

The Association of Breastfeeding Mothers (ABM) is a voluntary organisation founded in 1979 by mothers experienced in breastfeeding counselling. We became a charity in 1980 (and changed to a CIO in 2021, No. 1193445). As well as supporting mums and families and offering training to volunteers and healthcare professionals, we speak for breastfeeding families at a national advocacy level.

We welcome and support the CMA's intention to "drive better outcomes for parents, without compromising the compositional standards and safety of infant formula and follow-on formula, or undermining governments' wider policy objectives for this market".

Like the CMA, we want better outcomes for parents. We support women and families to have a positive breastfeeding experience, and we recognise that for many families this will include using infant formula at some point.

As members of the Baby Feeding Law Group, we support their submission in its entirety. We would like to make the following additional comment.

We believe that the proposed remedy "price promotion in retail settings" is likely to have a negative impact on cost and choice for families.

Cost:

Promotional prices are part of marketing which already represents a huge spend by formula manufacturers. Years of analysis by the consumer group Which? has consistently shown how special offers are used to influence consumer behaviour rather than genuinely reduce prices, in some instances pushing the everyday price of products up to allow for the 'reduced' prices.

Recent Which? Research on this topic:

- <https://www.which.co.uk/news/article/millions-of-people-excluded-from-lower-prices-at-big-stores-ac8cm2n8mls5-ac8CM2N8mLs5>
- <https://www.which.co.uk/news/article/which-investigation-reveals-loyalty-discounts-arent-always-as-good-as-they-appear-akMpl3i7bnAZ>

In the absence of action by manufacturers, it is the role of government to intervene and reduce the cost of this essential, non-substitutable product.

We do not support price promotion in retail settings. We believe this would have a negative impact on both price and parent choice.

Choice:

Although it is clear that high infant formula prices are impacting parents, there is very limited evidence that parents are influenced by the retail price when choosing a product for their baby. As outlined in BFLG's original response, price promotions are a form of marketing designed to build brand loyalty. Parents tend to be loyal to brands so there is then a risk of a promotion being withdrawn and a family feeling tied to a higher end product they can no longer afford, despite there being no evidence of meaningful difference between brands.

In addition to the remedies proposed by the CMA, we support the following as proposed by the BFLG:

1. Improvement of the Healthy Start scheme
2. A public health messaging campaign around the nutritional equivalence of all first infant formula
3. Enforcement of existing legislation designed to prevent inappropriate marketing of formula milks and to protect breastfeeding AND safe and appropriate formula feeding, and strengthening of this legislation in line with the International Code of Marketing of Breastmilk Substitutes and subsequent World Health Assembly Resolutions
4. Government establishment of pricing policies and practices to ensure infant formula is provided at lower prices on a long-term basis; e.g. through a price cap