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Breastfeeding Throughout Legal Separation: Women's Experiences of the Australian Family Law System

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Abstract

In 2006, the Australian Government introduced the Family Law Amendment (Shared Parental Responsibility) Act 2006 (Cth), which put in place a legal presumption of shared parental responsibility for children after separation and which emphasizes “equal-time” parenting arrangements regardless of the child’s age. A qualitative approach was taken to investigate breastfeeding women’s experiences of the implementation of the act and its impact on their ability to maintain breastfeeding. Fifteen women responded to questions related to their breastfeeding and their engagement with the family law system. Interviews were audio recorded and transcribed, and data were then analyzed thematically. These women experienced inconsistent advice from all facets of legal services, including opinions about the inappropriateness of breastfeeding for infants over 6 months of age. Breastfeeding was considered only as nutrition, without recognition of its immunological and cognitive benefits and the security and comfort it provides. Many participant women felt that they had been persuaded against discussing breastfeeding in the legal system, resulting in a sense of disempowerment.

Keywords: breastfeeding, family law, separation, best interests of the child

In July 2006, the Australian government introduced the Family Law Amendment (Shared Parental Responsibility) Act 2006 (Cth), which enshrines a legal presumption of equally shared parental responsibility for children after separation and emphasizes “equal-time” parenting arrangements for those children. This new law places expectations on both parents to participate equally in child care, regardless of the child’s age. Where equal time is not granted, there is an emphasis on substantial

and significant time. Breastfeeding is the optimal nourishment for infants and requires the infant and mother to spend significant time together. The expectation of equal-time parenting arrangements become problematic when considering breastfed children, because competing interests need to be balanced.

Breastfeeding is recognized internationally as the “physiological standard” for growth and development for human infants.¹ Indeed, breastfeeding is an essential component for normal physical and cognitive development, with both immediate and long-term advantages,² and there are adverse effects of not breastfeeding.³ The many benefits of a mother’s own breast milk for human infants are well documented.^{4,5} Breastfeeding is an important component of mother–infant attachment and bonding and is a valuable resource for societies worldwide to maintain.^{6–8} The alternative to breastfeeding is bottle feeding donor/expressed milk or infant formula. Breastfeeding and bottle feeding with infant formula or donor/expressed milk are not equivalent, and it is now recognized that there are risks of not breastfeeding. Infant formula has been directly attributed to increased infant morbidity and mortality around the world.^{9,10} Furthermore, mothers should remain free to make informed decisions to feed their infants as they wish, without the encumbrance of

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outsiders interfering with this right.¹¹⁻¹⁴ Therefore, women should not be legally obligated to refrain from or to prematurely cease breastfeeding.

Following separation, couples who are unable to reach amicable agreements may choose to resolve these through the Family Law system. Fehlberg et al¹⁵ discuss the intricacies of the new Family Law legislation but warn that “the subtlety of these provisions will be lost in the simpler message that parents must share parenting now.”

If parents cannot reach decisions about the shared care of their children outside of the Family Law system, any imposed shared parenting is unlikely to decrease parental conflict. In most cases, the couple remain in continuing conflict, and indeed the animosity and stress of the situation may lead to escalation of this conflict. Furthermore, such legal expectations are not congruent with many family arrangements even before separation, let alone after.¹⁶ It is common for the work of parenting to be shared, but in ways other than 50:50 contact. Evidence shows that fathers spend little time in sole charge of their children, with mothers taking the majority of child care duties.¹⁵

With the focus of this new amendment being on shared time, there is significant cause for concern that breastfeeding is being overlooked or even ignored during decision-making processes. It is therefore timely to research how the valuable health resource of breastfeeding is being considered while promoting equal or significant time with both parents.

Method

Exploratory qualitative research methods were used for this study. Qualitative research explores people’s experiences and understandings to explain, describe, and make sense of things. Knowledge generated from qualitative research is unique and context dependent because it is focused on the people, place, time, and conditions in which it arises.¹⁷ Qualitative research seeks to uncover the cultural, political, and social themes that underpin society.¹⁸ Therefore, qualitative research was a suitable method to explore women’s breastfeeding experiences.

The aims of the overall project were to (1) explore the impact of the equal-time parenting arrangements legislation on breastfeeding women and their ability to breastfeed; (2) identify the ways women manage their breastfeeding in shared parenting of their breastfed child/children; (3) explore women’s experience of the Family Law judicial system related to their breastfeeding

parenting role with their child following partner separation; and (4) identify issues that affect women’s custody of their breastfed child. This article presents the results of the third aim: women’s experience of the Family Law judicial system in relation to breastfeeding following separation from their partner.

