Updated) Implementing Regulations

In accordance with article A1/26R of the Implementing Regulations of the Law of Trading in Breastfeeding Substitutes, which states that: The Minister may issue the necessary amendments to these Regulations

A committee was formed to review, amend, and update the Implementing Regulations of the Law of Trading in Breastfeeding Substitutes by Decision No. 3749, dated 25/3/1435H.

Having perused the letter of the General Manager of Legal Affairs concerning the Implementing Regulations, and as required by the public interest

The Law of Trading in Law Implementing Regulations shall be approved as attached.

Minister of Health

Tawfiq bin Fawzan Al-Rabiah

Articles of the Law

General Provisions:

Article 1:

The following words and phrases shall have the meanings assigned thereto unless the context requires otherwise.

Breastfeeding Substitutes:

Any synthetic breastfeeding substitute prepared in accordance with the standards of the applicable Codex Alimentarius and the Saudi standards to meet the ordinary nutritional requirements of infants up to the age of six months, to be suitable for children's physiological (ordinary) needs, including home-prepared foods.

Complementary foods:

Any food, whether manufactured or locally prepared, suitable as a complement to breastfeeding or to a breastfeeding substitute, when either becomes insufficient to satisfy the nutritional requirements of the infant, provided that their use starts the sixth month of age onward.

Trading:

One or more processes that include manufacturing, storing, promoting, and selling products within the scope of this Law.

Marketing:

The activity through which a product's promotion, distribution, and sale are studied, as well as market and consumer research.

Label:

Any tag, written, printed, depicted, marked, embossed, or impressed on, or attached to, a container of any products within the scope of this Law

Container:

Any form of packaging of products for sale as a normal retail unit, including wrappers.

Samples:

Single or small quantities of a product that are provided free of charge.

Producer (Manufacturer):

Any individual, establishment, or company engaged, directly or through an agent or entity under its supervision or a contractor, in the manufacturing of a product within the scope of this Law

Marketing personnel:

Any person whose functions (job) involve the marketing of a product or products coming within the scope of this Law.

Supplier and Distributor:

Any person, company, or establishment engaged, directly or indirectly, in the business of marketing, at the wholesale or retail level, a product within the scope of this Law.

Healthcare institutions:

Every government or private institution engaged, directly or indirectly, in healthcare for mothers, infants, and pregnant women; and every nursery or childcare institution, excluding pharmacies and stores licensed to sell these products.

Health Care Worker:

Any staff member of healthcare institutions involved in mother and child nutrition, including workers in charitable and civil society organizations practicing healthcare.

The Minister:

The Minister of Health.

The Ministry:

The Ministry of Health

A1/1

National Coordinator: - National Coordinator of the National Breastfeeding program. The general Directorate – General Directorate of Nutrition.

Article 2:

The aim of this Law is to provide safe and adequate nutrition for infants, and young children through the protection and promotion of breastfeeding, and by ensuring the proper use of breastfeeding substitutes, when needed, on the basis of adequate information and through appropriate marketing and distribution.

A2/1

Ensure the proper use of breastfeeding substitutes when needed for preterm infants, infants, and young children as decided (prescribed) by a specialist physician. These are provided in health venues that deal with maternity and children in official ways.

Article 3:

This Law applies to trade and practices related to the following products:

Breastfeeding substitutes and complementary foods from milk products, foods and beverages, including bottle-fed complementary foods or baby foods when marketed or otherwise represented to be suitable, with or without modification, for use as a partial or total substitute for breastfeeding; feeding bottles and teats. It also applies to their quality and availability, and to the information concerning their uses.

A3/1

The breastfeeding substitutes and complementary foods for preterm infants, infants, and young children from birth to 3 years of age, and related products, include the following:

- A. Infant milk from birth to 12 months of age.
- B. Growth milk and follow-up milk or any other names of the products for the age from 12 months to 36 months, marketed as suitable for infants and young child feeding.
- C. Pacifiers and feeding bottles made of glass or other materials.
- D. Related devices and tools (milk pumps, teat covers, etc.)
- E. Complementary (processed) foods.
- F. Water used to mix infant formula.
- G. Any other liquids, such as herbal tea, juice, or any product marketed or presented as suitable for children under 36 months

Article 4:

Informational and educational materials, whether they are printed, audio, or visual, related to the feeding of infants and issued by the Ministry of Health or other concerned parties shall include clear information on the following points:

- A. The benefits and superiority of breastfeeding over other (artificial) feeding.
- B. The importance of adequate maternal nutrition and preparing the mothers for breastfeeding and maintaining it for the longest possible period.
- C. The negative effect of introducing partial bottle-feeding on breastfeeding
- D. The health hazards of improper use of breastfeeding substitutes and complementary foods.

