



Plunket

# Plunket Submission on the Commerce Commission's authorisation application from Infant Nutrition Council.

DATE: September 2018

Royal New Zealand Plunket Trust

## Introduction

Plunket's submission is guided by our vision that in the first 1,000 days we can make the difference of a lifetime. Our vision is underpinned by three strategic goals:

**Healthy tamariki** – we make sure every child/tamariki has the opportunity to be as healthy and well as they can be.

**Confident whānau** – we build the confidence and knowledge of whānau and families across New Zealand.

**Connected Communities** – we make sure no family/whānau is left isolated, disconnected or unable to cope.

Plunket works with families across Aotearoa to support breastfeeding and sees first-hand the challenges and joys associated with breastfeeding. We know that breastfeeding has significant impacts for children's health and well-being both in the short and long term life outcomes.

New Zealand has high breastfeeding initiation rates, but breastfeeding rates after the first six weeks of infants' lives decline steeply. We know that of the babies who are receiving some breastmilk at six weeks, 80% are still receiving some breastmilk at 6 months and only 60% are receiving any breastmilk at one year.

Plunket's goal is to see more babies being exclusively breastfed for longer and extending the duration of any breastfeeding. Breastfeeding mothers need a supportive societal environment for this to happen. Advertising in its many forms are key influencers to that supportive environment.

Plunket would like to commend the Commerce Commission for taking this preliminary decision. We agreed that there are public health benefits and potential to extending the restrictions for the advertising and marketing of infant formulas to children up to 12 months of age.

### Plunket's position:

Plunket fully supports the Commerce Commission's preliminary decision that it should grant authorisation to extend the restrictions on advertising and marketing in the INC Code to cover infant formula products for children aged up to 12 months of age.

### Rationale:

1. Plunket supports any action that supports breastfeeding. This proposal is consistent with International recommendations - research demonstrates that increases in marketing and increased sales of breastmilk substitutes negatively affects breastfeeding rates and status and increases the likelihood that mothers will stop breastfeeding.<sup>1</sup>
2. Plunket fully supports the World Health Organisation recommendation that women exclusively breastfeed up to 6 months, with continued breastfeeding along with appropriate complementary foods up to 2 years and beyond. The authorisation would support New Zealand to meet our international standards and fulfil our obligations under the WHO International code of marketing of Breast milk substitutes.<sup>2</sup>
3. New Zealand's parental leave provision is 22 weeks paid leave. This authorization can support exclusive breastfeeding for a longer period. Advertising beginning at six months could be very influential when the critical decision making regarding returning to work is made.<sup>3</sup>
4. Currently rates of breastfeeding drop dramatically from 3-6 months so any move to support continued breastfeeding would support more positive health outcomes.<sup>4</sup>

### Recommendations:

5. Plunket would suggest that all breast milk substitutes should be called just that, including follow on and toddler milks.
6. Plunket would like to suggest that this authorisation is applied to all formula companies trading in New Zealand, not just members of the INC.

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<sup>1</sup> Piwoz, E.G., & Huffman, S., 2015, **The Impact of Marketing of Breast-Milk Substitutes on WHO-Recommended Breastfeeding Practices**. Food and Nutrition Bulletin 2015, Vol. 36(4) 373-386.

<sup>2</sup> World Health Organization. International Code of Marketing of Breastmilk Substitutes. Geneva: World Health Organization; 1981.

<sup>3</sup> Ogbuanu, C., Glover, S., Probst, J., (2011), The Effect of Maternity Leave Length and Time of Return to Work on Breastfeeding. PEDIATRICS Volume 127, Number 6, June

<sup>4</sup> Plunket Breastfeeding Data Analysis: <https://www.plunket.org.nz/news-and-research/research-from-plunket/plunket-breastfeeding-data-analysis/>