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To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council – submission

Categories: Submission

To whom it may concern

I would like to object to the reauthorization of the MAIF agreement until a proper review is done. A re-authorization of the agreement for another 10 years is NOT acceptable in light of the continual breaches that have continued to occur and the fact that a review has not been done. In order to protect mothers and babies and create a fair, natural and supportive environment for our mothers we must have a society that practically support the idea that breastmilk is normal, rather than allowing a formula company to be commenting on the sidelines continually breaching their own guidelines and influencing health professionals who work with vulnerable families every day.

There are other practical reasons why a 10 year re-authorization does not make sense. The World Health Organization (WHO) is currently strengthening protections against food marketing in an effort to combat obesity. This may mean that the WHO code changes and should be considered before MAIF is reauthorized.

The National Breastfeeding Strategy is due at the end of 2015 and this should also be considered before reauthorizing the MAIF agreement.

This agreement does not meet Australia's obligations as legislation the full WHO International Code of Marketing of Breast-Milk Substitutes and subsequent World Health Assembly resolutions. Australia signed these in 1981 so it is a travesty that this has not been done for so many years. Australia's implementation is half-hearted and not compatible with modern marketing through electronic and social media including sales and loyalty programs.

Australia's MAIF Agreement is weak and out of date. It was signed in 1992 and is VOLUNTARY!!! It does not include marketing by electronic media or toddler milks, allowing companies to skate around the edges and promote their product anyway as there are no consequences, whereas for the family who choose formula there ARE consequences, such as decreased gut health, possible increased allergies and chance of obesity, increased likelihood of ear infections and hospitalizations due to gastroenteritis. Any new agreement must carry stiff penalties for breaches to convince companies to market ethically and perhaps to cover some of the cost of the consequences of their product on our health system.

The MAIF Agreement must cover toddler milks retailers and electronic marketing. Having an agreement that only covers some aspect of their product and marketing methods is allowing the companies to do what they like. Consumers do not differentiate between products so don't 'turn off' when they see marketing for toddler milks if they have an infant.

Retailers must also carry responsibility for implementing the MAIF Agreement as they are the face-to-face interaction with the customer. It is not acceptable for them to be able to have specials in their store that cover infant formulas.

The MAIF Agreement must be transparent and must include breastfeeding experts and government oversight and accountability. This is a serious health, ethical and economic issue and warrants the government taking it seriously.

Thank you for your consideration of this submission. I request that you allow for a one year reauthorization of the MAIF Agreement at most in order for proper review and inclusion of the National Breastfeeding Strategy and possible WHO changes to be considered and that all of the points I have made regarding electronic marketing, the voluntary nature of the agreement, marketing of toddler milks be considered when making a decision. This is a wonderful opportunity to do the right thing for modern families, for our health budget and for our society that wants to support breastfeeding families.

Regards

Donna Livingstone