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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

Dec 27, 2012

Dear Sir/ Madam,

We welcome the initiative to develop a Hong Kong Code to protect, promote and support breast feeding.

As part of the community, Heinz does support breastfeeding which has long term benefits to babies, mothers and the society. However, we feel important to highlight that Baby Foods are Complementary Foods, whether locally made or ready made, they have to be adequate to meet special nutritional and safety needs of babies, being essential to their growth and development, therefore, it is not appropriate to consider equal to substitute for breast-milk or to interfere with breast feeding.

WHO International Code of Marketing of Breast-milk Substitutes 1981 and Codex STD 74 define Complementary Foods as "any food, whether manufactured or locally prepared, suitable as a complement to breast-milk or to a breast-milk substitute, when either becomes insufficient to satisfy the nutrient requirements of the infant."

The need for timely introduction of adequate complementary feeding has been fully recognized, since infants and young children have increasing needs for additional energy and nutrients alongside with growth. The ability of breast milk to meet requirements for macronutrients and micronutrients becomes limited with increasing age of the infant and after 6 months of age, breast-milk alone is not sufficient and complementary foods need to be introduced (ESPGHAN 2008 and Butte N et al., WHO 2002).

Therefore Complementary Foods shall not be considered a substitute for breast-milk, nor can they be marketed as such, but from 6 months onward they are an indispensable complement to breast-milk.

Inadequate complementary nutrition can cause severe and even lasting damage to children's physical and mental health. It is also essential that Complementary Food is suited to child's development stage, besides being always prepared in hygienic and safe manner. This is valid both for locally prepared food as well as commercial products.

WHO (Global Strategy for Infant and Young Child Feeding, 2003) recommends that complementary feeding be:



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- timely - introduced at the appropriate age;
- adequate - in terms of the energy and nutrient needs of the child;
- safe - hygienically stored, prepared, and fed;
- properly fed - with age-appropriate feeding frequency and methods, consistent with the child's appetite, applying responsive feeding.

Complementary Foods must meet the specific needs of infants and young children.

Infants and young children's nutrient needs differ from those of older children and adults especially due to their high rate of growth and development. During the first 3 years of life, a young child's weight increases 5-fold and its brain gains 2g every day.

By about 1 year of age, most infants are physically able to consume home-prepared or family foods, however because of their small stomach capacity together with high energy and nutrient needs older infants and young children still require nutrient-dense foods. Complementary Foods are not simply smaller and mashed portions of adult food.

WHO (Global Strategy for Infant and Young Child Feeding, 2003) identifies "Inadequate knowledge "as being often "a greater determinant of malnutrition than the lack of food". Thus, access to accurate and complete information about complementary foods, including processed ones, is critical to educate caregivers, taking also into consideration that weaning contexts may be highly diverse.

Lack of proper and complete information may lead caregivers to turn to adult's convenience foods that can be often inappropriate for infant and young child feeding.

Thus, restricting marketing communication on commercial Complementary Foods may deprive caregivers of the necessary information to make aware choices and may induce them to resort to inappropriate foods.

Therefore, given Baby Food is not a substitute to breast-milk and it is vital for the growth and development of babies after 6 months, we highly encourage the Task Force to revisit and exclude Baby and or Complementary Food from its guideline, so that communication of Complementary Foods can continue to be correctly marketed.

Thanks for your kind attention. Should you want to discuss in greater detail, please don't hesitate to contact Ms Ada Chan at ada.chan@hjheinz.com.hk or 2586 9335.

Yours sincerely,


Allison Lin
General Manager
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