



Hong Kong College of Paediatricians 香港兒科醫學院

(Incorporated in Hong Kong with Limited Liability)



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14th November, 2012

Dr Lilian Leong
Chairman of the Taskforce on
Hong Kong Code of Marketing of Breastmilk Substitutes
Department of Health
Rm 1308, 13 Guardian House,
32 Oi Kwan Road,
Wan Chai,
Hong Kong

Dear Dr Leong,

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

Thank you for your letter dated 26th October 2012 inviting comments from our College on the captioned. The College supports the views that breastfeeding is best for newborns and infants.

At the recent Council Meeting held on 6th Nov, 2012, members suggested that it would be vital and essential to ensure a timely transmission of factual information of these products to healthcare workers by the Department of Health. This could greatly facilitate the communication between healthcare workers and parents/patients.

Thank you, once again, for inviting our College to comment on the Code.

With best wishes,

Yours sincerely,

Professor Pak C. Ng
President
Hong Kong College of Paediatricians

cc Dr Shirley Leung, Secretary to the Taskforce on Hong Kong Code of Marketing of Breastmilk Substitutes, Department of Health



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4 February, 2013

Dr Lilian Leong

Chairman of the Taskforce on

Hong Kong Code of Marketing of Breastmilk Substitutes

Department of Health

Rm 1308, 13 Guardian House,

32 Oi Kwan Road,

Wan Chai,

Hong Kong

Dear Dr Leong,

Consultation on “Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants & Young Children”

On behalf of the HK College of Paediatricians, I thank you very much for your letter dated 14 December 2012 regarding the captioned. The College Council at its latest meeting has deliberated discussions on our College’s principles and views which I am summarizing as follows.

1. The College unreservedly supports the principle that breast milk is the best nutrition for infants, and there is no “ideal alternative”.
2. The College supports the WHO Global Strategy for Infant and Young Child Feeding that recommends exclusive breast feeding in the first six months, and timely introduction of complementary feeding afterwards, along with continued breast-feeding for up to two years of age or beyond.
3. The College also supports the WHA resolution (WHA63.23, 2010) “to end inappropriate promotion of food for infants and young children, and to ensure that nutrition and health claims shall not be permitted for foods for infants and young children.” To quote the

Surgeon General of the USA, “Research indicates that the marketing of substitutes for breast milk has a negative effect on breastfeeding practices.” (The Surgeon General’s Call for Action to Support Breastfeeding 2011) Our College welcomes a Hong Kong Code that regulates the marketing of breastmilk substitutes.

4. In the case that a mother is unable to breast-feed, or decides not to breast-feed despite adequate information and counselling, she should be given support similar to breast-feeding mothers.

It is a fact that in Hong Kong many mothers have decided to formula-feed their children. This may be due to many reasons - medical, psychological/ social, or, shortage of maternity leave and breast-feeding facilities, etc. It cannot be overemphasized that mothers intending to formula-feed their babies should be given full support, aid and guidance similar to breast-feeding mothers.

Understanding on nutritional needs of infant and young children is advancing rapidly and parents must be provided with up-to-date and relevant information and education. Adequate information, training, education material as well as manpower and resources must be provided to health care professionals to conduct such activities without the influence of commercial interests. The Hong Kong College of Paediatricians has been and will be collaborating with Department of Health in supporting breastfeeding and providing information to parents on infant feeding and nutrition.

Likewise, proper product information should be available in a timely and easily accessible way to health care professionals. This should be provided directly from manufacturers/ distributors, and appraisal of new product information should be provided by the health authorities.

While the College welcomes the HK Code, it should be regarded as one and just one of the many components of our society’s efforts to implement the WHO Global Strategy of Infant and Young Child Nutrition. The SAR government should take the lead, in collaboration with the community, to execute concerted efforts to

- i. implement Baby Friendly Initiatives in health care facilities;

- ii. improve public policies and facilities to support breast-feeding mothers (e.g. breast-feeding rooms in public places, protecting the rights of working mothers to breast-feed). Prolonging the maternity leave and improving social benefits to mothers will encourage breastfeeding for a longer period.
- iii. provide comprehensive training for health care workers to support both breast-feeding and formula-feeding mothers and to establish healthy eating habits in young children.

Last but not least, we opine that the voluntary nature and the suggested implementation and monitoring strategy of the Code are not sufficient. We therefore propose regulation with legislative means and adamantly advocate the setting up of a Central Committee for the Promotion of Breast-feeding in the SAR government as a fundamental, enduring and effective avenue to this end.

Yours sincerely,



Dr WONG Sik Nin
President
Hong Kong College of Paediatricians