A4/1

The National Coordinator shall form an advisory committee out of specialists (consultants) in breastfeeding, infant, and young children feeding from the concerned authorities to review and adopt the informational and educational materials mentioned in Article 4.

A4/2

The informational and educational materials shall include the following:

- 1) The benefit of breastfeeding in general and absolute breastfeeding in particular (with no other supplements) until the age of 6 months, after which complementary feeding begins and breastfeeding continues until the end of the two years of the child's age.
- 2) Maternal nutrition, and the preparation for and maintenance of breastfeeding.
- 3) The need to initiate the education of mothers to start breastfeeding immediately after birth (within the first hour).
- 4) The reasons why pacifiers and artificial teats should not be used, and the harm they cause.
- 5) The difficulty of reversing the decision (not to breastfeed).
- 6) The proper use of infant formula, when needed, whether manufactured industrially or home-prepared.
- 7) The importance and ways of initiating complementary food at the age of six months.
- 8) How to feed infants using a cup, spoon, or other utensils.
- 9) The negative effect of introducing bottle-feeding on breastfeeding or any complementary foods before the end of the sixth month of age, and their effect on reducing the flow of mother's milk.
- 10) A statement on the preferability of preparing complementary food at home using materials available to the family in a safe manner.

A4/3

When such educational or media materials contain information about the use of infant formula, they shall include:

- 1) The social, health, economic, psychological, and environmental implications of their use.
- 2) The health hazards of inappropriate foods or feeding methods.
- 3) The health hazards of unnecessary or improper use of infant formula and other breastfeeding substitutes.
- 4) No pictures or texts that may idealize (hint) the use of breastfeeding substitutes shall be used in these materials.

Article 5:

It is prohibited to advertise and promote in any way breastfeeding substitutes and infant foods. This prohibition includes:

- A. Using healthcare institutions to promote, advertise, display, or distribute these products.
- B. Provision of samples of such products, gifts, articles, or utensils that may promote their use, by producers, suppliers (importers), and distributors, directly or indirectly, to mothers and healthcare institutions.
- C. Provision of any financial or material reward to healthcare workers to promote these products, by producers, suppliers (importers), and distributors.

A5/1

It is prohibited to advertise, promote, or distribute free samples, gifts, or instruments encouraging the use of breastfeeding substitutes and infant foods.

A5/2

Advertising, promotion, or distribution of free promotion samples, gifts, or instruments by producers, suppliers, and marketers of breastfeeding substitutes and infant food, and others, in healthcare institutions, pharmacies, public places, and educational institutions, shall be prohibited, in all forms, whether through individual or group meetings, distribution of contact information, or provision of leaflets and other means.

A5/3

Producers, importers, or marketers of breastfeeding substitutes, are prohibited from sponsoring any educational or entertainment activity.

A5/4

Direct or indirect contact between women and healthcare workers in manufacturers, suppliers, or distributors or companies marketing products covered by this Law, shall be prohibited.

A5/5

Healthcare professionals are prohibited from advertising or promoting - in any form- the products of breastfeeding substitutes and infant foods or receiving any financial or in-kind rewards from producers, suppliers, distributors, etc.

A5/6

Healthcare institutions are prohibited from advertising, promoting, offering, or distributing breastfeeding substitutes and infant food products.

Article 6:

As an exception to the provision of Article (5) of this Law, producers, suppliers, and distributors may present scientific brochures on infant food - after they are approved by the Ministry - to maternity and child care professionals (only), provided that the information included therein are merely scientific facts and indicate that breastfeeding is superior.

