



Undermining Breastfeeding for Profit

A Interim Report on the Weekly Collection of International Code Breaches

January 2023 to June 2023



Infant formula on TV and targeting to health workers.



How to use Infloiran with infants and babies



02 Healthcare professionals

Community pharmacies and Hospitals can order Infloiran®

infloran.com.au



Undermining of Breastfeeding for Profit

A Report on the Weekly Collection of International Code Breaches.

January 2023 to June 2023

June 2023© Breastfeeding Advocacy Australia



Undermining of Breastfeeding for Profit

An interim Report on the Weekly Collection of International Code Breaches and other predatory marketing in Australia.

January 2023 to June 2023

	Page No
Introduction	3
Continuing BAA's Weekly Collection	4
Observations from the previous 6 months	5
Changes to the type of advertising has been reported.	5
Changes to who initiated the advertising?	7
Social engineering	8
Recommendations	12
Who is BAA?	13
Abbreviations	14
Definitions	15



Introduction

We begin this subsequent report with a reminder that the existing International Code is the minimum standard that industry agreed they would abide by in 1981. Industry helped draft the Code and yet there is no attempt to adhere to the most basic standards of marketing practice laid out in those first documents. Despite more than forty years of advocacy and evidence that minimal compliance has ever been achieved, the talking and arguing between advocates continues.

