



November 10, 2015

Ms. Hannah Ransom
Senior Project Officer, Adjudication
Australian Competition and Consumer Commission
23 Marcus Clarke St
Canberra ACT 2601

Submitted via email: adjudication@accc.gov.au

Re: A91506 & A91507 – Infant Nutrition Council – submission

Submission on the Application for the revocation of A90539 and A90540 and the substitution with authorisations A91506 and A91507 lodged by the Infant Nutrition Council for the *Marketing in Australia of Infant Formula* (MAIF Agreement): Manufacturers and Importers Agreement Date 29 October 2015

Dear Ms. Ransom:

We appreciate the opportunity make a submission in response to the draft authorisation of A91506 and A91507. The International Board of Lactation Consultant Examiners® (IBLCE®) submits that:

1. The MAIF Agreement does not reflect “an appropriate implementation of the WHO Code” as suggested in previous submissions;
2. IBLCE requests that the ACCC hold a conference to discuss the draft determination, pursuant to section 90A of the CCA and welcomes an opportunity to present an oral submission;
3. IBLCE concurs with the Australian Breastfeeding submission¹ that Authorisation should not lock Australia into this agreement for another 10 years.

Thank you for your consideration and we look forward to hearing further from you.

Very Truly Yours,

Andreja Tekauc Golob, M.D., IBCLC

¹ Australian Breastfeeding Association D15+127882, 17.08.15,