

Consultation Form for Trade 業界諮詢意見表格

Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants & Young Children 《香港嬰幼兒配方奶粉和相關產品及食品的銷售及質素守則》

Part I: Company Details 第一部份: 公司資料

Name in English 英文姓名:	<u>Tong Chi Keung, Dominic</u>	Name in Chinese 中文姓名:	<u>唐志強</u>
Position 職位:	<u>CEO and Founder</u>		
Name of Association/ Organisation/ Company	(English 英文)	<u>BOM CITY LIMITED</u>	
協會/ 機構/ 公司名稱	(Chinese 中文)	<u>木棉寶堡</u>	
Address 地址	(English 英文)		
	(Chinese 中文)		
Phone No. 電話號碼:		Fax No. 傳真號碼:	
Email Address 電郵地址:			

Part II: Your Views 第二部份: 您的意見

(Please attach extra sheets if necessary 如空格不夠填寫, 請另附紙)

(1) Scope & Definitions (Articles 2&3) 範圍及定義(守則第二及三條)

Views 意見:

The definitions are clear to public. We support

- (a) 維護母乳餵哺; 以及
- (b) 確保配方奶、配方奶相關產品及供36個月以下嬰幼兒的食品獲得適當使用, 以為嬰幼兒提供安全及足夠的營養。

BUT

We will suggest to look into details how to execute the above items so as to achieve the best result and balance to mother and child.

(2) Information and Education(Article 4) 資訊及教育(守則第四條)

Views 意見:

We DO NOT AGREE with the following items

製造商或分銷商本人或代表他/她的其他人, 不應—

- (a) 舉辦、進行或贊助擬為市民大眾、孕婦及三十六個月或以下幼兒的母親而設有關母乳餵哺及配方奶餵養的教育活動; 或

The government should not restrict manufacturer and distributor to support the mentioned activities as breastfeeding and breast-milk substitutes are not mutual exclusive.

Public, especially the mothers **should have the right** to understand more on all availabilities in the market for their own selection.

Breastfeeding is definitely the most natural way to provide babies to grow up. However, if this kind of information is prohibited to propagate in the market, the mothers will not understand or even do not know what will be available in the market. That will stop them from the further **awareness of choice**.

I know some mothers who are not able to perform breastfeeding due to different reasons, what is the best choice for their babies? Government hospitals always recommend breastfeeding; doctors in private clinics/hospitals will recommend their choices, however, for **the underprivileged group** who is not able to visit these private clinics/hospitals, they need to check out this kind of information through all public channels, unless the government wants them to get inadequate information or wrong one amongst their peer groups.

With the support by these manufacturers and distributors, this kind of educational activities will be having more resources to organize more healthy and positive information to the necessity. *Milk is not Cigarette*, it is NOT hazardous to health. As long as the government can govern the manufacturers and distributors about their promotion content, it is a good and important message for all mothers to choose.

(b) 製造論述母乳餵哺及配方奶餵養的資訊或教育材料，及向市民大眾、孕婦及三十六個月或以下幼兒的母親派發有關材料，或贊助贈該等材料製造及派發。

The government should not restrict manufacturer and distributor to distribute or sponsor the mentioned materials as breastfeeding and breast-milk substitutes are not mutual exclusive.

Public, especially the mothers **should have the right** to understand more on all availabilities in the market for their own selection.

Breastfeeding is definitely the most natural way to provide babies to grow up. However, if this kind of information is prohibited to propagate in the market, the mothers will not understand or even do not know what will be available in the market. That will stop them from the further **awareness of choice**.

I know some mothers who are not able to perform breastfeeding due to different reasons, what is the best choice for their babies? Government hospitals always recommend breastfeeding; doctors in private clinics/hospitals will recommend their choices, however, for **the underprivileged group** who is not able to visit these private clinics/hospitals, they need to check out this kind of information

through all public channels, unless the government wants them to get inadequate information or wrong one amongst their peer groups.

With the support by these manufacturers and distributors, this materials can be a channel for more healthy and positive information to the necessity. *Milk is not Cigarette*, it is NOT hazardous to health. As long as the government can govern the manufacturers and distributors about their promotion content, it is a good and important message for all mothers to choose.

(3) Promotion to the Public (Article 5) 向公眾推廣(守則第五條)

Views 意見:

We DO NOT AGREE with stopping promotion to the public.

The government should not stop manufacturer and distributor the promotion to public as breastfeeding and breast-milk substitutes are not mutual exclusive.

Public, especially the mothers **should have the right** to understand more on all availabilities in the market for their own selection.

