

To:

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梁家騮議員

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民主黨 (黃碧雲議員)

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香港母乳育嬰協會

公民黨 (毛孟靜議員)

我支持香港政府頒布《香港配方奶及相關產品和嬰幼兒食品的銷售及品質守則》
(《香港守則》)，並以立法方式推行，原因如下：

奶粉商廣告規模驚人

僅僅於今年八月，奶粉商已投放 1.2 億港元於本地廣告市場(1)。嬰幼兒奶粉的廣

告鋪天蓋地，奶粉商大灑金錢對社會大眾進行「洗腦式」宣傳，令市民大眾誤以為奶粉營養成份媲美母乳，甚至比母乳更好。這些宣傳資訊，不僅影響嬰兒父母，他們的家人/朋友亦往往受到熏陶，批評媽媽餵哺母乳，為哺乳媽媽平添壓力。

銷售手法普遍帶誤導成分...

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奶粉廣告經常聲稱可令嬰幼兒「便便變軟」、能「促進腦部發展」、並含有各式各樣疑似科學化的成分。不過，這類聲稱不少都未有研究證實臨牀效用，有誇大失實之嫌。奶粉商更經醫院、醫務所派發試用裝，借市民對醫療人員的信任以謀利。香港消費者委員會已經多次(2)指出市面上嬰幼兒奶粉的銷售手法、健康聲稱、包裝標籤的問題，但多年來情況未有改善。業界去年推行的自律守則明顯無效。

研究證明奶粉銷售直接打擊哺乳率

奶粉商為了直接向媽媽推銷配方奶粉，大灑金錢成立 BB/媽媽會，隨處免費派發的奶粉試用裝，打擊婦女母乳餵哺的自信。根據二十年來國際上的大量研究顯示，當媽媽收到免費的奶粉試用裝、或依賴奶粉商提供的餵食資訊，以純母乳餵哺嬰兒的機會大為減低、餵母乳的時間會明顯縮短(3)、並會過早開始餵飼固體食物(4)。

香港對母乳支援落後

相比亞洲其他國家，香港餵哺母乳的比率偏低(5)，哺乳家庭面對的挑戰嚴峻。香港至今仍未有「愛嬰醫院」。港府多年均漠視國際公約，法定產假只有 10 周，哺乳休息時間更是聞所未聞。目前大多數公眾場所均未有設置育嬰間，不利哺乳媽媽外出哺乳及照顧嬰幼兒，也不便婦女外出擠奶。媽媽公開哺餵母乳的權利亦沒有立法保障。縱觀媽媽放棄餵哺母乳的原因，大部分都源於缺乏相關知識以及專業支援。將不良奶粉銷售的影響減少，是推廣母乳餵哺極為重要的一步。

母乳餵哺能促進母嬰身心健康，減低公共醫療開支，對嬰兒、媽媽、社會實在是百利而無一害。《香港守則》已經醞釀多時，我促請香港政府頒布《香港配方奶

及相關產品和嬰幼兒食品的銷售及品質守則》，並以立法方式推行，以守護嬰幼兒享用母乳的機會，保育本地哺乳文化。

I hereby support the Hong Kong SAR Government's launch of "The Hong Kong Code of Marketing and Quality of Formula Milk and Related Products and Food Products for Infants and Young Children" (the "HK Code") and the implementation of the HK Code by way of legislation for reasons listed below:

Aggressive Advertising by Formula Manufacturers

Formula manufacturers spent huge amount of money in advertising. In August this year alone, the money spent by the trade on local advertising reached HK\$120 million. "Brainwashing" advertisements can be seen everywhere, misleading people to think that formula milk is nutritionally comparable with or even superior to breastmilk. As not just parents are affected, their families and friends who are also influenced by the advertisements may criticise mothers for breastfeeding, bringing them extra pressure.

Generally Misleading Advertisements

Formula advertisements always claim that their formula can soften baby's stool or boost baby's brain development, and contains all kinds of ingredients which are seemingly scientific. However, many of these claims lack studies and researches to prove their clinical effectiveness and are suspected to be exaggerated and untrue. Formula manufacturers also give out free samples through hospitals and clinics and they are actually making profits by exploiting people's trust in medical practitioners. Although Hong Kong Consumer Council has pointed out repeatedly (2) the problems found in the marketing strategies, health statements and package labelling of formulas for the infants and young children in our market, there has been hardly any improvement over the years. The voluntary code introduced by the trade last year has proved itself ineffective.

Studies Prove that Marketing of Formulas Impacts Breastfeeding Rate

In order to promote formulae directly to mothers, formula manufacturers spent large sums of money on setting up baby or mother clubs and distributing free formula samples, thereby impacting mothers' confidence in breastfeeding. A large amount of international studies from the past 20 years suggested that if mothers had access to free formula samples and relied on formula manufacturers for feeding information, chances for mothers practising exclusive breastfeeding would be drastically lowered, the duration for breastfeeding obviously shortened (3) and the introduction of solids earlier than needed (4).

Hong Kong Lags Behind in Breastfeeding Support

When comparing with other Asian countries, Hong Kong's breastfeeding rate is relatively low (5). The lack of Baby Friendly Hospital in Hong Kong, the neglect of the international code and the mere 10-week statutory maternity leave have all given tremendous challenges to breastfeeding families, not to mention the zero mentioning of breastfeeding breaks. The fact that baby-care rooms are not provided at most of the public places has made it difficult for mothers to breastfeed and take care of their babies as well as to express milk while going out. Furthermore, mothers' right to breastfeed is not protected by law. Among all the reasons why mothers stop breastfeeding, most of them boil down to a lack of relevant knowledge and professional support. Curtailing the effects of misleading formula advertisements is a crucial step in promoting breastfeeding.

Breastfeeding promotes physical and psychosocial health of mothers and children, and thereby helps reduce public healthcare expenditure. It is beneficial to babies, mothers and the society as a whole. I urge the Hong Kong SAR Government to launch the long-awaited HK Code, so that babies' right to enjoy breastmilk can be safeguarded and the breastfeeding culture in Hong Kong can be nurtured.

註腳 / Reference :

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注意：本人不欲公開姓名

Sincerely,
[Your name]