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To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council - Submission

Categories: Submission

The Australian Breastfeeding Association (ABA) has made me aware of the current pending decision to re-authorise the MAIF agreement for 10 years. I am a member of ABA as a mother and because I feel that, although most people consider breastfeeding normal and natural, they don't necessarily realise the extent of the difference between formula and breast milk. Breastfeeding can be challenging, I have seen many friends opt for formula believing that although it's not breast milk, it's pretty close. In actual fact this is wrong. Formula is a safe and adequate option when one can afford adequate amounts, but even in my circle of friends where we all work as professionals, I have heard reports of formula being diluted. I can only imagine the risk children are at when more vulnerable mothers chose formula over breast feeding, where facilities to sterilise equipment and ensure water is clean don't exist.

It is for the safety of children that I primarily write. The MAIF agreement currently has many questionable aspects that mean there is the potential for companies to circumvent the intention of the MAIF agreement and the WHO code it was designed to (somewhat) comply with. For example:

- It doesn't cover retailers so they can advertise infant formula and toddler milks on line and in-store. They can promote it in any way they like.
- Manufacturers and importers can advertise toddler milks on TV, Facebook, company websites, industry-funded blogs, parent information and advice services, and baby clubs. Most of those I know don't even realise that it's not formula that's been spoken about. To them, toddler milk is the same as infant formula. This is likely because the industry is self regulated and opt to advertise in such a way that it is very difficult to differentiate between the two different groups of products.
- MAIF should also, for this reason, cover toddler milks. In my opinion these are even more redundant than infant formula. It currently only covers specific infant formula.
- Surprisingly, and perhaps because the MAIF agreement has not been reviewed or updated for such a long time, it does not currently cover electronic advertising. This is where we Mum's get most of our information so at the very least I think the MAIF agreement should cover electronic media.

In addition to these issues I understand that the MAIF Agreement is not transparent and lacks Australian government oversight and accountability. I am concerned particularly that some of the leading infant formula companies are policing their own compliance with the MAIF agreement. This is especially in the case of Nestle where the track record for the company is ethically and morally questionable across the globe. Because of this self regulation and lack of independent governance, breaches are not followed up and so those the MAIF Agreement was designed to protect, clearly are no better off than they would be if it just didn't exist.

Most alarmingly the MAIF 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 which we signed in 1981. This is disappointing at least and ridiculous, no changes have been made to the MAIF agreement

since 1992, despite changes to the WHO Code and the social and technological environment it now operates in.

Lastly, as Australia currently reviewing its national policy on breastfeeding and the National Breastfeeding Strategy is due at the end of the year, it would be both timely and considerate to ensure a full and transparent review of the MAIF be undertaken before any long term arrangements to infant formula marketing be made.

Thank you for taking the time to read about my concerns. Please consider granting an interim extension to the current agreement of 12months, instead of a further 10years.

Kind Regards

Bree Broomfield