
From: Rebecca Crockett
Sent: Monday, 9 November 2015 3:02 PM
To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council – submission

To Whom it May Concern,

I am writing in regard to the Infant Nutrition Council request of a re-authorization of the *Marketing in Australia of Infant Formula* (MAIF agreement) for a further 10 years. Given that:

- 1) The World Health Organisation (WHO) is in the process of strengthening protections against food marketing to children and their parents. The new protections are due out next year and may result in changes to the WHO Code. This information should be included in any review of MAIF; and
- 2) Australia is in the middle of reviewing its national policy on breastfeeding, the National Breastfeeding Strategy due at the end of 2015.

I strongly believe that an interim re-authorisation of 1 year rather than 10 is appropriate given the national and international reviews currently taking place.

It is important that all mothers and infants be protected from unscrupulous and misleading marketing from formula companies. Australia's MAIF agreement is 25 years old and out of date. Signed in 1992, it is a voluntary industry self-regulated Code of Practice that has not kept up with modern marketing methods by electronic and social media, including online sales and loyalty programs. Retailers are not covered by MAIF, so can advertise infant formula and toddler milks on-line and in-store.

One of the key omissions to the current MAIF agreement is that it does not cover toddler formula (12months plus). The formula industry is keen to keep this status-quo as it allows them to market toddler formula directly to consumers. This is often done in a way that mothers are unaware that the product is not for infants (0-6months), or follow-on (6-12months)—both currently unable to be marketed directly to mothers. Australian research shows that consumers do not differentiate between the toddler and infant/follow-on formula. Marketing in one is effectively marketing in all brackets and has the capability of undermining breastfeeding.

The current MAIF agreement is also legally weak—it is unenforceable and breaches have no repercussions. It does not apply to non-signatories. It is therefore unable to effectively protect vulnerable mothers and their infants from formula advertising. To re-instate the MAIF in its current form for 10 years would be an enormous step backwards for the support of breastfeeding and for the health of mothers and their children in this country.

Rebecca Crockett