
From: Emily Dickson
Sent: Thursday, 12 November 2015 10:15 AM
To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council – submission by EDickson

Categories: Submission

Objection to the ACCC's draft deliberation to approve the submission by the Infant Nutrition Council for re-authorisation of the MAIF agreement for 10 years.

The Infant Nutrition Council is an organisation of infant formula manufacturers. It represents the interests of its member organisations, namely to protect their market and increase opportunities for the promotion and sale of their products. They do not act in the interest of protecting breastfeeding and supporting mothers to be able to exclusively breastfeed their babies to six months of age and to continue breastfeeding to 2 years and beyond, as recommended by the World Health Organisation.

The Infant Nutrition Council would like the MAIF agreement to continue unchanged for another 10 years because the MAIF agreement allows them to promote their product to mothers without actually breaching the terms of the agreement.

The revision of Australia's National Breastfeeding Strategy is due at the end of 2015. The Infant Nutrition Council would like to lock-in the status quo for a further 10 years, to pre-empt possible tightening of regulations around infant formula marketing that may come from the National Breastfeeding Strategy revision. The ACCC, by allowing such a long extension period, is failing to protect the consumer from the commercial interests of the infant formula producers.

The ACCC should re-authorise the MAIF agreement for a maximum of 2 years. A 10-year extension of the MAIF agreement is anti-competitive, and is not in the interests of Australian consumers.

I ask the ACCC to reconsider the draft deliberation, and to approve the extension of the MAIF agreement only for the minimum period necessary, maximum 2 years, to allow more effective protection of mothers and infants from the commercial interests of formula manufacturers and retailers to be put in place as soon as possible.

Emily Dickson