Participants

The participants for this study were mothers who were breastfeeding a child following separation from their partner and who had experienced or were experiencing involvement of the Family Law system in determining parenting arrangements following the introduction of the amendment act. Only mothers over 18 years of age and able to speak English were recruited into the study.

Snowball sampling techniques were used to recruit 15 mothers through women’s health networks including the Australian Breastfeeding Association (ABA), the National Council of Single Mothers and their Children (NCSMC), the Solo-mothers listserver, and the ELSA list (National Abuse Free Contact Campaign discussion list). All of these organizations gave permission for participant recruitment requests to be posted on their e-mail lists and Internet bulletin boards. Mothers who responded to the recruitment request were contacted via phone or e-mail by the researcher and provided an introductory letter, a consent form, and an information sheet outlining the method, background, and purpose of the study. Those who chose to participate were required to provide written informed consent prior to the conduct of the interview. Participants were recruited across 5 states of Australia. This study was conducted under strict ethical guidelines, with ethical approval being granted from Flinders University’s human research ethics committee.

Study Data

Data were generated through semistructured, in-depth interviews.¹⁷ Participants were offered face-to-face or telephone interviews, depending on their geographical location. One interview was conducted in person in a public park, and all other interviews were conducted via the telephone at times convenient for the mothers. An interview guide of relevant topics for discussion was used as a prompt when required. The interviews lasted 44 to 85 minutes in duration and were audio recorded. These recordings were then transcribed verbatim by a professional secretarial service and analyzed using thematic analysis. Data management was achieved with the use of NVivo 8—a computer

program designed for qualitative data analysis. Transcripts were analyzed using the thematic analysis approach outlined by Benner,¹⁹ which sought to highlight and explore the narrated experiences, perceptions, salient events, and discursive patterns articulated by the participants. The data analysis was conducted by 2 researchers who separately read and marked up the transcripts and then met 3 times throughout the data collection and analysis phase to discuss and agree upon emerging themes and salient issues.

Results

Data analysis identified 4 major themes with regard to the mother's interactions and experiences with the Family Law system. These were inconsistent advice and decisions, the silencing of breastfeeding, the belief that the benefits of breastfeeding are insignificant, and the disempowerment of motherhood. Excerpts from the transcripts will be used to demonstrate each of these themes, using pseudonyms chosen by the mothers themselves.

Inconsistent Advice and Decisions

The mothers in this study spoke vividly of the inconsistent advice they received from people they came into contact with during the period of separation and development and enactment of parenting plans. This included inconsistent parenting plan decisions made in relation to their own and other women's similar situations. Women received solicited and unsolicited advice and information from peers, support groups, help lines, health professionals, counselors, mediators, domestic violence workers, police, lawyers, magistrates, and judges with regard to breastfeeding, parenting, and the law. All of the participant women spoke of the inconsistent and at times inaccurate information they received in regard to the legal process, the legislation, and the potential outcomes of court proceedings.

Mothers described great difficulties in feeling informed to make accurate and appropriate decisions when they received inconsistent advice from professionals. Lucy explains:

They've got a help center to help parents make the best decisions like how much time children of certain ages can be away from primary carers and lots of little things like that. ... You run different scenarios by them and the problem with that is one person you phone will say a child of Luke's

age shouldn't be going from [me] for more than 24 hours. Then you get the next one of the phone and they'll say if there's separation anxiety from his sister why don't you keep them both together? Rather than suggesting that the sister has less time [with the father] they want to increase Luke's hours away from you type thing. So inconsistency has been a real problem because I don't know the law.

The inconsistent information was forthcoming from all facets of the legal system and gave women unrealistic expectations about process and outcomes. This inconsistent information left women feeling confused and uncertain about the legal process, their legal rights, and how their breastfeeding role would be recognized in court.

When we went to court we never actually even saw a judge. I was really happy but I was also really shocked about the process. Even though I'd been told otherwise by my lawyer I still was scared that once I went there that I would have to stop breastfeeding Jake. At the time I think he was only 8 to 10 months old. (Leanne)

Some women described how misinformation was used to enact decisions.

