

A Study on the Marketing of Formula Milk for Infants and Young Children in Hong Kong



**Family Health Service
Department of Health**

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Executive Summary

Background

In June 2017, the Food and Health Bureau and the Department of Health (DH) launched the voluntary Hong Kong Code of Marketing of Formula Milk and Related Products, and Food Products for Infants and Young Children (HK Code), which aimed to protect breastfeeding and contribute to the provision of safe and adequate nutrition for infants and young children, based on adequate and unbiased information and through appropriate marketing. The good marketing practices promoted by the HK Code are applicable to formula milk and related products as well as food products for infants and children below 36 months old. Since the launching, DH has promulgated the HK Code to traders, relevant stakeholders and the public through various channels. A media and marketing study was conducted in 2016 to examine the local marketing practices and materials of breastmilk substitutes before the launch of the HK Code (2016 Study).

In December 2018, a commissioned study on the marketing of formula milk for infants and young children was conducted by Consumer Search Hong Kong Limited (CSG) with a view to assessing the latest local situation following implementation of the HK Code.

Study Objective

The Study aimed to systematically identify and analyse the information used for marketing and promoting formula milk for infants and young children under the age of 36 months to the general public, expectant parents and parents following implementation of the HK Code.

Methodology

This was an observational study. The methodology of the Study took reference from World Health Organization (WHO)'s toolkit on monitoring the marketing of breast-milk substitutes, including the adaptation of WHO's checklists to collect the marketing materials in the Study.

The Study assessed four aspects of marketing practices and materials on promoting formula milk targeting children under the age of 36 months marketed in Hong Kong, which are covered by the HK Code: (i) advertisements on various media; (ii) informational and educational materials; (iii) product labels; and (iv) product information. However, to examine the marketing trend, the collection of

advertisements had been extended to cover formula milk marketed for children over 36 months. Information presented in various format, including but not limited to image, text and other representations, were studied.

The fieldwork was conducted from January to March 2019. The advertisements of various media were captured from a local marketing database in 14 randomly selected days. The informational and educational materials and product information were collected from the manufacturers' websites over 14 continuous calendar days. Product labels were obtained from the purchase of formula milk products at retail outlets. All items of information collected in the Study were coded and the datasets were validated. The marketing materials came from 24 formula milk manufactures (relating to 38 brands) that represented over 99% of the relevant advertising expenditure in Hong Kong.

Study Findings

In the Study, a total of 945 items of marketing materials were collected and analysed, including 257 items of advertisements, 426 items of informational and educational materials, 148 items of product labels and 114 items of product information.

(i) Advertising on Various Media

A total of 257 advertisements on various media were identified from a local marketing dataset during the 14-day survey period. The Study found that the majority of advertisements (235 items, 91.4%) did not specifically promote formula milk targeting children under 36 months, which HK Code covers. Yet, cross-promotion (brand extension) was very common. There was a change in the tactic of promotion, from advertising formula milk products for infants and young children under 36 months to targeting those over 3 years, or solely brand promotion. In the 2016 Study, about 45% of advertisements promoted formula milk under 36 months of age, versus 8.6% in the Study. However, the marketing of formula milk was still rampant as reflected by the advertising expenditures. According to a local advertising database, the advertising expenditure on formula milk products for infants and children in Hong Kong remained enormous, despite a reduction from \$3.1 billion in 2015 to \$2.1 billion in 2019.

Of 257 advertisements, 192 items (74.7%) contained messages/representations that promoted specific health benefits of formula milk products or brands. These included promoting additives like human milk oligosaccharides (HMO); claims of better products or ingredients due to new or improved

manufacturing process; enhancing child development and intelligence; improved nutrition and health; building immunity; and/or preventing allergies.

Internet advertising remained the most prevalent form of advertising (211 items, 82.1%), involving various popular platforms such as Facebook, mobile app, websites and YouTube. Of the 23 television commercials (TVCs), the top 10 TVCs contributed to 97.4% of the total broadcast duration. The total broadcasting time of all TVCs is equivalent to 3 094 minutes (2.15 days) over the 14-day survey period. In the 2016 Study, the total broadcasting time of 7 TVCs was equivalent to 11.13 days over the 28-day period.

(ii) Informational and Educational Materials

A total of 426 informational and educational (I&E) items in text and/or video format were identified from 13 formula milk manufacturers' websites. They covered a range of topics and issues commonly encountered by parents at various stages. Of these, 230 items (54.0%) included invitations to make contact with company and 86 items (20.2%) explicitly displayed the product name/ logo/ brand name of formula products for 0-36 months. Fifty-seven items (13.4%) were associated with promotional practices of formula milk products such as provision of free samples, cash coupons etc.

Sixty-one items (14.3%) were I&E about breastfeeding and formula feeding & nutrition, which are not recommended by the HK Code. For those on breastfeeding (43 items), the majority did not contain comprehensive and balanced information as recommended by the HK Code, such as the importance of exclusive and sustain breastfeeding; the negative impacts of introducing bottle feeding, difficulty to reverse a decision not to breastfeed, etc. For those on formula feeding (18 items), only 22% provided proper instructions on the preparation and use of bottle feeding. None of these I&E items mentioned important information such as using boiled water $\geq 70^{\circ}\text{C}$ to prepare infant formula and consuming the feed within 2 hours after preparation.

(iii) Product Labels & Product Information

A total of 148 product labels (from 38 brands) and 114 items of product information (from 23 manufacturers' websites) of formula milk for infants and young children under 36 months were collected and examined.

All product labels (100%) contained image / text / representation that may idealise the use of formula milk such as using brand mascots, animals, toys and cartoon characters. Sixty items (40.5%) conveyed messages of professional

endorsement such as stating the product was “clinically proven” by scientific publications, meeting the food standards of overseas agencies, etc. Furthermore, 36 items (24.3%) contained representation that would likely undermine breastfeeding such as explicitly encouraging mothers to substitute breastmilk with formula milk or encouraging bottle feeding. Thirty-two items (21.6%) contained representation that made a comparison to breastmilk, e.g. “natural ingredients that were originally isolated from breastmilk”.

A hundred and twenty-eight product labels (86.5%) might contain health benefit statements. The stated health benefits can be general or specific, including high nutrition value of the products; supporting digestive system and gut health; supporting brain development; supporting immune system; supporting general growth and development; and supporting eye and vision development, etc.

On the other hand, messages communicating the possible health risks of using breastmilk substitutes and proper instructions for preparation and use of powdered formula milk were grossly inadequate in meeting the requirements of the HK Code and the International Code. Of 57 infant formula labels, only 40.5% stated “powdered formula milk is not a sterile product”; 21.1% mentioned using boiled water $\geq 70^{\circ}\text{C}$ to reconstitute infant formula in order to minimise microorganisms contamination; and 43.9% mentioned to discard any feed that are more than 2 hours after reconstitution.

Out of 114 items of product information, 71 items (62.3%) contained image / text / representation that may idealise the use of formula milk. About 29 items (25.4%) contained representation that made a comparison to breastmilk and/or suggested that the products were nearly equivalent or superior to breastmilk, whereas 9 items (7.9%) contained texts that were likely to undermine breastfeeding.

Conclusions and Recommendations

The Study found that the majority of advertisements did not specifically promote formula milk targeting children under 36 months, which HK Code covers. There was a change in the tactic of promotion, from advertising formula milk products for infants and young children under 36 months to targeting those over 3 years, or solely brand promotion. Cross-promotion (brand extension) was very common with heavy promotion of follow-up formula and brands having similar feel and look as infant formula. Yet, the marketing of formula milk remained rampant as reflected by the surveyed marketing information and the related advertising expenditures.

The I&E materials produced by the manufacturers were often associated with promotion of formula milk, which are not conversant by HK Code. Moreover, they produced I&E on breastfeeding and formula feeding & nutrition, which are not recommended by the HK Code. The majority of these items did not contain comprehensive and balanced information on exclusive and sustain breastfeeding; proper preparation and use of formula milk and bottle feeding, etc.

The majority of the product labels of formula milk for children under 36 months contained health benefit statements, representations that idealise the use of breastmilk substitutes, as well as inadequate information such as proper preparation and use of powdered infant formula and the possible health risks of its use which is recommended by HK Code.

WHO and research studies have shown that advertising and promotion of breastmilk substitutes have a negative impact on mothers' perception, as well as feeding choices and practices. Combating aggressive marketing and providing comprehensive and balanced information in marketing materials are crucial in protecting breastfeeding and ensuring the proper use of breastmilk substitutes.

Based on the Study's findings, the following recommendations are proposed:

- (i) The Government shall disseminate the findings of the Study to relevant traders and express concerns on the lack of compliance of the HK Code via various means such as conducting high level meetings, issuing reminder letters to the traders concerned, etc.;
- (ii) To protect the health of infants and young children and assist parents in making informed food choices, comprehensive and balanced information in marketing materials is crucial. More countries' experiences and research from developed countries would be needed to inform the local strategies and regulatory approaches in tackling the inappropriate promotion of health benefits statements in advertising formula milk for infants and young children;
- (iii) The WHO's "Guidance on ending the inappropriate promotion of foods for infants and young children" recommends that, among others, "there should be no cross-promotion to promote breast-milk substitutes indirectly via the promotion of foods for infants and young children." Yet, more countries' experiences and research from developed countries would be needed to inform the strategies and the regulatory approaches;

- (iv) Manufacturers and distributors should ensure that their marketing practices conform to the principles and aim of the HK Code, in particular the requirements on product labels and information (i.e. messages like the proper preparation and use of powdered infant formula and the possible health risks of its use) and I&E materials (e.g. no I&E on breastfeeding and formula milk feeding);
- (v) All stakeholders, including non-governmental organisations, health professional groups and institutions and individuals concerned are encouraged to monitor the marketing activities of manufacturers and distributors and draw their attention to activities which do not follow the principles and aim of this Code; and
- (vi) More stringent measures such as drawing up framework with legal consequence or punitive effect with reference to WHO's recommendations may be considered if the above mentioned measures are not effective in combating the inappropriate marketing of formula milk for infants and young children in Hong Kong in the longer run. Experience may be borrowed from developed countries of the WHO member states which have introduced legal measures for Hong Kong to consider how to strengthen the framework.

1. Introduction

1.1. Background

- 1.1.1. In April 2014, the Government set up a Committee on Promotion of Breastfeeding, chaired by the Under Secretary for Food and Health, to provide specific recommendations on strategies and action plans to strengthen the protection, promotion and support for breastfeeding. Its objective is to enhance the sustainability of breastfeeding and promote breastfeeding as a norm for baby care widely accepted by the general public. Among others, protecting breastfeeding from undue commercial influences is one core component of the comprehensive strategy to protect, promote and support breastfeeding in Hong Kong.
- 1.1.2. In June 2017, the Food and Health Bureau and the Department of Health (DH) launched the voluntary Hong Kong Code of Marketing of Formula Milk and Related Products, and Food Products for Infants and Young Children (HK Code)¹, which aimed to protect breastfeeding and contribute to the provision of safe and adequate nutrition for infants and young children, based on adequate and unbiased information and through appropriate marketing.
- 1.1.3. Drafted by the Taskforce on Hong Kong Code of Marketing of Breastmilk Substitutes, which comprises representatives from relevant government departments, non-governmental organisations (NGOs), healthcare organisations and academia, the HK Code makes reference to the International Code of Marketing of Breastmilk Substitutes² and relevant recommendations of the World Health Organization, as well as taking into account the latest local situation and views from various stakeholders collected during public consultation.
- 1.1.4. The good marketing practices promoted by the HK Code are applicable to formula milk and related products as well as food products for infants and children below 36 months old. It provides guidance to relevant sectors including traders, healthcare workers and healthcare facilities, as well as childcare workers and childcare facilities that are involved in infant and young children's nutrition. Since the launch of HK Code, DH has promulgated the HK Code to traders, relevant stakeholders and the public through various channels such as sending letters, organizing briefing sessions, and broadcast of Announcement of Public Interest.
- 1.1.5. A media and marketing study was conducted in 2016 to examine the local marketing practices and materials of breastmilk substitutes before the launch of the HK Code (2016 Study)³. The 2016 Study covered the marketing information of 7 formula milk manufacturers (covering 10 brands) that represented over 90% of the related advertising expenditure in Hong Kong.
- 1.1.6. In December 2018, a commissioned study on the marketing of formula

milk for infants and young children was conducted by the Consumer Search Hong Kong Limited (CSG) with a view to assessing the latest local situation following implementation of the HK Code.

1.2. *Study objective*

The Study aimed to systematically identify and analyse the information used for marketing and promoting formula milk for infants and young children under the age of 36 months to the general public, expectant parents and parents following implementation of the HK Code.

2. Study Methodology

2.1. Study design

- 2.1.1. This was an observational study.
- 2.1.2. The methodology of the Study took reference from World Health Organization (WHO)'s toolkit on monitoring the marketing of breast-milk substitutes, including the adaptation of WHO's checklists to collect the marketing materials in the Study.

2.2. Study coverage

- 2.2.1. The Study assessed four aspects of marketing practices and materials on promoting formula milk targeting children under the age of 36 months marketed in Hong Kong, which are covered by the HK Code: (i) advertisements on various media; (ii) informational and educational materials; (iii) product labels; and (iv) product information.
- 2.2.2. To examine the marketing trend, the collection of advertisements had been extended to cover formula milk marketed for children over 36 months. Information presented in various formats, including but not limit to image, text and other representations, was studied.
- 2.2.3. The marketing materials came from 24 formula milk manufactures (relating to 38 brands) that represented over 99% of the relevant advertising expenditure in Hong Kong⁴. (Annex 1)

2.3. Data sampling and collection

- 2.3.1. The fieldwork was conducted from January to March 2019. In the Study, a total of 945 items of marketing materials were collected and analysed, including 257 items of advertisements, 426 items of informational and educational materials, 148 items of product labels and 114 items of product information.
- 2.3.2. The advertisements of various media were captured from a local marketing database in 14 randomly selected days (covering weekdays and weekends). (Table 1) The informational and educational materials and product information were collected from the manufacturers' websites over 14 continuous calendar days. Product labels were obtained from the purchase of formula milk products at retail outlets. (Table 2)
- 2.3.3. All items of information collected in the Study were coded and the datasets were validated.

