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**From:** Beth McMullan  
**Sent:** Monday, 9 November 2015 4:06 PM  
**To:** Adjudication  
**Subject:** A91506 & A91507 – Infant Nutrition Council – submission

**Categories:** Submission

I am writing to object to the proposed reauthorisation of the MAIF agreement for a further 10 years.

This framework is already inadequate to promote optimal breastfeeding rates – i.e. the fact that it's a voluntary, industry code; that there are no authorities in place to take action in the case of breaches; and it does not conform to the International Code of Marketing Breastmilk Substitutes (WHO Code) (e.g., retailers are exempt from marketing restrictions, manufacturers promote unnecessary toddler formulas with the same logos etc as infant formula, there is no restriction on online advertising, where a lot of parents are now swamped with formula marketing).

Locking in an agreement now means there can be no room for amendments to reflect any outcomes of the current review of national policy on breastfeeding, the National Breastfeeding Strategy, due at the end of 2015.

Likewise, it will not reflect any outcomes of the World Health Organisation's review of protections against food marketing to children and their parents, which may result in an update to the WHO Code.

We have ample evidence of the risks posed to our population by sub-optimal breastfeeding rates. We also have evidence of the damage that unfettered marketing of breastmilk substitutes has on breastfeeding rates. From a public health perspective it makes the most sense to pursue a stronger, compulsory code with attendant penalties for breaches – for example, full implementation of the WHO Code – to ensure the best possible outcomes for Australian children and their families.

The commercial aims of the infant formula industry should not take precedence over the health and wellbeing of Australian children. At best, MAIF should only be reauthorised for one year, with major amendments thereafter to bring our agreement into line with policies aimed at supporting optimal breastfeeding rates – indeed, the government's own stated policies – and the best interests of Australian children and their families.

Regards,

Beth McMullan