
From: Emma Tueno
Sent: Tuesday, 10 November 2015 8:02 PM
To: Adjudication
Subject: A91506 & A91507 Infant Nutrition Council Submission

Categories: Submission

Hi

I am writing concerning the ACCC's draft deliberation to approve a reauthorisation of the *Marketing in Australia of Infant Formula (MAIF agreement)* for the next 10 years.

I am a mother of three young children and also a medical practitioner.

I think this 10 year period is too long and fails to address some of the problems of voluntary self regulation of marketing of infant formula.

As you would be aware, breast feeding should be the way that most infants are fed. Most mothers wish to breast feed at least for the early months of their infants life and there is abundant research that demonstrates the clear benefits of breastfeeding to both mother and baby. These benefits extend throughout the life of the baby and include reductions in infections and obesity rates.

Sadly, although most Australian mothers initiate breastfeeding, less than half of babies are exclusively breastfeed at 3 months and only 15% are exclusively breastfeed at 5 months. At aged 2 only 5% of children are receiving any breastmilk. This is in spite of WHO guidelines recommending that babies be exclusively breastfed until 6 months and breastfeeding to continue for at least the first 2 years of life. I believe a major cause of this is lack of support around breastfeeding and misinformation concerning breastfeeding - particularly that infant formula is as good or almost as good, that breastfeeding is difficult and that to recommend or promote breastfeeding is in some way 'judgemental'. Unfortunately, my experience as a parent and doctor is that infant formula companies promote these views - which is of course in their interests as profit making entities.

I request that the reauthorisation period be shortened to a one year period.

This will allow time for the outcome of the review of the national policy on breastfeeding - the National Breastfeeding Strategy - which I understand is due out at the end of this year to be known.

I am also concerned that there are no repercussions for breaches of the MAIF agreement and that the MAIF agreement seems very narrow - for instance it does not cover toddler milks (which I understand have little or no benefit) or retailers. Given the importance of breastfeeding to the ongoing health of an infant I think that there should be clear consequences for breaches of the agreement which should be extended to electronic media, social media campaigns, baby clubs and so on etc. Breastfeeding experts (for instance lactation consultants) should be included in the group which assesses possible breaches.

I am also concerned that this voluntary agreement may not comply with our obligations to the World Health Organisation around the marketing of breast milk substitutes.

Improving breastfeeding rates is a key health issue for our nation. Increasing breastfeeding rates has the potential to improve the health of children through their lives and lead to substantial savings in health spending. This can only be achieved with very tight regulation around the marketing of infant formula.

Thank you for the opportunity to express my views. I will wait with interest for the final outcome of this matter.

Kind regards,

Dr Emma Glanville.