
From: Glen Elliott-Rudder
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Categories: Submission

Dr Megan Elliott-Rudder

Tuesday 10 November 2015

To the officers of the ACCC

This letter is to register my strong objection to the Marketing in Australia of Infant Formula: Manufacturers and Importers Agreement (MAIF Agreement) being re-authorised for ten years.

As a primary care medical practitioner working with pregnant women, I see how easily influenced they are by the messages of skilled marketing. This particularly applies to disadvantaged women, who already have greater health needs.

As a mother of four breastfed children, I know how hard it can be at times to persevere with offering the normal, healthy nutritional option for my children, when manufacturers are blatantly offering “sweet dreams” for the cost of a can of formula. Manufacturers offer “care” and “immune protection” in their labeling, without specifying that their studies only compare between formula-fed infants. They do not compare to infants who are already benefiting from the supreme care of skin and eye contact and the supreme protections of breastfeeding: infants whose health would be detrimentally affected by a transition to infant formula feeding.

As a researcher with a PhD awarded for a randomized controlled trial into support for continuation of breastfeeding beyond two months of age, I am aware of how inadequate the current MAIF agreement is at protecting breastfeeding in Australia.

High-level evidence and common sense stand together calling for strong legal protections for breastfeeding. We need to promote, support and protect the short-term and long-term health of both mothers and infants.

The current MAIF agreement has insufficient power to protect mothers and infants from unethical marketing practices. It is an embarrassingly weak response to the World Health Organisation (WHO) International Code on Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions (The WHO Code). It is also due for review shortly in the context of reviewing Australia's 2010-2015 National Breastfeeding Strategy, particularly as it does not address more recent developments such as the rising market in toddler milk use (contrary to public health messages) and electronic media avenues.

The proposal to re-authorise the MAIF Agreement for 10 years is not in the best interests of Australia's mothers, infants, health budget, or international standing.

Yours sincerely,

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