



Baby Friendly Hospital Initiative
Hong Kong Association
愛嬰醫院香港協會

Submission to
Panel on Health Services of the Legislative Council on
Hong Kong Code of Marketing of Formula Milk and Related Products,
and Food Products for Infants & Young Children (HK Code)
10 April 2017

“Breastfeeding: a smart investment in people and in economies”

Keith Hansen, The World Bank¹

BFHIHKA has made submissions in support of the HK Code at meetings of the Panel of Health Services previously on 16 April 2012² and more recently as a joint submission on 20 March 2017³. Our position continues to hold.

BFHIHKA would like to emphasize

1. Breastfeeding is an important public health issue whatever the level of economic development of the country/territory.

In Hong Kong breastfeeding

- a. *reduces the risk of babies dying from the often fatal condition of necrotizing enterocolitis, sudden death infant syndrome, and our mothers from breast cancer⁴*
- b. *reduces the risk of babies being admitted into hospital for diarrhea and chest infections⁵*
- c. *reduces the risk of non-communicable diseases in both the children (overweight and diabetes) and their mothers (diabetes)⁶*
- d. *enhances children's cognitive development⁷*
- e. *reduces dental malocclusion^{8 9}*

2. The HK Code is important and necessary for Hong Kong

Advertising spending on formula milk for use from 0-36 months amounted to HKD 2.9 billion in 2015 (admanGo). This is seven times the 2015-16 budget of HKD 0.4 billion of the Department of Health for health promotion and approaches the HKD 3.1 billion for disease prevention services of all ages.¹⁰ Public funds should not be used to compete with such promotion of commercial products that affects the public health of the community of Hong Kong.



3. **The scope should remain as a coverage of formula milk for use from 0 to 36 months of age**
 - a. *Definition of breastmilk substitutes is defined by WHO¹¹*
 - b. *There is cross branding of formula milk for use below and above 6 months of age^{12 13}*
 - c. *Follow-on formula is unnecessary (WHO)¹⁴*
 - d. *Infants on formula milk can consume full fat cow's milk from 12 months of age (Joint statement of Department of Health and nine professional bodies in Hong Kong)¹⁵*
 - e. *Even UK has started the legislative process to regulate marketing of formula milk for use from 0 to 36 months of age.¹⁶*

4. **The HK Code protects both mothers who choose to breastfeed or use formula milk**
 - a. *In BFHIHKA's Baby-Friendly Health Facility programme currently enrolled by all public hospitals with maternity units in Hong Kong and being extended to Maternal and Child Health Centres, the facilities are assessed on their support and guidance to both breastfeeding AND non-breastfeeding mothers. Mothers' informed decision on infant feeding is respected.*
 - b. *Informed decision should be based on unbiased evidence-based scientific information and mothers' individual circumstances and not from promotional activities with the intention to increase the sale of formula milk.*
 - c. *The HK Code does not prevent mothers obtaining information that they need.*
 - d. *Access to formula milk for mothers who need to use them is not an issue as the HK Code does not prohibit the sale of formula milk.*

5. **Extension of maternity leave, support of mothers breastfeeding in the workplace, protection and support of mothers' right to breastfeed anywhere, any time are measures to go hand-in-hand with and NOT instead of the HK Code.**

6. **The voluntary HK Code should be launched immediately proceeding to legislation should being voluntary proves ineffective.**



- 1 [http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(16\)00012-X.pdf](http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(16)00012-X.pdf) accessed 31 March 2017
- 2 <http://www.legco.gov.hk/yr11-12/english/panels/hs/papers/hs0416cb2-1699-3-e.pdf> accessed 31 March 2017
- 3 <http://www.legco.gov.hk/yr16-17/english/panels/hs/papers/hs20170320cb2-1008-15-e.pdf> accessed 31 March 2017
- 4 [http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(15\)01024-7.pdf](http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(15)01024-7.pdf) accessed 31 March 2017
- 5 http://www.hkmj.org/system/files/hkm1404sp4p5_0.pdf accessed 31 March 2017
- 6 [http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736\(15\)01024-7.pdf](http://www.thelancet.com/pdfs/journals/lancet/PIIS0140-6736(15)01024-7.pdf) accessed 31 March 2017
- 7 ibid
- 8 ibid
- 9 http://www.hku.hk/press/news_detail_13763.html accessed 31 March 2017
- 10 <http://www.budget.gov.hk/2016/eng/pdf/head037.pdf> accessed 31 March 2017
- 11 http://apps.who.int/gb/ebwha/pdf_files/WHA69/A69_7Add1-en.pdf accessed 31 March 2017
- 12 http://www.who.int/nutrition/topics/WHO_brief_fufandcode_post_17July.pdf accessed 31 March 2017
- 13 Survey on Mothers' Views of Formula Milk Promotion and Information on Infant and Young Child Feeding (DH, 2013)
http://www.fhs.gov.hk/english/archive/files/reports/Survey_on_Mothers_views_on_FM_promotion_full_2016_final.pdf
accessed 31 March 2017
- 14 World Health Assembly Resolution 39.28, 16 May 1986
- 15 http://www.fhs.gov.hk/english/news/recommend_to_parents/joint_statement_poster.html
- 16 https://www.publications.parliament.uk/pa/bills/cbill/2016-2017/0095/cbill_2016-20170095_en_1.htm accessed 31 March 2017