Table 1: Randomly selected days for capturing advertisements of various media

Weekday	Weekend
22 Jan 2019 (Tue)	26 Jan 2019 (Sat)
28 Jan 2019 (Mon)	10 Feb 2019 (Sun)
31 Jan 2019 (Thu)	16 Feb2019 (Sat)
13 Feb2019 (Wed)	16 Mar 2019 (Sat)
21 Feb 2019 (Thu)	24 Mar 2019 (Sun)
26 Feb 2019 (Tue)	
6 Mar 2019 (Wed)	
8 Mar 2019 (Fri)	
11 Mar 2019 (Mon)	

Table 2: Sources of marketing information by type

Type of information (Items collected)	Source(s) of information
Advertising on various media (N=257)	<p>A marketing database⁴ with extensive coverage of local media channels:</p> <ul style="list-style-type: none"> • 82 television channels (free and paid) • 6 radio channels • 11 types of out-of-home advertising media in public places (e.g. billboards, mass transport systems) • 135 newspapers and magazines • 238 websites, mobile websites and applications <p>Social media platforms of formula milk manufacturers (n=28).</p>
Informational and educational materials (N=426)	Local designated websites of formula milk manufacturers (n=18).
Product labels (N=148)	Formula milk products purchased at retail outlets (e.g. supermarkets, personal stores and dispensaries).
Product information (N=114)	Local designated websites of formula milk manufacturers and retail outlets.

The detailed coverage of the marketing database by local private advertising monitoring company is available in Annex 2.

2.4. Study instruments and areas of analysis

2.4.1. Four checklists corresponding to the 4 categories of information were developed with reference to the World Health Organization (WHO)'s toolkit on monitoring the marketing of breast-milk substitutes⁵, the HK Code, the International Code of Marketing of Breastmilk Substitutes (WHO, 1981) and subsequent relevant resolutions, and the local context. The checklists

cover but are not limited to the following areas:

I. Advertising on various media

- Presence of any form of advertising or other form of promotion to the general public;
- Providing samples of formula milk directly or indirectly to pregnant women, mothers or members of their families;
- Seeking direct or indirect contact of any kind with expectant parents or parents of infants and young children;
- Collecting personal details of infants, young children, expectant parents, parents or carers of children under the age of 36 months for the purpose other than merely providing customer services relating to order and delivery of product, and product enquiry; and
- Inviting participation of infants, young children, expectant parents or parents of children under the age of 36 months in activities including baby show, mother care activities.

II. Information and educational materials

- Presence of information and education on breastfeeding and formula milk feeding;
- Display the name, brand name, packshot, logo and / or trade mark of any formula milk or refer to such product in any other manner; and
- Associate with promotional practices of formula milk.

III. Product labels

- Presence of any image, text or other representation that is likely to undermine or discourage breastfeeding, that makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk;
- Promote bottle feeding;
- Convey an endorsement or anything that may be construed as an endorsement by a professional or other body;
- Presence of any health and nutrition claims;
- Presence of the words “Important Notice” and thereunder a statement of the superiority of breastfeeding or their equivalent;
- Presence of a statement that the product should be used only on the advice of a health worker as to the need for its use and the proper method of use;
- Presence of instructions for appropriate preparation of formula milk, and a warning against the health hazards of inappropriate

preparation;

- Presence of graphics for easy identification of the product as a breastmilk substitute and for illustrating methods of preparation; and
- Contain the information that infants should receive complementary food in addition to the formula milk from an age, as advised by a health worker that is appropriate for their specific growth and development needs and from 6 months of age onwards.

IV. Product information

- Presence of any image, text or other representation that is likely to undermine or discourage breastfeeding, that makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk;
- Promote bottle feeding; and
- Convey an endorsement or anything that may be construed as an endorsement by a professional or other body.

For details, please refer to Annex 3.

2.5. *Pilot study*

2.5.1. A pilot study was conducted prior to the fieldwork to test the 4 checklists and the logistics of the fieldwork execution. A total of 10 items including advertisements of various media, informational and educational materials; product labels and product information were analysed. Adjustment to the content of the checklists were made before conducting the Study.

2.6. *Quality control*

2.6.1. The project team consisted of one project manager, one research manager, three supervisors and six project assistants. The project manager and research manager oversaw the administration of the Study. The supervisors provided training and coaching to the project assistants. The research manager conducted debriefings after completion of the first observations.

2.6.2. Each marketing item was assessed against the checklist by two project assistants independently. If there was any discrepancy in the observations, the supervisors examined the items and made the final interpretation. Kappa analysis was used to evaluate the inter-rater reliability of each information category. A kappa value of >0.6 (i.e. the strength of agreement is good or very good) was expected in the Study. (Table 3)

Table 3: Strength of agreement by value of K

Value of K	Strength of agreement
< 0.20	Poor
0.21 - 0.40	Fair
0.41 - 0.60	Moderate
0.61 - 0.80	Good
0.81 - 1.00	Very good

A kappa value of 0.81 was observed in the Study, suggesting that the level of agreement between the observers was very good.

3. Study Findings –Advertising on Various Media

3.1. Overall

3.1.1. During the 14-day survey period, a total of 257 advertisements involving 37 brands of formula milk for infants and children were identified.

3.2. Target age range

3.2.1. The Study revealed that a majority of advertisements did not specifically promote formula milk targeting children under 36 months. Yet, cross-promotion (brand extension) was very common. There was a change in the tactic of promotion, from advertising formula milk products for infants and young children under 36 months to targeting those over three years, or solely brand promotion.

3.2.2. Of 257 advertisements, only 1 item (0.4%) promoted infant formula and 21 items (8.2%) promoted follow-up formula for 6 to 36 months. However, 111 items (43.2%) promoted follow-up formula for those over 36 months, 106 items (41.2%) promoted brands /products without specifying age, and 18 items (7.0%) promoted products targeting a range of age groups, e.g. products for children aged 12-36 months as well as products for aged over 36 months. (Table 4, Figure 1)

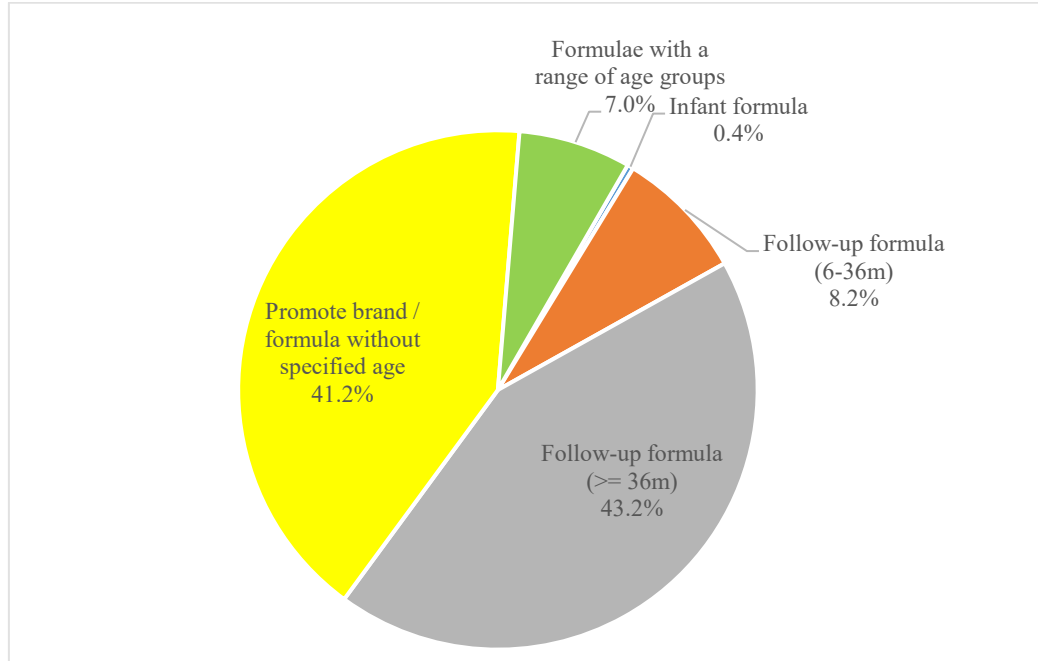
3.2.3. In the 2016 Study, about 45% of advertisements promoted formula milk under 36 months of age.

Table 4: Number of advertisements by products' target age range (single answer)

Target age range	Number	%
Total	257	100
Infant formula	1	0.4
Follow-up formula (6-36 months)	21	8.2
Follow-up formula (\geq 36 months)	111	43.2
Promote brand / formula without specified age	106	41.2
Formulae with a range of age groups	18	7.0

Base: Number of advertisements items =257

Figure 1: Percentage of advertisements by products' target age range



Base: Number of advertisements items =257

3.3. Analysis of the advertising expenditures on formula milk for infants and children

3.3.1. The marketing of formula milk was still rampant as reflected by the advertising expenditures. According to a local advertising database, the advertising expenditure on formula milk products for infants and children in Hong Kong remained enormous, despite a reduction from \$3.1 billion in 2015 to \$2.1 billion in 2019. Consistent with the observations described above, the amount targeting those aged under 36 months had decreased significantly from \$2.9 billion in 2015 (93.5%) to \$ 0.2 billion in 2019 (9.5%). (Table 5)

Table 5: Advertising expenditures on formula milk products for infant and children

Year	Advertising expenditures on formula milk products Amount (\$ billion)	
	All*	Targeting for children below 3
2015	3.1	2.9 (93.5%)
2016	2.5	2.3 (92.0%)
2017	2.6	1.2 (46.2%)
2018	2.5	0.28 (11.2%)
2019	2.1	0.20 (9.5%)

* Includes advertising expenditures on formula milk products targeting at infants and young children aged below 3 and formula milk products for children aged 3 or above.

3.4. Promoting specific health benefits of formula milk

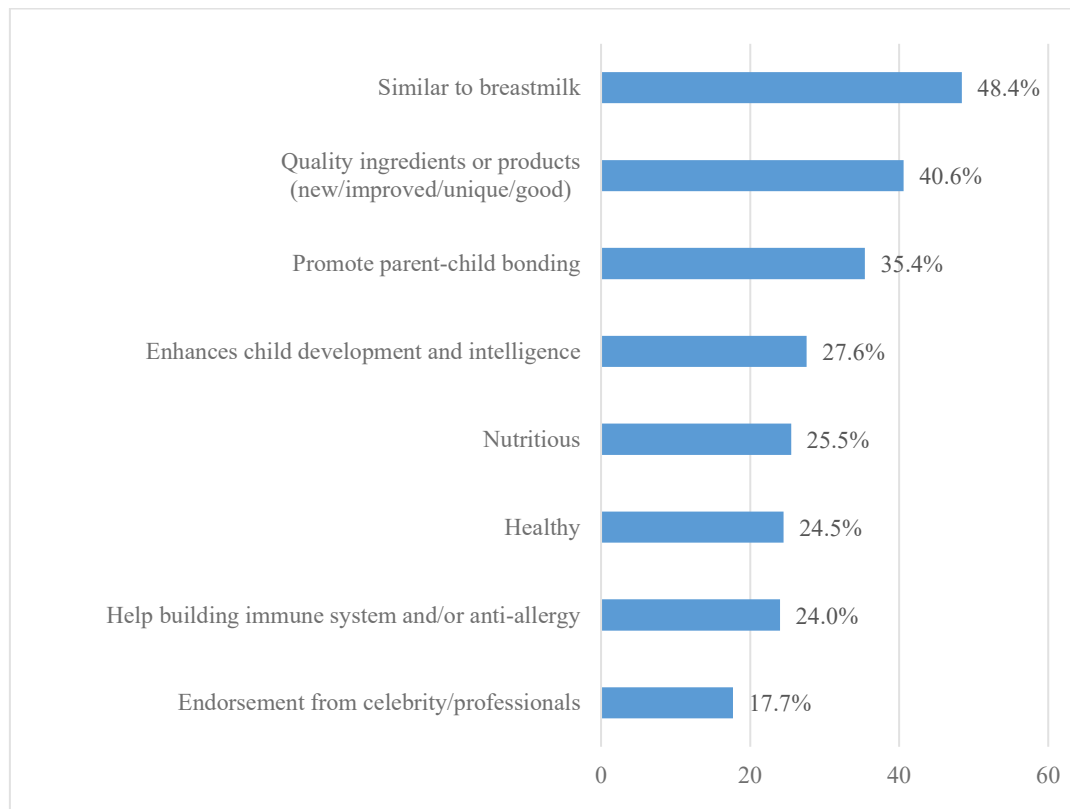
- 3.4.1. Of 257 advertisements, 192 items (74.7%) contained messages / representations that promoted specific health benefits of formula milk products or brands.
- 3.4.2. Of these, 93 items (48.4%) include image, text or representation that make a comparison to breastmilk, e.g. promoting additives like human milk oligosaccharides (HMO); and formula milk having an affinity with mothers' body, etc. Seventy-eight items (40.6%) claimed their products or ingredients were of better quality due to new or improved manufacturing process, place of origin, etc. (Table 6, Figure 2)
- 3.4.3. Other themes included promoting parent-child bonding; enhancing child development and intelligence, e.g. "having twice as much DHA to support brain development"; nutritious products, e.g. "providing the complete nutrition to babies", "the nutrients are easier to be digested and absorbed by babies"; promoting gut health; building immunity and/or preventing allergies.

Table 6: Themes of promotional messages conveyed by the formula milk products or brands in the advertisements (multiple answers)

Theme	Count	%
Total	192	100
Similar to breastmilk	93	48.4
Quality ingredients or products (new/improved/unique/good)	78	40.6
Promote parent-child bonding	68	35.4
Enhances child development and intelligence	53	27.6
Nutritious	49	25.5
Healthy	47	24.5
Help building immune system and/or anti-allergy	46	24.0
Endorsement from celebrity/ professionals	34	17.7

Base: Number of item with presence of other representations = 192. The percentages do not add up to 100%.

Figure 2: Theme of promotional messages conveyed by the formula milk products or brands in the advertisements



Base: Number of item with presence of other representations = 192. The percentages do not add up to 100%.

