

Media and Marketing Study on Formula Milk and Related Products for Infants and Young Children



衛生署

Department of Health

**Family Health Service
Department of Health**

2017

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Executive Summary

Background

The World Health Organization (WHO)'s International Code of Marketing of Breast-milk Substitutes (the International Code) and its subsequent relevant Health Assembly's resolutions aims to provide safe and adequate nutrition for infants through protecting, promoting and supporting breastfeeding, and to ensure the proper use of breastmilk substitutes on the basis of adequate and unbiased information and through appropriate marketing and distribution.

The Family Health Service (FHS) of the Department of Health (DH) commissioned Consumer Search Hong Kong Limited (CSG) to conduct a study on the marketing practices of formula milk and formula milk related products (namely, feeding bottles and teats for infants and young children) in Hong Kong (the Study) with a view to assessing the local marketing situation.

Study Objective

The objective of the Study was to systematically identify and analyse the information used for marketing and promoting formula milk and formula milk related products for infants and young children up to the age of 36 months to the general public, expectant parents and parents in Hong Kong.

Methodology

The Study covered information commonly adopted by the manufacturers of formula milk or formula milk related products for infants and young children up to the age of 36 months for dissemination to the general public and parents. It included (i) information disseminated via media advertisements; (ii) information presented as health education materials; (iii) information attached to or appearing on the container of the products (product label information); and (iv) product information. Information presented in various format including but not limited to image, text or other representations were studied.



The items of information studied came from 7 formula milk manufacturers (covering 10 brands) that represented over 90% of the respective advertising expenditure and 2 of the formula milk related product manufacturers in Hong Kong.

Four checklists corresponding to the 4 categories of information were used for recording the findings. The items in the checklists were designed with reference to the International Code, the subsequent relevant Health Assembly's resolutions and the local context.

A pilot study was conducted between 13 and 20 November 2015. Adjustments to the content of the checklists were made before conducting the main actual fieldwork.

In the main actual fieldwork, product label information and media advertisements were captured over 28 continuous calendar days between 15 February and 13 March 2016, while product information and health education information were captured during a period of 60 continuous calendar days between 11 February and 10 April 2016. The information on media advertisements was sourced from the database of a private advertising monitoring company, which covered magazines and newspapers, out-of-home advertising media, television and radio broadcasts, websites, mobiles websites and applications.

All items of information collected in the study were coded and the datasets were validated.

Study Findings

In the Study, a total of 410 relevant items were collected and studied including 161 media advertisements, 122 materials presented as health education, 77 product labels and 50 product information materials.

(i) Media Advertisements (161 items, with 160 on formula milk and 1 on formula milk related product)

Among 161 media advertisements items found, 81 came from social media, 31 came from websites, mobile apps and email, while 40, 7 and 2 items came from print media, television commercials (TVC), and out-of-home advertising respectively. Out of



the 160 items of media advertisements on formula milk studied, there were 107 items (66.9%) that had images, texts or other representations that might idealise the use of their products, of which 67 items implied health benefits to the child if the product was consumed. The health benefits included supporting digestive system and gut health, general growth and development, immunity, allergy prevention, brain and visual development. Nine items (5.6%) contained statements about the nutritional value or quality of their products, such as “contains no added cane sugar”, “contains protein of superior quality” and “contains nutrient of superior quality”.

Although only 7 TVCs related to formula milk were found, they were frequently broadcasted involving a total broadcasting frequency of 37,994 times, equivalent to 16,022.1 minutes (or 11.13 days). Although the TVCs did not specifically promote formula milk for babies below 6 months, they often showed brief product shots of follow-up formula milk with very similar packaging to infant formula milk. Five TVCs conveyed imageries of happy, clever and healthy child(ren), and a happy family. The other two highlighted the nutritional quality of their products.

Some media advertisements, in particular those in print media and social media, contained information on sales inducement (33 items, 20.6%), seeking of personal details of the infants or their parents (39 items, 24.4%) or invitation to attend exhibitions on baby products, relevant activities or antenatal seminars (33 items, 20.6%).

Only 1 media advertisement of formula milk related product was found. The item was in print media and was found to have images, texts or other representations that might idealise the use of formula milk related products.

(ii) Health Education Information (122 items, with 58 relevant to breastfeeding or formula milk feeding, and 64 were about other matters)

Information presented as health education materials on infant and young children nutrition were commonly found on manufacturer’s websites in text and video format. There were 58 items presented as health educational materials on breastfeeding or formula milk feeding. All of them contained product promotional activities (e.g. appearance of products or relevant promotional activities on the same webpage as the health education item on manufacturer’s website). Although most items (53 items, 91.4%) explained the benefits and superiority of breastfeeding, only a minority of the items mentioned about the value of exclusive breastfeeding for the first 6 months and



sustaining breastfeeding (13 items) and the importance of introducing complementary food from the age of 6 months (5 items).

