
From: Zoe Roxon-Hunter [REDACTED]
Sent: Monday, 16 November 2020 10:20 PM
To: Exemptions
Subject: Opposition to renewing the MAIF agreement.

To whom it may concern,

I am writing to oppose the INC request to re-authorise the MAIF agreement for a further 10 years. The MAIF agreement is a weak and watered down, outdated agreement and is not an adequate substitute to the WHO code. Breastfeeding is a human right and should be protected by government and the law at every possible level. The Australian Government's current decision to use MAIF, FSANZ and the NHMRC Infant Feeding Guidelines as a means of WHO Code compliance is a breach of the Convention on the Rights of the Child and the Innocenti Declaration.

Breastmilk is not just another corporate interest competing with other global corporate entities. It is the final stage of human reproduction and any attempt by corporate entities to attract customers away from breastfeeding has direct negative consequences on public health on a population level.

The ACCC promotes competition and fair trade in markets to benefit consumers, businesses, and the community. Yet breastfeeding and breastmilk are not goods and services to be bought and sold on the general market, nor should our biological functions be considered to be in competition with formula products.

I am a mother of two young children, both breastfed and a volunteer supporting women and families to breastfeed, I do not agree that the promotion of breast milk substitutes in Australia benefits any consumers, whether or not they are breastfeeding.

The marketing of toddler formula is especially insidious and I see frequent advertisements on social media and via paid promotional content via social Media "influencers". There seems to be very little regulation on this, despite the known health risks of highly processed, expensive and unnecessary toddler drink products. These products are heavily marketed as a tool to increase brand recognition and familiarity so that formula companies who are unable to promote infant formula can still Advertise their products.

Supermarket and pharmacies generally shelve toddler drink products adjacent to infant formula products which is confusing for parents who may view these products as a logical progression of products, despite toddler drinks falling outside the national dietary guidelines for children. Identical labelling and product placement has led to widespread consumer misuse. Instances have been recorded of babies being given an incorrect product owing to the similar labelling and product positioning.

Infant formula and toddler drinks should not be marketed as complementary products. Australia now needs to end the inappropriate marketing of toddler drink products through meeting the international minimum standard for marketing these products – legislating against the marketing of all breast milk substitute products (and infant feeding merchandise) 0-36 months, the Code.

The aggressive marketing of these expensive and potentially harmful products must now be stopped. The WHO advises that toddler drink products fall under the International Code definition of "breast milk substitute" and that health claims for these products are inappropriate.

The Australian Government is neglectful in their responsibility to protect breastfeeding, promote public health and fulfill obligations under international treaties.

Yours sincerely,
Zoe Roxon-Hunter