

T:D 102  
2018-06/011

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Commerce Commission

By email: [registrar@comcom.govt.nz](mailto:registrar@comcom.govt.nz)

Tēnā koe

**Infant Nutrition Council (INC).**

The New Zealand Nurses Organisation *Tōpūtanga Tapuhi Kaitiaki o Aotearoa* (NZNO) appreciates the opportunity to comment on the application from the INC seeking authorisation for an arrangement allowing the INC to restrict its members from marketing formula products for children aged up to 12 months. We apologise for the delayed response, which, as indicated was due to the short consultation timeframe and the difficulty of 'shortcutting' normal processes for member feedback. We note that it is likely that there will be a further opportunity for review should the application go ahead. We have consulted with members and staff, including members of Te Rūnanga, Women's Health College, Neonatal College and College of Primary Health Care Nurses, midwives and professional nursing and policy advisers.

In general NZNO welcomes any action providing regulatory support for the practical implementation of the World Health Organisation (WHO) Code of Breastfeeding and improve the rates of breastfeeding in Aotearoa New Zealand consistent with international recommendations. While new maternity leave provisions critically enable exclusive breastfeeding for six months, they do not support extended breastfeeding as recommended. For that reason we advise *extreme caution* around 'gateway advertising' at a period when mothers are likely to be resuming work. In particular we oppose the use of phrases 'follow on' formula' which may imply that such a product is necessary and/or appropriate for young babies.

NZNO would be happy to provide further information or liaison with our expert members if necessary. Once again, thanks you for the opportunity to comment.

Nāku noa, nā



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**About the New Zealand Nurses Organisation *Tōpūtanga Tapuhi Kaitiaki o Aotearoa* (NZNO)**

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NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand. NZNO represents over 52, 000 members, mainly nurses, midwives, students and health workers on professional and employment related matters. NZNO is affiliated to the International Council of Nurses and the New Zealand Council of Trade Unions.

NZNO promotes and advocates for professional excellence in nursing by providing leadership, research and education to inspire and progress the profession of nursing. NZNO represents members on employment and industrial matters and negotiates collective employment agreements.

NZNO embraces te Tiriti o Waitangi and contributes to the improvement of the health status and outcomes of all peoples of Aotearoa New Zealand through influencing health, employment and  
NZNO members - nurses, midwives and kaiāwhina - work in partnership with individuals, families, whānau and communities in all health settings throughout Aotearoa.