
From: [REDACTED]
Sent: Thursday, 19 November 2020 11:31 PM
To: Exemptions
Subject: AA1000534 – Infant Nutrition Council – submission

Categories: Submission

To whom it may concern,

Re: AA1000534 – Infant Nutrition Council –
submission

As a mum of two children (3 months old and 2.5 year old) I'm concerned about the marketing being used by formula companies within Australia. I have a two year old and many times a week I'm exposed to advertising for toddler milk drinks. These products are unnecessary and prey on the vulnerability of new parents wanting to provide the best nutrition to their children. The MAIF has no jurisdiction on these products and companies are getting consumers to trust these brands and their range of products. Marketing tactics such as this undermine breastfeeding and we need legislation that protects breastfeeding by stopping the aggressive marketing of toddler milk drinks to families. Each time I see these advertisements it makes me think of infant formula, which becomes advertising by proxy. When you are breastfeeding, particularly in the first few weeks as I've just done recently, it's really disheartening to see tins of 'milk drinks' nearly every day in your newsfeed on social media. The effectiveness of the MAIF Agreement has been watered down by the continued marketing of toddler milk drinks. This system is not working to protect families and children.

Here is an example of advertising that appeared on my social media feed on the 15/11/2020 (see attached picture). Each week most days I'm seeing ads for toddler milks and feeding related products, some of which make big claims. In the screenshot I attached a bottle company makes the following claims about their product:

- supports breastfeeding coordination
- allows baby to feed with their instinctive breastfeeding technique
- requires newborns to latch properly
- requires newborns to work at the feed
- designed to avoid nipple confusion
- save you and the health system \$\$\$

The main headline on the advertisement says 'closest thing to breastfeeding.' I don't understand these claims, they aren't clear and are misleading. How is this product, which I have to spend money on, going to save me \$\$\$ (money) when breastfeeding costs me nothing. Also how is it supposed to save the health system \$\$\$ (money) when there are health risks to both mother and baby from not breastfeeding. The health benefits of breastfeeding would be saving the health system money. Also my first child developed a bottle preference and my second developed nipple confusion after using artificial feeding products. I'm fortunate enough I could recognise this issue and got support however this ad and the claims make me think this product is risk free which it is not. If a family tried this product and experienced what I did but wasn't able to overcome the issue they would be stopping breastfeeding and forced to continue using these products. It's not difficult to see that sabotaging a breastfeeding dyad benefits companies advertising artificial milk and feeding products. This is why marketing of these products should not be allowed. Furthermore, all companies should not be

given the choice to participate in regulation, regulation should happen by parties without a conflict of interest and there should be harsh penalties to deter companies that breach a fully legislated WHO code.

Working as a health professional (Speech Pathologist) I've also experienced the push from companies to reach families with their products. Many years ago before I had children there was a representative from [REDACTED] who continued to reach out to me regularly offering to give us staff free products to look at, show families and have in our paediatric infant feeding kits to use in sessions. I felt the representative was very pushy in her emails and frequent contact. At one face to face visit she said the free products were not to be given out to families however if there were families struggling financially we could give them away. At the time I had no idea about the ways in which these companies associate with health professionals giving them perks (such as free products and "education") so that this association of the brand with the health professional strongly influences families. It's really powerful. Once becoming a mother I continued to buy only [REDACTED] products for my children. The not-for-profit organisation I work for also had a [REDACTED] representative come out to a staff professional development day where they presented a 'workshop' on their infant feeding products. It really was just a big advertisement for their products and not clinically useful as professionals. The hours I attended that day (including the [REDACTED] infant feeding workshop) were counted as professional development hours required to maintain my professional membership. These associations may seem benign however families are in a vulnerable position and health professionals may not know better (I certainly didn't). It also would be very difficult to know how frequently and far reaching marketing like this occurs and how many health professionals have been influenced by these relationships. Who is responsible for protecting families from these relationships where health professionals are being groomed to promote particular brands and products that undermine breastfeeding.

Families and children need protection from those who seek to profit from them and the current MAIF Agreement is allowing these violations to continue. I oppose the INC's request to re-authorise MAIF for 10 years.

Regards,

Katrina [REDACTED]