



**Australian Government**

**ISSUES PAPER TO INFORM DEVELOPMENT OF A NATIONAL FOOD PLAN**

**SUBMISSION COVER SHEET  
(not for publication)**

**Closing date for submissions: 5pm Friday 2 September 2011 Eastern Standard Time (EST)**

**Please complete and submit this form with your submission to:**

National Food Plan Unit  
Department of Agriculture, Fisheries and Forestry  
PO Box 858  
Canberra City ACT 2601  
Or email [nfpsubs@daff.gov.au](mailto:nfpsubs@daff.gov.au)

**Organisation or Individual:** **INFANT NUTRITION COUNCIL**

**Principal contact:** **JAN CAREY**

**Position:** **CEO**

**Phone:** **02 6273 8164** **Fax** **02 6273 1477**

**Mobile:** **0412 514 735**

**Email address:** **[jancarey@infantnutritioncouncil.com](mailto:jancarey@infantnutritioncouncil.com)**

**Street address:** **Level 2, 2-4 Brisbane Ave**

**Suburb/City:** **Barton** **State** **ACT** **Postcode** **2600**

**Postal address:** **PO Box 7190**

**Suburb/City:** **Yarralumla** **State** **ACT** **Postcode** **2600**

**NB:** For submissions made by individuals, all personal details other than your name and the state or territory in which you reside will be removed from your submission before it is published on the national food plan website at [www.daff.gov.au/nfp](http://www.daff.gov.au/nfp).

Copyright in submissions resides with the author(s), not with the department.

Submissions will be placed on the department’s website, shortly after receipt, unless prior contact has been made concerning material supplied in confidence, or to request a delayed release for a short period of time.

***Please indicate if your submission:***

- contains NO material supplied in confidence and can be placed on the national food plan website
- contains SOME material supplied in confidence (clearly marked COMMERCIAL IN CONFIDENCE)

## **SUBMISSION - NATIONAL FOOD PLAN ISSUES PAPER**

### **Introduction**

The Infant Formula Industry is a responsible industry that voluntarily agreed to comply with a self-regulatory code of conduct, the Marketing in Australia of Infant Formulas: Manufacturers and Importers Agreement (MAIF Agreement) which restricts its marketing practices to support government policies for the protection and promotion of breastfeeding.

The Infant Nutrition Council Ltd (INC) was established in 2009 and is an amalgamation of the Infant Formula Manufacturers' Association of Australia (IFMAA) and the New Zealand Infant Formula Marketers' Association (NZIFMA). The Infant Nutrition Council represents the significant majority of companies marketing and manufacturing infant formula in Australia and New Zealand.

The companies represented by INC are:

- Bayer Australasia Pty Ltd
- Dairy Goat Co-operative (NZ) Ltd
- Fonterra Co-operative Group Ltd
- H. J. Heinz Company Australia Ltd
- Murray Goulburn Co-operative Co. Ltd
- Nestlé Australia Ltd
- Nutricia Australia Pty Ltd
- Pfizer Australia Pty Ltd

Infant formula is vital for those babies who are not being exclusively breastfed as it is the only suitable substitute for breastmilk providing all the necessary nutrients and other ingredients to meet the baby's requirements before solids are introduced.

INC welcomes the opportunity to make this submission in response to the National Food Plan Issues Paper released by the Department of Agriculture Fisheries and Forestry (DAFF), particularly the need to include and recognise the positive role of good infant nutrition as an essential component of a National Food Plan.

INC recognises that the current consultation is the beginning of the policy development process and stands ready to further engage with the government as the National Food Plan develops. INC recognises that good nutrition is central to the health and well-being of all Australians, and that consideration of the nutritional needs of growing infants is an essential foundation to the health and well-being of Australians in later life. Indeed, concerns have been raised that a range of chronic diseases and physiological deficiencies may be attributable to poor nutrition early in life.

INC also considers that the National Food Plan should reflect not only the need to ensure a healthy and balanced food supply, but also the safety, affordability, access, and equity of the food supply and in this regard infant foods also need consideration.

The National Food Plan provides an opportunity to give direction and focus to government policy across a range of government departments. This has an impact on Australia's agriculture and food industry and may aid the development of a more coordinated and strategic approach in working with the food industry as a global supplier of nutritious and safe foods produced in a sustainable and profitable manner.

INC supports the need for a collaborative approach between industry and government that seeks to work toward the long term goals and expectations of the community. We must ensure that short-term objectives are consistent with the need for ensuring a viable, sustainable, profitable and globally competitive industry, without which there would be no food manufacturing in Australia.

The vision for the National Food Plan should be to have a growing, profitable, sustainable and globally competitive food industry that supports the health and well being of consumers and the communities in which they live.

The National Food Plan should establish a comprehensive work program for national coordinated action on the food industry priority issues, and amongst these issues infant formula and the special needs of infant nutrition is an important component. INC recognises that FSANZ and the Food Regulation Ministerial Council have already taken steps to undertake a review of food policy and food standards regulations in regard to infant formula products. However, there are a number of matters that remain of particular concern, such as the application of health claims to infant formula.

The National Food Plan should provide a framework that encourages and develops new technologies, research and innovation across a range of areas that then allows the food industry to respond to the significant challenges it faces in the areas of sustainability, food security, health and nutrition and supply chain management. This is equally true of infant formula manufacturing and the need for investment and constant improvements in infant nutrition.

The National Food Plan should recognise the need to support local manufacturing, yet also realise that not all manufacturing can take place in Australia and that imported products should not be overly or unnecessarily restricted. The fact that the Australian and New Zealand domestic markets are relatively small means that specialist infant formula product will on occasion necessarily be manufactured overseas and imported into Australia. Infant formula is not alone in this regard and Australian industry needs the flexibility of global trade and the ability to import products that are formulated for particular nutritional requirements and not labelled specifically for Australia and New Zealand but instead meet another well recognized international standard, such as Codex or EU.

Australian governments have had an ongoing regulatory reform agenda over recent decades yet there are problems of over-regulation, inconsistent national approaches by State and Territory government regulators and a lack of practical outcome focused approaches that continue to be a drain on the food industry.

INC is also concerned that compliance cost with government regulations at State and Territory, and Commonwealth level is high. These include food standards and regulations, environmental regulations, planning regulations, occupational health and safety and workplace relations requirements. The lack of uniformity across the Commonwealth, State and Territory jurisdictions is a problem in itself, as are the complicated and time consuming processes for changing regulations once they are in place.

The National Food Plan must further recognise global sourcing and governance arrangements within large multinational companies. These may result in investment decisions that are not always focussed on domestic issues in Australia, but on broader global circumstances. Framing regulations in such a way that considers the global context of the food supply will be crucial for an effective plan.

Finally, INC believes that recognition must be given to the significant role that industry self-regulation can play, and by way of example the effectiveness of the *Marketing in Australia of Infant Formulas: Manufacturers and Importers Agreement* (the MAIF agreement), and that such arrangements should be extended and are preferable rather than increasing regulations.