There were 64 items presented as educational materials concerning matters other than breastfeeding or formula milk feeding. All these items also contained product promotional activities.

(iii) Product Label Information (77 labels, with 61 on formula milk and 16 on formula milk related products)

The information on the labelling of 77 products were studied including 61 formula milk products and 16 on formula milk related products. All product labels of formula milk contained images, texts or other representations which might idealise the use of their products, such as emphasis on the child health benefits and on the superior quality of the product, or conveying message of endorsement and recommendations by professionals or trusted bodies.

All product labels of formula milk contained 1 or more health benefit statements, notably about supporting the brain development, supporting the digestive system and gut health and supporting the immune system. About one-third of the labels (20 labels, 32.8%) contained statements about the superior nutritional value or quality. For example, these labels mentioned that the product had a better nutritional quality or a higher nutritional level.

Variation was seen regarding the instructions on preparation of formula milk (such as the temperature of the water used) and warnings displayed on the product label. Among the 39 labels of powdered formula targeted at infants under 12 months of age, only 7 labels (17.9%) mentioned using boiled water allowed to cool down to no less than 70°C to prepare formula milk. There were 15 labels that mentioned the required temperatures to be other than 70°C. Unlike infant formula, only around half of the labels of follow-up formula mentioned that breastfeeding is the normal means for feeding infants and young children, and is natural for their growth and development, or equivalent.

Most (14 labels, 87.5%) of the labels of formula milk related products contained images, texts or other representations which might idealise the use of their products.



The most mentioned representation was about the functions or the quality of the products (11 labels, 78.6%). These representations included stating that the design of the teat might help better digestion and healthy development of jaw muscles, and that the design of the bottle might help to prevent ear infection or stomach discomfort. Nine labels drew comparison with breastfeeding. For example, the labels stated that the teats enabled the baby to mimic the natural suckling pattern, or to mimic the baby's latch-on to the breast.

Nearly all (15 labels, 93.8%) the labels of formula milk related products contained the term “maternalise” or equivalent. Three (18.8%) labels contained texts that mentioned that breastfeeding might be inconvenient, which appeared to discourage breastfeeding.

(iv) Product Information (50 items on formula milk)¹

During the study period, a total of 50 items of formula milk product information were identified. In general, product information provided information specific to the products for potential consumers' reference. It might contain information on product specifications, instruction of usage, materials or ingredients, and condition of storage. However, most of the items (48 items, 96.0%) had images, texts or representations that might idealise the use of formula milk and formula milk related products. The most mentioned representation implied a better development and growth of children if the products were consumed (43 items).

Many items (43 items, 86.0%) contained health benefit statements. They were mainly about supporting the digestive system and gut health/ better absorption, supporting brain development and supporting the immune system.

About one-third of the items (17 items) mentioned the nutritional quality of their products, such as the high nutritional quality, protein of high quality and docosahexaenoic acid (DHA) of high quality/ a higher amount of DHA.

Nine (18%) items contained images or texts which might encourage feeding by formula milk. The value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding for 2 years or beyond was only seen in 10 out of 50 items.

¹ There was no product information for formula milk related product available since there was no official website for the brands selected and no product information item was issued. Product information found in the product inserts of formula milk related products were categorised and analysed under product labels.



Conclusions

It was common for the manufacturers of formula milk and formula milk related products for infants and young children up to the age of 36 months to produce information in various formats for marketing and promotion to parents and the general public. Such information often contained texts, images or other representations to attract consumers to purchase the products, thereby encouraging formula feeding and discouraging breastfeeding.

Recurrent themes portraying benefits to the child health and development, such as improving immunity and digestive system, supporting brain development, supporting general growth and development, and emphasising the high nutritional quality were observed for promotion of the formula milk products. Formula milk related product manufacturers tended to promote their products by drawing comparison with breastfeeding.

In this study, it was found that formula milk manufacturers commonly used social media platform as a means to advertise their products. An overseas study also showed that infant formula manufacturers used various social media tools to promote products, thereby creating communities among users, and making discussions about infant feeding. The social media based content examined had little to nil compliance to the International Code. Therefore, the impact of social media for marketing formula milk should not be underestimated.

Although there were only 7 TVCs of formula milk during the 28-day survey period, the frequency and the total air time of these TVCs was 37,994 times and 16,022.1 minutes (or 11.13 days) respectively, reflecting a very aggressive marketing strategy. According to the private advertising monitoring company used in this study, milk powder for infants and children had the fourth highest advertising spending in 2016. Although the television commercials did not specifically promote infant formula, the commercials often showed brief product shots of follow-up formula with very similar appearance to infant formula, which might give the impression that the advertisement promoted infant formula as well.