Those who appoint themselves as code experts fail to include the full scope of the code continue to have meetings and discussions, but mothers and babies are in a worse position in 2023 than ever before. It is disappointing to see that there are few protections and little action to end this because it continues to be more important to be published or be perceived as some sort of expert rather than to make authentic change.

Those who take money from code violators to get published and advance their career are welcomed and celebrated by breastfeeding advocates, this is confusing and incongruent with change that filters down to genuine protection of mothers and babies. BAA will continue to collect and highlight these examples. We hope that the impact on the breastfeeding dyad of the predatory marketing from this vast array of unnecessary products is the focus of all actions and advocates, not the celebration of individuals.



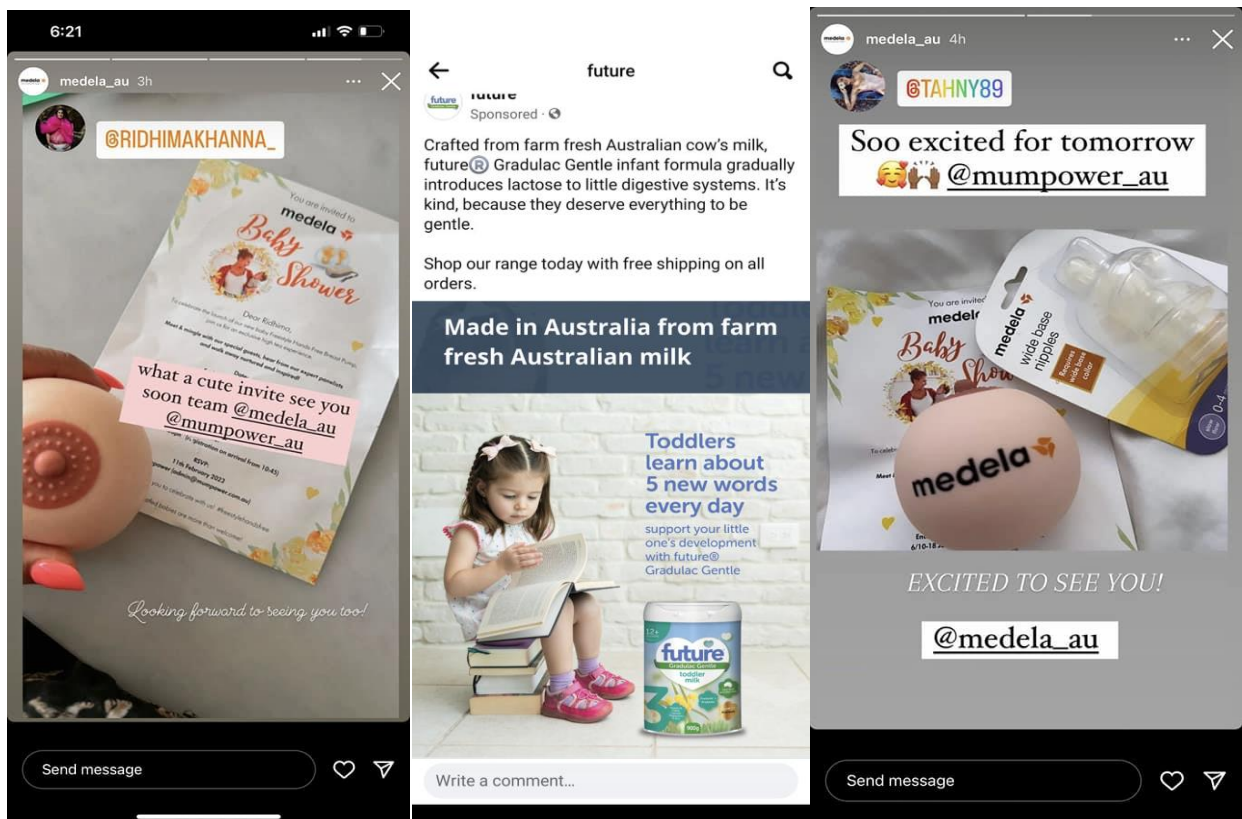
“Sponsorship by its very nature creates a conflict of interest. Whether it takes the form of gift items, meals or help with conference expenses, it creates a sense of obligation and a need to reciprocate in some way. The “gift relationship” thus influences our attitude to the company and its products and leads to an unconscious unwillingness to think or speak ill of them.” [David Clark¹](#)



