

**From:** Janet Yates  
**Sent:** Thursday, 12 November 2015 4:43 PM  
**To:** Adjudication  
**Subject:** A91506 & A91507 - Infant Nutrition Council - submission

To whom it may concern,

I am writing to express my concern that there is an application to extend the Marketing in Australia of Infant Formula (MAIF) Agreement for another 10 years.

Despite previous consumer concerns about MAIF, no review has been conducted prior to this application by industry for an extension for another period of 10 years. I believe that a reauthorisation of MAIF should be limited to one year to allow a proper review to occur.

It is important that all mothers and infants are protected from often misleading and false marketing of infant formulas and that the full World Health Organisation International code of Marketing Breastmilk Substitutes (WHO Code) should be implemented. Research shows this has been an effective tool at protecting breastfeeding.

Australia is currently reviewing its national policy on breastfeeding which is due at the end of 2015. Surely this should be completed before the government extends the agreement for a further 10 years.

There are real concerns that the MAIF Agreement is flawed as it currently stands. This is a voluntary industry self-regulated Code of Practice and doesn't include electronic media and toddler milks have grown considerably since the agreement was first signed in 1992. These two areas and the use of electronic media must be considered in any future arrangements.

Manufacturers and Importers can advertise toddler milks on many different forms of electronic media, parent information and advice services and baby clubs. Research shows that mothers do not recognize the difference between toddler formula advertising and infant formula advertising. Toddler formula advertising undermines breastfeeding.

Mothers and babies need to be protected and how can this happen if breaches of MAIF carry no repercussions and promotions by retailers such as supermarkets and pharmacies are not included.

The governance of the MAIF Agreement is not transparent. This Agreement does not involve breastfeeding experts and lacks Australian government oversight and accountability.

Thank you for considering this submission.

Yours sincerely,  
Janet Innes