



# HONG KONG COLLEGE OF RADIOLOGISTS

## 香港放射科醫學院

Founder College of the Hong Kong Academy of Medicine

(Incorporated in Hong Kong with limited liability)



**PRESIDENT**

Dr. C.K. Law  
羅振基醫生

**SENIOR VICE-PRESIDENT**

Dr. Jennifer L.S. Khoo  
邱麗珊醫生

**VICE-PRESIDENT**

Dr. Anne W.M. Lee  
李詠梅醫生

**WARDEN**

Dr. H.S. Lam  
林漢城醫生

**HONORARY TREASURER**

Dr. C.M. Tong  
唐卓敏醫生

**HONORARY SECRETARY**

Dr. Stephen C.W. Cheung  
張志偉醫生

**COUNCIL MEMBERS**

Dr. James C.S. Chan  
陳志生醫生

Dr. T.M. Chan  
陳子敏醫生

Prof. Dora L.W. Kwong  
鄭麗雲教授

Dr. C.Y. Lui  
呂振英醫生

Dr. Hector T.G. Ma  
馬天競醫生

Dr. W.T. Ngai  
魏偉達醫生

Dr. S.J. Shu  
許向捷醫生

Dr. Y.C. Wong  
王耀忠醫生

Dr. M.W. Yeung  
楊美雲醫生

**HONORARY LEGAL ADVISOR**

Mrs. Mabel M. Lui  
呂馮美儀女士

**HONORARY AUDITOR**

Mr. Charles Chan  
陳維端先生

**FOUNDING PRESIDENT &**

**IMMEDIATE PAST PRESIDENT**

Dr. Lilian L.Y. Leong  
梁馮令儀醫生

**EXECUTIVE OFFICER**

Ms. Karen Law  
羅雅儀小姐

Your ref: (1) in L/M (1) DH FHS 7030/10/2 Pt.2

20 February 2013

Dr. Shirley Leung

for Director of Health

Secretariat Office

Taskforce on Hong Kong Code of Marketing of Breastmilk Substitutes

Family Health Service, Department of Health

Room 1308, 13<sup>th</sup> Floor, Guardian House

32 Oi Kwan Road, Wan Chai, Hong Kong

Dear Dr. Leung,

**Re: Extension of Public Consultation on "Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants & Young Children"**

Thank you for your letter dated 31 December 2012 regarding the captioned issue.

The matter had been thoroughly deliberated by our Council Members at its recent Council Meetings. Our College unreservedly supports that breastfeeding is the optimal feeding for infants and young child. We fully agree with the content of the *International Code of Marketing of Breastmilk Substitutes* (adopted by the WHO in 1981) and subsequently *WHA resolutions*, and strongly support the Global Strategy for Infant and Young Child Feeding and the aims of International Code to empower mothers to make fully informed decisions on infant feeding free from commercial influences.

The College has great concern about some inappropriate and exaggerated advertising of formula milk and related products in various media channels. They may appeal to the public especially pregnant women and mothers who would have been led to believe these products are superior to breast milk. As health care workers we fully appreciate the benefit of breast feeding, not just in its nutritional content but also the un-replicable effect on infant-maternal bonding. The Council had reviewed the draft of **Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants & Young Children ("the HK Code")** and the leaflet for health workers and health care facilities, and we share with the wisdom of the Government that Hong Kong should develop its own Code to monitor the promotional practices of manufacturers and distributors on infant-and-young-child feeding and nutrition. We specially note the very detailed and explicit terms listed out in the Articles concerning information, education and promotional practices to be provided (and not to be provided) to the public and health care workers. We think these have

P.1 of 2

strike the best balance between the need to know the facts and the potential harmful effect of aggressive marketing. Articles 8 & 9 addressing 'Labelling' and 'Quality Standards' are highly relevant. For mothers who cannot breast feed their children due to health, social or other reasons, they need to be guaranteed that the mild product information they get from the manufacturers are based on facts and science rather than marketing jargons. Similarly they should rest reassured the quality meets internationally agreed standard.

Our College therefore fully supports the principles, aims and all contents of the **Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants & Young Children** to provide guidelines on marketing and quality of formula milk, feeding bottles, teats and pacifiers, and food products for infants and young children aged 36 months or below to manufactures and distributors, health workers and health facilities. While it is voluntary, the active surveillance and public complaint system would certainly exert positive pressure on the manufacturers and distributors to comply.

We appreciate the opportunity to express our views, and the Government's concerted efforts to the protection of breastfeeding and provision of safe and adequate nutrition for infants and young children. We look forward to continued participation in the community wide effort to make Hong Kong a more breast-feeding friendly society.

Yours sincerely,



Dr. Law Chun-Key  
President  
Hong Kong College of Radiologists