I got to court and I agreed [prior to hearing] that I'd stop breastfeeding, because my lawyer said with the new laws, because she was getting a bit older then, that there's no medical reason for her to be breastfed, that they'll tell me to stop. Yeah, so I said well I'll stop feeding then, thinking that was my only option and of course I went away there feeling the worst mother out. ... I couldn't find anyone to give me the right answers, and like your lawyer's supposed to know the law. ... But she said the new laws state that they will tell me to stop breastfeeding, because there's no reason for it because of her age. (Susan)

Other mothers spoke of being given the converse information in relation to breastfeeding but found such advice contrary to what was in the public domain.

My lawyer was telling me that a judge can't force you to stop breastfeeding. He was saying that's not going to happen but I did a fair bit of research

into it myself on the Internet and through other agencies and I had heard that had happened to people. They had been told to stop breastfeeding by a court because it was often seen that a mother was using breastfeeding as a reason to stop contact. (Leanne)

Uncertainties and assumptions about breastfeeding were used to throw doubt onto the parenting arrangements. These were delivered in an authoritative manner but not based on sound medical evidence.

Comments would come back through his lawyer that “A child of 6 months doesn’t need to be breastfed every 2 hours” and things like that.

There’s a lack of breastfeeding knowledge to all of them—how it works, supply and demand, if you’re feeding 4 hourly that feeds aren’t 4 hourly, like they used to be 20-odd years ago and things like that. There’s a misunderstanding about why children breastfeed and why it’s important to their overall development as far as their security and their comfort and all that sort of thing. (Lucy)

The inconsistent advice was based on a raft of personal attitudes, beliefs, and expectations about breastfeeding. These views affected the mothers’ legal support and satisfaction with the system. Some people were supportive of breastfeeding.

[My lawyer] is really quite supportive of the breastfeeding relationship and understands the importance of it, and says that overnights are not what is good for a breastfed baby. The 4 hours that you’re offering is quite good and that you’re expressing and that you’re trying to make this work. (Pauline)

The advice received was often judgmental and negative about breastfeeding. Much advice was negative about breastfeeding beyond 6 months and even more so beyond 2 years of child age. Such comments therefore conflicted with the mothers own breastfeeding practices.

My lawyer said to me at one point, you are joking, you’re not going to be breastfeeding a 2-year-old, you’re joking ... You won’t be breastfeeding a child that could walk are you and I got that several times, with the looks that go along with it. (Jenny)

[My lawyer] was not sympathetic at all and she treated me like ... I felt like a teenage prostitute who had got knocked up to her pimp. That’s how she treated me. She looked at me like she didn’t want to come near me. At one stage she called me precious [overprotective, beloved]—don’t be precious. She said the court doesn’t like precious mothers, you need to stop being so precious. I just said I’m not a precious mother. Wanting to breastfeed my child is not being precious. So I changed lawyers. (Rebecca)

I was actually put on the spot while I was in the witness box by the magistrate, who said to me, “When do you think that the child will give up breastfeeding?” And I had to say well when the child wants to, because I’m not going to know. ... I sort of got put on the spot and I had to make a bit of a call. I said if he chooses to self-wean before the age of 2 then I will let that naturally occur and that will be fine, but at the moment he is showing no signs of really easing up. ... Then she said you need to make a call about when you’re going to stop. (Ann)

The participant mothers described vastly different decisions with regard to parenting plans for their breastfed infants. Breastfeeding is only one consideration in a complex web of concerns in the decision process; it is nonetheless disconcerting for a mother to make decisions without clear guidance. This was particularly concerning when the outcome appeared to women to come down to the attitude of the individual official person presiding on the day.

Some decisions were made in favor of supporting the breastfeeding relationship between a mother and her child, as shown by Lucy and Trish’s experiences:

My magistrate, he said “Breastfeeding, I’m not an expert on that. We’ll just have to believe what the mother says on this and I’ll go with what the mother says.” (Lucy)

The magistrate said there’s no way that he’s going to give overnights to a 10-month-old baby who’s also being breastfed. (Trish)

However, some officials made no or little explicit recognition of the breastfeeding relationship, making decisions that resulted in extended separation of breastfeeding children and their mothers. When Georgianna was still breastfeeding her 12-month-old child, she was

ordered into an equal-time arrangement. This led to the rapid demise of her lactation.

The magistrate said right, to spread out the risk, I will give you a week about [parenting plan whereby child spends 1 week with mother and then 1 week with family].

