
From: Ruth McKinnon
Sent: Wednesday, 11 November 2015 9:34 PM
To: Adjudication
Subject: A91506 & A91507 – Infant Nutrition Council - submission

Categories: Submission

I submit the following objection to the ACCC's draft deliberation to approve the Infant Nutrition Council (INC) request of a re-authorization of the Marketing in Australia of Infant Formula (/MAIF agreement) for a further 10 years:

- the MAIF Agreement , being an industry self regulatory code of practice, has allowed infant formula companies the freedom to operate in an essentially unregulated environment. Advertising of infant formula, whilst not strictly permitted, has been allowed to proceed with the introduction and consequent advertising of 'toddler formula' using the same branding as on infant packaging.
- proper review of the efficacy of the MAIF Agreement has not been conducted since it's inception. Re-authorization for 10years prevents review in a thorough and transparent way. A short term extension, with the proviso of appropriate professional review and adoption of governmental oversight, would be the most appropriate option at this stage.
- my work with infants and families as midwife, lactation consultant and maternal and child health nurse spanning 25years, has enabled me to see the impact that formula and bottle use has on breastfeeding success. New parents are swamped with advertising and accessibility of formula products throughout pregnancy and parenthood, with ongoing practices by formula companies including approaches to health professionals to promote their products via paid seminars, direct contact and provision of samples. These sort of practices are unethical and directly undermine breastfeeding support.
- I believe the WHO Code against marketing of infant formulas should be fully adopted to properly protect mothers and infants against unethical marketing practices currently enabled under the MAIF Agreement.

Sincerely,

Ruth McKinnon IBCLC, RM, RN, MCHN