

ADVOCATING TO PROTECT,  
PROMOTE AND SUPPORT BREASTFEEDING

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Position: Co-convenor, Breastfeeding Coalition Tasmania

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Submission  
Consultation Paper -  
Proposal P1028  
Infant Formula

May 2016

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**Infant formula needs to be clearly differentiated from other similar products for the safety and protection of infants.**

In regulating infant formula, labelling requirements need to ensure that infant formula products can be easily differentiated from other similar products on the market. Current product labelling practices do not allow for the easy identification of infant formula suitable for consumption by an infant under the age of 12 months.

Research shows that consumers recognise formula as a category rather than an individual product<sup>1</sup>. Anecdotally we are aware that parents are not able to easily differentiate infant formula products when trying to select appropriate formula for their infants. Members of our coalition have observed parents making inappropriate selections for their infants. On several occasions members have reported talking with parents to ensure that they were aware that the product they selected was unsuitable for the infant in their company. Parents had not understood that some products were unsuitable as the sole source of nutrition for their infant and commented that they 'all look the same to me'.

Infant Feeding Guidelines for health workers<sup>2</sup> advise that for mothers who do not breastfeed, or do so only partially, advice should include: -

- that a suitable infant formula should be used until the infant is 12 months of age.
- the hazards of improper use of infant formula preparation and storage.

If parents are unable to easily distinguish *suitable* infant formula, infants are placed at risk and may be exposed to inappropriate products. Infants are a physiologically vulnerable population group and require protection.

The National Statement on Health Literacy<sup>3</sup> states that only about 40 per cent of adults will be able to make good choices based on thorough understanding of the issues they face and the choices available. The Australian Commission on Safety and Quality in Health Care separates health literacy into two components: individual health literacy and the health literacy environment.

*Individual health literacy is the skills, knowledge, motivation and capacity of a person to access, understand, appraise and apply information to make effective decisions about health and health care and take appropriate action.*

*Health literacy environment is the infrastructure, policies, processes, materials, people and relationships that make up the health system and have an impact on the way that people access, understand, appraise and apply health-related information and services.*

Ensuring that infant formula can be easily differentiated contributes to an individual's ability to understand, appraise and apply information about suitable infant formula, and make appropriate choices to protect their infant. A policy requirement for infant formula to be easily differentiated would improve the ability of people to access, understand and appraise health-related information therefore contributing to population health and protection.

**We agree with the prohibition on nutrient content and health claims on infant formula products.**

## References

1. Berry NJ, Jones S, Iverson D 2009, *It's all formula to me: women's understandings of toddler milk ads*. *Breastfeeding Review* 18(1): 21-30.
2. National Health and Medical Research Council (2012) *Infant Feeding Guidelines: Information for health workers*. Canberra: National Health and Medical Research Council.
3. Australian Commission on Safety and Quality in Health Care (2014) *Health Literacy National Statement*. Available <http://www.safetyandquality.gov.au/publications/health-literacy-national-statement/> Accessed 2/5/2016.

# Breastfeeding Coalition Tasmania

Breastfeeding Coalition Tasmania brings together many groups interested in creating a more supportive environment for breastfeeding. We do this by advocating for better facilities, support and protection for breastfeeding. Initially formed in 1996, the Coalition now extends across the state of Tasmania.

## Member Organisations

Australian Breastfeeding Association, Tasmania Branch  
Australian Medical Association, Tasmania  
Australian Society of Independent Midwives  
Baby Friendly Tasmania Reference Group  
Calvary Health Care Tasmania  
Child Health and Parenting Service, Department of Health and Human Services  
Child Health Association Tasmania  
Department of Education Tasmania  
Department of Premier and Cabinet, Community Development Division  
Diabetes Tasmania  
Dietetic Department, Royal Hobart Hospital  
Division of Women's and Children's Services, Launceston General Hospital  
Eat Well Tasmania  
Glenorchy City Council  
Good Beginnings Australia, Tasmania  
Hobart Private Hospital  
Lactation Consultants of Australia and New Zealand  
Lactation Consultants, Maternity Unit, Royal Hobart Hospital  
Launceston Birth Centre  
National Association of Child Birth Educators Tasmanian State Branch  
North West Private Hospital  
Oral Health Services Tasmania, Department of Health and Human Services  
Pharmaceutical Society Australia, Tasmanian Branch  
Health Improvement, Department of Health and Human Services  
Tasmanian Aboriginal Centre  
Tasmanian Early Years Foundation  
The Lactation Network  
Uniting Church in Australia, Synod of Victoria and Tasmania  
University of Tasmania