



Ms Alison Graham
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22 March 2021

David Hatfield
Director, Competition Exemptions
Australian Competition & Consumer Commission
exemptions@acc.gov.au

Dear Mr Hatfield,

Re – AA1000534 – Infant Nutrition Council - submission

My name is Alison and I am an Accredited Practising Dietitian. I have spent my career working in the area of infant and child nutrition in hospitals, community health services, and public health departments. I have worked with families during pregnancy and the early years of their child's life providing nutrition support, education, and advice. I have a special interest in feeding relationships.

Breastfeeding is one of the earliest and most impactful opportunities to support infant and maternal health and wellbeing. It is a fundamental human right that needs to be protected. With growing awareness of the commercial determinants of health, the government must protect families from the inappropriate marketing of breastmilk substitutes.

Over my career I have witnessed the expansion of breastmilk substitute product ranges from infant formula, to progress formula, toddler milk, and growing-up milk. Marketing of these products is aggressive, pervasive, and rapidly evolving. Toddler milks are marketed directly and prolifically to parents. This in turn acts to market infant formula through cross-promotion, using identical brands, colours and logos to infant formula. For the MAIF Agreement to be effective these practices must end.

In the absence of any other regulatory framework, I believe that the MAIF Agreement has the potential to provide public benefit if it is effective. The *Australian National Breastfeeding Strategy: 2019 and beyond* and the Department of Health submission to this application indicates that a review of the MAIF Agreement is planned for 2021. In light of this, I urge the ACCC to consider a further reduction of the re-authorisation period to 2 years.

I am excited to see that the ACCC is considering imposing a condition that extends the limitations on advertising set out by the MAIF Agreement to apply to toddler milk. This is desperately needed and I strongly support this condition. The World Health Organization is clear that toddler milks are breastmilk substitutes and therefore should not be marketed. Imposing this condition would increase public benefit from the MAIF Agreement by making it more effective. Given the history of industry marketing practices, I believe that a more targeted approach to address the issue of toddler milk would be ineffective.

Thank you for the opportunity to respond to the ACCC's draft determination on AA1000534. I am happy for my submission to be placed on the public register on the ACCC website.

Yours sincerely

A grey rectangular box redacting the signature of Alison Graham.

Alison Graham BHSc(N&D)Hons, MPH
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