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To: Adjudication
Subject: "A91506 & A91507 – Infant Nutrition Council – submission"

Categories: Submission

I would like to congratulate the government for attempting to regulate the Code of Practice of the marketing of infant formula. However, I would like to point out several flaws in the plan to reinstate the MAIF Agreement:

- The MAIF Agreement does not meet Australia's obligations to implement, as legislation, the full WHO International Code of Marketing of Breast-milk Substitutes /and subsequent World Health Assembly resolutions/ (the WHO Code). Australia signed the WHO Code in 1981. Australia's implementation of the WHO Code is half-hearted and has not kept up with modern marketing methods by electronic and social media, including online sales and loyalty programs.
- Australia's MAIF Agreement is weak and out of date. Signed in 1992, it is a voluntary industry self-regulated Code of Practice that does not include marketing by electronic media and toddler milks, which are covered in the full scope of the updated WHO Code and World Health Assembly resolutions.
- Breaches of MAIF carry no repercussions... how can this be protecting mother and infants?
- Research shows that implementation of the WHO Code in full has been shown to be an effective tool at protecting breastfeeding.
- Australia is in the middle of reviewing its national policy on breastfeeding, the National Breastfeeding Strategy due at the end of 2015, so it is premature to lock-in a 10 year arrangement on regulation of formula marketing.

There is an old saying that 'advertising creates a false sense of need'. I urge the government to consider implementing the WHO Code in its entirety rather than bring back the MAIF Agreement that has been shown to be ineffective.

Kind regards

Elizabeth Oei