

Submission from Canterbury Breastfeeding Advocacy Service, Te Puawaitanga ki Ōtautahi Trust

From: []@tepuawaitanga.maori.nz>

Sent: Wednesday, November 1, 2023 3:17 PM

Subject: RE: Commerce Commission proposes to authorise the restrictions on advertising and marketing of infant formula

Tēnā koe []

Thank you for offering an opportunity for the Canterbury Breastfeeding Advocacy Service to provide comment on the Commerce Commission's proposal to grant authorisation to the current and future members of Infant Nutrition Council Limited (INC) to restrict their advertising and marketing of formula products for infants aged up to 12 months old.

I have read through the emails, the submissions, and the INC amendment to the application and offer the following comment:

The Canterbury Breastfeeding Advocacy Service is a Te Aka Whai Ora funded service tasked with strengthening the protection, promotion and support of breastfeeding in the Canterbury rohe. Service activities include the development and provision of education and support information, the facilitation and support of local collaboration, the development and support of a Whānau-friendly and breastfeeding-friendly Canterbury, and the strengthening of a competent and capable workforce within Te Puawaitanga ki Ōtautahi (the service's kaupapa Māori host organisation) in regard to infant feeding.

Breastfeeding provides protection to infants and their mothers from several significant negative health outcomes. These include SUDI, diabetes, infections and illnesses for babies; and reproductive and breast cancers, diabetes and heart disease for their mothers. It is an important determinant of health that requires significant investment of resourcing to effectively support and protect.

The Canterbury Breastfeeding Advocacy Service fully supports the submissions offered by both the New Zealand College of Midwives and the New Zealand Breastfeeding Alliance, noting that whilst these submissions support the request for authorisation of the continued restriction of marketing by the Infant Nutrition Council due to such authorisation offering some protection to whānau, they are both clear that this is an inadequate response to the ongoing infant feeding needs of New Zealand whānau. The Canterbury Breastfeeding Advocacy Service notes that the failure of successive New Zealand Governments to implement the full recommendations of the International Code of the Marketing of Breast-milk Substitutes and subsequent World Health Assembly Resolutions creates the greatest health and financial harm for those whānau already significantly impacted by systemic inequities.

Whilst the Canterbury Breastfeeding Advocacy Service supports the authorisation generally, it doesn't support the proposed changes to clause 6.6 of the INC code, noting the greater need for protection of whānau in such vulnerable circumstances as emergencies and poverty.

Thank you again for the opportunity to offer input to this process.

Ngā mihi



**Te Puawaitanga
ki Ōtautahi Trust**

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Me aro koe ki te hā o Hineahuone
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For us and for those who will come after us

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He wāhi haumarū
Breastfeeding welcome here