

3.1 Policy

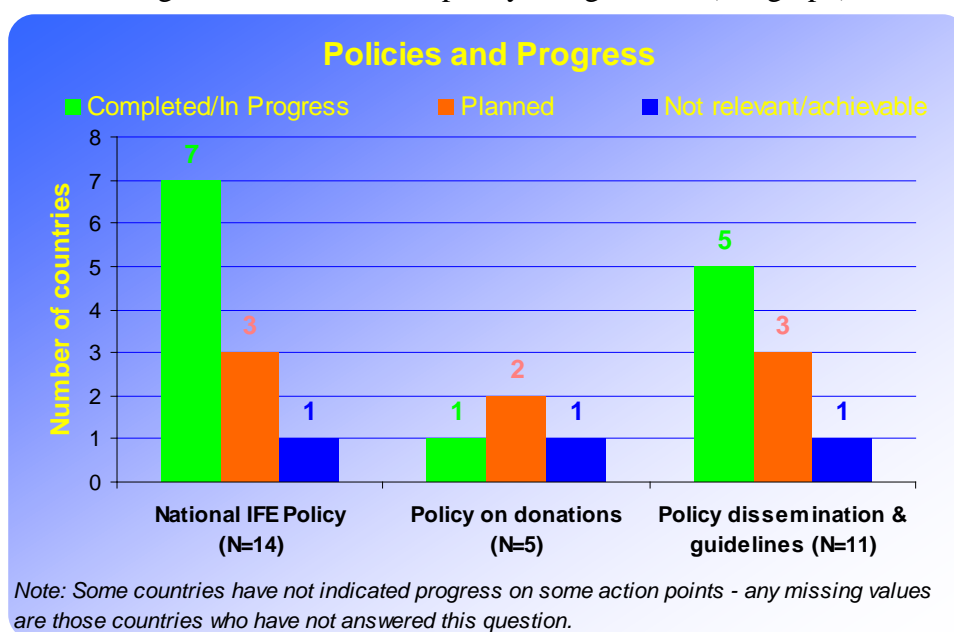
Operational Guidance on IFE. Key Point: Every agency should endorse or develop a policy on IFE. The policy should be widely disseminated to all staff, agency procedures adapted accordingly and policy implementation enforced.

See Ops Guidance Practical Step 1: Endorse or develop a policy

3.1.1 The importance of an IFE policy

A policy (or position/strategy/guidance note) on IFE clearly states roles and responsibilities to meet the provisions for safe and appropriate IFE.

In a country situation analysis by teams from the 16 countries a participating in a regional workshop on IFE in Bali workshop, lack of a policy on IFE or poor implementation of an existing policy was ranked as a constraint to effective IFE response by 11 out of 16 countries (Making it Happen Bali report, 2007). Follow-up with participants six months after the IFE workshop revealed that policy development was a priority area that they took action on: half of respondents had completed or were in progress on a national IFE policy, and three quarters of respondents (8/11) were working on dissemination of policy and guidance (see graph)¹.



Source of graph: Evaluation of regional workshop on IFE, ENN, March 2009.

Benefits of having a policy on IFE:

- Helps to clarify an agency's role in IFE and what is needed to support this in operational procedures

- Policy development offers opportunities to explore and consolidate areas of collaboration between different sectors in an agency, e.g. between nutrition and child protection and communication department.
- A policy can be used to monitor and evaluate the organisation's actions to meet their commitments.
- Endorsement of an agency's executive powers on a policy can facilitate engagement and collaboration among different agency departments/sectors.

Integrating key elements of IFE into existing policies, such as emergency preparedness plans or national infant and young child feeding policies, and/or operational procedures and guidelines, will increase the chances of implementation.

As reflected in Section 2, the *Operational Guidance on IFE* is a practical reflection of key policy and strategies, including the WHO Guiding Principles on Infant Feeding in Emergencies. An IFE policy should reflect the provisions of the *Operational Guidance on IFE* and make sure to include:

- Protection, promotion and active support of early, exclusive and continued breastfeeding
- Safe, adequate and timely complementary feeding
- Procurement, management, distribution and use of BMS, milk products, commercial baby food and infant feeding equipment
- Preventing / handling donations of infant formula, milk products and other breastmilk substitutes, bottles and teats in emergencies
- Compliance with the International Code and subsequent relevant World Health Assembly Resolutions.

Some resources have been developed to help put policy into practice. They are available in the Key Resources section of the IFE Orientation Package:

A **generic IFE policy** based on the *Operational Guidance on IFE* has been developed to help organisations developing policies.