3.5. Nature of Promotion

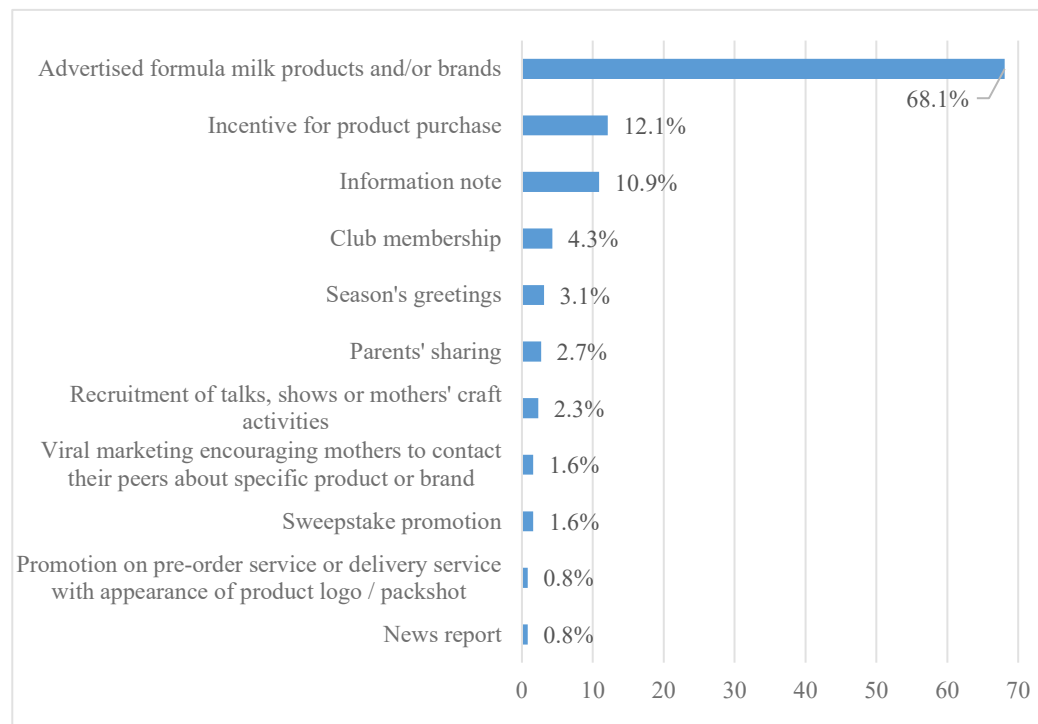
- 3.5.1. The nature of promotion included advertising formula milk products and/or brands (68.1%); offering incentives for product purchase such as free gifts, discounted price etc. (12.1%); promoting through information note on breastfeeding(10.9%), child nutrition, child health & care, parenting tips; club membership (4.3%) etc. (Table 7, Figure 3)

Table 7: Number of advertisements by nature of promotion (multiple answers)

Type of promotion	Count	%
Total	257	100
Advertised formula milk products and/or brands	175	68.1
Incentive for product purchase	31	12.1
Promotion through information note	28	10.9
Club membership	11	4.3
Season's greetings	8	3.1
Parents' sharing	7	2.7
Recruitment of talks, shows or mothers' craft activities	6	2.3
Viral marketing encouraging mothers to contact their peers about specific product or brand	4	1.6
Sweepstake promotion	4	1.6
Promotion on pre-order service or delivery service with appearance of product logo / packshot	2	0.8
News report	2	0.8

Base: Number of advertisements items =257. The percentages do not add up to 100%.

Figure 3: Percentage of advertisements by nature of promotion (multiple answers)



Base: Number of advertisements items =257. The percentages do not add up to 100%.

3.6. Use of promotional devices, seeking of personal details of parents or infants for promotion

- 3.6.1. A total of 40 items of advertisements of various media (15.6%) contained promotional devices to induce sales of the formula milk. Among these items, the commonly used promotional device was offering gifts to customers upon purchase, discounts, cash coupons, samples, sweepstake promotion and club membership.
- 3.6.2. Moreover, 27 items (10.5%) directly sought personal details of the parents or infants for getting samples, gifts, discounts and registration of mothers' club.

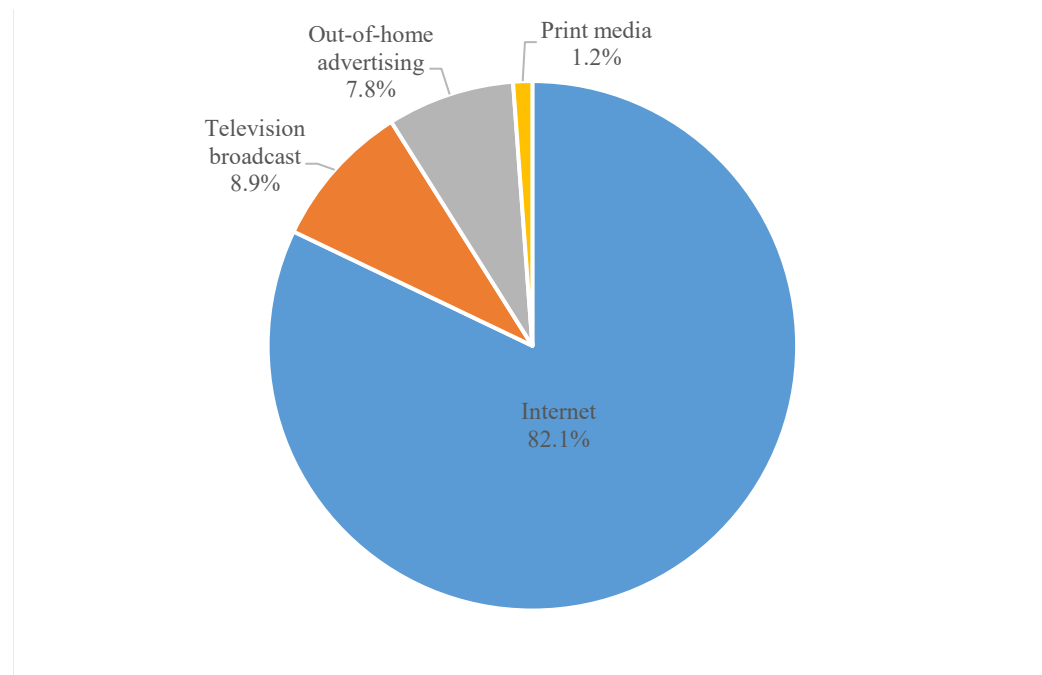
3.7. Source of advertisements

- 3.7.1. Of 257 items, 211 items (82.1%) were sourced from the internet, 23 items (8.9%) were from television broadcast and 20 items (7.8%) were from out-of-home advertising such as billboards and bus shelters. Three items were sourced from print media such as newspapers. (Table 8, Figure 4)

Table 8: Number of advertisements by media

Source of advertisements	Number	%
Total	257	100
Internet	211	82.1
Television broadcast	23	8.9
Out-of-home advertising	20	7.8
Print media	3	1.2

Figure 4: Percentage of advertisements by media



Base: Number of advertisements items =257

3.8. Internet advertising

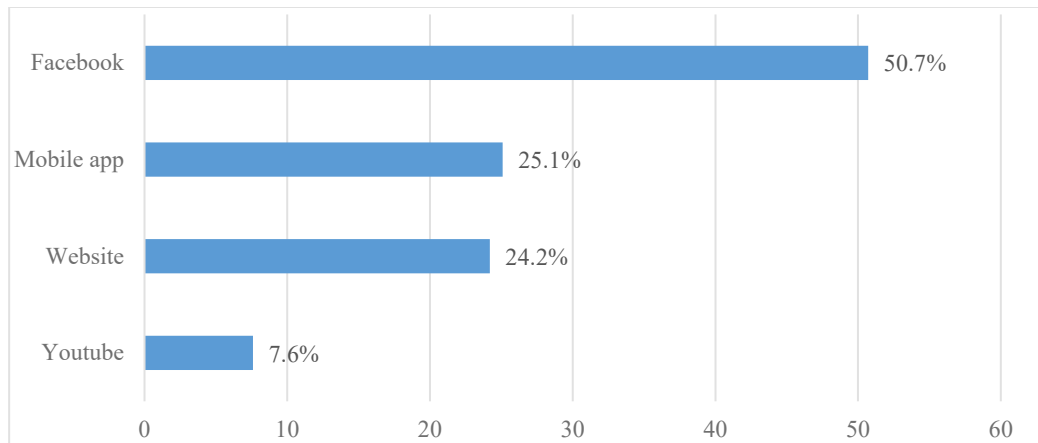
- 3.8.1. The 211 internet advertisements came from various channels: Facebook (107 items, 50.7%), mobile app (53 items, 25.1%), website (50 items, 24.2%) and YouTube (16 items, 7.6%). (Table 9, Figure 5)
- 3.8.2. About 102 items (48.3%) promoted the formula milk brands only and 78 items (37.0%) promoted follow-up formula targeting children over 36 months. Only one item (0.5%) promoted follow-up formula for those aged 6-12 months. (Table 9)

Table 9: Number of internet advertisements by channel and product type

	Number of items	%
Total	211	100
Type of channel		
Facebook	107	50.7
Mobile app	53	25.1
Website	50	24.2
YouTube	16	7.6
Product type		
Infant formula	0	0
Follow-up formula (6-12m)	1	0.5
Follow-up formula (12-36m)	13	6.2
Follow-up formula (≥ 36 months)	78	37.0
Promote brand only	102	48.3
Formulae with a range of age groups	17	8.1

Base: Number of internet advertising items = 211. The percentages do not add up to 100.

Figure 5: Percentage of internet advertisements by channel



Base: Number of internet advertising items = 211. The percentages do not add up to 100.

3.9. Television advertising

3.9.1. Twenty-three television commercials (TVCs) on formula milk targeting infants and children were identified. The total broadcasting frequency of all TVCs were 9 695 episodes, equivalent to 3 093.8 minutes (2.15 days) over the 14-day survey period. (Table 10)

3.9.2. There was a drop of overall broadcasting time of television advertising when compared with the 2016 Study (i.e. 11.13 days over the 28-day period for 7 TVCs in the 2016 Study).

3.9.3. The broadcast of TVCs was distributed more or less evenly throughout the day: afternoon (2 734 episodes, 28.2%), evening (2 594, 26.8%) and morning (2 340, 24.1%). About 7 623 episodes (78.6%) were broadcast at

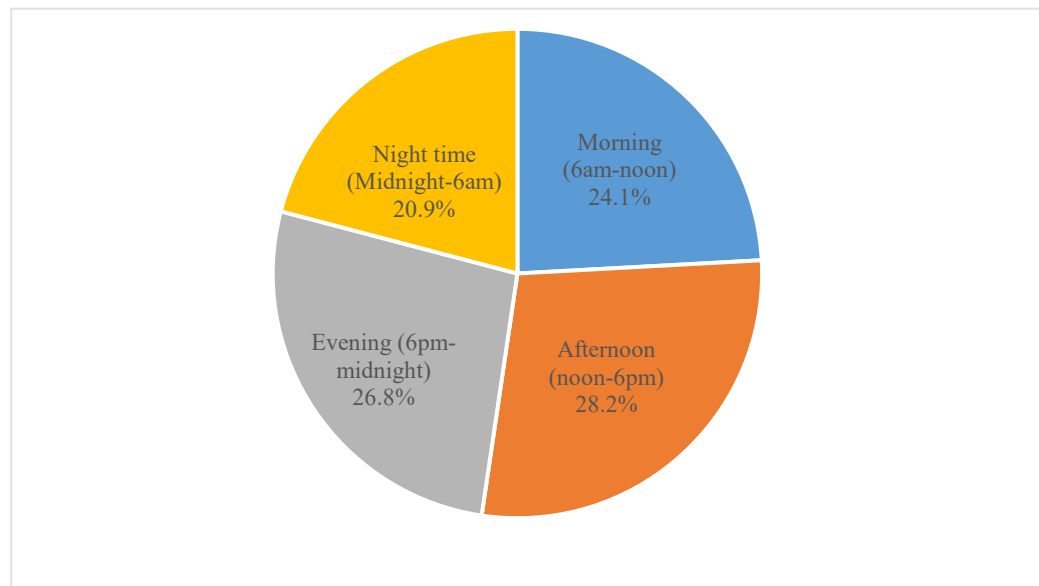
paid television channels and 2 072 episodes (21.4%) at free television channels. (Table 10, Figures 6 & 7)

- 3.9.4. Majority of the products promoted included follow-up formula for children aged above 36 months (54.6%) and formulae with a range of age groups (35.6%). (Table 10)

Table 10: Broadcast frequency and duration of TVC promotion targeting formula milk for infants and children by time of day, channel and product type

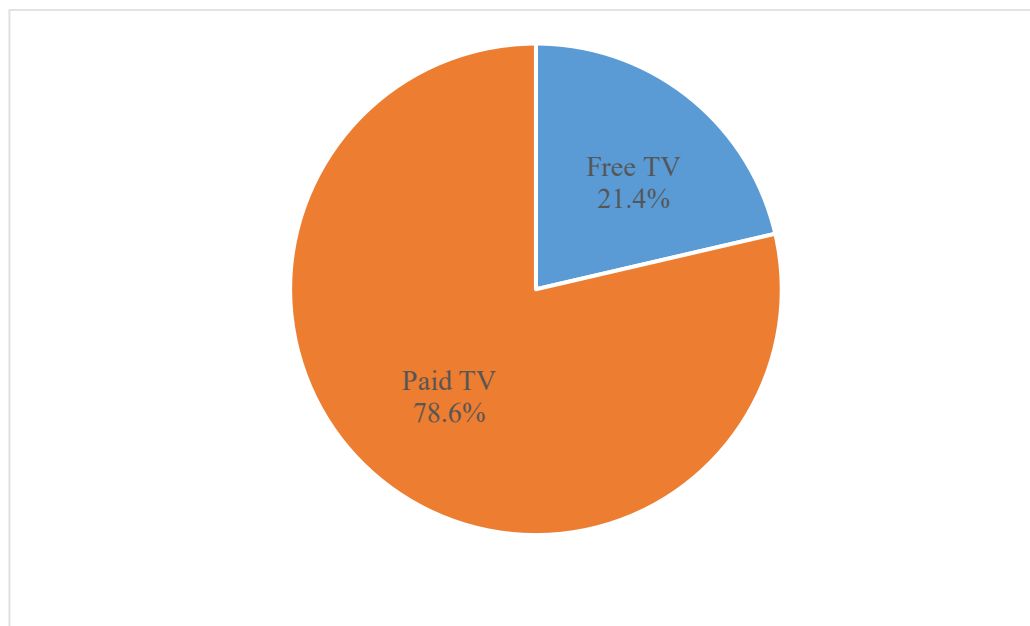
	Broadcast frequency		Broadcast duration
	No. of episodes	%	Minutes
Total	9 695	100	3 093.8
Broadcast time			
Morning (6am-noon)	2 340	24.1	717.3
Afternoon (noon-6pm)	2 734	28.2	891.05
Evening (6pm- midnight)	2 594	26.8	825.55
Night time (Midnight-6am)	2 027	20.9	659.9
Broadcast channels			
Free TV	2 072	21.4	687.7
Paid TV	7 623	78.6	2 406.1
Products promoted			
Infant formula	0	0	0
Follow-up formula (6-36 months)	3	0.03	0.3
Follow-up formula (≥ 36 months)	5 289	54.6	1 631.5
Promote brand only	949	9.76	316.4
Formulae with a range of age groups	3 454	35.6	1 145.6

Figure 6: Percentage of broadcast time of TVC promotion targeting formula milk for infants and children



Base: Number of TVC on formula milk targeting infants and children broadcasted episodes = 9 695

Figure 7: Percentage of broadcast channel of TVC promotion targeting formula milk for infants and children



Base: Number of TVC on formula milk targeting infants and children broadcasted episodes = 9 695

- 3.9.5. The TVC with the highest broadcast frequencies were analysed. (Table 11)
- 3.9.6. During the 14-day period, the 10 TVC broadcast 9 425 episodes (equivalent to 3 012.3 minutes), which contributed to 97.4% of the total broadcast duration (i.e. 3 093.8 minutes from the 23 TVC).
- 3.9.7. The top 10 TVC involved 5 formula milk brands from 3 manufacturers. Of these, 8 TVC promoted follow-up formula targeting children over 36 months and 2 TVC promoted the brands only.

