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18 December 2012

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

Dear Sirs

Consultation on the draft Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants and Young Children

The Hong Kong General Chamber of Commerce would like to offer our views on the Government initiative to develop a code for the marketing and quality of formula milk and related products, and food products for infants and young children.

The benefit of breastfeeding for both mother and child is widely recognized, and the Chamber also supports the promotion of breastfeeding. While the Hong Kong Code is voluntary in nature, it will affect stakeholders and inevitably users as well. We believe that there should be sufficient lead time for an informed discussion in the community so that the concerns and interests of various parties could be heard, particularly when key stakeholders were not involved in the preparation of the draft code. Hence, we suggest that the consultation period be extended for another three months to allow stakeholders to give the consultation document the full attention.

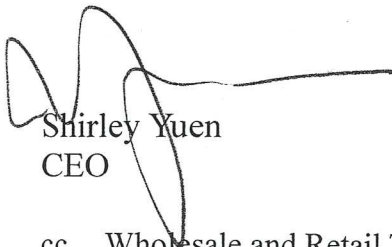
We understand that the International Code of Marketing of Breastmilk Substitutes have guidelines on marketing of breastmilk substitute for infants up to six months. Therefore, we are of the view that if the decision is for the Hong Kong Code to be adopted, it should follow the international practice.

In regard to the consultation on legislative proposals relating to formula products and foods intended for infants and young children under the age of 36 months, since it is being held in parallel and is related to the consultation on the draft Hong Kong Code, we believe that the public engagement exercise should also be extended for another three months to allow for thorough discussion among stakeholders.

As stated by this Chamber in other occasions, the decisions for important policy issues, such as the above consultations, should be made only after proper regulatory and economic impact assessment has been conducted.

Thank you for your attention.

Yours sincerely



Shirley Yuen
CEO

cc Wholesale and Retail Task Force, Business Facilitation Advisory Committee
The Hon Jeffrey Lam, LegCo Representative, HKGCC