Continuing BAA Weekly Collections

Between January 2023 and June 2023 has recorded approximately 516 examples of the continuation of the advertising that undermines breastfeeding for profit in Australia.

Every week a new post is created. Group members are asked to post a picture with the date and location of the activity. Each post is entered onto a spreadsheet and the picture is dated and saved into a file. Each weekly post has its own link. Contributors can interact with the Group admin and there are many questions and discussions that broaden the value of Weekly Collections beyond a simple record of predatory marketing to building a community of knowledgeable advocates.



Mothers need protection from this type of advertising disguised as a “gift” and lies about advantages of sugary and unnecessary toddler drinks.

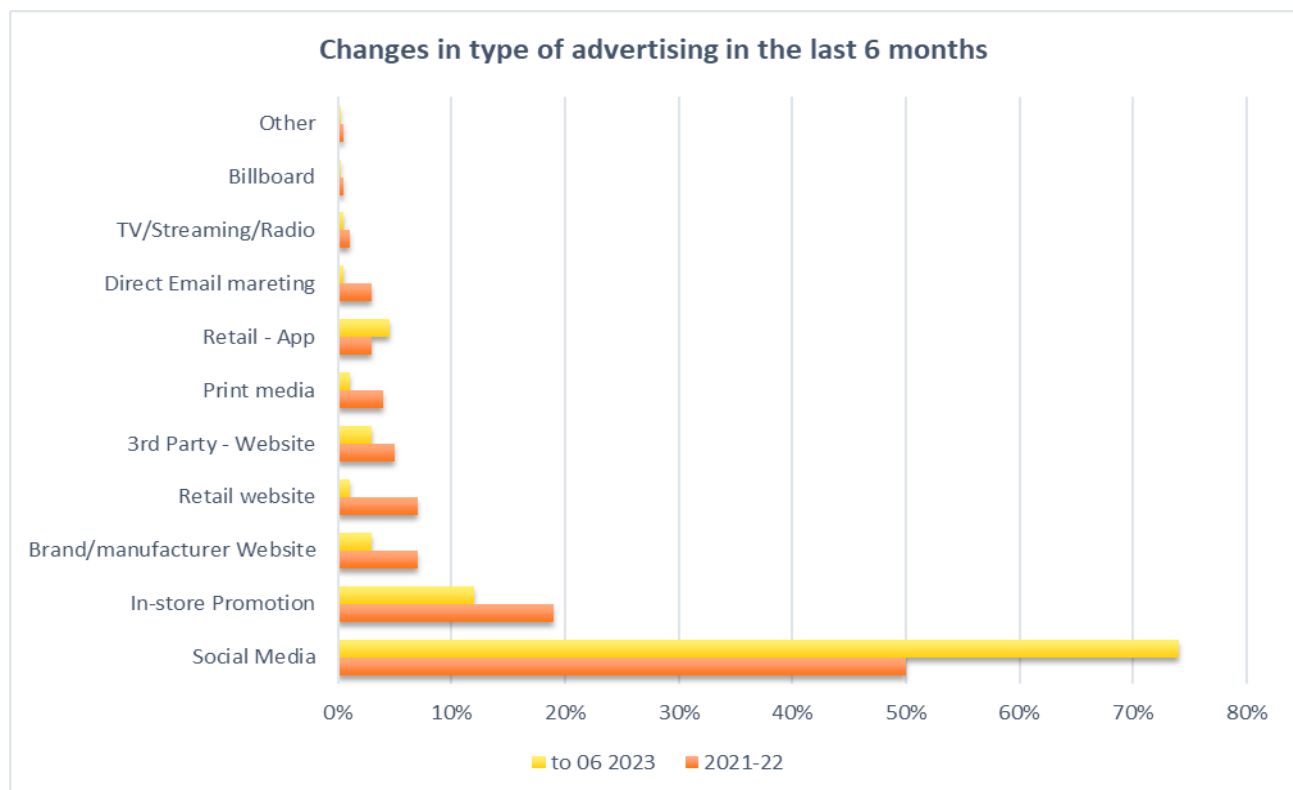


Observations from the previous six months

There has been a marked increase in Toddler Drink and industry 'hiding' 0-12m behind invitations to website to gain access to Specials, Discounts, Rewards Points across the whole range. Once inside the website the 0-6m is often the first product displayed. Reward Points are new in the last few months - particularly with Sprout. Members are becoming increasingly angry with SE - Pumps, Dummies, Lactation teas and 'other stuff'. They are also cross with the claims of 'closer to nature' etc. Members now seem to be looking for bottle emojis and other graphics, photos of SE, and sharing them on the Weekly post, so there is a slow and increasing awareness. Cross promotion is very evident, with pre-pregnancy to the grave UPF. The GUMs 4+ are starting to appear more now too.

Changes to the type of advertising has been reported.

The previous six months have seen changes in the type of advertising reported. Significantly, the amount of Social Media advertising has jumped from 50% to 74% of the reported violations and an increase in the use of retails apps is also noteworthy. A further disturbing change, also small in comparison to social media is the emergence of government agencies as an advertising vehicle.





AUSTRADEOFFICIAL
Posts

Follow



austradeofficial



Australian Government

Australian Trade and Investment Commission



18 likes

austradeofficial Australia's leading producer of goat dairy products for babies and children, @bubsaustralia has hit on winning formula in its #export strategy: diversification.

Long before pandemics and trade disruptions, Bubs Australia was expanding across Asia and since September this year it has entered the US market.