Table 11: The TVC with the top 10 highest broadcast frequency over the 14-day period

Television commercial	Target age range	Number of times broadcasted (episodes)	Total duration of broadcast (minutes)
	Total	9 425	3 012.3
TVC A	Follow-up formula (≥36 months)	2 582	860.7
TVC B	Follow-up formula (≥36 months)	1 613	537.6
TVC L	Follow-up formula (≥36 months)	1 225	102.2
TVC D	Follow-up formula (≥36 months)	847	282.3
TVC C	Follow-up formula (≥36 months)	830	276.7
TVC F	Follow-up formula (≥36 months)	601	300.5
TVC E	Follow-up formula (≥36 months)	565	282.5
TVC G	Brand only (no product)	556	185.3
TVC J	Brand only (no product)	393	131.1
TVC K	Follow-up formula (≥36 months)	213	53.4

4. Study Findings – Informational and Educational Materials

4.1. Overall

4.1.1. A total of 426 informational and educational (I&E) items in text and/or video format from 13 formula milk manufacturers' websites were identified during the 14-days survey period.

4.2. I&E materials by topics

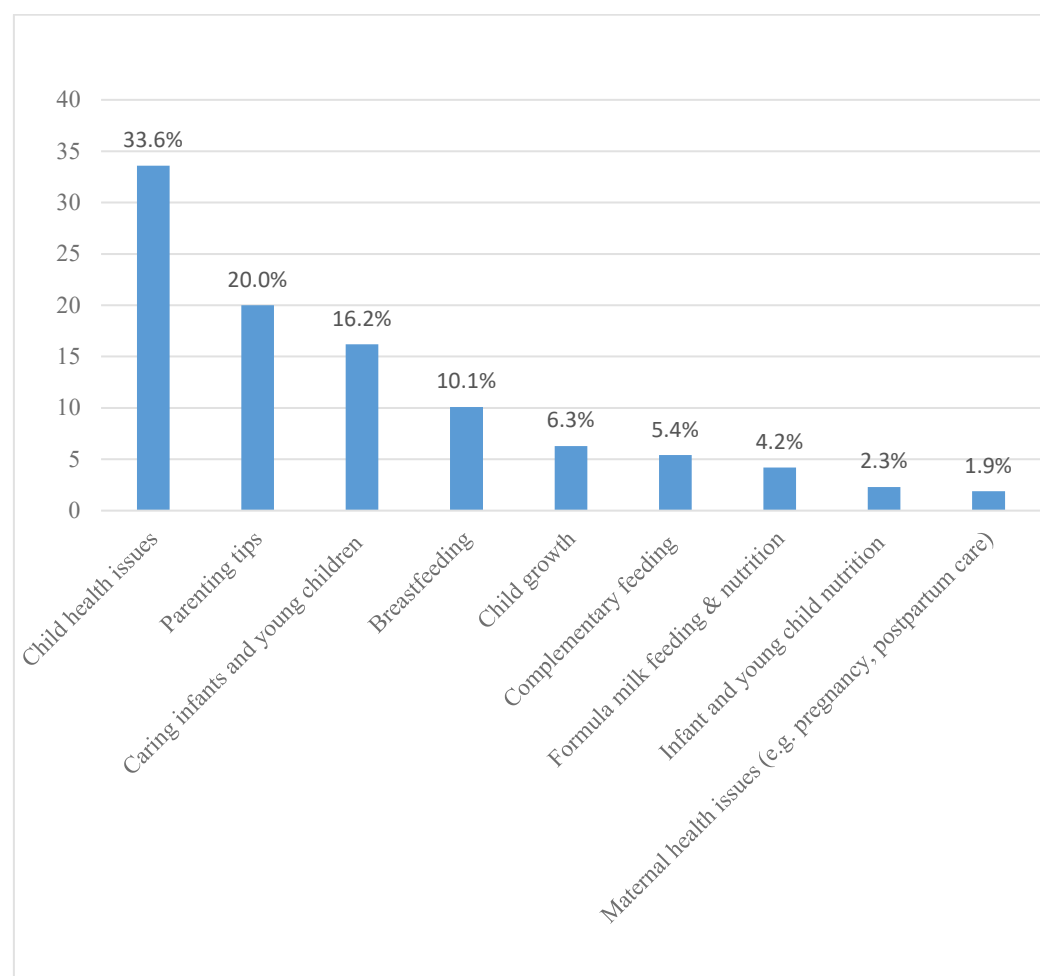
4.2.1. The surveyed I&E materials covered a range of topics commonly encountered by parents at various stages. These included child health issues (e.g. promoting infant gut health, allergy prevention, combating constipation), parenting tips (e.g. building character in young children, preparing children to school), infant and child care (e.g. managing baby's crying, promoting babies' good sleeping habits), breastfeeding, formula feeding and complementary feeding, etc. (Table 12, Figure 8)

Table 12: I&E items from formula milk manufacturers by topics

Topic	Count	%
Total	426	100
Child health issues	143	33.6
Parenting tips	85	20.0
Caring infants and young children	69	16.2
Breastfeeding	43	10.1
Child growth	27	6.3
Complementary feeding	23	5.4
Formula milk feeding & nutrition	18	4.2
Infant and young child nutrition	10	2.3
Maternal health issues (e.g. pregnancy, postpartum care)	8	1.9

Base: Number of informational and educational items = 426

Figure 8: Percentage of I&E items from formula milk manufacturers by topics



Base: Number of informational and educational items = 426

4.3. Associated promotional practices of formula milk products

4.3.1. Of 426 I&E items, 57 items (13.4%) were associated with promotional practices of formula milk, e.g. provision of free samples, cash coupons etc. Moreover, 230 items (54.0%) included invitations to make contact with the company, and 86 items (20.2%) from 12 manufacturers explicitly displayed the product name / brand name/ packshot/ product logo/ trademark of their formula products for 0-36 months.

4.4. I&E materials on infant and young child feeding and nutrition

4.4.1. To protect parents from undue commercial influences when making feeding decisions, the HK Code advises the manufacturers and distributors against providing informational / educational materials or organising health educational activities about breastfeeding and formula milk feeding. While they may conduct activities / produce information materials on other matters, these should neither refer to any products nor be associated with promotion of formula milk.

4.4.2. There were 94 I&E items related to infant and young children feeding: breastfeeding (43 items, 45.7%), formula feeding & nutrition (18 items,

19.1%), complementary feeding (23 items, 24.5%) and infant and young child nutrition (10 items, 10.6%). About 32 items (34.0%) from 11 manufacturers contained the product name/ brand name/packshot/product logo/ trademark. About 17 items (18%) provided health advice that encouraged the use of formula milk product or its ingredients.

- 4.4.3. For the I&E items on breastfeeding (43 items), the majority did not contain comprehensive and balanced information as recommended by the HK Code such as the benefits and superiority of breastfeeding; importance of exclusive and sustain breastfeeding; the negative impacts of introducing bottle feeding or early introduction of complementary food; difficulty to reverse a decision not to breastfeed, etc. (Table 13)

Table 13: I&E materials on breastfeeding: presence of information required by HK Code

I&E on breastfeeding	Count	%
Total	43	100
Benefits and superiority of breastfeeding	22	51.2
Exclusive breastfeed for 1 st 6 months , then sustain breastfeeding ≥ 2 years	11	25.6
Negative impacts of introducing bottle feeding or early introduction of complementary food	8	18.6
How to initiate and maintain exclusive and sustained breastfeeding	5	11.6
Difficulty to reverse a decision not to breastfeed	2	4.7
Introduction of complementary food from 6 months onwards	11	25.6

Base: Number of I&E items = 43

- 4.4.4. For I&E items on formula milk feeding (18 items), only 22% provided proper instructions on the preparation and use of bottle feeding. None mentioned such important information as using boiled water $\geq 70^{\circ}\text{C}$ to prepare infant formula and consuming the feed within 2 hours after preparation. A minority of items contained the balanced informed information such as the importance of exclusive and sustained breastfeeding; benefits and superiority of breastfeeding; the health risks of feeding infants by formula milk; the difficulty to reverse a decision not to breastfeed. (Table 14)

Table 14: I&E materials on formula milk feeding: presence of information required by HK Code

I&E on formula milk feeding	Count	%
Total	18	100
Benefits and superiority of breastfeeding	4	22.2
Exclusive breastfeed for the 1 st 6 months , then sustain breastfeeding > 2 years	5	27.8
Difficulty to reverse a decision not to breastfeed	1	5.6
Health risks of feeding infants by formula milk	2	11.1
Instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils	4	22.2
Explanations that powdered formula milk is not a sterile product and that to minimise the risks of serious illnesses, formula milk which is intended for consumption by infants under 6 months of age should be prepared using boiled water cooled down to no less than 70°C.	0	0
Proper use of formula milk (e.g. discard within 2 hours after preparation)	0	0
Financial implication of feeding an infant with formula milk	0	0

Base: Number of I&E items = 18

5. Study Findings – Product Label and Product Information

5.1. Overall

- 5.1.1. A total of 148 product labels (from 38 brands) and 114 items of product information (from 23 manufacturers' websites) of formula milk for infants and young children under 36 months were collected and examined.
- 5.1.2. Of 148 product labels, 57 items were infant formula and 91 items were follow-up formula for the 6- to 36-month-olds.
- 5.1.3. Of 114 product information, 26 items were infant formula, 78 items were follow-up formula for the 6- to 36-month-olds, and 10 items were formulae for a range of age groups. Their breakdown by formula type is shown at Table 15.

Table 15: Product labels and product information by formula type (single answer)

Type	Product label		Product information	
	Number	%	Number	%
Total	148	100	114	100
Infant formula	57	38.5	26	22.8
Follow-up formula (6 - 12 months)	44	29.7	37	32.5
Follow-up formula (12 - 36 months)	47	31.8	41	36.0
Formulae with a range of age groups	-	-	10	8.8

Base: Number of product label = 148; Number of product information = 114

5.2. Product labels of formula milk

- 5.2.1. The labels were analysed against the marketing and labelling requirements as recommended by HK Code. (Table 16, Figure 9)
- 5.2.2. All product labels (100%) contained image/text /representation that may idealise the use of formula milk such as representation of animals, toys, cartoon characters, or brand mascots.
- 5.2.3. Sixty items (40.5%) conveyed messages of professional endorsement such as stating the product was “clinically proven” by scientific publications, meeting the food standards of overseas agencies, etc.
- 5.2.4. Furthermore, 36 items (24.3%) contained representation that would likely undermine breastfeeding such as explicitly encouraging mothers to substitute breastmilk with formula milk or encouraging bottle feeding. Thirty-two items (21.6%) contained representation that makes a comparison

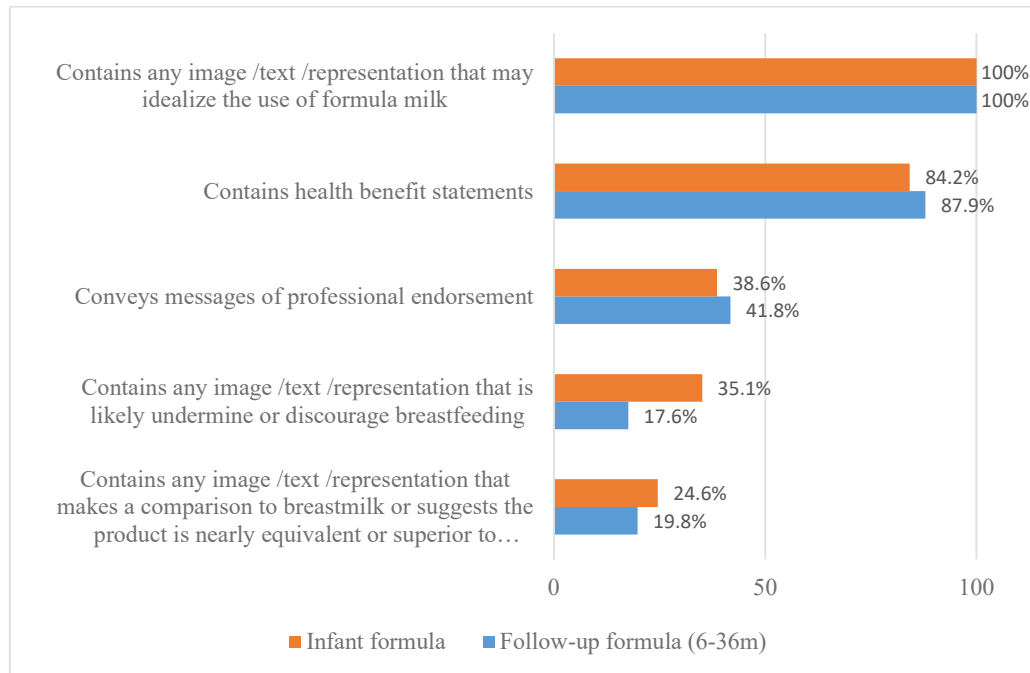
to breastmilk, e.g. “natural ingredients that were originally isolated from breastmilk”.

