



## Hong Kong Code Consultation

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From:

To: &lt;hkcode@dh.gov.hk&gt;

Dear Sir / Madam,

Thank you for the consultation on Hong Kong Code. Below please find the feedbacks of our company and industry related companies on the code:

We find that the labelling requirements of Hong Kong Code on baby foods and milk formula seem even higher than Codex or WHO or other international standards. For examples,

- Codex requires to show only 32 nutrition information while the legislative proposals require to show 33 nutrition information. This is different to normal international standard and practice.

- According to the guidelines of WHO, the packaging should not have pictures of infants, or other pictures or text which may idealize the use of infant formula. They may, however, have graphics for easy identification of the product as a breastmilk substitute. However, in Hong Kong Code, it does not allow to show any photograph, drawing or graphic representation other than for illustrating methods of preparation. It seems the practice are different to international standards.

- WHO has some requests on warnings. However, they do not have special requirements on font sizes and having both Chinese and English. As the size of the packaging are limited, it is not feasible to include so many information.

- The requirements of having warning about the health risk of introducing the product prior to recommended age on baby foods and milk formula are not required in Codex or international standards as they are common sense to consumers.

- Codex or international standards only require to state "the date before which the product is to be consumed". However, the Hong Kong Code requirements of adding "date of manufacture"

are different to international standards and practice.

The code and practice seem different to those required by other countries, e.g. European Union, United States, Singapore, China, Australia, New Zealand, etc.

Hong Kong required importing milk formula from other countries. However, no products in the world have similar kinds of packaging required by the Code. Hong Kong is a small city and it is not possible for some international manufacturers to produce special Hong Kong packaging. These discourage small and medium milk formulas brands and baby foods in the market and reduce the choice available to consumers. It also encourages monopoly in the market.

If the supply is monopolized by several brands in the market, the babies in Hong Kong will not have other choices in case there are some shortages in certain brands.

Besides, some of the products have shelf life of two years and still on the shelves of different shops. If the grace periods are short, it is difficult for the manufacturers to change the packaging.

We hope the government can use international standards and practice when setting the guidelines of Hong Kong Code.



PS: We do not want to disclose our company name to the public.