Dr Francesco Branca

Director

Department of Nutrition

World Health Organization

Geneva

E-mail: [nutrition@who.int](mailto:nutrition@who.int)

Cc:

Unicef, [nutrition@unicef.org](mailto:nutrition@unicef.org)

Date

Dear Dr Branca,

As representative of ……. , I would like to submit to your attention our concerns regarding the revision of the Baby-friendly Hospital Initiative (BFHI) and the related Operational Guidance that is currently underway. Our concerns are shared by a large number of individuals and associations active in the protection, promotion and support of breastfeeding, including the BFHI, in Italy.

While we welcome the decision to retain the order, number and subject matter of each of the original Ten Steps, to integrate the Code and internal monitoring into Step 1, and to maintain the current 80% standard for accreditation, we would like you to consider the following points before the new package is approved and released:

1. To allow comparison over time and among countries, it is important to retain global guidelines, criteria, assessment and monitoring tools, as well as scoring systems.
2. It is also important to retain standardized model training courses, despite the obvious need for some local adaptation.
3. Accreditation should continue to be based on independent external assessment, inclusive of mother interviews, and conducted by knowledgeable individuals.
4. The language for the revised Step 9 should clearly state the facility’s responsibility for minimizing the use of bottles, teats and pacifiers.
5. The BFHI package should include standards for safe and respectful birth practices as an essential component. An empowering language should be used throughout the Guidance.
6. The BFHI is about healthy term infants. A separate set of standards should be adopted for preterm and sick infants (see [NEO BFHI Baby-Friendly Hospital Initiative for Neonatal Wards](http://www.ilca.org/main/learning/resources/neo-bfhi)).
7. It would be important to include something on the ethical issues related to conducting randomized trials on infant and young child feeding.
8. Finally, the Guidance should include a discussion on the interrelationship between each of the 10 Steps and how they work together as a comprehensive breastfeeding support program.

Tackling the above points will need time. We therefore ask you to postpone the launch of the new BFHI package until all parties have had the time to discuss them in detail and to come to an agreement. We look forward to receiving an indication that our concerns were taken into due consideration.

Yours sincerely,

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