
From: Jessica Edquist
Sent: Wednesday, 11 November 2015 12:10 AM
To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council – submission

Categories: Submission

Dear Dr Walker and the adjudication committee, I am writing to express my concerns regarding the proposal to re-approve the voluntary agreement on Marketing in Australia of Infant Formula (MAIF) proposed by infant formula manufacturers. The MAIF agreement has not changed since 1992, and does not adequately meet Australia's obligations to enforce the World Health Organisation's International Code on Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions (the WHO Code).

As a mother of young children, I see advertising of infant formula in violation of the WHO Code all over the place. There are ads for 'toddler formula' in baby magazines with pictures of a crawling baby looking six to nine months old. There is tiny small print saying this formula is suggested for infants over 12 months, but the can looks virtually identical to the same brand's formula for younger babies. With such visuals, it is pretty clearly an advertisement for a breast milk substitute.

Then I walk into the chemist or supermarket and see a large display of formula 'on special'. The MAIF doesn't cover retailers, so they can advertise in-store as much as they like. The cans proudly proclaim 'improved formula with added DHA for brain development', but there's no poster listing all the ingredients in breastmilk that aren't in formula

- or the additives in formula that aren't in breastmilk.

These advertisements are known to work. Parents are convinced to give their babies formula instead of breastmilk, and as a result, more babies get gastrointestinal infections, ear infections, childhood obesity and all its concurrent health problems.

Infant formulas and breastmilk are not just equal competing products in a marketplace. One of them is produced by mothers (sometimes at considerable personal cost) and has huge long term health benefits for society. The others are produced by companies with enormous marketing reach and advertising budgets, and have huge long term health costs for babies and therefore Australian taxpayers. Breastfeeding is a public good that requires protection. If the MAIF agreement is to be renewed at all, it should not be for ten years. A period of one year would allow time to update the agreement with any changes to the WHO Code resulting from the WHO's current review of food marketing with respect to obesity, and any changes necessitated by Australia's new National Breastfeeding Strategy due late 2015. It would also be appropriate to conduct a review of consumer concerns about the marketing of infant formula, to take into account new advertising strategies such as electronic direct marketing and social media, and incorporate the findings into any renewed agreement. Toddler milk should be included as a breastmilk substitute (the WHO recommendation is to breastfeed until at least two years or longer if desired, so any milk product aimed at children under two years should be considered a breastmilk substitute). The agreement needs to cover retailers as well as manufacturers and importers. The agreement should be made compulsory instead of voluntary. Any breaches of the agreement should be attached to financial penalties - currently there are absolutely no repercussions, which makes the whole thing rather pointless.

Ideally, instead of renewing the current inadequate agreement Australia would legislate the updated WHO Code in full, as research shows that this is an effective way to protect breastfeeding. The MAIF agreement as it stands is incomplete, out-of-date, and toothless; Australian parents and babies deserve better.

Yours sincerely,

Dr. Jessica Edquist.