



 Dryelle Oliveira Dias Leão<sup>1</sup>

 Muriel Bauermann Gubert<sup>1</sup>

<sup>1</sup> Universidade de Brasília,  
Faculdade de Ciências da Saúde,  
Departamento de Nutrição,  
Núcleo de Estudos  
Epidemiológicos em Saúde e  
Nutrição. Brasília, Distrito Federal,  
Brasil.

#### Correspondence

Dryelle Oliveira Dias Leão  
[dryelle.oliveiradi@gmail.com](mailto:dryelle.oliveiradi@gmail.com)

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## We need to talk about so-called growing up milks

### *Precisamos conversar sobre os chamados compostos lácteos*

#### Abstract

Industry is constantly looking to innovate and launch new products to attract consumers. In this context, growing up milk was launched. This product with a mixture of at least 51% milk base (milk or dairy products) with other food products, which according to the manufacturers is aimed at children from one years old to pre-school age. There are 13 different types of these mixtures on the Brazilian market. Similar packaging can confuse caregivers, who may believe these compounds are substitutes, equivalents, or follow-up to infant formulas at a reduced cost. They are often promoted commercially with giveaways and discounts on multiple purchases or combos and are heavily promoted on social media. Their labels advertise that they contain essential oils, fiber, immunonutrients, vitamins, and minerals, which may lead consumers to think that the product alone provides everything the child needs for this age, despite being an ultra-processed product, not recommended for consumption by this child. As they are new products in the market, they still are still not regulated by the Brazilian Standard for Commercialization of Food for Infants and Children in Early Childhood, Nipples, Pacifiers, and Feeding Bottles, today Law No. 11,265/2006 and Decree No. 9,579/2018. The suggestion is that these mixtures should be included in the legislation, with marketing controlled

within the scope of the law, as well as the creation of rules to restrict the abusive advertising of these and other products for children between one and three years old.

**Keywords:** Breast-Milk Substitutes. Food Industry. Breastfeeding

### Resumo

A indústria busca constantemente inovar e lançar no mercado novos produtos que atraiam o consumidor. Nesse contexto, foi lançado o composto lácteo, um produto com a mistura de pelo menos 51% de base láctea (leite ou derivados) com outros produtos alimentícios que, segundo os próprios fabricantes, é voltado para crianças de um ano até a idade pré-escolar. Existem no mercado brasileiro 13 tipos diferentes de compostos lácteos. A semelhança entre as embalagens pode causar confusão na compra por parte dos cuidadores, que podem achar que esses compostos são substitutos, equivalentes ou seguimento das fórmulas infantis, a um custo reduzido. Eles costumam ser promovidos comercialmente com brindes e descontos em compras múltiplas ou combos, além de serem intensamente promovidos em mídias sociais. Os rótulos deles valorizam o fato de conterem óleos essenciais, fibras, imunonutrientes, vitaminas e minerais, o que pode induzir o consumidor a pensar que o produto fornece, sozinho, tudo que a criança precisa nesta faixa etária, apesar de ser um produto ultraprocessado, não recomendado para o consumo dessa criança. Por serem produtos novos no mercado, ainda não se enquadram na Norma Brasileira de Comercialização de Alimentos para Lactentes e Crianças de Primeira Infância, Bicos, Chupetas e Mamadeiras, hoje Lei nº 11.265/2006 e Decreto nº 9.579/2018. Sugere-se a inclusão do composto na legislação, com a comercialização controlada no escopo da lei, bem como a criação de normas para restringir a publicidade abusiva deste e outros produtos para crianças entre um e três anos de idade

**Palavras-chave:** Substitutos do Leite Materno. Indústria Alimentícia. Aleitamento Materno.

## CONTEXT

The 1970s were a milestone in relation to breastfeeding worldwide. Around this time science became interested in the declining rate of breastfeeding and the increasing sale of infant formula worldwide. Mike Muller's book<sup>1</sup> ignited the issue, accusing the formula industry of introducing its products into poor countries and encouraging artificial feeding at the expense of breastfeeding, without concern for the consequences of misuse or inappropriate use of these compounds.

At first, breastmilk substitutes were promoted by highlighting their resemblance to human milk. However, around 1950, advertisements began to introduce infant formulas as substitutes and with nutrient supply that surpassed breast milk in quality.<sup>2</sup> Unregulated marketing, coupled with the significant changes in society at the time - such as the growing urbanization and the entrance of women into the workforce - provided the perfect setting for the promotion of what industry claimed to be the symbol of female liberation.

The consequences of these anti-breastfeeding investments soon appeared. Childhood illnesses increased, mainly due to poor sanitary conditions in the preparation of formulas, which became vehicles of contamination and provided less than recommended nutrients, due to dilution errors,<sup>2</sup> in addition to the formulas themselves being unregulated at that time. Children using the formulas also had developmental delay due to the low essential fatty acid content of these products and their propensity for chronic non-communicable diseases due to their high energy density.<sup>3</sup>

To control the use and marketing of these products, as well as to promote and protect breastfeeding (BF), the World Health Organization (WHO) - together with academia, non-governmental organizations, governments of various countries, and civil society - created in 1981 the International Code for the Marketing of Human Milk Substitutes.<sup>4</sup>

In Brazil, the Code was first published as a Resolution by the National Health Council (CNS) in 1988, revised in 1992, called the Brazilian Standard for the Commercialization of Infant Food (NBCAL). NBCAL, after several reformulations, was transformed into Law No. 11,265/2006, and regulated by Decree No. 8,552/2015, replaced by Decree No. 9,579/2018.<sup>5-7</sup>

Brazilian legislation on infant formulas and food products for children up to three years old, including nipples, bottles and pacifiers, is now one of the most comprehensive legal instruments in protecting breastfeeding, as it encompasses most of the items established by the WHO code.<sup>8</sup> However, despite the collective efforts of lawmakers and civil society to advocate for breastfeeding, loopholes in the law still allow industry to develop strategies to promote their

products, including confusing visual labeling, loyalty merchandising and rewards programs, or the development of new products that take advantage of legislative loopholes.

