

Sale of Infant Foods Ethics Committee of Singapore (SIFECs) Code of Ethics –
Frequently Asked Questions (FAQs) on the Sale of
Infant Formula via Online and Electronic Channels

Adherence 1st January 2020

Last amended 8th March 2021

List of amendments

AMENDMENTS AS OF 8th March 2021

Amendment of points 2.4.2.2, and Appendix A3B(ii)

1. These points are amended by adding more specific guidelines on the watermark, specifically stating that it should be in the centre of the first image of the product listing, covering the front of the tin, with legible text of the abbreviated statement.

Amendment of point 2.5

2. This point is amended by adding another sentence to state that reviews should not be re-purposed into promotional materials.

1. Overall Principles

- 1.1. The purpose of this FAQ is to support the interpretation and implementation of the online sales of products within the scope of Sale of Infant Food Ethics Committee of Singapore (SIF ECS) Code of Ethics.
- 1.2. It is imperative that this FAQ is read alongside the SIF ECS Code of Ethics, with the overarching principle to ensure optimal nutrition for infants, by protecting and promoting breastfeeding and by ensuring the proper and safe use of breastmilk substitutes when necessary, on the basis of adequate information and through appropriate marketing and distribution practices in Singapore. *In the application of these guidelines, retailers and the infant nutrition industry must first and foremost ensure adherence to the SIF ECS Code.*

2. Websites retailing formula milk products within the scope of the Code

- 2.1. Promotion or advertising of products (in all retail, online or other electronic channels, including but not limited to broadcast, print and out-of-home media) within the scope of the Code is prohibited.

Statements on the importance of breastfeeding and advisory on the proper use of products within the scope of the Code


- 2.2. Prior to a consumer accessing information of any form about products within the scope of the Code on the website of infant food industry and retailers, the infant food industry or retailers should display to the consumer the below statements:
 - 2.2.1. A statement on the World Health Organisation's **recommendation for optimal infant feeding**, such as *"The World Health Organisation (WHO) and Health Promotion Board (HPB) recommends exclusive breastfeeding for the first six months of life. Unnecessary introduction of bottle feeding or other food and drinks will have a negative impact on breastfeeding. At*

around six months of age (but not before 4 months), infants should receive nutritionally adequate and age-appropriate complementary foods while breastfeeding continues for up to two years of age or beyond.”

- 2.2.2. A statement **acknowledging the superiority of breastfeeding**, such as *“(Infant nutrition industry company name/retailer) fully recognises breast milk’s primacy, value and superiority and supports exclusive breastfeeding as recommended by the WHO.*
- 2.2.3. A statement that indicates that the content found on the website is meant only for general information, such as *“The content on this website is intended as general information for Singaporean residents only and should not be used as a substitute for medical care and advice from your healthcare practitioner”*
- 2.2.4. A statement that summarises HPB’s **nutritional recommendations for infants and young children** from 0 to 2 years old, such as *“The Health Promotion Board recommends that infants start on age-appropriate complementary foods at around 6 months, whilst continuing breastfeeding for up to 2 years or beyond to meet their evolving nutritional requirements. If no longer breastfeeding, toddlers can switch to full cream milk after 12 months. This should be complemented by a good variety of solid foods from the four main food groups (fruits, vegetables, grains, meat and alternatives).”*
- 2.2.5. A statement that **directs readers to HPB’s early nutrition webpage** for more information on the nutritional requirements of infants and young children, such as *“For more information on the nutritional requirements of infants and young children, please visit www.healthhub.sg/earlynutrition”*
- 2.2.6. Statements in 2.2.1 to 2.2.5 shall be preceded by the words “Important Notice” or equivalent terms.

- 2.3. The above display in 2.2. should include a click-through acknowledgement by the consumer that the consumer has read and understood the information. The display should be provided at least once per day for each consumer who accesses the site on multiple occasions. An example can be found below:

IMPORTANT NOTICE



Breast milk is best for babies. The World Health Organisation (WHO) and Health Promotion Board (HPB) recommends exclusive breastfeeding for the first six months of life. Unnecessary introduction of bottle feeding or other food and drinks will have a negative impact on breastfeeding. At around six months of age (but not before 4 months), infants should receive nutritionally adequate and age-appropriate complementary foods while breastfeeding continues for up to two years of age or beyond. Consult your doctor before deciding to use infant formula or if you have difficulty breastfeeding.

