



प्रो.(डॉ.) अतुल गोयल

Prof. (Dr.) Atul Goel

MD (Med.)

स्वास्थ्य सेवा महानिदेशक

DIRECTOR GENERAL OF HEALTH SERVICES



सत्यमेव जयते

भारत सरकार
स्वास्थ्य एवं परिवार कल्याण मंत्रालय
स्वास्थ्य सेवा महानिदेशालय
Government of India
Ministry of Health & Family Welfare
Directorate General of Health Services

No. Z.28017/11/2023/SAS-III(FTS:8207396)

11th September 2024

Sub: Bill to prevent commercialization of Human Breast milk.

Dear *Shri Kamala Vardhan ji*

Donation of Human Breast milk is to be done freely and voluntarily without any monetary benefits to the donor and with an understanding that the donated milk may be used free of cost to feed the New-born/infants of another mother admitted in the hospital.

The National Neonatology Forum and the entire medical community is deeply concerned by the recent trend to commercialize Human milk by some companies. We strongly condemn any attempt, overtly or covertly, to commercialize Human milk or its products. We propose to take appropriate steps to prevent the sale of Human milk or its products and protect the Rights of the newborn, infants and lactating mothers.

In view of the above, meetings were conducted in this Directorate and after detailed deliberation with stakeholders/participants the following decisions were made:-

Human milk banks should be established in all major government hospitals so that human milk banking can be promoted.

Commissioners of Food Safety of all states/UTs are instructed to closely monitor the sale of human milk and not to issue any FSSAI license for the same. Further any such licenses already issued be suspended/cancelled immediately apart from taking legal action against such companies/Food business operators.

Warm personal Regards,

Yours Sincerely,

(Atul Goel)

To

Shri Kamala Vardhan Rao
The Chief Executive Officer
FSSAI, 3rd & 4th Floor
FDA Bhawan, Kotla Toad
Near Baal Bhawan, New Delhi 110 002
(email : ceo@fssai.gov.in)



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Sub: Bill to prevent commercialization of Human Breast milk.

Dear *Dr. Rajeev,*

Donation of Human Breast milk is to be done freely and voluntarily without any monetary benefits to the donor and with an understanding that the donated milk may be used free of cost to feed the New-born/infants of another mother admitted in the hospital.

The National Neonatology Forum and the entire medical community is deeply concerned by the recent trend to commercialize Human milk by some companies. We strongly condemn any attempt, overtly or covertly, to commercialize Human milk or its products. We propose to take appropriate steps to prevent the sale of Human milk or its products and protect the Rights of the newborn, infants and lactating mothers.

In view of the above, meetings were conducted in this Directorate and after detailed deliberation with stakeholders/participants, the following decisions were made:-

Human milk banks should be established in all major government hospitals so that human milk banking can be promoted.

DCGI is requested to closely monitor the sale of human milk and not to issue any license for the same. Further, any such licenses already issued be suspended/cancelled immediately apart from taking legal action against such companies/Food business operators.

Warm personal regards,

Yours Sincerely,

(Atul Goel)

To

Dr. Rajeev Singh Raghuvanshi
Drug Controller General of India (DCGI)
FDA Bhawan, Kotla Marg, ITO, Mandi House,
New Delhi, Delhi, 110002
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Registration of Society Act XXI of 1860

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Dr Manju Puri

Editor In Chief

Journal of Neonatology
Dr Somashekhar Nimbalkar

NNF/ADMIN/2024/D-16

Dt.22.08.2024

To,
Honourable Prime Minister
Shri Narendra Modiji,
Government of India.

Sub: Prevention of Commercialisation of Human Milk

Respected Sir,

We, the members of the National Neonatology Forum, are a group of professionals working for improving survival of the newborn babies in our country since 1981. Sir, we are working closely with the Government of India in various ways to improve survival of neonates, and to bring it to a single digit, to achieve the SDG target 3.2 by 2030.

Today, we are writing to you with a request to highlight breastfeeding as the most suitable method of feeding for the infants in your monthly MAN KEE BAAT programme.

Breastfeeding provides best nutrition to neonates and young infants. Initiation of the breastfeeding within one hour of birth prevents neonatal mortality by 22% and 16% neonatal deaths can still be prevented if breastfeeding is initiated within one day (24 hours) of birth.

Breastfed/breastmilk fed preterm infants also have less morbidity, better survival and better neurodevelopmental outcomes. Breastfeeding provides protection against several infectious diseases like diarrhoeas and respiratory tract infections which are major killers in under 5 children. Breastfed infants also have higher intelligence and provides long-term benefits to the babies like reduction from asthma and other allergic diseases. Infants who are not breastfed are at an increased risk of having chronic diseases and conditions like type 2 diabetes, asthma, and childhood obesity later in the life. Breastfeeding also provides important health benefits to the mother.

Sir, Breastfeeding has been the traditional way of feeding the baby in our country, but since it is recommended to start breastfeeding early (initiated within one hour of birth), and exclusive breastfeeding (only breastfeeding for the first six months of infant's life), after which, complementary feeding should be initiated along with breastfeeding for 2 years of age or beyond. However, despite all the health and other benefits, breastfeeding practices in our country remain suboptimal and require urgent attention. National data from NFHS-5, revealed that only 41.8% are able to begin breastfeeding within an hour of birth, and only 63.7% children under the age of 6 months are exclusively breastfed. It means formula milk is introduced early. It is alarming to note that 22.1% infants are being bottle fed at 6-8 months of age in our country.

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Sir, during the last few decades, the status of breastfeeding is being undermined in the health facilities and society in several ways, one of the major causes being commercial influence of baby food companies on the mothers and families and also some commercial entities are marketing expressed, pasteurised donor breastmilk at a very high cost and thus making profit on it. Companies are procuring human milk from lactating mothers and after modifying the milk in factories, market it as a substitute to mother's milk. Companies are also manufacturing human milk based mother's milk fortifiers, although benefit of these products in comparison to bovine-milk based fortifier are not clear.

Such commercialisation of human milk is not only unethical but also against the stated policy of the Government of India which explicitly says that "Donor human milk cannot be used for any commercial purpose." But commercial entities are not only selling products based on human milk but also promoting them actively among the health care providers.

Commercialization of human milk poses the **risk of exploitation of donors** as many lactating mothers face economic pressures to sell their milk and this leads to pumping by mothers from marginalized communities. There is also high probability that health of donors from low socio-economic background, having poor baseline health and nutrition, may further compromise as they tend to provide milk for monetary compensation. There are also chances that lactating woman may divert her breastmilk from her own infant to meet the incentivized demand to sell.

Cambodia's Cabinet recently ordered the country's Health Ministry to "immediately prevent the purchasing and exporting of breast milk." after reports that impoverished mothers were selling their milk to supplement their incomes. The order, issued in a letter stated that **"Although Cambodia is poor and [life is] difficult, it is not at the level that it will sell breast milk from mothers."**

Sir, presently India does not have any legal tool to prevent commercialisation of the human milk and to regulate the human milk banking. We request you to kindly highlight the issue in the **MAN KI BAAT** with an emphasis on keeping the donation of the breastmilk voluntary and with an appeal for all to avoid commercial sale of the breastmilk.

Thank You Sir.

Dr Sushma Nangia
President, NNF

Dr Surender Singh Bisht
Secretary General, NNF