From:

Sent: Wednesday, 11 November 2015 11:06 AM

To: Adjudication

Subject: Proposed renewal of the MAIF agreement - objection

Categories: Submission

To whom it may concern,

I am writing in objection to the proposal to renew the MAIF agreement for a period of 10 years.

The MAIF agreement is essentially unchanged from the original proposal and has not been subjected to vigorous review.

In my extensive experience as a midwife and Maternal and Child Health Nurse, the agreement is not meeting it's objectives.

The agreement is a voluntary, self regulatory, code of conduct, that is not working.

Under the agreement, infant formula, for use from birth, is unable to be advertised yet I regularly see this occurring in the catalogues of discount pharmacies. As a means of getting around this restriction, formula companies have developed a toddler formula which is marketed in the same tin as the infant formula. This ensures their branding is still evident to families in the wider community. Toddler formula is not necessary, there is no evidence supporting it's use in infant and child nutrition and this is also backed by the WHO. The manufacturing and advertising of toddler formula is purely an exercise to promote their "from birth" product.

I believe that the MAIF agreement needs to be subjected to considerable scrutiny, that compliance should be mandated and heavy fines applied for breach of the code. At present we rely on the good will of formula companies who are primarily concerned with making a profit and show little concern for the wellbeing of infants in their aggressive and subversive marketing of their products.

I realise that the MAIF agreement is a local endorsement of the International Code of Marketing of Infant Formulas as ratified by the WHO but the International Code is also falling short of the mark.

Like cigarettes, infant formula should be available in plain packaging. All stage 1 formulas have to comply with an Australian Standard as suitable for infants from birth, none is better than another and none are equivalent or superior to breastmilk yet there is often implications in the marketing that they are somehow alike.

In spite of strong health promotion campaigns and investment in supporting breastfeeding, rates of breastfeeding initiation and duration are declining in Australia and the potential health impacts of this over time will be catastrophic.

A recent article in the business section of 'The Age' newspaper about Chinese visitors to Australia buying cans of "Premium" formula to be sent back to China, included a quote from the company CEO, to the effect that "women in China also want the best for their baby" and that is why they were sourcing this formula. This is an example of how the MAIF agreement is often breached as this statement is misleading. It is also an example of the aggressive marketing in developing nations with emerging economies. Women in China have been breastfeeding for millenia and have managed to sustain the most populated nation on earth. To imply that their formula is somehow the "best for Chinese babies" is misleading and insulting.

The marketing and promotion of infant formula is out of control and the potential long term consequences for infants, not just in Australia, is catastrophic. Developing nations subjected to the misleading and aggressive marketing of these products face an addition risk in a time of crisis. The lack of available clean water or facilities to sterilise water and equipment increases the morbidity and mortality of young infants who are not breastfed.

I am aware that Blackmores are an emerging company in the Infant Formula Market and I am concerned that their profile in the "Health Food" section of the supermarket will be used as part of their promotion strategy for their product.

We need to ensure our government is not complicit in this. The MAIF agreement needs stringent review and

mandated compliance.

Please consider these concerns in your decision making. I am well aware that the INC is a powerful industry lobby group but things are not always as they seem on paper. What we see in the real world is vastly different.

Regards

Andrea Vaughan