A6/1

To be distributed, scientific brochures prepared by producers, suppliers, and marketers of the products, must be approved in advance by the National Coordinator of the Breastfeeding Promotion Program (General directorate of Nutrition), and these materials must mention only evidence-based scientific facts published by international health organizations and bodies and assert the superiority of breastfeeding and the benefits it provides to infants.

Article 7:

Visual, audio, and printed media shall contribute effectively to raising public awareness to help achieve the objectives of this Law through programs and publications presented by specialists (consultants) in this field.

A7/1

Audio, visual, and printed programs promoting breastfeeding shall be published and broadcasted without violating the Law and Implementing Regulations thereof.

A7/2

Breastfeeding substitutes and infant food products may not be advertised or promoted in any audio, visual, or printed program in any advertising or educational material or through modern technology (smart devices).

Article 8:

Relevant ministries, such as the Ministry of Health and other public or private health institutions; Ministry of Education; Ministry of Culture and media; Ministry of Social Affairs; Ministry of Higher Education; and Ministry of Islamic Affairs, Endowments, Dawah and Guidance shall contribute to disseminating health information relevant to this Law through their available means and within their jurisdiction.

A8/1

The Minister shall form a national committee to promote breastfeeding at the Ministry of Health. With the participation of the following parties: Ministry of Education; Ministry of Media (Ministry of culture and media); Ministry of Labor and Social Development (Ministry of Labor and Social Affairs previously); Ministry of Islamic Affairs, Endowments, Dawah and Guidance (FKA, the Ministry of Islamic Affairs, Dawah and Guidance) to draw up plans, ensuring the implementation and monitoring of the Law and its Regulations, decisions, and measures needed to protect and promote breastfeeding, and disseminate the information related to this Law, each as per its competency, to follow up and evaluate the measures (actions) taken by these authorities (Ministries).

A8/2

Scientific health information related to this Law shall be approved by the committee referred hereto in A1/8.

A8/3

With the help of a scientific committee, the National Coordinator shall translate the Law of breastfeeding substitutes and its Implementing Regulations into the English language, with reference to the origin of the text in Arabic.

Article 9:

Healthcare institutions are not permitted to employ staff members and employees of producers, suppliers, and distributors of breastfeeding substitutes to work in the field of maternity and child care. Furthermore, the staff or employees of these healthcare institutions are not allowed to work with producers, suppliers, and distributors.

A9/1

Government or private healthcare institutions and related parties are not permitted to employ staff members and employees of producers, suppliers, and distributors of breastfeeding substitutes, whether paid or unpaid.

A9/2

Prohibition of the use of incentive schemes for sales and marketing staff or employees. The sales quotas for these products shall not be specified specifically for the sale and distribution of these products in healthcare institutes and their staff members or pharmacies or any place intended for its sale.

Article 10:

Without prejudice to Saudi standards concerning breastfeeding substitutes, every container must have a clear, conspicuous, easily readable and understandable, and difficult-to-remove label that shall include the following points:

- 1) A conspicuous statement of the superiority of breastfeeding preceded by the words "Important Notice". The statement is to be determined by the competent department in the Ministry.
- 2) Instructions for the appropriate preparation, and a warning against the health hazards of inappropriate preparation. Neither the container nor the label shall have pictures of infants, nor they shall have other pictures or text that may imply its superiority over breastfeeding.
- 3) A statement that the product must be used only when it is absolutely necessary and on the advice of a physician or a specialist in infant feeding. The statement shall also include the proper method of use.

- 4) A statement (label) stating the following:
- The ingredients used.
 - The composition of the product.
 - The storage conditions required.
 - The batch number and the expiry date in a clear and direct, not symbolic, way.

A10/1

Without prejudice to the texts of the technical regulations, the valid standards, and the content of Article (10), labels on breastfeeding substitutes and infant food, must include the following information in a clear way, difficult to remove, and easy to read in Arabic and English:

- The words “Important Notice” or their equivalent.
- A clear statement of the superiority of breastfeeding.
- A statement that the product to be used only on the advice of a specialist physician as to the need for its use, and the proper method of use.
- Instructions for the appropriate preparation and a warning about the health hazards of inappropriate preparation.
- A warning that the product is unsterilized and that it might get contaminated during processing and preparation.
- The name of the product; it must explain the true nature of the food and be specific, not general.
- A statement (label) stating the following:
 - The ingredients used
 - The composition of the product
 - The nutritional value
 - The storage conditions required
 - The batch number, the production date and the expiry date in a clear and direct, not symbolic, way.