(Infant nutrition industry company name/retailer) fully recognises breast milk's primacy, value and superiority and supports exclusive breastfeeding as recommended by the WHO.

The content on this website is intended as general information for Singaporean residents only and should not be used as a substitute for medical care and advice from your healthcare practitioner. The Health Promotion Board recommends that infants start on age-appropriate complementary foods at around 6 months, whilst continuing breastfeeding for up to 2 years or beyond to meet their evolving nutritional requirements. If no longer breastfeeding, toddlers can switch to full cream milk after 12 months. This should be complemented by a good variety of solid foods from the four main food groups (fruits, vegetables, grains, meat and alternatives). For more information on the nutritional requirements of infants and young children, please visit www.healthhub.sg/earlynutrition”

I ACKNOWLEDGE

Product listing

2.4. **Listing of products within the scope of the Code must follow the principles of Clause 4.1(c) and Clause 6.1(b) of the SIF ECS Code, where there should be no side-by-side display and/or listing of products within the scope of the Code with other formula milk products, in accordance to the below guidelines:**

2.4.1. Products within the scope of the Code should only be accessible via distinct navigation links and shall not appear on the following, including but not limited to website's main homepage, '*all products*' listings;

2.4.2. Search listings for generic terms¹ for formula milk must not contain listings of products within the scope of the Code. Should this be technically not feasible, infant nutrition industry and retailers must ensure the following:

2.4.2.1. Products within the scope of the Code is '**de-boosted**²';

2.4.2.2. And carry a watermark of the abbreviated '**Statement concerning the superiority of breastfeeding**' to the effect of 'Breast milk is the best nutrition for your baby'. The watermark should be in the centre of the first image of the product listing, covering the front of the tin, with legible text of the abbreviated statement.

2.5. Public reviews and ratings in any form on products within the scope of the Code is not encouraged. Product reviews and ratings must not be repurposed in any form to be used as promotional materials.

¹ This refers to general terms that may refer to both in-scope and out-of-scope products such as but not limited to 'formula milk', 'baby milk', brand names

² Listings of in-scope products must be found only at the end of the generated search pages

Product Information and pictorial depiction

2.6. The inclusion of product information about products within the scope of the Code, including pack shots, on a website is acceptable, provided guidelines 2.1 to 2.4 are adhered to and follows the below:

2.6.1. the product information is exactly the same as the information on the label (for example: ingredient listing, nutritional profile, nutrient and health claims, and nutrition information);

2.6.2. any additional information provided is factual in nature and intended to provide sufficient information to help consumers make an informed choice as to the specific nature of the infant formula, any intended special purpose, and the objective differences between formulas; and

2.6.3. product logos are not displayed independently of pack shots.

2.6.4. The inclusion of additional texts and/or information on pack-shots of in-scope products is acceptable, provided guidelines 2.6.1. to 2.6.3. are adhered to, as well as the following:

2.6.4.1. Product information included on pack-shots is limited to the weight of product, information on intended use of product i.e. 'Stage 1' or 'for infants 0 to 6 months' and product price

2.6.4.2. Additional texts and/or information on pack-shots is consistent across all brands and stages of formula milk products, whether within or outside the scope of the Code

3. Frequently Asked Questions on websites retailing formula milk products within the scope of the Code

- 3.1. FAQ pages are an important means of providing information regarding products within the scope of the Code to consumers. For more information on nutritional requirements of infants and young children, a reference to the Health Promotion Board's Early Nutrition webpage should be made (www.healthhub.sg/earlynutrition)
- 3.2. Any FAQ pages relating to products within the scope of the Code should commence with a statement as to why breastfeeding is best and/or superior. This can be in the form of a statement similar to the '*Statement concerning the superiority of breastfeeding*' at the top of the page, or an initial question and answer.
- 3.3. FAQs relating to infant and follow-on formula should be guided by the same principles as stated in 3.2. above, and must be factual in nature.
- 3.4. If an FAQ relates to a named health condition, the answer should direct consumers to consult with relevant healthcare personnel.