I just—I tried it [expressing]. ... I didn't have the head space to do it. Whether it was just the belief in God, I don't know. Just hoped that I didn't dry up. I kept doing that every so often, just to try and make sure there was milk...yeah, but not for long. The streams had actually stopped. My breasts shape changed. But they became those flat folds of skin.

Leanne was persuaded to accept a full day and over-night shared parenting arrangement for her infant.

I think from about 8 months to 10 months of age, I had so much difficulty and I had quite a lot of engorgement and mastitis and such that I just stopped breastfeeding her.

I tried to hand express on a few occasions but I didn't really have a technique. I was just trying to do it to relieve engorgement. ... I thought if she's going to have to go away from me every weekend there's no point. I can't go through this every week. ... I stopped cold turkey breastfeeding her. She left for her dad I think on a Saturday, came home on the Sunday and I just didn't feed her again, ... 3 months later she wanted to breast-feed again. (Leanne)

The participants recognized the difficulty of such decision making but reflected that in their experiences the interpretation of law was generally in favor of 50:50 shared care.

The judge made a number of comments during the trial which were, well my hands are tied I'm going to have to do something here, we all know that new legislation, and the new legislation is about 50:50 parenting. (Jenny)

It is nothing to do with the woman standing there saying, I do breastfeed, my baby won't settle without the breast, I don't feel my baby's emotionally able to be separated right now, she ends up, you know, in a completely distressed state for the next 12 hours after a long or extended access

visit. ... They don't listen to any of that, it's all about the father having extended periods...with the child. (Jenny)

Silencing of Breastfeeding in the Legal Process

The majority of mothers were advised not to use breastfeeding in their legal case but rather to present other aspects of parenting. Breastfeeding was considered as a potentially powerful tool to limit the time a father can have with his child. Breastfeeding was therefore seen as a highly vexed component in a legal case.

One lawyer...said to me in very strong terms, that I didn't want to frustrate access for the father by using breastfeeding as a reason for him not being able to see his child for extended periods of time, and the term that the lawyer used was an access bitch because if you're an access bitch, the judge will just turn against you if they can construe, the other side's barrister, that you have frustrated his access because of breastfeeding. ...So make sure that breastfeeding's only one of the issues you put forward. Melissa was under a year old, so she was probably 8 or 9 months old. (Jenny)

Such a perception of breastfeeding was frustrating and perplexing for these mothers. As Jenny explains:

[He said] let's just have the breastfeeding as one of the little issues, which is strange, because it is actually one of the big issues.

The silencing of breastfeeding was more evident for mothers of infants over 1 year of age. Population standards and normative behavior were used to dissuade mothers against using breastfeeding in their case. Again Jenny explains:

It's the standard that we set in our own country that matters, it's the average standard in the population and the average standard in the population is that women don't breastfeed for more than 6 to 12 months and you are an outlier, you have to fit in to what the norm is and the norm is that children don't breastfeed after a year.

At times when breastfeeding was presented in a case it was quickly dismissed without further discussion.

It was mentioned about breastfeeding to the magistrate. The magistrate's words were he can meet his nutritional needs elsewhere. (Georgianna)

Some women described going to great lengths to gather supporting evidence of the benefits for maintaining breastfeeding only to be told they should not use it in their case.

The fact I printed a ton of information for my lawyer and to be attached to my affidavit, ... but I was informed that you don't want to be seen to be teaching the judge. The judge would find that offensive. These judges had been doing this for many, many years I was told and they know the ins and outs, they know about breastfeeding (Jenny)

Benefits of Breastfeeding Ignored

The mothers in this study all spoke of experiences where the many benefits of breastfeeding to both the child and the mother were not considered or disputed in order to promote shared care. The mothers were dismayed by these attitudes. Pauline and Jenny described this well.

They just basically said that it's not a big deal ... that it's not that important, the father can feed her with a bottle and formula and thousands of people do it. It was just a lifestyle choice. I couldn't believe that in this day and age, people still considered it as a lifestyle choice and not a health choice. I was really disappointed. (Pauline)

It's Melissa's desire to keep breastfeeding and the World Health Organization says that I should go for 2 plus years. Oh yes, that was just met with such disparaging times, it was just, oh yes, now the World Health Organization, well it hardly applies to Sydney, Australia, does it. (Jenny)

These attitudes were frequently experienced through the legal system but also from health professionals. Georgianna sought advice from her doctor when her baby was 4 months old. She said:

He was oh maybe it's time to stop breastfeeding. I just think...fuck you all. It's my choice. ...This is good for me and it's good for my son. ...They basically told me it was more a lifestyle choice.