Table 16: Labelling requirements of designated products related to marketing in compliance with HK Code by target age range

	Infant formula		Follow-up formula (6-36 months)	
	Count	%	Count	%
Total	57	100	91	100
Contains any image/ text/ representation that may idealise the use of formula milk	57	100	91	100
Contains health benefit statements	48	84.2	80	87.9
Conveys messages of professional endorsement	22	38.6	38	41.8
Contains any image/ text/ representation that is likely undermine or discourage breastfeeding	20	35.1	16	17.6
Contains any image/ text/ representation that makes a comparison to breastmilk or suggests the product is nearly equivalent or superior to breastmilk	14	24.6	18	19.8

Base: Number of product label = 148 (Infant formula = 57 and follow-up formula = 91)

Figure 9: Labelling requirements of designated products related to marketing in compliance with HK Code by target age range



Base: Number of product label = 148 (Infant formula = 57 and follow-up formula = 91)

5.3. Health benefit statements

5.3.1. Of 148 product labels, 128 items (86.5%) might contain health benefit statements. The stated health benefits can be general or specific including high nutrition value of products (125 items, 97.7%); supporting digestive system and gut health (62 items, 48.4%); supporting brain development (61 items, 47.7%); supporting immune system (57 items, 44.5%); supporting general growth and development (41 items, 32.0%); and supporting eye and vision development (34 items, 26.6%), etc. (Table 17)

Table 17: Themes of health benefit statements presented on product labels (multiple answers)

	Infant formula		Follow-up formula (6-36 m)		Total	
	Count	%	Count	%	Count	%
Total	48	100	80	100	148	100
Highlights high nutrition value	46	95.8	79	98.8	125	97.7
Supports digestive system and gut health	24	50.0	38	47.5	62	48.4
Supports brain development	22	45.8	39	48.8	61	47.7
Supports immune system	19	39.6	38	47.5	57	44.5
Support general growth and development	14	29.2	27	33.8	41	32.0
Supports eye and vision development	13	27.1	21	26.3	34	26.6
Supports bone development	4	8.3	13	16.3	17	13.3
Supports intelligence development/ learning	6	12.5	8	10.0	14	10.9
Prevents allergy	6	12.5	4	5.0	10	7.8
Supports nervous system	1	2.1	6	7.5	7	5.5
Supports emotional/ social/ communications skill development	3	6.3	3	3.8	6	4.7
Supports body coordination skills	3	6.3	3	3.8	6	4.7

Base: Number of product label with health benefit statements = 128 (Infant formula = 48 and follow-up formula = 80). The percentages do not add up to 100%.

5.4. Other labelling requirements

- 5.4.1. The product labels generally met the labelling requirements such as having product information written in Chinese and/or English; displaying a list of the ingredients and nutritional composition, storage instructions and batch number, etc. (Table 18)
- 5.4.2. On the other hand, messages communicating the possible health risks of using breastmilk substitutes and proper instructions for appropriate preparation and use of powered formula milk were grossly inadequate in meeting the requirements of the HK Code and the International Code.

5.4.3. Regarding the “Important Information”, only 32 items (21.6%) stated that the use of breastmilk substitutes might put infants at risk, e.g. having diarrhoea, when compared with breastfed infants. Of 57 product labels on infant formula, only 23 items (40.5%) contained the statement “powdered formula milk is not a sterile product”; 12 items (21.1%) mentioned the necessity of using water $\geq 70^{\circ}\text{C}$ to minimize microorganisms contamination during preparation, for consumption by infants under 6 months of age; and 25 items (43.9%) mentioned the requirement to discard any feed that has not been consumed more than two hours after reconstitution. Only about half of the labels (infant formula and follow-up formula) stated the source of protein contained in the formula. (Table 18)

Table 18: Other labelling requirements of designated products in compliance with HK Code by target age range

	Infant formula		Follow-up formula (6-36 m)	
	Count	%	Count	%
Total	57	100	91	100
Product information is printed in the container or a well attached label.	57	100	91	100
Product information is written in Chinese and/or English.	57	100	91	100
Includes the recommended age of introduction in Arabic numerals.	47	82.5	90	98.9
Contains a warning about the health risks of improper preparation and of introducing the product prior to the recommended age.	56	98.2	67	73.6
Displays a list of the ingredients and nutritional composition of the product.	57	100	91	100
Contains storage instructions	57	100	91	100
Contains batch number, date of manufacture and date before which the product should be consumed	57	100	91	100
Contains the name and address of the manufacturer or distributor	57	100	91	100
Includes the words " IMPORANT NOTICE " in capital letters	48	84.2	64	70.3
Includes a statement on the superiority of breastfeeding, or equivalent	57	100	63	69.2

Table 19: Other labelling requirements of designated products in compliance with HK Code by target age range (continues)

	Infant formula		Follow-up formula (6-36 m)	
	Count	%	Count	%
Includes a statement on the use of breastmilk substitutes may put infants at risk when compared with breastfed infants, or equivalent	12	21.1	20	22
Includes the word “ Warning ”	31	54.4	41	45.1
Contains a statement that the product should be used only on the advice of a health worker	56	98.2	60	65.9
Contains a statement on the need to follow all preparation instructions carefully the proper method of use	56	98.2	70	76.9
If in powdered form, contains instructions for appropriate preparation:				
<ul style="list-style-type: none"> Contains the statement “powdered formula milk is not a sterile product”; 	23	40.5	31	34.1
<ul style="list-style-type: none"> Contains the statement “powdered formula milk may become contaminated during preparation”; 	10	17.5	20	22
<ul style="list-style-type: none"> shows necessity of using water $\geq 70^{\circ}\text{C}$ in order to minimize microorganisms contamination during preparation, which is intended for consumption by infants under 6 months of age”; and 	12	21.1	-	-
<ul style="list-style-type: none"> “Discard any feed that has not been consumed more than two hours after reconstitution”. 	25	43.9	41	45.1
Includes a feeding chart in the preparation instructions.	55	96.5	84	92.3
Specifies the source of protein contained in the formula milk.	27	47.4	46	50.5

Base: Number of product label = 148 (Infant formula = 57 and follow-up formula = 91)

5.5. *Product information of formula milk*

- 5.5.1. A total of 114 items of product information from 23 manufacturers' websites were identified. They included 26 of infant formula, 78 of follow-up formula for the 6- to 36-month-olds and 10 of formulae for a range of age groups.
- 5.5.2. According to the HK Code, product information on formula milk should only be provided upon request, and must be restricted to factual and correct information which does not undermine or discourage breastfeeding. About 71 items (62.3%) contained image /text /representation that may idealise the use of formula milk. Fifty-four items (47.4%) conveyed messages of professional endorsement. About 8 items (7%) discussed scientific findings or updates that were not referenced by supporting evidence, e.g. publications. (Table 19)
- 5.5.3. On the other hand, 29 items (25.4%) contained representation that made a comparison to breastmilk and/or suggested that the products were nearly equivalent or superior to breastmilk. These included stating that their products contained ingredients that could also be found in breastmilk; made direct comparison between breastmilk and their products in explicit wording, such as "similar to breastmilk" and "originated from breastmilk"; and highlighted how natural the products were; and the affinity of the products to maternal body.
- 5.5.4. About 9 items (7.9%) contained texts that were likely to undermine breastfeeding. These included items encouraging mothers to substitute breastmilk with formula milk or combined feeding in explicit wordings; mentioning the difficulties of breastfeeding; and highlighting the products being nutritionally complete.
- 5.5.5. There were 9 items (7.9%) that contained images or text that promoted bottle feeding such as promoting "the product is ideal for bottle feeding", etc.

Table 20: Product information provided by manufacturers and distributors in compliance with HK Code

	Count	%
Total	114	100
Contains any image /text /representation that may idealise the use of formula milk	71	62.3
Conveys messages of professional endorsement	54	47.4
Discusses scientific findings /updates that were not referenced	8	7
Contains any image /text /representation that makes a comparison to breastmilk or suggests the product is nearly equivalent or superior to breastmilk	29	25.4
Contains any image /text /representation that is likely undermine or discourage breastfeeding.	9	7.9
Promotes bottle feeding	9	7.9

Base: Number of product label = 114 (Infant formula = 26, follow-up formula = 78 and formulae with a range of age groups = 10)

6. Discussion

- 6.1. The current Study had revised its methodology and checklists with reference to the latest WHO Code monitoring documents, HK Code and the local situation. The scope of the Study was also extended to cover marketing materials from 24 formula milk manufactures (covering 38 brands) that represented over 99% of the respective advertising expenditure in Hong Kong.
- 6.2. When compared with the 2016 Study, there was a change in the tactic of promotion, from advertising formula milk products for infants and young children under 36 months to targeting those over 3 years, or solely brand promotion. Yet, the marketing of breastmilk substitutes remained rampant as reflected by the surveyed marketing information and the related advertising expenditures.
- 6.3. Overseas experiences repeatedly showed the industry has effectively used cross-promotion (brand extension) to circumvent the marketing Codes in various countries. Follow-up formula having similar feel and look as infant formula are heavily promoted. A study showed that follow-on formula advertisements occurred more frequently in the United Kingdom where infant formula advertising is prohibited; and toddler milk advertisements appeared more frequently in Australia where infant and follow-on formula advertising is prohibited⁶.
- 6.4. In May 2016, WHO issued the “Guidance on ending the inappropriate promotion of foods for infants and young children”. Among others, it recommends that “there should be no cross-promotion to promote breast-milk substitutes indirectly via the promotion of foods for infants and young children.”⁷. Yet, more countries’ experiences and research from developed countries would be needed to inform the strategies and the regulatory approaches in tackling the cross-promotion marketing.
- 6.5. The WHO’s Marketing of Breast-milk Substitutes: National Implementation of the International Code, Status Report 2020 revealed that while the number of WHO member states putting in place some form of legal measures has increased over the years, provisions of the Code that are most readily adopted are mainly in the areas of promotion to the general public and promotion in health care facilities. There are still 58 member states which have no legal measures at all, including Australia, Canada, Japan, New Zealand, Singapore and United States of America etc. Legislation in many countries still has gaps e.g. prohibit the inclusion of nutrition and health claims on labels, lack of strong provisions for monitoring and enforcement, etc. More countries’ experiences and research would be needed to inform the strategies and the priorities in devising the regulatory approach.
- 6.6. Last but not least, the health benefit statements were still prevalent and messages communicating the possible health risks of using breastmilk

substitutes and proper instructions for appropriate preparation and use of powered formula milk were grossly inadequate in meeting the requirements of the HK Code and the International Code.

7. Conclusion and Recommendations

- 7.1. The present Study revealed a significant shift to promoting formula milk products targeting children over 36 months or the brand following the implementation of the voluntary HK Code. Cross-promotion (brand extension) was very common with follow-up formula having similar feel and look as infant formula being heavily promoted. Yet, the marketing of breastmilk substitutes remained rampant as reflected by the surveyed marketing information and the related advertising expenditures.
- 7.2. The I&E materials produced by the manufacturers were often associated with promotion of formula milk, which are not conversant by HK Code. Moreover, they produced I&E on breastfeeding and formula feeding & nutrition, which are not recommended by the HK Code. The majority of these items did not contain comprehensive and balanced information on exclusive and sustain breastfeeding; proper preparation and use of formula milk and bottle feeding, etc.
- 7.3. The majority of the product labels of formula milk for children under 36 months contained health benefit statements, representations that idealise the use of breastmilk substitutes, as well as inadequate information such as proper preparation and use of powdered infant formula and the possible health risks of its use which is recommended under the HK Code.
- 7.4. WHO and research studies have shown that advertising and promotion of breastmilk substitutes have a negative impact on mothers' perception, as well as feeding choices and practices.⁸⁻¹⁰ Combating aggressive marketing and providing comprehensive and balanced information in marketing materials are crucial in protecting breastfeeding and ensuring the proper use of breastmilk substitutes.
- 7.5. Based on the Study's findings, the following recommendations are proposed:
 - (i) The Government shall disseminate the findings of the Study to relevant traders and express concerns on the lack of compliance of the HK Code via various means such as conducting high level meetings, issuing reminder letters to the traders concerned, etc;
 - (ii) To protect the health of infants and young children and assist parents in making informed food choices, comprehensive and balanced information in marketing materials is crucial. More countries' experiences and research from developed countries would be needed to inform the local strategies and regulatory approaches in tackling the inappropriate promotion of health benefits statements in advertising formula milk for infants and young children;
 - (iii) The WHO's "Guidance on ending the inappropriate promotion of foods for infants and young children" recommends that, among others, "there should be no cross-promotion to promote breast-milk

substitutes indirectly via the promotion of foods for infants and young children.” Yet, more countries’ experiences and research from developed countries would be needed to inform the strategies and the regulatory approaches to tackle the cross promotion between formula milk under 36 months and those over 36 months;

- (iv) Manufacturers and distributors should ensure that their marketing practices conform to the principles and aim of the HK Code, in particular the requirements on product labels and information (i.e. messages like the proper preparation and use of powered infant formula and the possible health risks of its use) and I&E materials (e.g. no I&E on breastfeeding and formula milk feeding);
- (v) All stakeholders, including non-governmental organisations, health professional groups and institutions and individuals concerned are encouraged to monitor the marketing activities of manufacturers and distributors and draw their attention to activities which do not follow the principles and aim of this Code; and
- (vi) More stringent measures such as drawing up framework with legal consequence or punitive effect with reference to WHO’s recommendations may be considered if the above mentioned measures are not effective in combating the inappropriate marketing of formula milk for infants and young children in Hong Kong in the longer run. Experience may be borrowed from developed countries of the WHO member states which have introduced legal measures for Hong Kong to consider how to strengthen the framework.

8. Limitations

- 8.1. The Study only covered items advertised/ available on selected days between January and March 2019. The observations were hence only snapshots of the situation within that period.
- 8.2. The monitoring on the advertisements of various media was sourced from the database of a private advertising monitoring company. As the database had limited coverage on out-of-home advertising media, some items related to out-of-home advertising media might have been missed out in the Study.
- 8.3. I&E materials and product information available from sources other than manufacturers' websites were not captured by the Study. Hence, some of these information items and promotional materials might not have been covered in the analysis.
- 8.4. Certain types of promotion in social media were not covered (e.g. viral marketing).

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5. World Health Organization, United Nations Children's Fund. NetCode toolkit. Monitoring the marketing of breast-milk substitutes: protocol for ongoing monitoring systems. Geneva: World Health Organization; 2017. Licence: CC BY-NC-SA 3.0 IGO.
6. Berry NJ, Jones SC, Iverson D. Circumventing the WHO Code? An observational study. Arch Dis Child. 2012 Apr;97(4):320-5.
7. World Health Organization. Maternal, infant and young child nutrition: Guidance on ending the inappropriate promotion of foods for infants and young children. Geneva: World Health Organization; 2016.
8. World Health Organization. A Framework for Implementing the set of recommendations on the marketing of foods and non-alcoholic beverages to children. 2012.
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10. Glossary

“Follow-up formula”*

means –

- (a) a product that, according to its descriptions or instructions for use, is –
 - (i) represented as a replacement for human breastmilk or infant formula, and
 - (ii) intended for consumption as a liquid element in a progressively diversified diet by persons of any age from 6 months to under 36 months (even if it is also claimed in the descriptions or instructions, if applicable, to be suitable for consumption by persons of any other age); or
- (b) a product marked or labelled as “follow-up formula” or “較大嬰兒配方產品” or “較大嬰兒配方奶”, or with any other words of similar meaning.