Appendix A: Implementation guidelines and examples

- (1) Advertising and promotional practices for products within the scope of the Code are prohibited

A. Promotional Practices and Price Discounts

PROHIBITED

(1) any financial or material inducements for specific purchase of in-scope product, price-off offers



Formula-specific Vouchers, Tie-in sales & bonuses



Free Gifts/gift packs



Lucky draw, hampers, premiums



Free samples



Price-off discounts/vouchers



Bundling Promotions

ALLOWED WITH LIMITATIONS

Related promotions must exclude in-scope products i.e. product brand promotions, formula milk category promotions, baby category



Baby Fair promotions, Coupon Codes & Cashback for Baby-related & Formula Milk products



Formula Milk brand promotions

ALLOWED



Free Delivery & General rebates



Generic vouchers, rewards points award and redemption, Discount codes, cashback for total purchase

B. Advertising

Prohibited

E.g. Any information on broadcast mass media (Digital and print) and online media (websites, blogs, online video hosting platforms, social media)



Pop-up banners, ads on websites, posters



Social media posts promoting formula milk

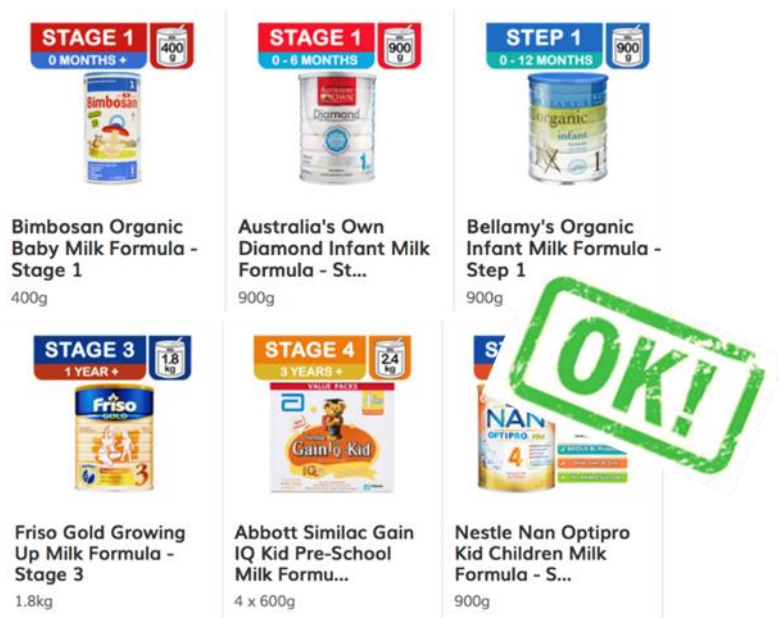


EDM promoting formula milk offers

(2) Pack-shots for in-scope products must be consistent across brands

A. Additional texts and/or call-outs on pack-shots of products within the Scope of the Code is acceptable, provided they adhere to the following:

- (i) Additional text/call-outs must reflect only what is factually found on the formula milk label and limited to weight of product, information on intended use of product i.e. 'Stage 1', 'for infants 0 to 6 months', product price
- (ii) Pictorial depictions of product must be **consistent across ALL stages and brands**

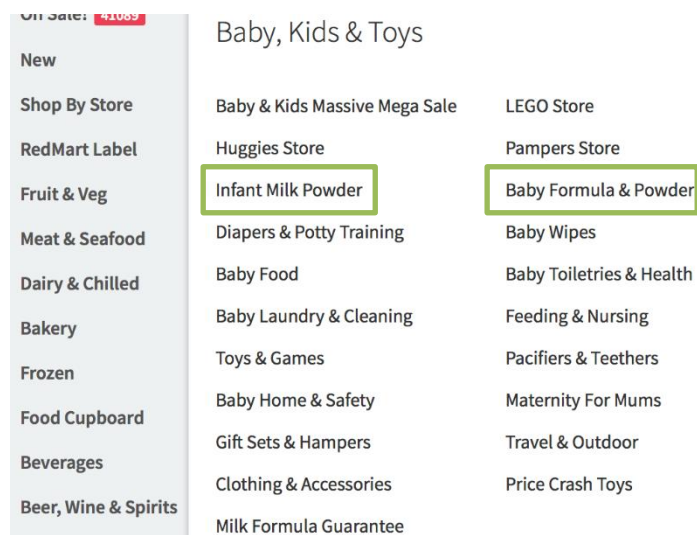


Disclaimer: Images used are only for illustration purposes. Please take note that products within the scope of the Code should not be placed alongside other formula milk products that are outside the scope of the Code.

