
From: Alison Stacey
Sent: Wednesday, 11 November 2015 11:03 AM
To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council – submission

Categories: Submission

Dear Sir/Madam,

I hope this is one of many emails you receive from concerned parents regarding the proposal to re-authorise the Marketing in Australia of Infant Formula (MAIF) agreement.

As a mum, and as a doctor, I'm concerned.

Since discovering a few days ago that I had the opportunity to voice my concerns, I've been deliberating about the best way to do this. I am aware that you have received detailed submissions from a variety of sources (notably the Australian Breastfeeding Association; La Leche League NZ/Aust; Breastfeeding Coalition Tasmania; and the Australian National University), as well as a response on behalf of the Infant Nutrition Council. I have done my best to summarise my thoughts into a few points:

1. Breastfeeding is important. The health benefits for mothers and children - both on an individual level as well as a population level - are indisputable. Breastfeeding is cheaper than formula feeding - both in terms of the cost of purchasing infant formula, as well as health related costs. Breastfeeding is also a much more environmentally friendly way of feeding an infant.
2. The marketing of infant formula undermines breastfeeding. This is the point of advertising - to sell product - so by definition companies that market infant formula are seeking to reduce breastfeeding rates. The WHO Code - when fully implemented - has been shown to be protective of breastfeeding.
3. The current MAIF agreement does not meet Australia's obligations under the WHO Code. Significant omissions include the marketing of toddler formula (research has shown that parents do not discriminate between toddler formula advertising and infant formula advertising.. and it's no coincidence that the tins are almost identical in appearance.) as well as promotions by retailers and in social media.
4. As an industry sponsored and industry regulated agreement, what are the repercussions for breaches? Last year I saw a TV commercial for 'follow on' or 'toddler' formula. There were strategically placed babies that appeared to be 6-12 months old in the commercial, implying that formula was for them. This was in breach of the MAIF agreement... but I could not find anywhere to raise my concerns, or any information on what the consequences would be if the manufacturer was found to have indeed breached the agreement.
5. Expert opinion may change: the National Breastfeeding Strategy is under review; and the WHO is also in the process of strengthening protections against food marketing to children and their parents. The outcomes of these processes should be able to be taken into consideration when updating the MAIF. Granting a 10 year approval removes incentive to review and include relevant recommendations... particularly in an industry sponsored agreement.

So what would I like to see? An interim re-authorisation for 1-2 years. During that time, a review that updates the MAIF to meet the full WHO Code. And regulation to ensure that if breaches occur, consequence ensue.

Thank you for taking the time to read my concerns.

Kind regards,

Alison