Article 11:

Breastfeeding substitutes and complementary foods must meet the Saudi standards, and the container or package must illustrate (in writing) the appropriate age for use.

A11/1

Breastfeeding substitutes and complementary foods must meet the valid technical regulations and Saudi standards, and the container or package must illustrate (in written) the appropriate age for use.

Article 12:

Healthcare institutions shall take the appropriate measures to encourage and protect breastfeeding by providing relevant advice, information, and training of healthcare workers.

A12/1

Healthcare institutions (governmental and private) shall commit to having healthcare workers in the field of maternal and childcare, following the approach (training course) adopted by the National Coordinator of the Breastfeeding Promotion Program.

A2/12

The Saudi Commission for Health Specialties shall make it obligatory for healthcare professionals in the field of maternal and childcare to adopt the training course as hours of continuous education and training, and it shall include these in training programs for relevant staff.

A12/3:

Healthcare institutions shall undertake the following:

- 1) Raise awareness among women (pregnant and lactating) in particular, as part of the education program, about the benefits of breastfeeding, the hazards of infant formula, the importance of early initiation of breastfeeding through continued uninterrupted skin-to-skin contact between mother and child immediately after birth. Teaching mothers the feeding - to feed on demand, the importance of and need for cohabitation (presence of mother and child at the same place all day), the correct positions of breastfeeding, the importance of starting breastfeeding immediately after birth, and ways to express milk manually and store breast milk.
- 2) Create a breastfeeding advisory job in coordination with the relevant bodies, with proper qualifications as approved by the National Coordinator of the Breastfeeding Promotion Program, to help mothers start breastfeeding early and advise mothers who face difficulty in breastfeeding.
- 3) Create support groups inside and outside the health institutes.
- 4) Take safe and appropriate measures to ensure continuity of breastfeeding by a sick mother or a mother accompanying another child.

Article 13:

Healthcare institutions shall not accept any free or low-priced infant formula or foods, to minimize the spread of breastfeeding substitutes.

A13/1

Government and private healthcare institutions shall not accept any free or low-priced breastfeeding substitutes and infant foods, or buy products at prices lower than the set wholesale price or lower than %80 of the retail price.

A13/2

Medical Supplies Department at the Ministry and the department concerned in the other health sectors shall set a mechanism and regulations concerning the acceptance of product samples. In a way that does not conflict with the Law and its Implementing Regulations, depending on the illnesses and according to what was approved by Royal Decree No. 333, dated 9/8/1437H

Article 14:

Social shelters caring for orphans may accept products of infant formula and foods

A14/1

The National Coordinator of Breastfeeding Program shall set a mechanism and regulations concerning the acceptance of free samples from companies, producers, and suppliers to the social shelters caring for orphans in a way that does not conflict with the Law and its Implementing Regulations.

A14/2

Free samples from companies, producers, and suppliers donated to social shelters shall be in compliance with the approved standards and specifications.

A14/3

Social shelters caring for orphans shall be committed to the Law of Trading in Breastfeeding Substitutes and its Implementing Regulations and the mechanism set by the Program when accepting free samples in compliance with the approved standards and specifications.

Article 15:

Healthcare workers concerned with maternal nutrition shall encourage breastfeeding and make efforts to ensure it is practiced. They must be fully aware of the requirements of their work and qualified to provide information, advice, and training to those who need them.

A15/1

Healthcare institutions shall ensure that their healthcare workers and other personnel concerned with maternity and childcare - physicians, nurses, midwives, nutritionists, social workers, health educators, etc. - are adequately qualified in maternal nutrition and promotion of breastfeeding.

A15/2

Healthcare professionals working in breastfeeding promotion and maternity and childcare shall develop their skills, follow the recent issues in this field, and participate in conferences, seminars, workshops, and all related activities.

