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I was shocked to learn that the ACCC is considering 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 current MAIF agreement is already an imperfect tool to monitor Australia's implementation of the WHO International Code on Infant Formula Manufacturers. From its beginning it did not fully implement the WHO Code (to which Australia is a signatory). While the WHO Code has since been tightened to further protect babies and breastfeeding, the MAIF agreement has not changed significantly since 1992.

Since then, there has been increasingly significant research evidence of the contribution of breastfeeding not just to the wellbeing of babies but to the long term health of our nation. And yet the number of babies in Australia exclusively breastfed, according to WHO and government recommendations, continues to fall.

Not only does the code allow manufacturers to promote formula in a positive way through 'toddler formula' advertisement, and through using television and internet marketing to promote infant formula (and undermine exclusive breastfeeding), it does not include retailers at all. And there is increasingly sophisticated aggressive promotion of formula as an equal alternative to breastmilk through baby clubs supported by formula manufacturers and on social media.

In addition, Australia is currently reviewing its national policy on breastfeeding with the National Breastfeeding Strategy due to be released at the end of 2015.

It is therefore premature to lock in, for a further 10 year arrangement, and without any review, the currently inadequate regulation of formula marketing.

I respectfully request the ACCC approve only a 1 year re-authorization of the MAIF until the review of a national policy has been completed and the recommendation handed down.

Dot Newbold