Breastfeeding is definitely the most natural way to provide babies to grow up. However, if this kind of information is prohibited to propagate in the market, the mothers will not understand or even do not know what will be available in the market. That will stop them from the further **awareness of choice**.

I know some mothers who are not able to perform breastfeeding due to different reasons, what is the best choice for their babies? Government hospitals always recommend breastfeeding; doctors in private clinics/hospitals will recommend their choices, however, for **the underprivileged group** who is not able to visit these private clinics/hospitals, they need to check out this kind of information through all public channels, unless the government wants them to get inadequate information or wrong one amongst their peer groups.

We DO NOT AGREE with the following

製造商或分銷商本人或代表他／她的其他人不應－

- (a) 直接或間接取得嬰兒、幼兒、孕婦及三十六個月或以下幼兒母親的個人資料；或
- (b) 邀請嬰兒、幼兒、孕婦及三十六個月或以下幼兒母親參與活動，例如嬰兒表演、餵養指導活動等目的為了推廣其產品或其品牌。

This is one of the opportunities for mothers to understand more, it is the **basic human right** to keep awareness of different public

information. As long as this is not violated to law or making disturbance to mothers, we should support the manufacturers and disturbers.

With the support by these manufacturers and distributors, this materials can be a channel for more healthy and positive information to the necessity. *Milk is not Cigarette*, it is NOT hazardous to health. As long as the government can govern the manufacturers and distributors about their promotion content, it is a good and important message for all mothers to choose.

(4) Promotion in Health Care Facility (Article 6) 在醫護機構進行推廣(守則第六條)

Views 意見:

We DO NOT AGREE with stopping promotion in Health Care Facility.

Health care personnel such as doctor and nurse are professions. They should have the correct judgment of what they have obtained, which is good or not to release to public, and which one is the appropriate for their clients.

Manufacturers and disturbers should provide pure and scientific information about their baby formulae to these health care facilities and they should supply objective information to the new mothers and mother-to-be.

(5) Information and Promotion to Health Worker (Article 7) 向醫護人員提供資訊及推廣 (守則第七條)

Views 意見:

We DO NOT AGREE with stopping information and promotion to health worker

The government should not restrict manufacturer and distributor to promote and provide information to health worker.

These health workers such as doctor and nurse are professions, they **should have the right and judgment** to understand more on all availabilities in the market for their own selection.

Milk is not Cigarette, it is NOT hazardous to health. As long as the government can govern the manufacturers and distributors about their promotion content, it is a good and important message for all health workers to choose.

Manufacturers and distributors should provide pure and scientific information about their baby formulae to the healthcare professionals (Include GPs, pharmacists etc) annually.

(6) Labelling (Article 8) 標籤 (守則第八條)

Views 意見:

Agreed with the regulation

(7) Quality Standards (Article 9) 品質標準(守則第九條)

Views 意見:

Agreed with the regulation

(8) Implementation and Monitoring (Article 10) 推行及監察(守則第十條)

Views 意見:

The penalties should be clearer and announce to the general public, especially to the pharmacy and hospital.

Part III: Specific Questions 第三部份: 指定問題

(Please attach extra sheets if necessary 如空格不夠填寫, 請另附紙)

- (1) 製造商及分銷商應容許有充分時間來預備守則的推行, 您認為何時是最佳的推行時間? (可就不同條款提出不同推行日期)

Manufacturers and distributors should be given sufficient time to get prepared for implementing the Code. In your opinion, what will be the optimal time for the implementation? (You may wish to provide different time frame for different articles)

Views 意見:

No idea, should leave it to manufacturer, distributor and government



Signature :

Date: 31/12/2012

Please return us this form on or before 31 December 2012 through any of the following means 請透過以下任何一項途徑於 2012 年 12 月 31 日或之前交回此表格:

Post 郵寄: The Secretariat Office, Taskforce on Hong Kong Code of Marketing of Breastmilk Substitutes, Family Health Service, Department of Health, Room 1308, 13/F, Guardian House, 32 Oi Kwan Road, Wanchai, HK
香港灣仔愛群道 32 號愛群商業大廈 1308 室家庭健康服務衛生署香港母乳代用品銷售守則專責小組秘書處

Fax 傳真: (852) 2574 8977

E-mail 電郵: hkcode@dh.gov.hk

Note : In providing us your views, please let us know in case you do not want to be attributed. Unless otherwise specified, all responses will be treated as public information and may be published in the future without further notice. 注意: 如不欲公開姓名，請於提交意見時清楚表示。除非另加指明，否則所有意見均視作公共資訊處理，日後可能會在沒有通知下予以公開。

*** END***