Article 16:

Healthcare workers and members of their families shall not accept any financial or material rewards or gift from producers, suppliers, and distributors of breastfeeding substitutes and complementary foods.

A16/1

Healthcare workers and members of their families shall not ask for or accept any financial or material rewards or gifts or services from producers, suppliers, and distributors of breastfeeding substitutes and infant foods.

Article 17:

The staff of healthcare institutions shall not benefit from any contributions that might be made to them by producers or distributors of products within the scope of this Law, such as attending courses, seminars, or scholarships unless approved by the Ministry or the authority with which they are affiliated.

A1/17

The staff of healthcare institutions shall not benefit from any contribution, that might be made to them by marketers, suppliers, or producers of breastfeeding substitutes and infant foods, such as attending conferences, courses, or scholarships unless obtaining written approval from the authority to which they are affiliated and documentation of the local committee and the other concerned healthcare sectors.

Article 18:

No person other than healthcare workers or pharmacists are allowed to demonstrate how breastfeeding substitutes, manufactured or home-prepared, are given, and this shall be limited to mothers and family members who need to use them; and the information given must include a clear explanation of the hazards of inappropriate use of these products.

A18/1

Healthcare workers and pharmacists shall be committed to clearly explaining how breastfeeding substitutes are prepared, the hazards of inappropriate use of these products, and the importance of breastfeeding.

Article 19:

A committee(s) shall be formed, consisting of the following parties:

- A. A representative of the Ministry of Justice, nominated by the Minister of Justice
- B. A representative of the Ministry of Health, nominated by the Minister of Health
- C. A representative of the Ministry of Commerce and Industry, nominated by the Minister of Commerce and Industry

At least one of the members of the committee must be an official legal advisor. The committee shall examine the violations against this Law and take the necessary decisions. The Minister shall approve the decisions of the committee. The Implementing Regulations of this Law shall specify the term of membership of the committee and how it operates. Remunerations of the members of the committee shall be determined through a decision by the Council of Ministers based upon the recommendation of the Minister.

A9/1

The Minister of Health shall issue a decision on the formation of a committee to examine the violations against this Law and its Implementing Regulations, at least one of the members of the committee must be an official legal advisor. The term of committee membership shall be three (3) years.

A19/2

The committee shall assume its tasks as follows:

- A. The committee shall hold its meetings at the concerned department at the Ministry of Health. The meeting shall be considered legal in the presence of all members. The committee shall issue its decision by absolute majority.
- B. The Committee shall have the right to seek assistance from the competent medical professional in relation to the violation or as it deems appropriate.
- C. The Commission shall, in its work, undertake the necessary investigation, notify the concerned parties, hear the violator's statements and verify his defense, while recording the proceedings in written minutes.
- D. The concerned persons shall be informed in writing to appear before the committee at the time and in the place specified by the committee. The committee shall consider adding an appropriate period of time if the attendance requires moving from one city to another.
- E. If a violator or their legal representative fails to attend after being notified, another date shall be set, provided that the period between the date of notification and the new date is no less than 30 days. If a violator or their legal representative fails to attend after the second date notification, the committee shall decide in the violation.
- F. The committee shall forward its decisions to the Minister of Health, and the concerned persons shall be notified of the committee's decision within no more than 30 days after the decision has been adopted.
- G. The committee for the examination of violations shall submit the decision of the Committee after accreditation to the violator (individuals, agent, representative of health and private institutions). In the absence of the violator, the agent or the legitimate representative to receive the decision, the employer or the body of the violator or the agent shall notify him no later than thirty days after the adoption of the resolution and in the event that it is not received, the decision shall be deemed effective.
- H. The Committee shall follow up on the implementation of resolutions or decisions, with the relevant department and concern departments

A19/3

A general secretariat shall be established by a decision of the National Coordinator (Supervisor of the General Directorate of Nutrition) to the committee to consider violations of the provisions of this Law and its Implementing Regulations composed of executive secretary and secretary.

A 19/4

The executive secretary of the committee shall check the transactions received from the secretariat of the examination committee and verify the completeness of the files and prepare the case for presentation to the committee, writing minutes of meetings and decisions of the committee and proving the presence of the parties to the case and their absence and their requests in the minutes of the meetings

A 19/5

The criteria of selection of the executive secretary, he/she must be experienced and efficient to enable him or her to absorb the issues presented and have a university qualification.