Although most items acknowledged that breastfeeding is best for infants, many did not mention other optimal infant and young child feeding practices such as sustaining breastfeeding and the importance of introducing complementary food from the age of 6



months.

WHO advised that boiled water cooled down to no less than 70°C water should be used to prepare formula milk for consumption by infants under 12 months of age. Only a few formula milk labels displayed this instruction. Instead, because a lower temperature could maintain the active cultures in the milk powder, some labels recommended a lower temperature to prepare the formula milk. This might pose a health risk to children because formula milk powder is not a sterile product.

Breastfeeding confers many health benefits to mothers and their babies. Mothers' decision to initiate and sustain breastfeeding depends on a variety of factors. Nonetheless, exposure to prevalent marketing practices of formula milk and formula milk related products does not foster a promotive and supportive breastfeeding community. According to the principles of the International Code and the subsequent relevant Health Assembly's resolutions, steps should be taken to ensure that there is no advertising, or any form of promotional activities to promote formula milk for children under 36 months and its related products. Manufacturers of formula milk and formula milk related products should be encouraged to follow these principles so as to create an environment that is conducive to breastfeeding.



1. Introduction

1.1. Background

The World Health Organization (WHO)'s International Code of Marketing of Breast-milk Substitutes (the International Code)¹ and its subsequent relevant Health Assembly's resolutions² aims to provide safe and adequate nutrition for infants through protecting, promoting and supporting breastfeeding, and to ensure the proper use of breastmilk substitutes on the basis of adequate and unbiased information and through appropriate marketing and distribution.

The Family Health Service (FHS) of the Department of Health (DH) commissioned Consumer Search Hong Kong Limited (CSG) to conduct a study on the marketing practices of formula milk and formula milk related products (namely, feeding bottles and teats for infants and young children) in Hong Kong (the Study) with a view to assessing the local marketing situation.

1.2. Study Objective

The objective of the Study was to systematically identify and analyse the information used for marketing and promoting formula milk and formula milk related products for infants and young children up to the age of 36 months to the general public, expectant parents and parents in Hong Kong.



2. Study Methodology

2.1. Study Design

2.1.1 The Study was an observational study.

2.2. Study Coverage

2.2.1. The Study covered information commonly adopted by the manufacturers of formula milk or formula milk related products for infants and young children up to the age of 36 months for dissemination to the general public and parents. It includes

- (a) information disseminated via media advertisements;
- (b) information presented as health education materials;
- (c) information attached to or appearing on the container of the products (product label information); and
- (d) product information.

Information presented in various format including but not limited to image, text or other representations were also studied.

2.2.2. The items of information studied came from 7 formula milk manufacturers (covering 10 brands) that represented over 90% of the respective advertising expenditure³ and 2 of the formula milk related product manufacturers in Hong Kong.

2.2.3. Product label information and information disseminated via media advertisements were captured over 28 continuous calendar days between 15 February and 13 March 2016.

2.2.4. Product information and information presented as health education materials included were those that were collected or appeared during a period of 60 continuous calendar days between 11 February and 10 April 2016.



2.3. Sources of Information

2.3.1. The following table details the sources of information:

Table 1 Source of information

Source	Description
Exhibitions	Exhibitions in relation to formula milk and/ or formula milk related products
Mass media	Television broadcasts: local free and major paid television stations covered by the private advertising monitoring company (see below) Radio broadcasts: local free and major paid radio stations covered by the private advertising monitoring company (see below) Out-of-home advertising media: advertisements displayed in public places (e.g. billboards, transit) covered by the private advertising monitoring company (see below) Printed media: magazines and newspapers covered by the private advertising monitoring company (see below)
Social media	Manufacturers' social media platforms and social media
Websites and applications	Manufacturers' official websites, mobile websites and applications; major local websites, and mobile websites and applications available for placing advertisements covered by the private advertising monitoring company (see below)
Point of sale	Purchase of actual products and collection of product information and/ or any other information from common retail outlets (e.g. supermarkets, personal stores)
Vicinity of healthcare facilities	Information provided to pregnant women/ mothers in the vicinity of healthcare facilities (e.g. private clinics)
Others	Emails: communications that manufacturers sent to members of mother's clubs Hotline enquiry services: information provided to members of mother's clubs/ general public through manufacturers' customer hotline enquiry service

2.3.2. The information disseminated via media advertisements was sourced from the database of a private advertising monitoring company, which covered the following:

Table 2 Coverage of the private advertising monitoring company

Source of information	Coverage
Magazines and newspapers	160 titles
Out-of-home advertising media	14 types
Television	71 channels
Radio	9 channels
Websites, mobile websites and applications	135 websites, mobile websites and applications



The detailed coverage of the private advertising monitoring company is available in Appendix 1.

