



Dietitians NZ

Ngā Tohunga Mātai Kai



11 June 2018

The Registrar
Commerce Commission
registrar@comcom.govt.nz

To whom it may concern

Reference “Infant Nutrition Council”

Application from the Infant Nutrition Council Limited (INC) seeking authorisation for an arrangement allowing the INC to restrict its members from marketing formula products for children aged up to 12 months

Dietitians are registered health professionals who meet standards required by the New Zealand Dietitians Board under the Health Practitioners Competency Assurance Act (HPCA) 2003. In New Zealand, by law, dietitians must be registered with the Dietitians Board and hold a current practising certificate, work within a specified scope of practice, participate in a continuing competency programme, and adhere to a Code of Ethics.

Dietitians New Zealand Incorporated (Dietitians NZ) is the professional association of registered dietitians and associated nutritional professionals. With a current membership of approximately 550, we represent the largest group of fully trained food and nutrition professionals in New Zealand. Dietitians NZ exists to build a strong and sustainable profession that empowers New Zealanders around food and nutrition; and inspire change to enhance the health and wellbeing of Aotearoa, New Zealand. We trust the comments made in our submission will be given due consideration.

Dietitians NZ fully support the application from the INC seeking authorisation for an arrangement allowing the INC to restrict its members from marketing formula products for children aged up to 12 months.

In 2015 the Commission authorised an arrangement allowing the INC to restrict its members from marketing infant formula products for children up to 6 months.

Dietitians NZ Paediatric Special Interest Group (SIG) members were asked to comment on the application. All SIG members (123 in total) support the application.

Rationale for Dietitians NZ support of the application include those outlined as the impetus for extending the INC Code to cover follow-on formula and to restrict members from marketing products for children up to 12 months

- The INC code forms an important part in New Zealand meeting its obligation under the World health Assembly's international code of marketing of breast milk substitute (WHO code)
- New Zealand would align with recent guidance from the World Health Assembly
- New Zealand would align with the position in Australia
- Be consistent with the Ministry of Health's nutrition guidelines for infants
- Support public health goals for the protection and promotion of breast feeding in New Zealand

Thank you for the opportunity to make a submission. We ask that our comments be taken into consideration.

Yours faithfully

Contributors to this submission are the Dietitians NZ Paediatric Special Interest Group (SIG)



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