A19/6

The directors of health affairs and their counterparts shall set up committees to adjust (detect) the violations of this Law (Control or adjust Committee). The committee shall inspect and detect the violations in accordance with a control record in the healthcare institutes and pharmacies and shall be submitted to the director of health affairs in the region, who shall submit them to the committee not later than two weeks from the date of the violation. The staff of the Control or adjust Committee shall be jointly or severally engaged in the following:

- A. Search and investigate cases of violations, collect and evaluate evidence, and carry out all legal procedures to clarify the truth in terms of verifying the occurrence of the violation and the place where it was committed.
- B. Receive and record communications and complaints in a special statement prepared for this purpose and prepare a report containing the place and time of the communication, full information about the name, identity, address and telephone number of the complainant (prosecutor), the names of the persons and places reported; and complete description, and the evidence presented with the complaint.
- C. Move to the location of the violation and adjust it with supporting documents to prove the violation, and reserve it when necessary.
- D. To inspect all establishments, shops and the like, and for the following purposes:
- E. The entry of suspicious sites from establishments, shops and the like, identifying the names of the violators and their addresses in the location of the violation, setting witness testimony and hearing the violators' statements and seizure, without the need to obtain permission from any other party to control the violation.
- F. The control or adjust Committee shall submit its minutes and documents concerning the seizure of violations to the Committee for the consideration of violations of the provisions of this Law

Article 20:

Without prejudice to any other severer punishment stipulated by any other law, anyone proved to be in breach of any provision of this Law from among manufacturers, importers, or distributors of breastfeeding substitutes, whether individuals, institutions, or companies, shall receive one or more of the following punishments:

- A. Warning (admonition)
- B. A fine of no less than 5,000 riyals and no more than 150,000 riyals.
- C. Closure of the establishment (violation firm) for no more than 180 days

Article 21:

Without prejudice to any other severer punishment stipulated by any other law, anyone proved to be in breach of any provision of this Law from among private healthcare institutions or their personnel, shall be punished as follows:

- A. Warning
- B. A fine of no less than 5,000 riyals and no more than 150,000 riyals.
- C. Closure of the institution for no more than 60 days

Article 22:

If the committee finds that the violation requires the imposition of a fine greater than the amounts mentioned in Articles 20 and 21 of this Law, or revocation of the license, the committee shall raise the issue to the Minister to refer it to the Board of Grievances to resolve it as it deems necessary.

Article 23:

The committee's decision may be challenged in the Board of Grievances within 60 days from the date the decision is communicated to the violator.

Article 24:

Through a ruling by the Board of Grievances, the text of the punishment (penalty sentences) may be published in one or more of the local newspapers at the expense of the violator.

Article 25:

Any employee violating provisions of articles 17, 16, 15, 13, 9, 5, and 18 of this Law shall be punished in accordance with the provisions of the Employee Disciplinary Code.

A25/1

Decisions issued against the employees after their approval by the Minister shall be referred to the institute to which the employee applies to implement the decision

Article 26:

The Minister, in coordination with the Minister of Commerce and Industry, shall issue the necessary Implementing Regulations and decisions for this Law within 90 days of its publication in the Official Gazette.

A26/1

The Minister may issue the necessary modifications to these regulations.

Article 27:

This Law cancels all others those laws or Laws conflict with it.

Article 28:

This Law shall be published in the Official Gazette and come into force 90 days after the date of its publication.

A28/1

- These regulations and the executive decisions shall be published in the Official Gazette and come into force (effective) 90 days after their publication.

References:

1. International Law of Marketing of Breastfeeding Substitutes 1981.
2. Resolutions subsequent to the International Law of Marketing of Breast-mil Substitutes.
3. Global Strategy for Infant and Young Child Feeding 2002.
4. Law Essentials 3+2 (Guidelines for Policy Makers on Implementing the International Law of Marketing of Breast milk Substitutes and Subsequent WHA Resolutions
5. Country Implementation Of the international Law of marketing of Breast Milk Substitutes: Status Report 2011