Leanne had a similar experience:

I'd spoken to a doctor about it and the doctor was very unsupportive. She was telling me that her children had stopped breastfeeding overnight by 15 months and that Jake shouldn't be feeding so much and it was all about me wanting to keep him as my baby and that I should be saying no to him. She really devastated me and made me feel like I was a shit mother and that I shouldn't be breastfeeding him so much and that it's not normal.

Such views were very concerning and frightening for the mothers, because they felt confused when doing what they believed was in the child's best interests.

I found it frightening. When I got the court papers I found it really frightening because I couldn't understand how the breastfeeding relationship could be so insignificant to a court. I understood that it's important for the child to have regular contact with the father but I couldn't understand how that overrode the breastfeeding relationship also, so that was confusing and scary for me. (Leanne)

Disempowerment of Motherhood

The participant mother's experiences of the family law system led to a sense of disempowerment of their role as mother. Women described being bullied through mediation processes with their ex-partners, counselors, mediators, and judiciary.

[I have experienced] big bullying and I've had to make huge concessions. (Annette)

Rebecca experienced bullying from her own lawyer in a court as a means to establish an agreement.

In the court she demanded that I express ...and I just said no. She wrote it down in the orders. The mother will provide a bottle of expressed milk. And I just said no, I wouldn't sign off on that. ...I hate it, I hate it, I hate it. ...I was actually sexually assaulted when I was 12 and ... I do feel that. ...I felt assaulted.

The mothers spoke of being bullied through use of fear or “scaremongering” by ex-partners, mediators, and lawyers.

Basically, what he said to me was that he had had 2 cases of babies of similar ages, and he said that the courts had decided 50:50. One had said yep, the baby is old enough, off it goes, and the other one they said no it's not. And he said to me—he felt that in the scheme of things...to try not to inflame the situation, that I should attempt [shared care], because the courts [will order shared care] 50% of the time. (Pauline)

I'll have to tell you a few terrible stories about women that he was dealing with that were breastfeeding children, had run away from violent husbands and the court had ordered them to move back to the state and the father got shared care half of the week and they had to hand over a 6-month-old baby and a 2-year-old and yeah. That made me feel quite ill and yeah. (Fiona)

Such experiences resulted in the mothers experiencing a sense of disempowerment.

So I felt very disempowered because I was told all along the court counselors are impartial but I felt they kind of leaned toward [father] and that if you don't agree with the court counselors, if you go into court that they would still award with [father] anyhow and that would be traumatic for me and the children and all sorts of things so that was really hard. (Lucy)

This sense of disempowerment negatively affected the women's sense of motherhood, because the mothers felt that they had to constantly fight for what they strongly believe was their child's best interests.

I just felt like all the way along I was being judged extremely negatively for wanting to breastfeed and the anguish and the feeling of just utter desperation, really of extreme distress and concern and that is not from being an irrational or overprotective mother, it's simply that this is what this little person is asking for and her rights, I feel, are completely and utterly denied in that system. (Jenny)

Even when women felt strength to fight the system they were discouraged.

I so wanted to have the opportunity to get breast-feeding experts to stand up in the court and for this to become a test case for overnight access not commencing until Melissa is fully weaned and I was, at that point, was suggesting it would be the age of 4. But I was told that it was completely and utterly ludicrous, unreasonable and overly conservative. (Jenny)

Rebecca and Lucy summed these perceptions up well.

As a Mum you don't feel any security or protection, you just feel this constant threat that your baby might be taken away from you for 7 days in a fortnight. (Rebecca)

It makes you feel so angry. You feel so disempowered. You're told by your domestic violence counselor, “Stand up, you're the child's voice, you need to tell the court” and you do and then you're not believed you just feel so disempowered. ...It's been about 20 months but, you know, you come out the other side a hell of a lot stronger. (Lucy)

Discussion

This study makes a vital contribution to our current knowledge of the experiences of mothers who breast-feed children post separation, and is extremely timely as it complements the current enquiries on the impact of the 2006 reforms. It is unique in its approach of focusing on the issues of consideration and management of breastfeeding in making parenting plans for breastfed children.