A number of organisations have developed **agency policies** that may be useful to refer to. For example, World Vision Policy (2007) and UNHCR policy on handling milk products in refugee situations. 2006 (*Note: UNHCR policy based on Operational Guidance on IFE, v2.0, 2006*)

3.1.2 Context-specific guidance

In response to a specific emergency, an agency or group of agencies may release a statement or joint statement on IFE. This statement sets out the position of the agencies that are signatories to the statement on a particular issue or in a particular context. Joint statements are an accessible means of informing all those interested in the relief effort – agencies, governments, military, media, general public, and across sectors – health, nutrition, food security, water and sanitation - about an issue, the key concerns, and what actions are needed.

Joint statements can help:

- Coordinate response by national governments and agencies in a specific emergency context.

- Bring attention to IFE and official advice to agencies especially donors, the general public and the media in a specific emergency context
- Point to key policies and guidance materials.

Example of joint statements in action:

To facilitate consistency and timely release of joint statements in emergencies, in 2008 a **model joint statement** based on the *Operational Guidance on IFE* was produced by participants of a regional IFE workshop in Indonesia (see [Model Joint Statement on IFE](#)). This model was subsequently used as the basis for an Interagency Joint Statement by UNICEF, WHO, Save the Children, ACF and Merlin in the Myanmar cyclone response 2008 ([Myanmar_Joint Statement on IFE_2008](#)). The model joint statement also informed content developed by UNICEF and WHO targeting the media (see [unicef-who-media statement-on IFE_china](#)) and by the logistics cluster (see box below).

The IASC Logistics Cluster [in Myanmar] will not accept milk powder or infant formula into its warehouses or deliver it as cargo with its assets (trucks, boats, planes and helicopters) if it is not part of Nutrition Cluster approved supplementary feeding programs. This is in line with international policy as agreed among WHO, UNICEF, UNHCR and major NGOs.

<http://www.reliefweb.int/rw/rwb.nsf/db900SID/EGUA-7GLQR8?OpenDocument>

3.1.3 International Code

Agencies involved in an emergency need to be aware of existing national measures or legislation implemented to give effect to the International Code and relevant subsequent WHA resolutions in the affected country. The emergency response should consult and work with national policies or legislation that exists in an emergency affected country, such as national laws, directives and other measures implemented to give effect to the International Code and relevant subsequent WHA resolutions. Such laws, directives or measures may include a specific clause related to emergencies that needs to be widely disseminated.

Agencies also need to be acquainted with the International Code and resolutions themselves. This is because, as stipulated in article 11.3 of the International Code, "independantly of any other measure taken for implementation of this Code, manufacturers and distributors of products within the scope of this Code should regard themselves as responsible for monitoring their marketing practices according to the principles and aim of this Code, and for taking steps to ensure that their conduct at every level conforms to them". In practice, this means that any anyone involved in using BMS, bottles and teats – from funding, to donating, to supplying, to distributing - is responsible for how they are used and for ensuring their use conforms to *the International Code*. This responsibility is reflected in the *Operational Guidance on IFE*:

6.1.4 An agency should only supply another agency/institution with BMS if both are working as part of the nutrition and health emergency response (see definitions) and the provisions of the Operational Guidance and Code are met (see 6.2 – 6.4). Both the supplying agency and the implementing agency/institution are responsible for

ensuring the provisions of the Operational Guidance and Code are met, and continue to be met for the duration of the intervention. Operational Guidance on IFE, v2.1, Feb 2007

The International Code is integrated into the *Operational Guidance on IFE*. So reflecting this in IFE national policy will help to uphold *the International Code* in emergencies.

Monitoring for Code violations is a straightforward activity that can be carried out in emergencies. A simple form has been developed by IBFAN to do this ([3_IBFAN Code Monitoring Form](#)).

Reporting Code violations

Violations of the International Code should be reported to the IFE Coordinator in the particular emergency situation and to WHO and UNICEF at the country/regional level. For field details, contact WHO at the HQ level, email: cah@who.int and nutrition@who.int and UNICEF dclark@unicef.org

Violations should also be reported to the IBFAN International Code Documentation Centre (IBFAN-ICDC) in Malaysia, email: ibfanpg@tm.net.my

3.1.5 Key references

Generic IFE policy

Model Joint Statement on IFE

IBFAN Code Monitoring Form

[unicef-who-media statement-on IFE_china](#)

[Myanmar_Joint Statement on IFE_2008](#)

World Vision Milk Policy

[unhcr milk policy](#)

3.1.6 Checklist

Some examples of 'do's and don'ts' on policy: you can add your own.....

Do's	Don'ts
Develop a policy on IFE	Don't ignore national legislation on the International Code
Have a clear position on use of milk and milk products in emergencies	Don't ignore violations of the International Code or inappropriate actions, e.g. untargeted distributions of milk powder
Monitor and report on violations of the International Code	Don't wait until an emergency situation to develop a policy position

3.1.7 Key resources

Planning guide for national implementation of the global strategy for infant and young child feeding Geneva, World Health Organization, 2006
http://whqlibdoc.who.int/publications/2007/9789241595193_eng.pdf

