
From: Kate Heffer
Sent: Wednesday, 11 November 2015 1:17 PM
To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council - submission

Categories: Submission

To whom it may concern

I am writing to express my belief that the ACCC should not grant a ten year re-authorisation of the MAIF Agreement as requested by the Infant Nutrition Council. Instead I firmly believe that the MAIF should only be renewed for one more year and a full review of the available system be undertaken. As a mother of young children I feel disheartened at the widespread breaches of the MAIF agreement I have witnessed in print and screen media over recent years. The MAIF Agreement is a voluntary agreement and formula manufacturers and retailers are not inclined in any way to follow it other than in the most cursory way. For instance I regularly see advertisements for toddler milks which clearly depict children under 12 months of age. These sorts of advertisements are insidious and only encourage the normalisation of formula milk. This impacts on the health of our society as it leads to premature weaning of babies and thus more hospital admissions and health effects into adulthood. A review has not being conducted prior to the INC recommended a ten year renewal. As the World Health Organisation intends to review it's WHO code in the next 12 months, a short term renewal of the MAIF agreement would allow the new information expected from this to be included in any review of MAIF. In addition Australia is also in the process of reviewing it's National Breastfeeding Strategy and it is premature to renew MAIF for ten years before this process is completed at the end of this year.

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. In fact the MAIF does not even include the marketing of toddler milks which are a way for formula companies to insinuate advertising aimed at parents of younger babies in the guise of a "toddler" formula ad (as described above). There are currently no repercussions for formula manufacturers or retailers who breach MAIF; MAIF does nothing to protect mothers and babies and the normal and natural breastfeeding relationship. It makes it harder for health professionals to assist mothers and reach optimal outcomes for our future health as a nation.

I hope to hear that the current MAIF Agreement has only being renewed for a further year to allow a full review of the ways in which the current system fails to fully protect babies and mothers and hold formula manufacturers and retailers accountable for their actions.

Yours faithfully,
Kate Heffer
(Breastfeeding mother)