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**From:** Jo Allan  
**Sent:** Thursday, 12 November 2015 10:45 AM  
**To:** Adjudication  
**Subject:** A91506 & A91507 – Infant Nutrition Council – submission  
**Categories:** Submission

Sir/Madam,

I write to you in my capacity of a student nurse and concerned mother of two children, to register my objection to Infant Nutrition Council's (INC) request of a re-authorization of the *Marketing in Australia of Infant Formula* (MAIF agreement) for a further 10 years, rather only a short-term interim re-authorisation is all that is required. Australia is in the middle of reviewing its national policy on breastfeeding, the National Breastfeeding Strategy due at the end of 2015, so it is premature to lock-in a 10 year arrangement on regulation of formula marketing

One of the Australian National Health Priority Areas ([www.aihw.gov.au/overweight-and-obesity](http://www.aihw.gov.au/overweight-and-obesity)) focuses on the need to reduce obesity. To combat obesity, the WHO is in the process of strengthening protections against food marketing to children and their parents. This may result in changes to the WHO Code. This is due out early next year. This information should be included in any review of MAIF; therefore an interim re-authorization of 1 year rather than 10 is more appropriate.

Australia's MAIF Agreement is weak and out of date. Signed in 1992, it is a voluntary industry self-regulated Code of Practice that does not include marketing by electronic media and toddler milks, which are covered in the full scope of the updated WHO Code and World Health Assembly resolutions. Mums are bombarded with images of bottles, formula etc and they start to be influenced by this, questioning their bodies ability to provide for their infants.

Retailers...why are they not covered by the code? This is absolutely ridiculous; they can advertise infant formula and toddler milks on line and in-store, through pricing and discounts. They are using our babies health for their profits and there is no need for toddler milk, so they are ripping consumers off left right and centre, but that's OK, because their clever advertising makes it look like the norm.

Why is the governance of the MAIF Agreement not transparent? Why does it not involve breastfeeding experts on the panel? Where is the government oversight and rigorous accountability?

In conclusion the MAIF Agreement does not meet Australia's obligations to implement, as legislation, the full WHO International Code of Marketing of Breastmilk 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.

Thank you

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Joanne Allan