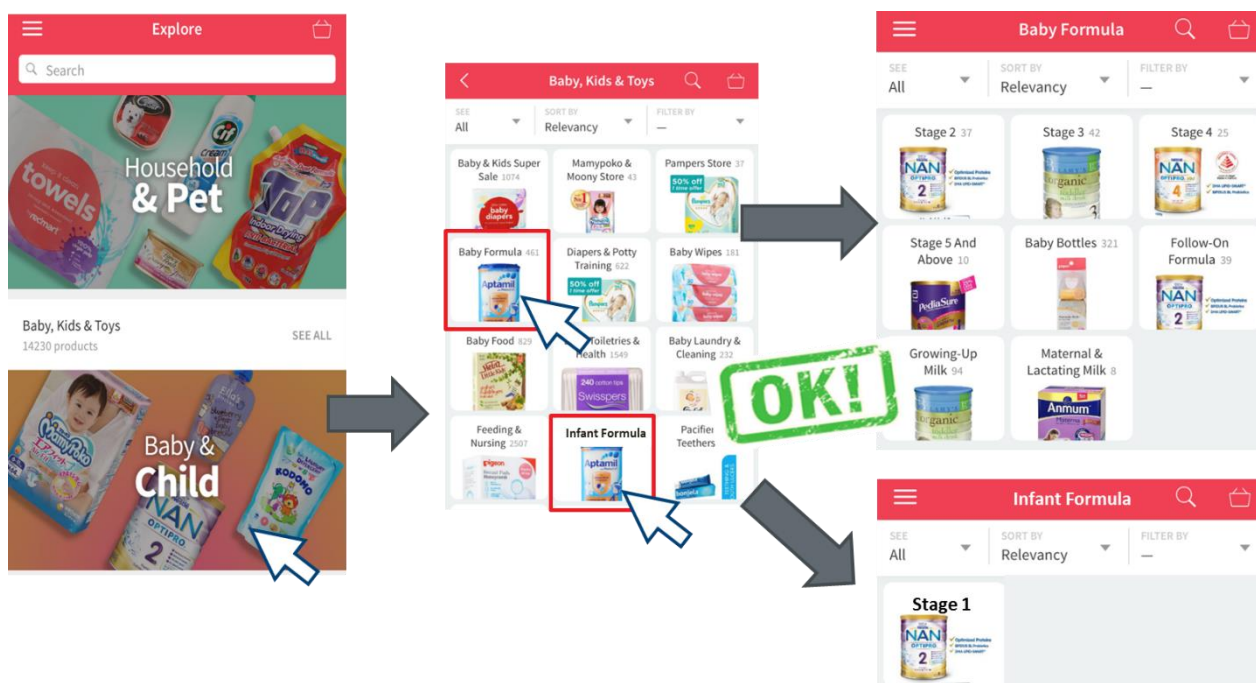
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(3) Listing of products within the scope of the Code should be distinct and separate from products outside the scope of the Code

A. In-scope products should only be accessible via navigation links – should not appear on homepages, ‘all products’ listings



Sub-category listing of infant formula (Products within the scope of the Code) and Baby Formula & powder (Products outside the scope of the Code are listed separately)



Mock-up illustrating separate sub-category navigations of products within the scope of the Code

B. In search listings for generic terms for formula milk such as ‘formula milk’, ‘baby milk’ or ‘formula milk brands e.g. Nan, Similac, Mamil Gold, etc.’, listings of products within the scope of the Code must not appear. Should this be technically not feasible, infant nutrition industry and retailers must ensure the following:

- (i) Products within the scope of the Code must be ‘de-boosted³’;
- (ii) And carry a watermark of the abbreviated ‘Statement concerning the superiority of breastfeeding’. The watermark should be in the centre of the first image of the product listing, covering the front of the tin, with legible text of the abbreviated statement.