“Infant formula”*

means –

- (a) a product that, according to its descriptions or instructions for use, is intended for consumption as a substitute for human breastmilk that is specially manufactured to satisfy, by itself, the nutritional requirements of persons of any age up to and including 12 months until the introduction of appropriate complementary feeding (even if it is also claimed in the descriptions or instructions, if applicable, to be suitable for consumption by persons of any age over 12 months); or
- (b) a product marked or labelled as “infant formula” or “嬰兒配方產品” or “嬰兒配方奶”, or with any other words of similar meaning.

* Food and Drugs (Composition and Labelling) Regulations (Cap. 132W).

Annex 1 – List of surveyed 24 manufacturers and 38 formula milk brands

Manufacturer	Formula Milk Brand(s)
1. Abbott Laboratories*	Abbott Similac HMO
	Abbott Eleva Organic
	Abbott Similac Total Comfort
	Abbott PediaSure
2. Ans Baby	ANS Baby
3. Babybio	Babynat
	Babybio Optima
	Babybio
	Babybio CAPREA
4. Bellamy's	Bellamy's Organic
5. Biostime	Biostime
	Biostime Premium
6. Danone*	Cow and Gate
	Nutricia Aptamil Platinum
	Nutricia Aptamil Pronutra
	Nutricia Nutrilon Pronutra+
	Nutricia Allecure
7. Friesland*	Friso
8. Gilbert Laboratories	Physiolac
9. HiPP	Hipp
10. Holle	Holle
11. Kendal Nutricare	Kendamil
12. Mead Johnson Nutrition*	Mead Johnson
13. Munchkin	Munchkin
14. Nanny Care	Nanny Care
15. Nestle Group*	Illuma
	Nestle
	Wyeth
16. Snow Brand*	Snow Brand
17. The a2 Milk Company	a2 PLATINUM
18. Orient EuroPharma	Karihome
19. Joannusmolen	EkoBaby
20. Meiji Seika Pharma Co., Ltd.	Meiji
21. 智多健 AAA	智多健 AAA
	Nutritalent AAA

22. Vit-Gute	維奇貝兒
23. Kiwi House	Kiwi House
24. Jun Le Bao Ru Ye (君樂寶乳業)	Jun Le Bao (君樂寶)

* Covered in the 2016 Study (incl. Fonterra)

Remarks:

- The current Study covered the marketing materials from 24 formula milk manufactures (38 brands) that represented over 99% of the relevant advertising expenditure in Hong Kong.
- The 2016 Study covered the marketing materials from 7 formula milk manufacturers (10 brands) that represented over 90% of the relevant advertising expenditure in Hong Kong.

Annex 2 – Coverage of the private advertising monitoring company

Newspapers and Magazines

am730	Top Gear
Apple Daily	*Bloomberg Businessweek (Asia Edition)
*China Daily (Hong Kong Edition)	Bloomberg Businessweek
Classified Post (Weekly)	*Fortune (Asia Edition)
Headline Daily	*Forbes Asia
Headline Finance	*Macau Business
HK01 Weekly	*Business Intelligence
Hong Kong Commercial Daily	*The Economist (Asia / Pacific Edition)
Hong Kong Economic Journal	*Time (Asia Edition)
Hong Kong Economic Times	*Yazhou Zhoukan
*Jornal Va Kio	Capital
*Macao Daily News	Capital CEO + Capital Entrepreneur
*Macau Daily Times	Capital Weekly
*Macau Post Daily	Economic Digest
Metro Daily	Hong Kong Economic Journal Monthly
Ming Pao Daily	iMoney
Oriental Daily News	Property Browser
Sing Pao	Property Times
Sing Tao Daily	Squarefoot.com.hk
Sky Post	Baby-mo
South China Morning Post	Milk B
Sunday Morning Post	Ours Magazine
Ta Kung Pao	Pregnancy Magazine
*The Financial Times	Pre-mo
*The International New York Times / The International Herald Tribune	Smart Parents
The Standard	Super Parents
Wen Wei Po	Whiz-kids Express
Audiophile	e-zone
*Asia-Pacific Boating	PC Market
Automobile Magazine	Cosmopolitan
Car Plus	Elle Hong Kong
Caz Buyer	Elle Man / Elle Men
Men's Machines	Esquire (Hong Kong Edition)
Gafencu Men	*SD magazine
Harper's Bazaar (Chinese Edition)	Tao (Monthly)
J Men (Quarterly)	U Magazine
Jessica	Wine Now Monthly
Jet	*High Life
Manifesto	*Essential Macau
Marie Claire (Hong Kong Edition)	Home Journal
Marie Claire 2 (Hong Kong Edition)	Home Solutions
Men's Uno	Hong Kong Tatler Homes
Milk	Modern Home
Milk X	Interior Beaute / Pace Interior Beaute
Mina	Perspective

MING'S	Today's Living
MR	design anthology
MR Style	Ming Watch
una (Hong Kong Edition)	Revolution
Zip	Spiral
Zip Homme	*Tasting Kitchen
Culture	Tic Talk Hong Kong
Harper's Bazaar Art	Time Square
Harper's Bazaar Deluxe	Watch Critics
*Macau Closer	Dogs Magazine
*Macau Inc	Pets Magazine
CITYMAGAZINE	Jiujik
East Week	JobMarket
Hong Kong Tatler	Recruit
Hong Kong Tatler Society	Golf Digest
Hong Kong Walker	Golf Vacations
# Legend	*Business Traveller Asia Pacific
Magazine P (Quarterly)	Cosmopolitan Bride / Cosmo Bride
Metro Prosperity / Metrobox	ELLE BRIDE / Elle Wedding
Metropop	Harper's Bazaar Bride
Ming Pao Weekly	Jessica Dream Wedding
Oriental Sunday	Wedding Message
Prestige Hong Kong	
*Regional Publications	

Television broadcast

TVB Jade	Cable TV Movie 1 / hd Movie 1
TVB Pearl	Cable TV Movie Classics
TVB Finance Channel / J5	Cable TV Soccer Betting
TVB J2	Cable TV Top News
TVB News Channel / iNews	Cable BBC World News
ViuTV Chi	Cable National Geographic Channel
ViuTVsix	Cable Fox Movies
HK Open TV / FanTV Chi	Cable Fox Sports
Hong Kong International Business Channel	Cable Fox Sports 2
Cable CNBC Hong Kong	Cable Star Chinese Movies
Cable Finance Info Channel	Now TV Business News Channel
Cable News Channel	Now Sports 1

Cable No. 1	beIN - Now Sports 2 / Now Sports 2
Cable TV AXN	Now Sports 3
Cable TV Channel 18	Now News
Cable TV Sports Plus / Channel 63	Now Animax
Cable TV Children	Now AXN
Cable TV Cine p. / hd245	Now Discovery Channel
Cable TV CNN	Now TLC / Discovery Travel And Living
Cable TV Discovery	Now FOX Sports
Cable TV Drama	Now Golf 2
Cable TV Entertainment	Now National Geographic Wild
Cable TV Sports 2 Channel / Super Soccer	Now Sports 4
Cable TV Sports / hd202	Now Sports 5
Cable HD Channel 603 / hd203	Now Sports 6
Cable TV HMC	Now Sports 7
Now STAR Chinese Movies	Now Animal Planet
SCM Legend / Now STAR Chinese Movies 2	Now FOX Sports 3
Now FOX Movies Premium	Now Bloomberg TV
Now FOX Sports 2	Now FOX
Now Golf 1	Now Premier League 1 / Now LeSports PL Channel 1
Now TV Golf 3	Now Premier League 2 / Now LeSports PL Channel 2
Now Sports Prime	Now Premier League 3 / Now LeSports PL Channel 3
Now Drama / Now Entertainment	Now Premier League 4 / Now LeSports PL Channel 4
Now Chinese Drama / Now Drama Channel	Now Premier League 5 / Now LeSports PL Channel 5
Now Baogu Movies	Now Premier League 6 / Now LeSports PL Channel 6
Now CNBC	Now beIN SPORTS 1
Now National Geographic Channel	Now beIN SPORTS 2

Now 668

Now beIN SPORTS Max

Now Jelli

Now beIN SPORTS Max 2

Now Asian Food Channel

Now beIN SPORTS Max 3

Radio Broadcast

Commercial Radio 1

Commercial Radio 2

HMV864 / AM864

Metro Finance 104

Metro Plus

Metro Showbiz 997

Mobile Websites and Applications

881903.com (iPhone)

Apple Daily Animated News (Tablet App)

AASTOCKS (iPhone)

Baby Kingdom (iPhone & iPad)

am730 (Android)

Beauty Exchange (iPhone)

am730 (iPhone)

Big fun (Mobile App)

Apple Daily Animated News (Android)

Bloomberg (Mobile App)

Apple Daily Animated News (iPhone)

Broadway Palace AMC (iPhone)

Cityline (Mobile App)

Wsj (Mobile App)

discuss (Mobile App)

Yahoo! Finance (Android)

Eat & Travel (iPhone)

Yahoo! News (Mobile App)

ETNet (Mobile App)

YouTube (Mobile App)

FanPiece (Mobile App)

28car.com

Forbes Asia (Mobile App)

28hse.com

Headline Daily (Android)

881903.com

Headline Daily (iPhone)

Adaymag.com

Hk01 (Mobile App)

Am730.com.hk

HKEJ (Mobile App)

Asiadog.com

HKEJ (Tablet App)

Asiatatler.com

Hket (Mobile App)

Bloomberg.com

Hong Kong Movie (Mobile App)

Cinema.com.hk

Hong Kong Toolbar (Android)

Cnp.hk

Hong Kong Toolbar (iPhone)

Cook1cook.com

i-cable.com (Mobile App)

Cosmopolitan

Metro Daily (Mobile App)

Cpjobs.com

Ming Pao (iPhone)

Ctgoodjobs.hk

Money 18 (iPhone)

Cup.com.hk

Movie Express (iPhone)

Dcfever.com

myTV SUPER (Mobile App)	discuss
Next (Mobile App)	Ejinsight.com
now Finance (Mobile App)	Elle
now News (Mobile App)	Espnfcasia.com
Nytimes (Mobile App)	Esquirehk.com
on.cc (Mobile App)	ETNet
OpenRice Hong Kong (Android)	Finet.hk
OpenRice Hong Kong (iPhone)	Flyday.hk
Programmatic ads (mobile GDN)	Foodeasy.com
Programmatic ads (mobile non-GDN)	Forbes.com
Sing Tao Daily (iPhone)	Getjetso.com
TVB Finance (Mobile App)	Harpersbazaar.com.hk
Tvmost (Mobile App)	Hk01.com
UA Cinemas (Mobile App)	Hket.com
Viu (Mobile App)	Hkm.appledaily.com
ViuTV (Mobile App)	Hutchgo.com.hk
Hypebeast.com	Price.com.hk
Inmediahk.net	Property.hk
Jessicahk.com	Recruit.com.hk
Jetso.com.hk	Ringhk.com
Jmen.com.hk	She.com
Jobsdb.com	Sina.com.hk
Lifestyleasia.com	South China Morning Post
Luxury-insider.com	Squarefoot.com.hk
Marieclaire.com.hk	Stheadline.com
Mensuno.asia	Style-tips.com
Mingpao.com	Sundaykiss.com
Mingpaoweekly.com	Sundaymore.com
Monsterparent.com	Thestandnews.com
Mrrm.com.hk	Ulifestyle.com.hk
My-magazine.me	Unwire.hk
Nmplus.hk	Uwants
Now.com	Viu.com
Nytimes.com	Viu.tv
Ohpama.com	Vjmedia.com.hk
On.cc	Weekendhk.com
Openrice.com	Wsj.com
OrientalSunday.hk	Yahoo! Wap
passiontimes.hk	Youtube.com
Popa.hk	Zuji.com.hk
Popbee.com	

Websites

*Qoos.com	Asiadog.com
28car.com	Asiatatler.com
28Hse.com	Asiaxpat.com
3weekly.com	Baby-kingdom.com
881903.com	Baby-mo.hk

Aastocks.com	Bastillepost.com
Adaymag.com	Beautyexchange.com.hk
Am730.com.hk	Bloomberg.com (Asia Edition)
A-performers.com	Capital-hk.com
Carplushk.com	Metroradio.com.hk
Cinema.com.hk	Mingpao.com
Cityline.com	Mingpaoweekly.com
Cnp.hk	Monsterparent.com
Cosmopolitan.com.hk	Msn.com.hk
Cpjobs.com	My903.com
Ctgoodjobs.hk	My-magazine.me
DCFever.com	Nextdigital.com.hk
Discuss.com.hk	Nmplus.hk
Edigest.hk	Now.com
Edu-kingdom.com	Nytimes.com (Traditional Chinese Edition)
Eduplus.hk	Ohpama.com
Elle.com.hk	On.cc
Eprice.com.hk	Openrice.com
Esdlife.com	Orientalsunday.com.hk
Espnfcasia.com (Asia Edition)	Passiontimes.hk
Etnet.com.hk	Price.com.hk
Facebook RHS	Programmatic ads (GDN)
Finet.hk	Programmatic ads (non-GDN)
Flyday.hk	Property.hk
Foodeasy.com	Qooza.hk
Forbes.com (Asia Edition)	Quamnet.com.hk
Getjetso.com	Recruit.com.hk
Gohome.com.hk	Ringhk.com
Harpersbazaar.com.hk	Sckid.com
Him.com.hk	Scmedia.com.hk
Hk01.com	Scmp.com
Hkej.com	She.com
Hket.com	Sina.com.hk
Hkgolden.com	Squarefoot.com.hk
Hutchgo.com.hk	Stheadline.com
I-cable.com	Style-tips.com
Jessicacode.com	Sundaykiss.com
Jessicahk.com	Sundaymore.com
Jetso.com.hk	Thestandard.com.hk
Jobsdb.com.hk	Timway.com
Lifestyleasia.com	Tvb.com
Luxury-insider.com	Tvmost.com.hk
Marieclaire.com.hk	Uwants.com
Mensuno.asia	Viu.com
Viu.tv	Youtube.com.hk
Weekendhk.com	Yp.com.hk
Wsj.com (Asia Edition)	Zuji.com.hk
Yahoo.com.hk	
*Macau websites	

Direct Advertisers (Ad Visual Only)