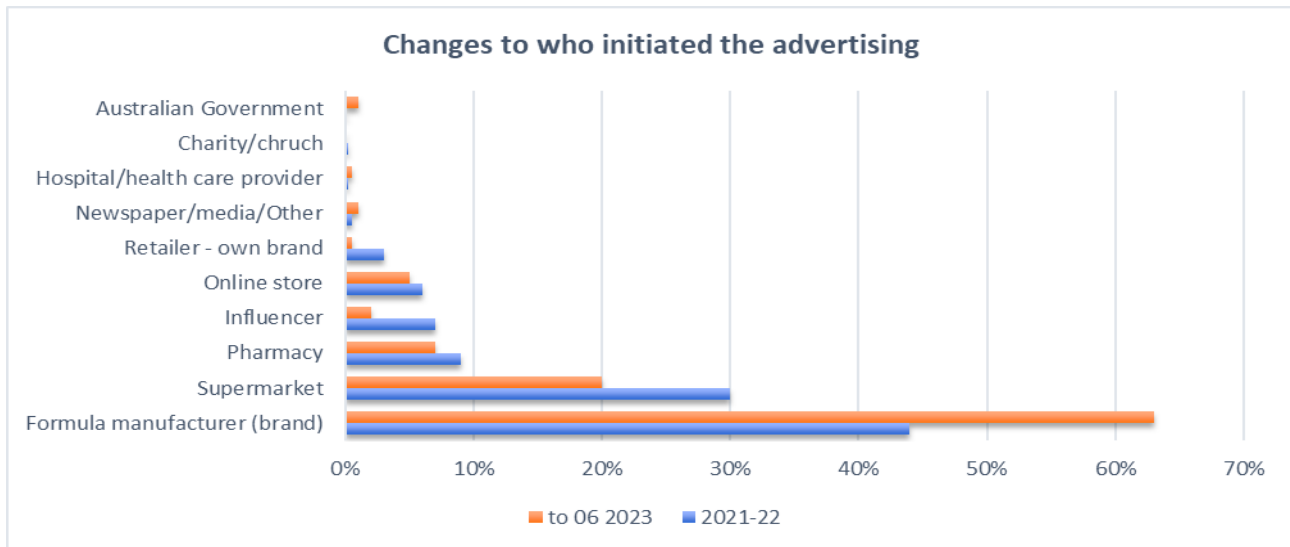
Who initiated the advertising?

Hit the link in the bio to discover more #ausbiz success stories.

This is truly a disturbing development and contradicts the governments' own policies. The government is advertising that they will support businesses to undermine public health! Who is watching?



Changes to initiation of advertising



It was pleasing to note that there were no charities or churches reported this time but the appearance of the Australian government and the significant increase in initiation of advertising from the formula companies is concerning. Another disappointment was the inclusion of UNICEF, both in Australia and Malaysia tasked with protecting children, knowledge of safe and appropriate food sources that are not ultra processed and of commercial benefit to wealthy multinationals should be their expertise, unfortunately they are as easily manipulated as governments and the public.

UNICEF Australia
Sponsored ·

We know Mother's Day can be a difficult time for some. If you'd still like to show love and appreciation to someone no longer with you, purchase this miracle peanut paste in their memory to help prevent malnutrition.

Prevent malnutrition in memory of a mother

SHOP NOW →

unicef for every child

shop.unicef.org.au/gifts
Honour a mother's life this Mother's Day

Shop now

Like Comment Share

MUST HAVE

#We Makan Together

Save a malnourished child

unicef for every child

UNICEF Malaysia · Follow

Dec 16, 2022



Definitions from Oxford Languages²

Social Engineering

1. the use of centralized planning in an attempt to manage social change and regulate the future development and behaviour of a society.
2. in the context of information security) the use of deception to manipulate individuals into divulging confidential or personal information that may be used for fraudulent purposes. "

Observations on social engineering

6:58    11% 

← QUT (Queensland University of Technol... 

 **QUT (Queensland University of Technology)** 
Sponsored • 

Are you a parent of a baby or toddler aged 6 months to 2 years? Do you sometimes struggle to pay the bills? QUT researchers invite you to complete this survey to share your experiences around feeding your baby.



