

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
Hong Kong

24th December 2012

To whom it may concern,

Re: Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants & Young Children

We Celki Medical are aware that the Taskforce on Hong Kong Code of Marketing of Breastmilk Substitutes developed the captured regulation in Oct 2012. The purpose of the proposed regulations is to contribute to safe nutrition for infants and young children by means of setting standards for food stuffs for infants and young children and by respecting inappropriate practices used to promote these products. The regulations have been promulgated due to the fact that the Taskforce is committed to promote, support and protect breastfeeding. The taskforce recognizes that improper practices in the marketing of breastmilk substitutes are contributing to inappropriate feeding practices and causing infant malnutrition. According to the Taskforce, marketing of breastmilk substitutes requires special treatment, which makes usual marketing practices unsuitable for these products. We fully support breastfeeding and appreciate to tackle inappropriate marketing of breastmilk substitutes.

Situation in Hong Kong

There are many reasons which make a mother is unable to physically breastfeed her infant such as she is at work or other reasons like inverted nipple or cracked nipple and who would have difficulty feeding directly from mother's breast. Then these mothers would need breastfeeding devices to help them. In addition, a research article stated that returning to work is one of the key reasons stop breastfeeding in Hong Kong¹. As a result, working mothers would also need not only a breastpump but also breastmilk collecting and feeding devices to help them to continue breastfeed their babies. There are approximately 20-30% of pregnant women purchased a breastfeed pump in 2010.

Celki Medical Company

Celki is the medical company represents Medela AG to distribute its breastfeeding products in Hong Kong. We commit to provide the best products and services including breastfeeding to our customers. We support breastfeeding of infant as we believe breastmilk is the best source of nutrition for infants. We are

¹ Tarrant et al. BMC Pregnancy and Childbirth 2010, 10:27; <http://www.biomedcentral.com/1471-2393/10/27>; 12 Dec12

not only carrying the best breastfeeding products which include breastfeed pumps, collection devices, storage devices, and feeding devices. We also support Hong Kong Breastfeeding Mothers' Association to organize educational talks for public to promote breastfeeding. We are devoted to support breastfeeding.

Medela AG

Medela's fundamental objective is to promote the breastfeeding of infant. It invents and manufactures innovative and quality products through research and technological developments to be in the furtherance of feeding breastmilk to infants. It supplies products which are specifically geared for the feeding of breastmilk to infants, and not for feeding of formula milk or breastmilk substitutes.

Medela supplies a product named Calma feeding device which is a special feeding device that has specifically designed to require baby to create a vacuum and maintain the correct wide jaw angle as it would be in breastfeeding and thereby, encourages an infant to mimic suckling on a breast in order to prevent any interference with the natural suckling mechanism of the infant. In addition, Medela's breastmilk collection bottles which come along with breastpumps as well as on their own are used for collecting and storing breastmilk when mothers use a breastpump to express breastmilk.

On the other hand, due to the fact that Medela's objective is to promote breastfeeding of infant, all the informational booklets provided by Medela as well as the leaflets contained in the packaging of Medela's products promote the breastfeeding of infants exclusively.

We support breastfeeding as we supplies the products are in the furtherance of feeding breastmilk to infants which include breastpumps and specifically designed devices for feeding of breastmilk to an infant such as Calma feeding device and breastmilk collection bottles. Therefore, we hereby define all of our products as breastfeeding devices. We also consider our breastfeeding products do not fall within the definition of the affected products of the Hong Kong Code. However, we would appreciate if a clear statement could be made.

We look forward to receiving a reply of our concern.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Vincent Rouvier', with a horizontal line underneath.

Vincent Rouvier
Chief Executive Officer
Celki Medical Company