20th Century Fox (二十世紀霍士影片)	Dramatic English School & Studio
3M	EF Education First [EF Education]/EF Language School
AddWealth Global / www.addwealth.biz (宇宙天地)	EPS
Adidas (愛迪達)	Estee Lauder (雅詩蘭黛)
Air France (法國航空)	Etrade (億創理財)
Antipodean (相向英語學校)	Feva Works IT Education Centre
Apple Computer	Fortress
AsiaRooms.com	Fuji Xerox (富士施樂)
Bank Of America	Hang Seng Bank
Bank of China / BOC (中國銀行 / 中銀)	Hang Seng Insurance
Blue Cross	Headline Job
Bobbi Brown	Hewlett-Packard
British Airways (英國航空)	HK SAR Government
British Council	Hong Kong Economic Times Group
Canon (佳能)	Hong Kong Red Cross (香港紅十字會)
Cartier	Hong Kong Trade Development Council / TDC (香港貿易發展局)
Cathay Pacific	Hong Thai
Celestial Pictures (天映娛樂 / 天影娛樂)	HotelClub.com
China Construction Bank	HSBC
China Travel Service / CTS (中國旅行社 / 中旅社)	HTC
Chinese Gamer International (中華網龍股份)	Hutchison 3G HK (和記電訊 3G)
Chow Tai Fook (周大福集團)	Indigo Pearl
Citibank	Intercontinental Film Distributors(HK)
Citic Ka Wah Bank	IT / I.T
Coca Cola	Johnnie Walker
Cosmetic Care Asia	Johnson & Johnson - Acuvue
Dah Sing Bank	Johnson & Johnson - Clean & Clear
DBS Bank	JPMorgan Chase Bank, National Association
Dell	KBC Bank & Insurance Group (比聯)
Dermes Clinique	Konica Minolta (柯尼卡美能達)
Dragonair	Laneige
Lenovo (聯想集團) [Legend Group]	Singapore Airlines
Levi's	Smart Car
LifeZtore	Smartone-Vodafone [Smartone (數碼通)]
Linguaphone	Sony
L'Oreal (歐萊雅) - Biotherm	Sony Ericsson Mobile Communications
Maria College	Sony Pictures Releasing International
MTR Corporation (港鐵) Merger of MTR (地鐵) & Kowloon Canton Railway / KCRC (九廣鐵路)	Standard Chartered Bank (渣打銀行)
Mercedes Benz (平治)	Starwood Hotels & Resorts
Merck Sharp & Dohme / MSD (美國默沙東藥廠)	Swire Properties
Microsoft (微軟)	The Brandon Learning Centre (科慧學習中心)
Monster.com	The Government of Macau Special Administrative Region (澳門特別行政區政府)
New Horizons Learning Centre	The Hong Kong Management Association / HKMA (香港管理專業協會)

Johnson & Johnson - Neutrogena (露得清)	The University of Hong Kong / HKU (香港大學)
Nike	The Wall Street Institute
Oasis Hong Kong Airlines (甘泉香港航空)	Town Gas / TGC (中華煤氣)
Olympus (奧林巴斯)	Travelzoo
Open University of Hong Kong (香港公開大學)	Uniqlo
P&G - Vidal Sassoon	Unisoft (軟硬體)
PCCW HKT / Pacific Century CyberWorks	United Overseas Bank
Pizza Hut	University of Liverpool
Qantas (澳洲航空公司)	USAFIS
Samsung (三星)	Walt Disney (和路迪士尼)
Shanghai Commercial Bank	Warner Bros (華納兄弟 / 華納影片 / 華納影視)
Sharp	Wing Hang Bank
Shun Hing JVC (信興 JVC)	Wing Lung Bank

Out-of-home Advertising Media

Billboard

Causeway Bay
 Central
 Main Subway connecting TST and East TST
 Eastern Harbour Tunnel
 Cross-Harbour Tunnel
 Jordon
 Mongkok
 Prince Edward
 Sheung Wan
 Tai Lam Tunnel
 Tsim Sha Tsui
 Wanchai
 Western Harbour Tunnel
 Yau Ma Tei
 Lantau Link

Bus Body

Citybus
 New World First Bus
 Kowloon Motor Bus

Bus Shelters

Citybus Shelters
 New World First Bus Shelters
 Kowloon Motor Bus Shelters

MTR (EAL, MOL, WRL & LR)

East Rail Line
 Light Rail
 Ma On Shan Line

West Rail Line

Feeder Bus

MTR (Urban Lines) (incl. AEL)

MTR In-Train TV

Tram Body

Tram Shelters

Video Wall

Chungking Express, Tsim Sha Tsui (CTV)

Broadway Cinema, Mongkok (BTV)

Harbour City, TST (Harbour)

Times Square, Causeway Bay (TSTV)

Infinitus Plaza, Central (DTV)

Hilton Tower, Tsim Sha Tsui (HTV)

Plaza 2000, Causeway Bay (P2000)

President Theatre, Causeway Bay (PTV)

One Pacific Centre, Kwun Tong (OTV)

Cheung Sha Wan Plaza, Lai Chi Kok (LTV)

JP Plaza, Causeway Bay (JTV)

C.L.I. Building, Wan Chai (WTV)

Outdoor (Ad Visual Only)

Mini-Bus

POP

Taxi

Macau Outdoor (Ad Visual Only)

Airport

Billboard

Bus Panels

Bus Shelters (incl. City Information Panels)

Taxi

Annex 3 – Four checklists used in the Study

Media Advertisements

Observation Checklist

Reference No.: _____

Observer No.: _____ Supervisor No.: _____

Date(s) of conducting content analysis: _____

Part A: Basic Information

Material's reference no.: _____

Manufacturer: _____

Brand: _____

Product: _____

Stage: _____

Remarks: _____

Product type mentioned in the promotion:

Observer to note:

- If product falls within definition of infant formula and follow-up formula, treat as **infant formula**
- If no age range is specified (e.g. no product shot), write down “no age range”

Formula milk	
Infant formula for infants aged ≤ 12 months, Specify the age range _____	01 <input type="checkbox"/>
Follow-up formula for infants and young children aged from 6 - 36 months, Specify the age range _____	02 <input type="checkbox"/>
Formula milk for young children aged ≥ 36 months Specify the age range _____	03 <input type="checkbox"/>
Formula milk for infants and young children (no specified age)	
Brand only (no specific FM product)	04 <input type="checkbox"/>
Others, please specify: _____	05 <input type="checkbox"/>

Source of Information:

Observer to note:

- If there are multiple sources of information, select the first launch medium
- Delete as appropriate (e.g. Opinion / Analysis/ Debate)

A. Television Broadcast

Yes ☐ 01No ☐ 02

Date of the broadcast (dd/mm/yyyy)	____ / ____ / ____	
Time of the day	_____hours____minutes	
	Period	Frequency
	01 <input type="checkbox"/> Morning (6am – noon)	_____
	02 <input type="checkbox"/> Afternoon (Noon – 6pm)	_____
	03 <input type="checkbox"/> Evening (6pm – midnight)	_____
	04 <input type="checkbox"/> Night time (Midnight – 6am)	_____
Transmission time	01 <input type="checkbox"/> _____ minutes _____ seconds	
	02 <input type="checkbox"/> Unable to measure the time	
Channel	<u>Free</u> 01 <input type="checkbox"/> Television Broadcasts Limited (TVB) 02 <input type="checkbox"/> HK Television Entertainment Company Limited (HKTVE) 03 <input type="checkbox"/> Fantastic Television Limited (Fantastic TV) <u>Pay</u> 04 <input type="checkbox"/> Hong Kong Cable Television Limited 05 <input type="checkbox"/> PCCW Media Limited 97 <input type="checkbox"/> Other, specify: _____	
Number of views and the relevant date(s)	_____	
File number for pictures/ screen-shots	From _____ to _____	

B. Internet

Yes ☐ 01No ☐ 02

Accessed date (dd/mm/yyyy)	____ / ____ / ____	
Source	01 <input type="checkbox"/> Manufacturer / Distributor of baby food products 02 <input type="checkbox"/> Online retailers 03 <input type="checkbox"/> Other, specify: _____	
Type of channel	01 <input type="checkbox"/> Website (Other than social media) 02 <input type="checkbox"/> Mobile application (Other than chat applications) 03 <input type="checkbox"/> Facebook 04 <input type="checkbox"/> YouTube (video and text) Number of views: _____ 05 <input type="checkbox"/> Instagram 06 <input type="checkbox"/> Blog 97 <input type="checkbox"/> Other, specify: _____	
File number for pictures/ screen-shots	From _____ to _____	
Link for the website	_____	

C. Other Sources of Information

Yes ☐ 01No ☐ 02

Newspaper/magazine/print publication	01 <input type="checkbox"/>	Tram Body	07 <input type="checkbox"/>
Radio	02 <input type="checkbox"/>	Bus Shelter	08 <input type="checkbox"/>
Interactive	03 <input type="checkbox"/>	Flat-panel display at commercial buildings	09 <input type="checkbox"/>
Airport	04 <input type="checkbox"/>	Newsline Express (MTR In-train TV)	10 <input type="checkbox"/>
Billboards / Video Wall	05 <input type="checkbox"/>	Roadshow	11 <input type="checkbox"/>

Bus Body	06 <input type="checkbox"/>	Other transportation (e.g. mini-bus, taxi)	12 <input type="checkbox"/>
Other outdoor (e.g. POP), specify: _____			13 <input type="checkbox"/>
Other, specify: _____			97 <input type="checkbox"/>
<u>If the format of information is booklet/ brochure</u> Number of pages: _____			

Type of Promotion

Type of promotion:	01 <input type="checkbox"/> Advertisement 02 <input type="checkbox"/> Information note 03 <input type="checkbox"/> Interview (e.g. with celebrities) 04 <input type="checkbox"/> News report 05 <input type="checkbox"/> Promotion on pre-order service/delivery services <input type="checkbox"/> appearance of product logo / packshot <input type="checkbox"/> promote FM product / brand 06 <input type="checkbox"/> Expert's opinion / Analysis/ Debate (e.g. professionals' health advice) 07 <input type="checkbox"/> Recruitments of talks, seminars or mother craft activities 08 <input type="checkbox"/> Viral marketing encouraging mothers to contact their peers about specific product or brand 08 <input type="checkbox"/> Sweepstakes and promotions 09 <input type="checkbox"/> Club memberships 10 <input type="checkbox"/> Incentives of products purchase 97 <input type="checkbox"/> Other, specify: _____
--------------------	---

Part B: Content Analysis

Observer to note: For all observations, attach text and/ or photos where relevant

- Whether the material conveys messages about the benefits of specific product / brand

Observer to note: If yes, put down the message(s) in "Remarks"

■	Yes	01 <input type="checkbox"/>	No	02 <input type="checkbox"/>	→ Go to Q2
Messages	Presence		Remarks, text and/or photo(s)		
New/ Improved	Yes 01 <input type="checkbox"/>	No 02 <input type="checkbox"/>			
Convenient	Yes 01 <input type="checkbox"/>	No 02 <input type="checkbox"/>			
Promote parent-child bonding	Yes 01 <input type="checkbox"/>	No 02 <input type="checkbox"/>			
Similar to breast milk	Yes 01 <input type="checkbox"/>	No 02 <input type="checkbox"/>			
Healthy	Yes 01 <input type="checkbox"/>	No 02 <input type="checkbox"/>			
Nutritious	Yes 01 <input type="checkbox"/>	No 02 <input type="checkbox"/>			

Protects against diseases	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
Enhances child growth	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
Enhances child intelligence	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
Enhances child development	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
Helps build the immune system	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
Other, specify:	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

2. Presence of promotional devices to induce sales of the company's products

■ Yes ₀₁ ☐ No ₀₂ ☐ → Go to Q3

Remarks, text and/or photo(s)

3. Cross-promotion :

Whether the advertised formula milk product has a similar look-and-feel to other products and/or an appearance of age mismatch between the ad and the formula milk product.

Observer to note: If yes, put down the message(s) in "Remarks"

■ Yes ₀₁ ☐ No ₀₂ ☐ → Go to Q4

Impression: e.g. the formula milk product appeared in the advertisement has similar look-and-feel to formula milk for infant and young children under 36 months (Stage 1,2,3 formula), although the ad promote Stage 4 FM, but the child appeared in the ad (crawling on floor) is just 6-9 months

	Presence	Remarks, text and/or photo(s)
FM with similar look-and-feel to IF & FF < 36 months	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
Appearance of age mismatch on infants and toddlers <36 months and FM products	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
Other, please specify: _____	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

4. Seeking directly or indirectly personal details of infants, young children, expectant parents or parents of children under the age of 36 months for the purpose of promoting designated products

■ Yes ₀₁ ☐ No ₀₂ ☐ → Go to Q5

Text and/or photo(s):	Remarks
-----------------------	---------

5. Inviting participation of infants, young children, expectant parents or parents of children under the age of 36 months in activities including baby shows, mother craft activities for the purpose of promoting designated products

▪ Yes ☐₀₁ No ☐₀₂

Text and/or photo(s):	Remarks
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~~END OF OBSERVATION CHECKLIST~~

Informational and Educational Materials

Observation Checklist

Reference No.: _____

Observer No.: _____ Supervisor No.: _____

Date of conducting content analysis: _____

Part A: Basic Information

Material's reference no.: _____

Manufacturer: _____

Website visited and accessed date: _____

Topic of information:

Formula Milk Feeding / Formula Milk Nutrition	₀₁ <input type="checkbox"/> Go to B1
Breastfeeding / Breastmilk Nutrition	₀₂ <input type="checkbox"/> Go to B1
Weaning	₀₃ <input type="checkbox"/> Go to B2
Maternal nutrition	₀₄ <input type="checkbox"/> Go to B2
Child care e.g. caring newborn babies	₀₅ <input type="checkbox"/> Go to B2
Health topics: e.g. gut healthy, allergy etc	₀₆ <input type="checkbox"/> Go to B2
Parenting: e.g. reading and playing with toddlers	₀₇ <input type="checkbox"/> Go to B2
Others, specify: _____	₀₈ <input type="checkbox"/> Go to B2

Title of information: _____

Format of information: _____

Part B: Content Analysis

Observer to note: For all observations, attach text and/ or photo(s) where relevant.

B1. Information about breastfeeding and formula milk by M&Ds

1. Mentioning of infant formula and follow-up formula products for 0-36 months

■ Yes ₀₁ ☐ No ₀₂ ☐ → Go to Q2

	Mention	Remarks, text and/or photo(s)
(i) Product name	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(ii) Brand name	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(iii) Product shot	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(iv) Product logo	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(v) Product trade mark	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(vi) Information of the other FM product (e.g. stage 4 FM), specify:	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

2a. Whether all or parts of information about breastfeeding and formula milk feeding is

acknowledged /cited from the materials prepared by DH

▪ Yes ☐₀₁ No ☐₀₂ → Go to Q3

Remarks, text and/or photo(s)

Observer to note: If the information about breastfeeding and formula milk feeding on the materials is sourced from DH, go to item 2b. Otherwise, go to Q3.

