

Ministry of Health feedback on the Draft Determination

Paragraph	Text in Draft Determination	Suggested amendment or comment
7	World Health Organisation spelling; Breast-Milk Substitutes; “...The WHO Code aims to protect and promote breastfeeding, and to restrict the marketing of breast-milk substitutes in ways that could undermine this aim.”	World Health Organization; Breast-milk Substitutes; “...The WHO Code aims to protect and promote breastfeeding, and to restrict the marketing and distribution of breast-milk substitutes in ways that could undermine this aim.”
8	“The WHO Code was voluntarily adopted by the Government of New Zealand in 1983”;	“The WHO Code was <del>voluntarily</del> adopted <u>on a voluntary</u> basis by the Government of New Zealand in 1983.
8	“...The INC Code forms an important part in New Zealand meeting its obligations under the WHO Code.”	“...The INC Code <del>forms</del> is an important part <del>in</del> of New Zealand’s fulfilment of <del>meeting</del> its obligations under the WHO Code.”
19.1	“...under the Code for Advertising Food, using the INC Code as guidelines when assessing such complaints; and”	“...under the <u>Advertising Standards Code (formerly the Code for Advertising Food)</u> , using the INC <u>New Zealand Follow-on Formula Marketing Guidelines</u> Code as guidelines when assessing such complaints; and”
25.3	Footnote 21 is incorrect	The correct URL to the MoH’s nutrition guidelines for infants is: <a href="https://www.health.govt.nz/system/files/documents/publications/food-and-nutrition-guidelines-healthy-infants-and-toddlers-revised-dec12.pdf">https://www.health.govt.nz/system/files/documents/publications/food-and-nutrition-guidelines-healthy-infants-and-toddlers-revised-dec12.pdf</a>
25.4	Footnote 22 refers to irrelevant information	Delete footnote.
35	“...Stage three formula, also known as “toddlers’ milk”...”	Stage three formula is known as “toddler milk” or “toddler milk drink”.
35	“...The composition of stage three formula differs significantly enough from stage one and two formula that they are not generally substitutable.”	“...The composition of stage three formula differs significantly enough from stage one and two formula that they are not <del>generally</del> substitutable.”
36	“Stage two and three formulas are designed primarily as dietary supplements, rather than complete dietary replacements. Stage one formula, on the other hand, is intended to be a substitute for breast milk...”	Stage one and two are actually more similar in composition than stage two and three. An infant who is not breastfed relies on infant formula (stage 1 or 2) as the principal source of nourishment between 6 and 12 months as solid foods are gradually introduced to their diet. Stage two formulas are considered a substitute for either breast milk or infant formula. Stage 3, on the other hand, is a formulated supplementary food intended to supplement a normal diet

		<p>where intakes of energy and nutrients may not be adequate.</p> <p>Of note, the MoH does not recommend Stage 2 or Stage 3 formulas, deeming both of them unnecessary as infant formula can be used from birth to 12 months, then the child can have whole milk to drink (dark blue label).</p>
84	<p><i>"...were to prevent an uptake of follow-on formula use and a corresponding drop in breastfeeding."</i></p>	<p>Add "Effectively reducing the duration of breast feeding."</p>
86	<p><i>"...a recent paper in the Lancet summarised an extensive literature review on the effects of breastfeeding which identified a number of health benefits to both infants and their mothers from breastfeeding..."</i></p>	<p><i>"...a recent paper in the Lancet summarised an extensive literature review on the effects of breastfeeding which identified a number of health benefits to both infants and their mothers from breastfeeding..."</i> <u>A number of these health benefits are dose-dependent and relate to breastfeeding duration with a longer duration resulting in greater health benefits.</u></p>
103	<p><i>"The existence of these net (consumer surplus) benefits of formula feeding for many mothers is evidenced by the fact that 84% of mothers stop exclusively breastfeeding after six months and 34% of mothers stop any breastfeeding when the child is between six and 11 months..."</i></p>	<p>This is not what the study found and is not useful for making your point as the public health recommendation is for women to exclusively breastfeed to around six months at which time baby is ready for and needs food as well. Once food is introduced this is no longer considered exclusive breastfeeding. Suggest you use the following key findings from the study:</p> <ul style="list-style-type: none"> <li>• Currently in NZ a large proportion of children do not achieve the recommendation for duration of breastfeeding (to at least 1 year) or exclusive breastfeeding (to six months).</li> <li>• At age six months only 15.7% of the children were being exclusively breastfed.</li> <li>• At age six months 65.6% of children were still being breastfed.</li> <li>• At 1 year 36.6% of children were still being breastfed.</li> </ul>
104		<p>It is the role of health workers to provide this information to mothers and parents. In NZ there is universal maternity care with midwife visits continuing until baby is six weeks old. After this, families receive free, regular appointments with a Plunket nurse. We</p>

		<p>do not see the infant formula industry as being responsible for providing this information.</p> <p>The 2012 Growing Up in New Zealand Follow-up Report reported on the why women stop breastfeeding. The top 2 reasons were the perception that they didn't have enough milk and because their baby didn't seem satisfied after breastfeeding.</p>
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