

Department of Health and Human Services

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File:

Robert Fitzgerald
Commissioner
Parental Leave Inquiry, Productivity Commission
GPO Box 1428
CANBERRA ACT 2601

Dear Mr Fitzgerald

I would like to thank you for granting this opportunity to provide a written submission in response to the Productivity Commission's *Paid Parental Leave: Support for Parents with Newborn Children*, Draft Inquiry Report.

I would like to comment on a number of key points this Report has raised, particularly in regard to the relationship between the provision of paid maternal leave and postnatal health programs.

I acknowledge and agree with the statement in your Report that 'child and maternal health and welfare benefits from a period of absence from work for the primary caregiver of around six months and a reasonable prospect that longer periods (nine to twelve months) are beneficial' (p. XVIII). The Department of Health and Human Services (DHHS) currently provides a series of Child Health and Parenting Services programs that reflect the Department's commitment to delivering family health support mechanisms for this crucial period of early childhood development.

I will, however, draw your attention to a number of issues that I believe could usefully inform your final report.

In 2001 the World Health Organisation (WHO) published a systematic review entitled *The Optimal Duration of Exclusive Breastfeeding* that recommended mothers provide 'exclusive breastfeeding for the first 6 months of life in both developing and developed countries' (p. 20). This six month time-period is further pronounced in the National Health and Medical Research Council (NHMRC) *Dietary Guidelines for Children and Adolescents in Australia*, which states 'a baby needs no other foods during the first six months of life' (http://www.nhmrc.gov.au/publications/synopses/_files/n33.pdf).

Furthermore, I have attached a recent Victorian longitudinal study which recommends a number of policy and workplace initiatives for consideration under the implementation of a mandatory paid maternity leave scheme. It states that

[m]aternal post-natal employment has a negative effect on the likelihood of maintaining breastfeeding for 6 months, and this in turn has an impact on child health outcomes ... The provision of lactation breaks, employer education, or the introduction of paid maternity leave have a measurable, positive effect on mothers' ability to offer their infants breast milk for at least 6 months duration. (Cooklin, A. Donath, S. and Amir, L. 'Maternal Employment and Breastfeeding', University of Melbourne and La Trobe, *Acta Paediatrica*, 2008)

Section 5.6 of your Report recommends as a 'bottom line' an 18 week paid parent leave scheme. However, in light of the evidence cited above, this period of leave would be considerably inadequate in achieving optimal child health outcome targets.

Moreover, your Report uses the promotion of lifetime labour force engagement by women as the primary basis for its calculation of the recommended maternal leave. Your calculations appear to ignore the broader (and well-documented) economic repercussions linked to the premature cessation of breastfeeding in Australia. These are related to reduced physical growth rates and weakened immune systems, along with the increased risk of early physiological debilitations such as childhood obesity and heart disease ('Promoting and Supporting Breastfeeding', *The Journal of the American Dietetic Association*, May 2005, p. 810-818; Chandra, R. K. 'Interactions Between Early Nutrition and the Immune System', *Ciba Foundation Symposium*, 2007, p. 77-92; Bellamy, C. 'The State of the World's Children 2001', *The United Nations' Children's Fund*, 2001, p. 21-27)

In conclusion, I recommend that your final draft include:

- an expansion of the initial 18 week paid maternity leave period to a six month scheme, in line with recommendations made by the WHO, NHMRC and numerous researchers in this field; and
- a greater engagement with the broader economic nexus related to the promotion of breastfeeding in Australia, particularly in relation to early childhood development outcomes.

Thank you again for providing me with the opportunity to comment.

Yours sincerely



Mark Byrne
Director, Disability, Child, Youth and Family Services

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Enc. Cooklin, A. Donath, S. and Amir, L. 'Maternal Employment and Breastfeeding', University of Melbourne and La Trobe, *Acta Paediatrica*, 2008