
From: Arianwen Harris
Sent: Wednesday, 11 November 2015 12:39 PM
To: Adjudication
Subject: "A91506 & A91507 – Infant Nutrition Council – submission"

Categories: Submission

Please do not give MAIF another 10 year agreement but work to protect the health of babies and women by creating a code which is more protective and enforceable.

To: adjudication@accc.gov.au

Dear ACCC,

I am deeply concerned that you are considering reauthorising MAIF for 10 years. I would like to see the full implementation of the WHO code in Australia with strong enforcement options for breaches.

As you will know there is currently a shortage of formula in Australia. In my online mothers group many women have been very concerned about not having access to formula but when they explain further they are looking for a stage three or toddler formula. We know that it is an unnecessary product designed to get around marketing rules so much so that toddler formula has been given in 2014 by CHOICE (<https://www.choice.com.au/about-us/media-releases/2014/october/2014-shonky-award-winners>) MAIF does not cover the advertising of toddler milk.

MAIF currently does not carry electronic marketing. This may sound small but it means ads like ones from similac are shared for free all over Australian media. This means the advertising of infant formula is occurring.

If we fully implement the WHO code we will give babies and mothers the best opportunity to breastfeed. Breastfeeding is the biological norm and not breastfeeding carries significant risks for both babies and mothers. It also places an economic, health and environmental burden on our country.

MAIF does not cover retailers which means discounting and promotion can occur in store, on television or in pamphlets. I regularly see formula and formula items advertised as a necessity for purchase before baby is even born. Given that almost all women start out breastfeeding (96%) adds from retailers suggested formula is a must buy is under mining and false.

MAIF has no enforcement options which means that formula companies can and do get away with breaches.

MAIF does not have clear governance and does not include any breastfeeding experts and lack accountability.

--

Arianwen Harris