
From: Patrick Rodgers
Sent: Wednesday, 11 November 2015 10:54 PM
To: Adjudication
Subject: A91506 & A91507 - Infant Nutrition Council - submission

Categories: 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, a review has not been conducted prior to this application by industry for an extension for another 10 years. As this has not yet occurred, I believe that a reauthorisation of MAIF should be limited to one year to allow a proper review to occur.

I believe it is important that all mothers and infants be protected from often misleading and false marketing of infant formulas and the the full World Health Organisation International code of Marketing Breastmilk Substitutes (WHO Code) should be implemented.

Research shows that implementation of the WHO Code in full has been shown to be an effective tool at protecting breastfeeding.

Australia is in the middle of reviewing its national policy on breastfeeding, the National Breastfeeding Strategy due at the end of 2015, so surely this should be completed before the government locks in a 10 year arrangement on regulation of formula marketing.

I have genuine concerns that the MIAF Agreement is weak as it currently stands as it is a voluntary industry self-regulated Code of Practice and doesn't include electronic media and toddler milks which have grown considerably since 1992 when the agreement was first signed. These two areas of Toddler milks and the use of electronic media must be considered in any future arrangements.

Manufacturers and importers can advertise toddler milks on TV, Facebook, company websites, industry-funded blogs, parent information and advice services, and baby clubs. Research shows that mothers do not differentiate between toddler formula advertising and infant formula advertising. Therefore advertising toddler formulas undermines breastfeeding. This lack of governance is not acceptable.

Also breaches of MAIF carry no repercussions and promotions by retailers (supermarkets and pharmacies) are not included - this does not protect mothers and babies?

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

I appreciate your consideration of this submission.

Yours sincerely
Patrick Rodgers