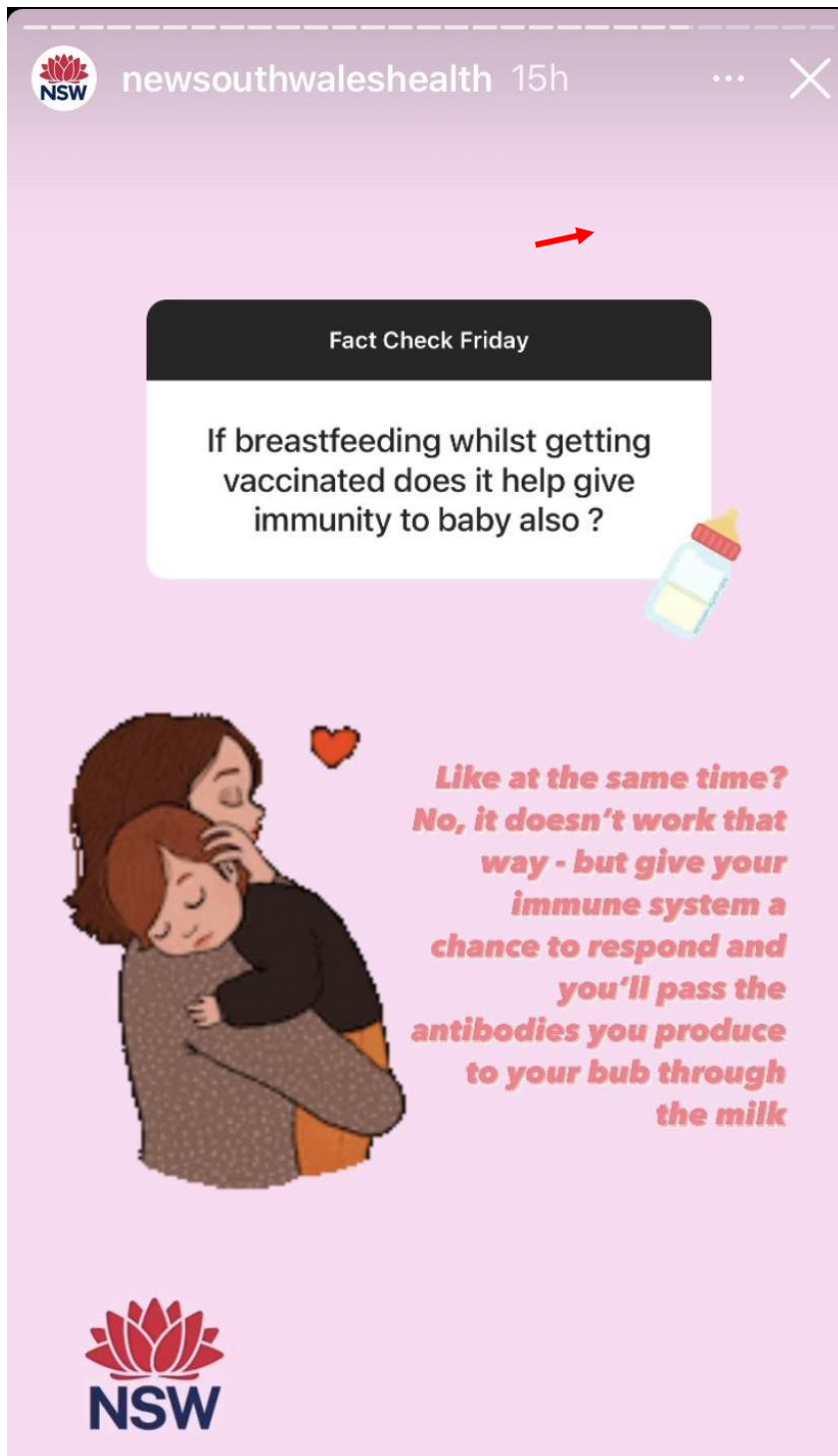
QUT.EDU.AU
Parents needed for QUT study
Feeding your Baby in Tough Times - Survey [LEARN MORE](#)

What influences the use of images in advertisements that are not about infant feeding products? There is poor understanding of industry influence on what is considered normal infant feeding. It is so disappointing to see this image used by the Queensland University of Technology when they could have easily used a breastfeeding picture or a picture of both. Those choosing would have no idea that they were reinforcing the normalization of artificial feeding, as a society we need to normalize breastfeeding, it needs to be seen and experienced for this to happen.

