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22 April 2010

Sarah Eady & Alison Wallace  
Nutrition Researchers  
Clinical Nutrition  
The NZ Institute for Plant and Food Research Ltd

Dear Alison and Sarah

**RE: COMPOSITION OF HUMAN BREASTMILK IN THE NZ POPULATION**

Thank you for the invitation to comment on the ethics of the proposed 'Maternal Nutrition Project'. While the project outline was sent to me personally this response is a joint one from Louise James and myself as Trustees of the Infant Feeding Association of New Zealand.

IFANZ is a charitable trust with the vision that "All mothers, families and caregivers are able to make and implement informed decisions about optimal feeding practices for infants and young children." We are affiliated to the International Baby Food Action Network (IBFAN) and hold the regional office of IBFAN Oceania.

We consider the proposed project has the potential to directly or indirectly undermine breastfeeding by overstating the need for 'good' maternal nutrition when in truth most women can breastfeed very adequately on a normal fresh food diet. Further we consider the project to be unethical for the following reasons:

**Conflicts of interest:**

Commercial enterprises by definition are profit driven entities and Nutricia is no exception. It is therefore inappropriate for Plant and Food Research, as a government agency, to work alongside a baby food manufacturer without creating a perceived or actual conflict of interest.

It is implausible that Nutricia is 'committed to the support and promotion of breastfeeding' while it continues to actively promote products that erode women's confidence in exclusive and sustained breastfeeding. Again we see this as a conflict of interest.

Women do not need ‘a new food/beverage product which can be consumed by lactating women to support breast milk composition and production’. What they do need is protection, support and skilled services in the health and nutrition care system that is free from commercial influence so they may build confidence in their unique abilities to nurture and nourish their babies through breastfeeding.

**International Code of Marketing of Breastmilk Substitutes:**

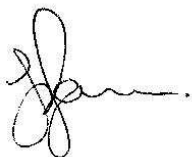
Paragraph 44 of the Global Strategy for Infant and Young Child Feeding (2003) clearly spells out that commercial enterprises have only two roles; 1) to ensure the quality of their products and 2) to fully implement the International Code of Marketing of Breastmilk Substitutes and subsequent relevant World Health Assembly Resolutions. To develop a new food for lactating women fulfils neither role.

It is stated that Nutricia/Danone has a ‘commitment to social responsibility’ yet it does not uphold its responsibility to the International Code Article 5.5 that companies “should not seek direct or indirect contact of any kind with pregnant women or with mothers of infants and young children.” We know from independent monitoring both nationally and internationally that Nutricia violates the International Code which further indicates it is far from socially responsible.

Thank you for consulting on the project – it is appreciated. Given that Plant and Food Research has a ‘commitment to science for public good’ we fail to see any evidence of public good resulting from the proposed project and urge you not to proceed.

Should you require further information please do not hesitate to contact us.

Yours sincerely



Louise James, National Coordinator



Marcia Annandale, Lactation Consultant