In this context, the so-called growing up milks (GUM) was regulated by the Brazilian Ministry of Agriculture, Livestock, and Food Supply (MAPA) in 2007. GUM is defined as “a powdered product resulting from the mixture of dairy ingredients – milk and/or dairy product(s) or food substance(s) - with other ingredients such as vegetable oils and sugar, along with chemical additives, such as flavorings, preservatives, flavor enhancers, among others, and dairy components must represent at least 51% of the total ingredients.”<sup>9</sup> Today, in Brazil, 13 types of growing up milks are marketed by three Different brands.

A GUM does not fit, a priori, by its composition, into any of the product categories covered by the scope of the legislation on milk, infant formula, follow-up, diet therapy, cereals, etc.<sup>5-7</sup>

According to the website of one of the companies offering GUM for sale, the “main difference between milk powder and milk mixture is that the latter includes the possibility of adding important nutrients for healthy development in childhood, such as vitamins, minerals, fiber in adequate quantities, and DHA (docosahexaenoic acid).”<sup>10</sup> This “growing up milk” is offered as the food that will provide the necessary nutrients, especially vitamins and minerals, for this phase of life.

In other countries, it is usually sold as fortified milk, not growing up milk,<sup>11</sup> but it has a long list of ingredients and is not nominally characterized in legislation, similar to Brazil. Few studies have found the need for this product,<sup>12-14</sup> because there are already other products that may meet requirements in special cases, such as malnutrition and innate errors of metabolism. The point is that there is no international legal definition to regulate GUM.

The composition of these products often includes vegetable oils, sugar, and food additives in the list of ingredients. According to the new classification, these products are ultra-processed.<sup>15,16</sup> However, this information is not known to the consumer, which can be induced to consume this product by ingenious and misleading marketing techniques,<sup>17</sup> in which product advertising omits product information that would influence customer decision making, as detailed below. In this reflection, we will focus on two aspects of marketing GUM: label design and product advertising strategies on social networks, television media, and manufacturers' websites, in light of the proposals by McDaniel and Gates.<sup>18</sup>

In the case of product label design, words such as “Premium”, “Supreme”, and similar are used to reinforce the idea that the product has a special composition and favors more adequate growth compared to milk powder. The most common nutritional claims are the presence of DHA,

a source of minerals, rich in vitamins, zero added sugars, and adding fiber to aid bowel function. Just as important as nutrition claims is the label design of these products. GUM packages display the same colors, font and lettering, text distribution, and prominent elements as products for children under one year old (infant and follow-on formulas) of the same brand (Figure 1).

**Figure 1.** Examples comparing labels on growing up milk with those on infant formula. Source: Internet stock photography images.



These characteristics, reinforced by marketing strategies, imply that milk mixture provides continuity in infant feeding after infant formulas and follow-up formulas, which along with the attractive price compared to infant formulas, can encourage the caregiver to purchase them. This can occur through relationship marketing, characterized by a focus on long-term business relationship, with the objective of building customer loyalty to the brand. In this type of marketing, a company needs to offer what the customer is looking for: meeting their needs with access to the best product at the lowest possible price, so that the customer will believe that it is the best for them.<sup>19</sup>

Another a risk is that caregivers will confuse GUM with infant formula, making an unequal replacement. Under no circumstances should GUM be offered to children under one year of age, as they are formulated for the nutritional needs of older children and are not a complete diet, but just as “supplement”.

The nutritional claims on the labels value the addition of vegetable or fish oils, fiber, immunonutrients, vitamins and minerals. The promise is that these elements will ensure proper nutrition, motor and bone growth and development, strength, and intelligence. By advertising that growing up milk is almost magical, they imply that it provides all that the child needs.

Other commercial promotion strategies involve giving away gifts and toys, discounted pricing on the purchase of larger cans, and even subscription to child-friendly cartoon channels. The strategies also include compound buying clubs on manufacturers' websites; social media promotion, paid sponsorship of maternity blogs and digital influencers, and celebrity product promotion. Manufacturers' websites feature question and answer sections, often signed by healthcare professionals, justifying and emphasizing the advantages of additives.<sup>10</sup>

This is why we need to talk about these growing up milk. Regulation of this type of product is urgent. As in the past, civil society, health professionals, and governmental and non-governmental bodies must join forces and work together to update the current legislation, so that the marketing and advertising of the so-called GUMs fall under the same strict rules for other early childhood products. The specific inclusion of these products in the scope of Decree No. 9,579/2018,<sup>7</sup> is necessary, placing them as their own category, and in view of the potential damage from their misuse, at least hold GUM to the same restrictions on commercial promotion as the follow-up and early childhood formulas. Our children must be protected, and this cannot wait.

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**Contributors**

Leão DOD participated in the conception and design; literature review, data collection, analysis and interpretation of data; review and approval of the final version of the article. Gubert MB participated in the conception and design; data analysis and interpretation; review and approval of the final version of the article.

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