

# Consultation Form for Trade 業界諮詢意見表格

## Hong Kong Code of Marketing and Quality of Formula Milk and Related Products, and Food Products for Infants & Young Children 《香港嬰幼兒配方奶粉和相關產品及食品的銷售及質素守則》

### Part I: Company Details 第一部份: 公司資料

Name in English 英文姓名:	Winnie Law	Name in Chinese 中文姓名:	
Position 職位:	Marketing Manager		
Name of Association/ Organisation/ Company 協會/ 機構/ 公司名稱	(English 英文)	Hutchison China Meditech Limited	
	(Chinese 中文)		
Address 地址	(English 英文)	[REDACTED]	
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### Part II: Your Views 第二部份: 您的意見

(Please attach extra sheets if necessary 如空格不夠填寫, 請另附紙)

#### (1) Scope & Definitions (Articles 2&3) 範圍及定義(守則第二及三條)

Views 意見:

WHO clearly states "...infants be breastfed exclusively for the first 6 months of life and that, once complementary feeding has begun, breastfeeding should continue up to the age of two years or beyond."

Therefore, we would agree to protect and promote breast-feeding up to first 6 months of age. Current practice of no promotion for infant formula (up to 6 months) is sufficient and in line with the local social situation.

Follow-up formula, by definition, is the liquid part of the weaning diet for infants from the 6<sup>th</sup> month on and for young children. Therefore it is not intended to use or market as breast-milk substitute.

In view of the situation in Hong Kong, breast-feeding rate up to one year of age is low due to various reasons e.g. short maternity leave. Therefore, **there is a legitimate need for use of follow-up formula. Consumers should have the right to receive correct and direct product information** to ensure the proper use of these products.

Therefore, we think the code should not include the follow-up formula. If, anyhow include follow-up formula, the code of practice should have lesser restriction of information or educational materials providing to mothers with children aged up to 36 months.

#### (2) Information and Education(Article 4) 資訊及教育(守則第四條)

Views 意見:

4.2.1 Product information should not be limited on manufacturer or distributor's websites, at the premises of retailers or at health care facilities only. Product information in printing should also be provided by manufacturer or distributor upon consumers' requests.

**(3) Promotion to the Public (Article 5) 向公眾推廣(守則第五條)**

Views 意見:

5.3 If pregnant women or mothers of children aged 36 months or below are willing to provide personal details to manufacturers or distributors in order to get more product information for correct use of the products, this should not be prohibited.

**(4) Promotion in Health Care Facility (Article 6) 在醫護機構進行推廣(守則第六條)**

Views 意見:

**(5) Information and Promotion to Health Worker (Article 7) 向醫護人員提供資訊及推廣 (守則第七條)**

Views 意見:

7.3.2 (d) Company names and/or brand names in printed materials and in backdrops should be allowed to acknowledge the sponsors. The brand name, by its nature, is not a promotional “tool”. Health workers should know what brands of products existing in the market.

**(6) Labelling (Article 8) 標籤 (守則第八條)**

Views 意見:

**(7) Quality Standards (Article 9) 品質標準(守則第九條)**

Views 意見:

**(8) Implementation and Monitoring (Article 10) 推行及監察(守則第十條)**

Views 意見:

**Part III: Specific Questions 第三部份: 指定問題**

(Please attach extra sheets if necessary 如空格不夠填寫, 請另附紙)

- (1) 製造商及分銷商應容許有充分時間來預備守則的推行, 您認為何時是最佳的推行時間? (可就不同條款提出不同推行日期)

Manufacturers and distributors should be given sufficient time to get prepared for implementing the Code. In your opinion, what will be the optimal time for the implementation? (You may wish to provide different time frame for different articles)

Views 意見:

A one year period is needed for the manufacturer to design and produce new labels which complies with the new requirements. Another 2-years transition period is needed for exhausting the products

at the trade level. Therefore, for the revision of the labels, a minimum of 3-years transition period would be needed after the announcement.

\*\* I do not want to be attributed my name and personal details. Please keep for your internal use only.

Signature :

Date: 24 Dec 2012

Please return us this form on or before 31 December 2012 through any of the following means 請透過以下任何一項途徑於 2012 年 12 月 31 日或之前交回此表格:

Post 郵寄: The 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, HK  
香港灣仔愛群道 32 號愛群商業大廈 1308 室家庭健康服務衛生署香港母乳代用品銷售守則  
專責小組秘書處  
Fax 傳真: (852) 2574 8977  
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Note : In providing us your views, please let us know in case you do not want to be attributed. Unless otherwise specified, all responses will be treated as public information and may be published in the future without further notice. 注意: 如不欲公開姓名, 請於提交意見時清楚表示。除非另加指明, 否則所有意見均視作公共資訊處理, 日後可能會在沒有通知下予以公開。

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