At the heart of the study lies the hypothesis that shared care arrangements have been affected by misconceptions regarding the intent and effect of section 65DAA of the Family Law Act 1975 (Cth) and other sections relevant to shared care. Section 65DAA relevantly provides that if equally shared parental responsibility is to be granted, the court must consider making an order for equal time or, if not, for substantial and significant time. The decision making is to be guided by 2 factors: the best interests of the child and whether such time is “reasonably practicable.” However, there

is no presumption that either equal time or substantial and significant time actually is in the best interests of the child. That must be determined on an individual basis using considerations set out in the Family Law Act 1975 (Cth) section 60CC.

It is clear that the new shared parenting provisions are attempting to introduce an attitudinal shift toward cooperative parenting and away from the previous typical arrangement of 80:20, in which children lived with one parent and saw the other parent every other weekend and for half of the school holidays. Shared parenting is intended to be the new standard arrangement. However, the specific arrangements for any particular family are nonetheless to be determined on an individual basis according to both the child's best interests, which remains the paramount consideration (section 60CA), and the requirement of reasonable practicability. It is this factor that has potentially been overlooked, particularly in the public perception of shared parenting. This potential misunderstanding has possibly been exacerbated by the legislative presumption of equal shared parental responsibility; it seems that many people believe the presumption is for equal time or at least for substantial and significant time. This belief may be affecting the decision making of parents in developing informal arrangements or parenting plans—especially if they believe that equal-time shared care is the new normative outcome. When applied in this manner, the interpretation of the law may result in the belief that the best interests of the child are achieved with equal time itself.

The tensions and uncertainties mentioned above are brought into sharp relief in the case of breastfed infants of separating parents and in terms of whether shared care is in those children's best interests and is reasonably practicable. This issue also involves ethical questions about the mother's choice and right to breastfeed. The experience of the participant mothers in this study suggests that the requirement of reasonable practicability is not consistently considered or applied to breastfeeding infants within the family support services and legal system.

This research has demonstrated that the decisions regarding shared parenting of breastfed children do not always appear to consider breastfeeding to be in the best interests of the child's health and well-being or are not practicable for the maintenance of breastfeeding. Some cases involve day-to-day arrangements that make breastfeeding virtually unworkable or require the cessation of breastfeeding, and thus breastfeeding seems to

be overlooked. This is in contrast to an Australian government²⁰ response paper which assumes that the courts do consider breastfeeding as a form of appropriate care when determining the child's best interests.

The experiences of this group of women indicate vastly different responses to breastfeeding within mediation services and from solicitors and the judiciary. Similarly, the experiences of these women indicate differing understandings of the meaning and operation of section 65DAA and likely court outcomes, with advice that often emphasizes finding a way to make equal time work, because it is likely to be ordered, rather than considering whether equal time is itself in the best interests of the child and reasonably practicable for that family.

As with any research, there are limitations to the study. As qualitative research, the findings are the researcher's interpretation of the experience of these mothers. The study includes a relatively small number of participants and cannot be generalized to the broader population. The study participants cannot speak for all mothers breastfeeding throughout separation and experiencing the Australian Family Law system. Furthermore, qualitative research uncovers the meanings and experiences of people in a given time and place, but these will not remain fixed, because people are social beings in a dynamic and changing social world.

Conclusion

The study was aimed not at undermining either the shared care parenting ideal or the role of the father but rather at highlighting the contemporary experience of a group of Australian mothers attempting to maintain breastfeeding through separation and shared parenting. It is evident from these mothers that the experience of negotiating parenting plans in the family court system is harrowing and stressful, leading to frustration and fear and ultimately disempowerment. Furthermore, this research suggests that shared parenting orders made since the amendments, which separate breastfeeding mothers from their child, have significant negative impacts on women's ability to breastfeed their infant, influencing their perseverance and ultimately breastfeeding duration. For them, the practical effect is an arrangement that arguably operates contrary to the best interests of the child and that in some situations is not reasonable or practicable—which is the very principle the parenting orders or plans are meant to implement. This study has highlighted the

need for improved education about the significance and practicalities of breastfeeding and its resource value to society as well as ways to enable breastfeeding in postseparation parenting arrangements. Further research on a broader scale would further our understanding of both formal and informal parenting arrangements for breastfed children. Like the conclusions of McIntosh and Chisholm,²¹ this study adds support to the need for further research into age-specific issues involving the emotional and psychological impact of shared care on infants and children under 4 years of age.

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