

The Secretariat Office of the 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

Dear Sir / Madam,

Baby Planner, as a key private provider of ante-natal and post-natal education in Hong Kong, continuously connects with local pregnant moms and moms with infants.

Upon our understanding, **the key obstacles of breastfeeding are the length of maternity leave and the support of breastfeeding in workplace and out-of-home environment.** This understanding is also consistent with other scientific researches on the local moms.

In current years, increasing numbers of moms are aware that breast milk is superior to formula milk **even there are strong presence of marketing activities of infant formula milk, feeding bottles, etc. They likely choose breast milk as the first choice to feed their babies.** This figure has been shown in the data from Department of Health. However, the rate lapsed significantly when babies aged 3 months and more. The answer is already crystal clear.

Obviously, **the proposed Code cannot solve, even not intend to solve, the key, root cause of low breast-feeding rate in Hong Kong.** We hardly believe the implementation of this proposed Code can improve the breast-feeding rate and this will only create other side problems that eventually impact the choice of consumers.

Hong Kong as a free, open economy, freedom of information is already one of our core values. Consumers should be accessible to different information to make their own choice under fair

environment. However, the proposed Code will create barrier to access information and negatively affect the choice of consumers.

If prohibition of marketing activities of breastfeed substitutes and related products can improve the rate of breastfeeding, we strongly urge the government to also prohibit the corresponding activities of "junk food", e.g. carbonated soft drink, snacks, chocolates, etc, in order to alleviate the child obesity. If this logic is correct, it should be applied for all categories in harming the health of public.

In conclusion, we agree that breast milk is the best food for infants and we need to encourage more and more moms to breastfeed their babies. Meanwhile, breast milk substitutes still have their medical and social functions in this modern society. We urge the government can take several measures to improve the rate of breastfeeding in consistent with other developed countries as below:

1. **Increase the length of maternity leave** from 10 weeks to 20 weeks or even more.
2. **Increase the support of breastfeeding in workplace and out-of-home environment**, e.g. providing tax incentives for developers to provide breastfeeding room in shopping malls, office buildings, MTR stations. Also, government can provide such facilities in all public building, like libraries, government offices, sport centres, etc.
3. **Regulate the product claims and labels in compliance with WHO / Codex guideline and Hong Kong Food Labeling laws.** Surely, no claims can be allowed as "Close to Breast Milk" for breast milk substitutes and related products.

Baby Planner Limited

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