



To: Food Standards Australia New Zealand

Proposal P1028: Infant Formula

Thank you for the opportunity to review this proposal on behalf of the members of New Zealand Breastfeeding Alliance (NZBA).

NZBA considers that standards for all products should align with the International Code of Marketing of Breastmilk Substitutes and relevant World Health Assembly resolutions. Health and well-being of infants in the short and long term should be the primary consideration; therefore it is essential that the regulation of these products be without commercial influence.

It is the view of NZBA that breastfeeding is the best start for all infants; there are only few instances where exclusive breastfeeding is not possible. For infants with significant medical conditions where alternative feeding is required, in part or in full, the management should be monitored by a medical professional, we therefore believe that all special formula be available on prescription only. It is our belief that only products for which there is scientific evidence be available in New Zealand.

There are many families who struggle with concerns over gastro intestinal issues who turn to products which are not scientifically proven, as the products claim that they may be of benefit. We would like to see stronger regulation around the availability of these products and the removal of health benefit advertising to the general public.

All products which are to be available for purchase by the public should carry the 'breast is best' message.

Again, NZBA wishes to thank FSANZ for the opportunity to comment on this proposal.

Yours sincerely

Pp Jane Cartwright
Executive Officer