Government agencies have again chosen to use bottle images, how can awareness of the negative impact be communicated to those with such authority? Choosing a neutral image of a child being held is possible or at the very least occasional breastfeeding images on their own.



There are two products that can be used to demonstrate the extraordinary success of the marketing of infant feeding products and the deliberate destruction in confidence in breastfeeding as a natural and normal way to feed and nurture human infants. These examples also demonstrate



the failure of those in positions of power to protect mothers and babies from predatory marketing.

The first is Mumamoo, a formula company from South Australia, proudly established by women and celebrated as a business success story about women and for women. The women behind this product have clearly experienced breastfeeding difficulty and had found themselves giving formula and feeling conflicted but also believing that it was their only option for themselves and their children. The motivation to create the company was to meet a perceived need and make a living from the inevitable event of breastfeeding failure. The second product is Biomilk, also the result of a woman having a failed breastfeeding experience and seeking not only a solution but also a way to make a profit from breastfeeding failure.



The complete absence of any questions about how breastfeeding could fail so often and with such misery is not challenged, explored, or considered at any point. The complete acceptance that breastfeeding just doesn't work and it is ok to exploit every vulnerable mother who comes after them is also not challenged but celebrated. Industry enjoys this idea that talking about the issues with the system that lead to certain breastfeeding misery and failure is somehow a criticism of those who experience this. **This traps women in certain breastfeeding failure and maintains and increases the market for alternatives to breastfeeding.**





Breastfeeding does work and we should talk about why so many women experience problems when they have made an informed choice to breastfeed and have asked for help. Those who have experienced this should want to prevent every mother that comes after them from having the same experience and not accepting that it is normal to fail and looking to profit from other women's misery. It is time for Australia to step up and take action to protect breastfeeding and prevent predatory marketing.

What can you do?

- Contribute to the Weekly Collections.
- Circulate these reports to your local members.
- Look for opportunities to have discussions and raise awareness.
- Join BAA and volunteer to help us.



Summary of Recommendations

BAA will begin with this unmet recommendation from the taxpayer funded Best Start Report 2008³

Recommendation 22

That the Department of Health and Ageing adopt the World Health Organization's International Code of Marketing of Breast-milk Substitutes and subsequent World Health Assembly resolutions

Penalties commensurate with the profits and marketing budgets that reflect the costs to public health.

An independent central body that oversees the infant feeding and parenting industry.

Government directives about the use of bottle-feeding images in public health messages.

No industry representatives or academics that have been funded by industry on any public health committees.

All taxpayer funded organisations related to infant care and feeding must be free from commercial influence.

No Professional Development Points for events that take sponsorship from products that undermine breastfeeding.

All donations must be unbranded and suitable for the situation.

Emergency workers must have training on breastfeeding and harm minimisation for artificially fed infants.

Plain paper packaging for infant formula products, with penalties for false claims



Who is BAA?

Breastfeeding Advocacy Australia is a volunteer, non-profit organisation with 12 specific goals (as listed below and in our constitution) and this includes a Mother Support arm called Nurturing Mothers BAA.

Breastfeeding will be culturally and politically enabled, protected and promoted as the ultimate achievable norm of infant and young child feeding in Australia. Breastfeeding Advocacy Australia is established to be a non-profit organisation whose purpose is to advance health by undertaking any of the following activities:

1. creating public and government awareness of the role of successful breastfeeding as the single most important public health measure a country can implement;
2. providing education to government agencies, health workers and the public about critical barriers to achieving breastfeeding and strategies to make positive change;
3. providing a forum for interested parties to interact and be informed;
4. participation in opportunities that affect policy related to breastfeeding;
5. recognise and advocate for the human rights of families and their infants in Australia to enact an informed decision to breastfeed without the existing legislative and informational barriers that exist;
6. advocate for legislation to enforce the International Code of Marketing of Breast-milk Substitutes and the subsequent WHA resolutions (the Code);
7. identify and expose products and practices that undermine informed decision making about breastfeeding that fall outside the Code;
8. record breaches of the Code and report them to international, federal and state governing bodies whose role is to protect, promote and support breastfeeding;
9. expose predatory marketing practices and report them to international, federal and state governing bodies whose role is to protect, promote and support breastfeeding;
10. create cognizance of how attitudes towards infant feeding have been affected by commercial influence amongst those who work with families including, but not limited to health professionals, child-care workers, legal representatives, the media and politicians;
11. advocate for families to be given information about biologically normal sleep in the first 1000 days of life;
12. advocate for breastmilk, breastfeeding and unpaid carers work to be recorded numerically in the GDP figures