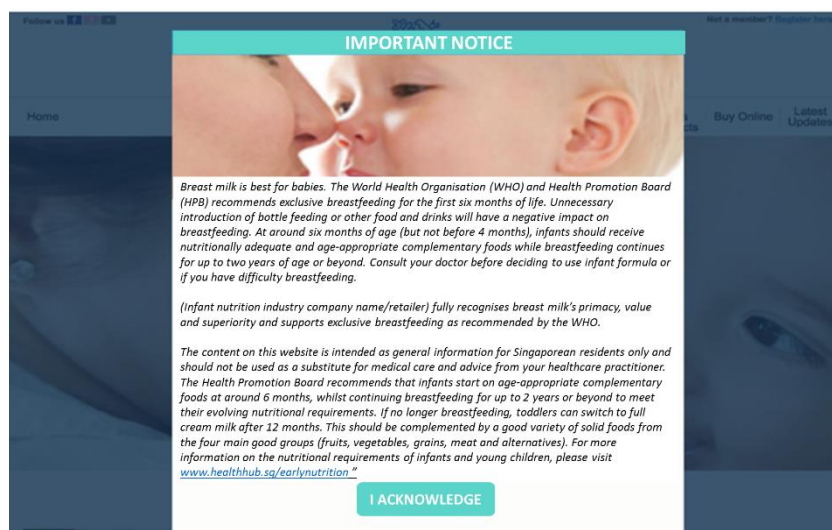


³ Listings of in-scope products must be found only at the end of the generated search pages

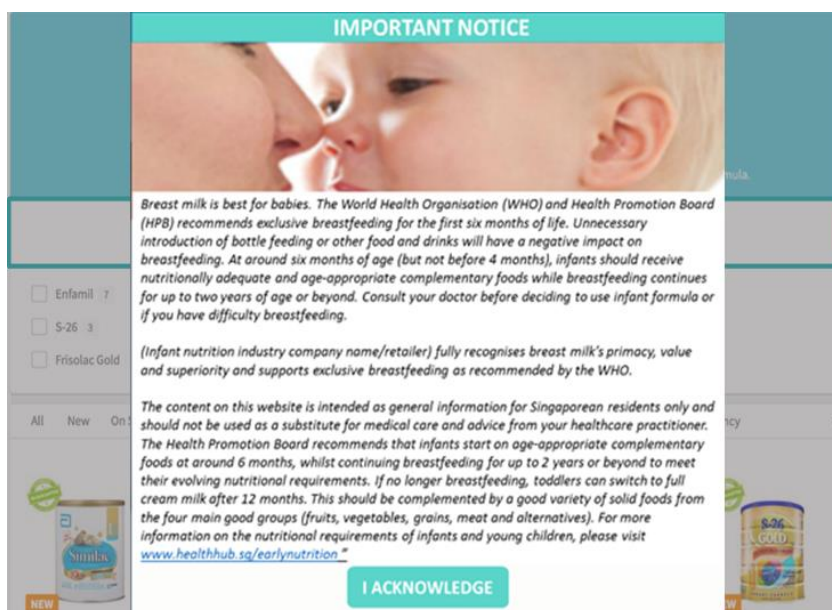
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- (4) A 'Pop-up' **important notice** on breastfeeding as specified in 2.1. must be included on the landing page of the formula milk category

i. Website Homepage



ii. Infant Formula landing page on an e-commerce site



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BREAST MILK

IS BEST FOR YOUR BABY

The WHO and HPB recommend exclusive breastfeeding for the first 6 months of life.
Please consult your doctor or a healthcare professional before deciding to use infant formula.

Infant Formula Landing Page

☐ Enfamil 7

☐ S-26 3

☐ Frisolac Gold 1

☐ Similac 7

☐ Isomil 2

☐ GROW 1

☐ NESTLE 5

☐ Bellamy's 1

☐ Karihome 1

☐ Dumex 4

☐ Bimbosan 1

AllNewOn SaleIn Stock

Relevancy

NEW

NEW

NEW

NEW

NEW

NEW

Product Listing page

Abbott Similac NEOSURE Stage 1
Baby Formula

850 g

★★★★★ Write a review

\$62.40

ADD TO CART



Breast milk is the best for your baby. The World Health Organisation recommends exclusive breastfeeding for the first six months of life. Unnecessary introduction of bottle feeding ... [more](#)