
From:
Sent: Tuesday, 10 November 2015 11:24 PM
To: Adjudication
Subject: A91506 & A91507-Infant Formula Council-submission

Categories: Submission

To whom it may concern:

I wish to register my objection to approval of the Infant Nutrition Council's request of a re-authorization of the Marketing in Australia of Infant Formula (MAIF) for a further 10 years. In my experience as a Registered Nurse who conducts well baby clinics in pharmacies, MAIF is an out dated, ineffectual tool to stem the advertising of formula in Australia. There has been no review to determine MAIF's effectiveness prior to this request by the INC for reauthorisation. The National Breastfeeding Strategy is being reviewed and WHO is also considering strengthening the International Code of Marketing of Breast-milk Substitutes (the WHO Code) in light of the worldwide obesity epidemic. Both these reviews will have to be considered and a review of MAIF conducted. For this reason I believe that reauthorisation should be for one year only.

I see every day the effect of marketing on the decisions that families make in regard to infant feeding. Advertising claims are not information on which parents can make informed decisions and yet I hear parents parroting back industry marketing claims like "gentle on tummies" when it is well accepted in the literature that formula fed babies have more gastrointestinal episodes than breastfed babies. Then there are the Novalac formulas with a marketing claim in their name like "Sweet Dreams". MAIF is supposed to prevent formula advertising to the general public. In my experience it is clearly not working.

For many years I have sent complaints to APMAIF and in the last year to the Health Department. This takes up a great deal of my time and is also a risky thing for me to do as I am employed by the pharmacy selling the products which are being marketed inappropriately in my opinion. Often my complaint has been considered out of scope because of the narrow focus of MAIF in comparison to the WHO Code. There appears to be no real consequences to the company when a breach is recorded. I simply do not have the time to follow up many potential breaches. I know my colleagues feel the same. In affect the agreement relies on people volunteering their time to police the companies' behaviour.

There has been no report from the Tribunal since APMAIF has been disbanded. There is also doubt about the infant feeding qualifications of the Tribunal members. This does very little to inspire confidence in MAIF's ability to fulfil its role adequately.

MAIF does not cover toddler milk advertising. This is a major concern. It is advertised everywhere...on television in prime time and throughout the day, on parenting websites and Facebook pages. The cans look almost exactly the same as Stage 1 and 2 formulas which cannot be advertised. Families do not differentiate, meaning that the advertising of toddler milk with unsubstantiated health claims is a proxy formula advertising. Incentives like teddies, sippy cups or bowl sets meant to be given out with toddler milk sales are inadvertently given out to purchasers of formula by uninformed pharmacy staff. Marketing shelf talkers for toddler milk are placed on the shelves right next to formula, in effect advertising that brand's formula as well. I have sent photos of this common occurrence. It is not considered a breach.

MAIF does not cover formula company Carelines and Baby Clubs which serve to advertise the company brand. A new advertising tactic is to name a prenatal vitamin the same name as a formula, Aptamil's Profuture.

Electronic marketing is another area of concern not adequately addressed by MAIF. Parents simply have to click that they understand breastfeeding is important before reaching the company websites with pseudoscientific health marketing claims eg "nutritionally supporting your baby's immune system and brain development", "nutritionally complete". Pop up advertising happens when mothers click on online formula articles eg " A2 formula...gentle on tummies" with a pack shot of a can with a partially obscured number 3 on it and a face of a baby who looks younger than 12 months. This blatant advertising will be considered out of scope.

In my experience health professionals and pharmacy staff have no understanding of their obligations under MAIF. Hence formula samples can be found on display in doctors' waiting rooms. Formula samples appear in my desk drawers without me requesting them or signing for them. Pharmacy assistants give out formula samples when it is supposed to be only given out by health professionals "for professional evaluation". It is almost impossible to prove

that formula samples are used inappropriately in this way. When I reported to APMAIF about a pharmacy assistant signing for samples and giving them to a mother, my identity was revealed, the pharmacy denied it and my position there was compromised. Retailers should be covered by MAIF as they are under the WHO Code.

Another form of proxy advertising is the discounting of formula online and in store by retailers which MAIF allows but the WHO Code does not.

Another concern is that as MAIF is a voluntary agreement, some companies are not signatories. A potential breach I recently sent in was not considered in scope because the company involved, Bellamy's, is not a signatory. Bellamy's also makes unproven claims about their organic formula on their website.

Our Australian Dietary Guidelines recommend that baby's begin solids at around 6 months. And yet baby foods are advertised from 4 months. This is confusing for parents and puts babies at greater risk of obesity. Other baby foods for infants under 6 months which are covered under the WHO Code are not covered by MAIF. This is a major weakness.

Thank you for taking the time to consider my submission as someone who works at the coal face to protect breastfeeding from the influence of pervasive formula advertising. MAIF is an ineffective and weak tool that is not fulfilling its purpose of protecting breastfeeding by curtailing formula advertising to the public. I request that MAIF reauthorisation be for a period of one year only until the National Breastfeeding Strategy and the WHO Code reviews are known and a MAIF review than undertaken. Locking in an ineffective agreement for 10 years is a detrimental move and will continue to make the job of health professionals like me that much harder.

Regards