2b. If all or parts of information about breastfeeding and formula milk feeding is acknowledged /cited from the materials prepared by DH, whether there is any alteration of the content; and

▪ Yes ☐₀₁ No ☐₀₂ → Go to Q3

Remarks, text and/or photo(s)

3. Presence of explanation to clearly and conspicuously explain the following matters, with reference to the age of the infants and young children and the stage of feeding in discussion and with regard to the nature of promotional and educational materials made:

Material on breastfeeding

	Presence	Remarks, text and/or photo(s)
(i) the benefits and superiority of breastfeeding	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(ii) the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years of beyond	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(iii) how to initiate and maintain exclusive and sustain breastfeeding	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(iv) why it is difficult to reverse a decision not to breastfeed	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	

(v) the importance of introducing complementary food from the age of 6 months onwards	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(vi) how and why any introduction of bottle-feeding negatively affects breastfeeding	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

Material on formula milk feeding or use of a feeding bottle

	Presence	Remarks, text and/or photo(s)
(i) the benefits and superiority of breastfeeding	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(ii) the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond;	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(iii) why it is difficult to reverse a decision not to breastfeed;	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(iv) instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils;	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(v) the health risks of feeding by formula milk, feeding by using a feeding bottle and teat and improper preparation of feeding bottle and teat;	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(vi) explanations that powdered formula milk is not a sterile product and that to minimise the risks of serious illness, formula milk which is intended for consumption by infants under 6 months of age should be prepared using boiled water cooled down to no less than 70 °C	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(vii) formula milk should be prepared one feed at a time and that the reconstituted formula milk should be consumed within 2	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

hours after preparation and any unused milk must be discarded;		
(viii) the financial implication of feeding an infant with formula milk.	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

4. Presence of invitation to make contact with the company

▪ Yes ₀₁ ☐ No ₀₂ ☐

Remarks, text and/or photo(s)

~~END OF B1 OBSERVATION CHECKLIST~~

B2 – Information about matters other than breastfeeding and formula feeding e.g. complementary feeding/weaning by M&Ds

5. Mentioning of infant formula and follow-up formula products for 0-36 months

▪ Yes ☐₀₁ No ☐₀₂ → Go to Q6

	Mention	Remarks, text and/or photo(s)
(i) Product name	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(ii) Brand name	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(iii) Product shot	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(iv) Product logo	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(v) Product trade mark	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(vi) Information of the other FM product (e.g. stage 4 FM), specify:	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	

6. Presence of promotional practices of formula milk to

- i) convey messages about the benefits of specific products; and
- ii) induce sales of the products.

Observer to note: If yes, put down the messages in 'Remarks'

Yes ☐₀₁ No ☐₀₂ → Go to Q7

	Presence	Remarks, text and/or photo(s)
(i) convey messages about the benefits of specific products;	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(ii) induce sales of the products	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	

7. Presence of recommending any food or drink products for infants under 6 months old

▪ Yes ☐₀₁ No ☐₀₂ → Go to Q8

Remarks, text and/or photo(s)

8. Presence of invitation to make contact with the company

▪ Yes ☐₀₁ No ☐₀₂ → Go to Q9

Remarks, text and/or photo(s)

9. Presence of information not substantiated by scientific literature

▪ Yes ☐₀₁ No ☐₀₂ Not applicable ☐₉₇

Remarks, text and/or photo(s)

~~END OF B2 OBSERVATION CHECK~~

Product Label

Observation Checklist

Reference No.: _____

Observer No.: _____ Supervisor No.: _____

Date of conducting content analysis: _____

Part A: Basic Information

Material's reference no.: _____

Manufacturer: _____

Brand: _____

Product: _____

Stage: _____

Package Size: _____

Product type:

*Observer to note: If product falls within definition of infant formula and follow-up formula, treat as **infant formula***

Formula milk	
Infant formula for infants aged ≤ 12 months	01 <input type="checkbox"/>
Follow-up formula for infants and young children aged from 6 - 36 months	02 <input type="checkbox"/>

Age range of target consumers: _____

Part B: Content Analysis

Observer to note: For all observations, attach text and/or photos where relevant;

FORMULA MILK

- Whether product information is printed on the container or a well-attached label
 - Yes 01 ☐ No 02 ☐ → Go to Q2
- Whether written in languages appropriate to target readership, e.g. Chinese and/or English
 - Yes 01 ☐ No 02 ☐ → Go to Q3
- Presence of any image, text, or other representation that
 - is likely to undermine or discourage breastfeeding;
 - makes a comparison to breastmilk or suggests that the product is nearly equivalent or superior to breastmilk.

(i) Yes <input type="checkbox"/> ₀₁		No <input type="checkbox"/> ₀₂ →Go to Q4
Presence		Remarks, text and/or photo(s)
(i) is likely to undermine or discourage breastfeeding	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(ii) makes a comparison to breastmilk or suggests that the product is nearly equivalent or superior to breastmilk	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	

4. Presence of any image, text or other representation that may idealise the use of breast-milk substitutes

■ Yes <input type="checkbox"/> ₀₁		No <input type="checkbox"/> ₀₂ →Go to Q5
Presence		Remarks, text and/or photo(s)
Nutrition and Health Claims	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
Benefits, quality, necessity, superiority of product	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
Pictures of any infant or young children being bottle-fed	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
Representation of animals, toys, cartoon characters, or brand mascots	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
Images that idealise the product/brand (e.g. flowers, hearts, landscapes)	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
Other, specify: _____	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	

5. Presence of endorsement or equivalent that may be construed as an endorsement by a professional or other body

■ Yes <input type="checkbox"/> ₀₁		No <input type="checkbox"/> ₀₂ →Go to Q6
Please specify: <input type="checkbox"/> ₀₁ Doctors <input type="checkbox"/> ₀₂ Nutritionist /dietitians <input type="checkbox"/> ₀₃ Government Food Agencies		
<input type="checkbox"/> ₀₄ Others, please specify: _____		
Remarks, text and/or photo(s)		

6. Presence of promotional devices to induce sales of the company's products

■ Yes ☐₀₁ No ☐₀₂ →Go to Q7

Remarks, text and/or photo(s)

7. Presence of a list of ingredients and nutritional composition of the product

■ Yes ☐₀₁ No ☐₀₂ →Go to Q8

Remarks, text and/or photo(s)

8. Indication in a clear, conspicuous and legible manner of

- instructions for appropriate preparation and use in words and/or in easily understood graphic;
- the age for which the product is recommended in Arabic numerals;
- warning about the health risks of improper preparation and of introducing the product prior to recommended age;
- required storage conditions both before and after opening of the product, taking into account climatic conditions;
- batch number, date of manufacture and date before which the product is to be consumed, taking into account climatic and storage conditions;
- the name and address of the manufacturer or distributor; and
- the weight of milk powder in one level scoop.

(i) Yes ☐₀₁ No ☐₀₂ →Go to Q9

	Presence	Remarks, text and/or photo(s)
(i) instructions for appropriate preparation and use in words and/or in easily understood graphics	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(ii) the age for which the product is recommended in Arabic numerals	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	
(iii) warning about the health risks of improper preparation and of introducing the product prior to	Yes <input type="checkbox"/> ₀₁ No <input type="checkbox"/> ₀₂	

	recommended age		
(iv)	required storage conditions both before and after opening of the product, taking into account climatic conditions	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(v)	batch number, date of manufacture and date before which the product is to be consumed, taking into account climatic and storage conditions	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(vi)	the name and address of the manufacturer or distributor	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(vii)	the weight of milk powder in one level scoop	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

9. Presence of the word “IMPORTANT NOTICE” in capital letters and indicates thereunder the statement:

- i) “IMPORTANT NOTICE” in capital letters;
- ii) “Breastfeeding is the normal means of feeding infants and young children” or equivalent;“ or Breastmilk is the natural food for their healthy growth and development” or equivalent; or
- iii) “Use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infant” or equivalent.

Yes ₀₁ ☐ No ₀₂ ☐ →Go to Q10

	Presence	Remarks, text and/or photo(s)
(i) “IMPORTANT NOTICE” in capital letters	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(ii) “Breastfeeding is the normal means of feeding infants and young children” or “Breastmilk is the natural food for their healthy growth and development” or equivalent	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	
(iii) “Use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infant” or equivalent	Yes ₀₁ <input type="checkbox"/> No ₀₂ <input type="checkbox"/>	

10. Presence of the words “Warning” and indicates thereunder the following statements

Observer to note: If product falls within the definition of infant formula and follow-up formula, treat as an infant formula

For infant formula

- i) The word “Warning”;
- ii) “Before deciding to supplement or replace breastfeeding with this product, seek the advice of a health professional as to the necessity of its use” or equivalent;
- iii) “It is important for your baby’s health that you follow all preparation instructions carefully” or equivalent; or
- iv) “If you use a feeding bottle before the establishment of breastfeeding, your baby may refuse to feed from the breast” or equivalent.

Yes ☐ No ☐ →Go to Q11

	Presence	Remarks, text and/or photo(s)
(i) The word “Warning”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) “Before deciding to supplement or replace breastfeeding with this product, seek the advice of a health professional as to the necessity of its use” or equivalent	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) “It is important for your baby’s health that you follow all preparation instructions carefully” or equivalent	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iv) “If you use a feeding bottle before the establishment of breastfeeding, your baby may refuse to feed from the breast” or equivalent	Yes <input type="checkbox"/> No <input type="checkbox"/>	

For follow-up formula

- i) The word “Warning”
- ii) “Before deciding to supplement or replace breastfeeding with this product, seek the advice of a health professional as to the necessity of it its use” or equivalent; or
- iii) “It is important for your baby’s health that you follow all preparation instructions carefully” or equivalent.

Yes ☐ No ☐ →Go to Q11

	Presence	Remarks, text and/or photo(s)
(i) The word “Warning”	Yes <input type="checkbox"/> No <input type="checkbox"/>	

(ii) “Before deciding to supplement or replace breastfeeding with this product, seek the advice of a health professional as to the necessity of its use” or equivalent	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) “It is important for your baby’s health that you follow all preparation instructions carefully” or equivalent	Yes <input type="checkbox"/> No <input type="checkbox"/>	

11. Presence of the instructions for preparation of powdered formula milk:

- i) “Powdered formula milk is not a sterile product” or equivalent; or
- ii) “Powdered formula milk may become contaminated during preparation” or equivalent.

▪ Yes ☐ No ☐ →Go to Q12

	Presence	Remarks, text and/or photo(s)
(i) “Powdered formula milk is not a sterile product” or equivalent	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) “Powdered formula milk may become contaminated during preparation” or equivalent	Yes <input type="checkbox"/> No <input type="checkbox"/>	

12. Presence of the instructions for preparation of powdered formula milk: “It is necessary for formula milk to be prepared one feed at a time using boiled water allowed to cool down to no less than 70°C for consumption by infants under 6 months of age” or equivalent

▪ Yes ☐ No ☐ →Go to Q13

Observer to note: Write down what temperature the material suggests if not “no less than 70°C”

Remarks, text and/or photo(s)

13. Presence of the instructions for preparation of powdered formula milk: “Discard any feed that has not been consumed more than two hours after reconstitution” or equivalent

▪ Yes ☐ No ☐ →Go to Q14

Remarks, text and/or photo(s)

14. Presence of the instructions for the use of hygienic practices, e.g. “Clean hands, preparation surfaces” or equivalent

▪ Yes ☐₀₁ No ☐ ₀₂ →Go to Q15

Remarks, text and/or photo(s)

15. Presence of a feeding chart in the preparation instructions

▪ Yes ☐ ₀₁ No ☐ ₀₂ →Go to Q16

Remarks, text and/or photo(s)

16. Presence of the source of protein contained in the formula milk

▪ Yes ☐ ₀₁ No ☐ ₀₂ →Go to Q17

Remarks, text and/or photo(s)

17. Presence of the information that infants should receive complementary food in addition to formula milk from an age, as advised by a health worker, that is appropriate for their specific growth and development needs, and from 6 months of age onwards

▪ Yes ☐ ₀₁ No ☐ ₀₂

Remarks, text and/or photo(s)

18. Cross-promotion

Whether the formula milk products of the same line have a similar look-and-feel with each other.

Observer to note: If yes, put down the message(s) in "Remarks"

Yes

☐

No

☐

Impression: Similar graphics, colour tone, packaging etc

Remarks, text and/or photo(s)

~~END OF OBSERVATION CHECKLIST~~

Product Information

Observation Checklist

Reference No.: _____

Observer No.: _____ Supervisor No.: _____

Date of conducting content analysis: _____

Part A: Basic Information

Material's reference no.: _____

Manufacturer: _____

Brand: _____

Product: _____

Stage: _____

Product type:

Observer to note: *If product falls within definition of infant formula and follow-up formula, treat as **infant formula***

Formula milk	
Infant formula for infants aged ≤ 12 months	01 <input type="checkbox"/>
Follow-up formula for infants and young children aged from 6 - 36 months	02 <input type="checkbox"/>

Age range of target consumers: _____

Format of information: _____

Channel of obtaining information: _____

(If the format of information is webpage)

Website visited and accessed date: _____

(If the format of information is booklet/ brochure)

Number of pages: _____

Part B: Content Analysis

Observer to note: For all observations, attach text and/ or photo(s) where relevant;

FORMULA MILK

1. Presence of image, text or representation that

- is likely to undermine or discourage breastfeeding;
- makes a comparison to breastmilk and/or suggests that the product is nearly equivalent or superior to breastmilk.

▪ Yes ☐ No ☐ → Go to Q2

	Presence	Remarks, text and/or photo(s)
(i) is likely to undermine or discourage breastfeeding	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) makes a comparison to breastmilk and/or suggests that the product is nearly equivalent or superior to breastmilk.	Yes <input type="checkbox"/> No <input type="checkbox"/>	

2. Presence of any image, text or other representation that promotes bottle feeding

▪ Yes ☐ No ☐ → Go to Q3

Remarks, text and/or photo(s):

3. Presence of any endorsement or equivalent that may be construed as an endorsement by a professional or other body

▪ Yes ☐ No ☐ → Go to Q4

Please specify: ₀₁ ☐ Doctors ₀₂ ☐ Nutritionist /dietitians ₀₃ ☐ Government Food Agencies
₀₄ ☐ Others, please specify: _____

Remarks, text and/or photo(s)

4. Whether written in languages appropriate to target readership, e.g. Chinese and/or English(s)

▪ Yes ₀₁ ☐ No ₀₂ ☐ → Go to Q5

Remarks, text and/or photo(s)

5. Presence of information not substantiated by scientific literature

▪ Yes ₀₁ ☐ No ₀₂ ☐ Not applicable ₉₇ ☐

Remarks, text and/or photo(s)

~~END OF OBSERVATION CHECKLIST~~