

**Annexure 6 – Guidance document for interpretation of the MAIF Agreement:
Electronic media**

MAIF Complaints Committee's interpretation of the MAIF Agreement related to electronic media marketing activity

Overall Principles

1. The purpose of these guidelines is to support the interpretation of the MAIF Agreement. This guidance does not replace the responsibility of the MAIF Complaints Committee to apply the MAIF Agreement objectively, using common sense in light of the context of the website, on a case by case basis.
2. These guidelines are to be read with the aim of the MAIF Agreement in mind and as an overarching principle: that is, to contribute to the safe and adequate nutrition for infants, by the protection and promotion of breastfeeding and by ensuring the proper use of breast milk substitutes, when they are necessary, on the basis of adequate information and through appropriate marketing and distribution.

Consumer-based websites

3. Prior to a consumer accessing information about infant formula on a manufacturer website, manufacturers should display to the consumer the information required by clauses 4(a) and 4(b) (Important Notice information). This display should include a click-through acknowledgement by the consumer that the consumer has read and understood the information. The display should be provided at least once per day for each consumer who accesses the site on multiple occasions.
4. A tab or link labelled 'Breastfeeding is Best', 'Benefits of Breast Milk' or similar, which links to the Important Notice information, should be included on each page of a website which provides information about an infant formula product. The tab/link should be included on the navigation toolbar of each web page or another equally prominent location.
5. The inclusion of product information about infant formula, including a description and pack shots, on a website is acceptable, provided the above guidelines 3 and 4 of this document are followed and:
 - the product information is the same as the information on the label of the product (for example: ingredient listing, nutritional profile and nutrition information);
 - any additional information provided is factual in nature and intended to provide sufficient information to help consumers to make an informed choice as to the specific nature of the infant formula; and
 - product logos are not displayed independently of pack shots.

Frequently Asked Questions

6. FAQ pages on websites are an important means of providing information regarding formulas to consumers, and assisting consumers to differentiate between different types of formula.

Any FAQ pages relating to infant formula should commence with a statement as to why breastfeeding is best. This can be in the form of a statement at the top of the page, or an initial question and answer.

Other electronic communications and social media

7. In accordance with these guidelines, manufacturers and importers should adopt reasonable measures, to monitor and manage social media forums and other electronic platforms which are within their control to ensure they comply with the MAIF Agreement. Manufacturers and importers must not conduct any paid influencer activity for their infant formula products.
8. Manufacturers and importers should not initiate discussion or actively provide information about infant formula via social media forums and other electronic forums. However it is recognised that manufacturers and importers cannot control postings by consumers or third parties on such forums which are not under their control and are therefore entitled to respond to issues or questions raised provided:
 - the question is directed to the manufacturer or the issue requires a corrective or clarifying statement;
 - the response is in the same forum;
 - the response is in line with guideline 5 above and, unless the context otherwise requires, limited to the matters raised by the consumer or third party post;
 - if a question relates to a health condition, the consumer is directed to speak to a healthcare professional; and
 - includes a statement to the effect that breastfeeding is best for babies, which links to the Important Notice Information on the manufacturer's website.
9. Electronic mailings to consumers (such as e-newsletters) should only include information about infant formula which is otherwise permitted under the MAIF Agreement (for example, an announcement about change of availability). Where appropriate, the relevant communication should include the Important Notice information.
10. Manufacturers are entitled to initiate communication to consumers via social media forums and other electronic platforms on urgent health and safety matters provided the communication is limited to the health and safety matter.