

12 December 2022

Maria Vamvakiou MP  
Chair, Human Rights Subcommittee  
Level 2, Office 1. 14 Dimboola Road  
Broadmeadows  
VIC 3047

RE: submission to the Inquiry into the rights of women and children around the world

Dear Ms Vamvakiou,

Thank you for inviting submissions to the Inquiry into the rights of women and children worldwide. This inquiry is a significant opportunity to address the scope of human rights violations at an international level. I bring to the Committee's attention the issue of maternal health and nutrition of infants and young children, a group often overlooked. This is a unique issue because infants and young children rely on women's primary breastmilk production for optimal health, growth, and development. Promoting commercial formula products displaces breastfeeding and risks maternal, infant and young child health. It also makes women dependent on commercial products, in some contexts pushing their families into poverty and leaving them vulnerable in natural disasters.

Australia is a member of the World Health Assembly and, as such, is obliged to act to end exploitative marketing of breastmilk substitutes. Australia also has an obligation to support breastfeeding under the Convention on the Rights of the Child and other UN human rights instruments to respect, protect, and fulfil children's rights to health and nutritious foods. Women, too, have the right to be protected from harmful interference by industry and to have skilled breastfeeding support.

I work in maternal-child health, primarily focusing on breastfeeding advocacy. I am a volunteer breastfeeding counsellor and work with women from many cultural backgrounds. As part of my advocacy, I have become sensitised to how Australian commercial milk formula ('formula') manufacturers violate international law. These laws protect mothers and babies from harmful marketing practices which undermine their health and well-being.

All global health authorities agree on the importance of supporting mothers to breastfeed wherever possible. The widespread marketing and promotion of formula influences feeding decisions and negatively impacts breastfeeding rates.<sup>1</sup> The Lancet estimated that 823,000 child deaths would be prevented each year in low- and middle-income countries if

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<sup>1</sup> World Health Organization. How the marketing of formula milk influences our decisions on infant feeding [Internet]. Geneva: World Health Organization; 2022 [cited 2022 Aug 8]. Available from: <https://www.who.int/publications-detail-redirect/9789240044609>

breastfeeding were adopted at close to universal levels; 20,000 maternal breast cancer deaths every year would also be prevented in such a scenario.<sup>2</sup>

It is therefore highly concerning that the Department of Agriculture, Water and the Environment recently awarded AU\$160,000 in grant funding to assist Australian formula manufacturers in developing marketing strategies to expand into markets in Southeast Asia, Latin America and the Middle East.<sup>3</sup> While this may be common practice when supporting Australian industry, there is an important context that makes the Australian Government's support in this instance inappropriate and highly damaging to the health of mothers and babies. For example, improved breastfeeding rates can potentially prevent 66,000 child deaths and save US\$145 billion annually in the Southeast Asia Pacific region<sup>4</sup> alone.

I draw your attention to a recent commentary published in *The Lancet Regional Health Western Pacific* regarding the role of Australian formula manufacturers in undermining food security and children's right to health in the Asia-Pacific region. The Australian Government does little to prevent pervasive, exploitative formula marketing at home and abroad.

Link to the Lancet commentary for your consideration in the inquiry:

[https://www.thelancet.com/journals/lanwpc/article/PIIS2666-6065\(22\)00255-3/fulltext](https://www.thelancet.com/journals/lanwpc/article/PIIS2666-6065(22)00255-3/fulltext)

Australian formula companies have a long-established track record of inappropriate marketing practices encouraging unhealthy and dangerous reliance on infant formula products.<sup>5</sup> The Australian Government must protect the health and well-being of mothers, infants and young children by protecting breastfeeding and curbing the unethical marketing practices of Australian formula manufacturers.

I will follow the inquiry with interest.

Yours faithfully

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<sup>2</sup> Victora CG et al., 2016 'Breastfeeding in the 21st century: epidemiology, mechanisms, and lifelong effect', The Lancet, Vol 387, page 467

<sup>3</sup> DAWE grant funding for Australian formula companies <http://getindustry.com.au/2022/01/19/grant-just-the-formula-for-dairy-exports/>

<sup>4</sup> Ahsan S, Jain S, Walters D. The Global Cost of Not Breastfeeding. Nutrition International and Alive & Thrive. 2022. Retrieved August 8, 2022 from <https://www.nutritionintl.org/wp-content/uploads/2022/07/CONBF-Global-Brief-July-28-2022-FINAL.pdf>

<sup>5</sup> Breastfeeding Advocacy Australia submission to ACCC 2020 <https://storage.googleapis.com/wzukusers/user-34970444/documents/05fec7d05dd14ebb8a9045e50a98231e/061220%20FINAL%20NO%20ADDRESS%20BAA-ACCC-MAIF-SUBMISSION.pdf>

### Further Reading

- *Formula For Disaster* - Save the Children  
<https://www.savethechildren.org.uk/what-we-do/policy-and-practice/our-featured-reports/dont-push-it>
- *Submission to the ACCC re Australian formula marketing laws* - Breastfeeding Advocacy Australia  
<https://storage.googleapis.com/wzukusers/user-34970444/documents/05fec7d05dd14ebb8a9045e50a98231e/061220%20FINAL%20NO%20ADDRESS%20BAA-ACCC-MAIF-SUBMISSION.pdf>
- *The Global Cost of Not Breastfeeding* – Alive & Thrive, Nutrition International  
<https://www.nutritionintl.org/wp-content/uploads/2022/07/CONBF-Global-Brief-July-28-2022-FINAL.pdf>