Abbreviations

ACM	Australian College of Midwives
BAA	Breastfeeding Advocacy Australia
BMS	Breastmilk Substitute
COI	Conflict of Interest
GDP	Gross Domestic Product
GUM	Growing Up Milk 36 months+
IBFAN	International Baby Food Action Network
ICMBMS	International Code on the Marketing of Breastmilk Substitutes
International Code	International Code on the Marketing of Breastmilk Substitutes
MAIF	Marketing in Australia of Infant Formulas: Manufacturers and Importers Agreement
NMBAA	Nurturing Mothers BAA
Toddler Drink	Powdered drink for 12 – 36 months
UPF	ultra-processed food
UPP	ultra-processed powder
WHO	World Health Organization



DEFINITIONS from the International Code of Marketing of Breast-milk Substitutes

"Breast-milk substitute"	means any food being marketed or otherwise presented as a partial or total replacement for breast milk, whether or not suitable for that purpose.
"Complementary food"	means any food whether manufactured or locally prepared, suitable as a complement to breast milk or to infant formula, when either become insufficient to satisfy the nutritional requirements of the infant. Such food is also commonly called "weaning food" or breast-milk supplement".
"Container"	means any form of packaging of products for sale as a normal retail unit, including wrappers.
"Distributor"	means a person, corporation or any other entity in the public or private sector engaged in the business (whether directly or indirectly) of marketing at the wholesale or retail level a product within the scope of this Code. A "primary distributor" is a manufacturer's sales agent, representative, national distributor or broker.
"Health care system"	means governmental, nongovernmental or private institutions or organizations engaged, directly or indirectly, in health care for mothers, infants and pregnant women; and nurseries or child-care institutions. It also includes health workers in private practice. For the purposes of this Code, the health care system does not include pharmacies or other established sales outlets.
"Health worker"	means a person working in a component of such a health care system, whether professional or non-professional, including voluntary unpaid workers.
"Infant formula"	means a breast-milk substitute formulated industrially in accordance with applicable Codex Alimentarius standards, to satisfy the normal nutritional requirements of infants up to between four and six months of age, and adapted to their physiological characteristics. Infant formula may also be prepared at home, in which case it is described as "home-prepared".
"Label"	means any tag, brand, marks, pictorial or other descriptive matter, written, printed, stencilled, marked, embossed or impressed on, or attached to, a container (see above) of any products within the scope of this Code.
"Manufacturer"	means a corporation or other entity in the public or private sector engaged in the business or function (whether directly or through an agent or through an entity controlled by or under contract with it) of manufacturing a product within the scope of this Code
"Marketing personnel"	means any persons whose functions involve the marketing of a product or products coming within the scope of this Code
"Samples"	means single or small quantities of a product provided without cost.
"Supplies"	means quantities of a product provided for use over an extended period, free or at a low price, for social purposes, including those provided to families in need.





References

¹ Clark, D. L. (2017). Avoiding conflict of interest in the field of infant and young child nutrition: better late than never. *World Nutrition*, 8(2), 284-287.

² Oxford University Press Oxford Languages <https://languages.oup.com/google-dictionary-en/>

³ House of Representatives Standing Committee on Health and Ageing (2008). The Best Start: Report on the Inquiry into the Health Benefits of Breastfeeding. Retrieved from https://www.aph.gov.au/Parliamentary_Business/Committees/House_of_Representatives_Committees?url=haa/breastfeeding/report.htm