The social media platforms and websites of manufacturers were not monitored by the private advertising monitoring company. Therefore, the relevant information was extracted from the social media platforms and websites directly.

2.4. Study Instrument and Areas of Analysis

2.4.1. Four checklists (Appendix 2) corresponding to the 4 categories of information were used for recording the findings.

2.4.2. The items in the checklists were designed with reference to the International Code, the subsequent relevant Health Assembly's resolutions and the local context.

2.4.3. The following were the areas of observation on each category:

(a) Information disseminated via media advertisements

(i) Frequency and duration (specifically for television commercials) of each item; and

(ii) Content of the advertisement:

1. Manufacturer's name;
2. Brand name;
3. Product name;
4. Target age range;
5. Theme of advertisement;
6. Common look and feel;
7. Marketing information (i.e. official website, customer service line and retailing location);
8. Presence of any product shot;
9. Any image, text or representation which may idealise the use of formula milk and formula milk related products;
10. Any term such as "maternalise", "humanise" or equivalent which suggests comparison with breastmilk;
11. Any image or text that encourages feeding by formula milk or discourages breastfeeding;
12. Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents;
13. Presence of promotional activities include but are not limited to
 - advertising;
 - using special displays;



- offering prizes or gifts such as samples of formula milk or formula milk related products to any person;
 - 14. 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;
 - 15. 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; and
 - 16. Key messages of the media advertisements.
- (b) Information presented as health education materials
- On matters related to breastfeeding or formula feeding,*
- (i) If the items prepared by DH are used, whether there is any alteration of the content;
 - (ii) Whether DH is acknowledged in the reproduced items as the source of the information;
 - (iii) Presence of marketing practices of formula milk/ formula milk related products in the vicinity of the items (e.g. appearance of promotional activities on the same webpage as the health education item on manufacturer's website);
 - (iv) Any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation;
 - (v) Any term such as "maternalise", "humanise" or equivalent which suggests comparison with breastmilk;
 - (vi) Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents;
 - (vii) Whether it is written in languages appropriate to target readership, e.g. Chinese and/ or English;
 - (viii) Any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding;
 - (ix) Any image, text or other representation that suggests that the product is nearly equivalent or superior to breastmilk; and
 - (x) Clearly and conspicuously explains 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 items made:



where the items are about breastfeeding –

- the benefits and superiority of breastfeeding;
- the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond;
- how to initiate and maintain exclusive and sustained breastfeeding;
- why it is difficult to reverse a decision not to breastfeed;
- the importance of introducing complementary food from the age of 6 months onwards;
- how and why any introduction of bottle feeding or early introduction of complementary food negatively affects breastfeeding;

where the items are on feeding by formula milk or the use of a feeding bottle –

- the benefits and superiority of breastfeeding;
- the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond;
- why it is difficult to reverse a decision not to breastfeed;
- instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils;
- the health risks of feeding by formula milk, feeding by using a feeding bottle and teat and improper preparation of feeding bottle and teat;
- 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;
- that formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded; and
- the financial implication of feeding an infant with formula milk.

On matters other than breastfeeding and formula feeding

- (i) Presence of marketing practices in the vicinity of the items (e.g. appearance of promotional activities on the same webpage as the health education item on manufacturer's website)
- (ii) Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents; and
- (iii) Whether written in languages appropriate to target readership, e.g. Chinese and/ or English.



(c) Product label Information

On formula milk

- (i) Any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation;
 - Any terms such as “maternalise”, “humanise” or equivalent which makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk;
 - Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents;
 - Any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding;
- (ii) Presence of indication in a clear, conspicuous and legible manner the following particulars –
 - instructions for appropriate preparation and use in words and/ or in easily understood graphics;
 - the age for which the product is recommended in Arabic numerals;
 - a warning about the health risks of improper preparation and of introducing the product prior to the recommended age;
 - the required storage conditions both before and after opening of the product, taking into account climatic conditions;
 - the 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;
 - the weight of milk powder in 1 level scoop;
- (iii) Presence of the word “IMPORTANT NOTICE” in capital letters and indicates thereunder the statement “Breastfeeding is the normal means of feeding infants and young children. Breastmilk is the natural food for their healthy growth and development. Use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infants” or equivalent;
- (iv) Contains the word “Warning” and indicates thereunder the following statements –



- in the case of infant formula: “Before deciding to supplement or replace breastfeeding with this product, seek the advice of a health professional as to the necessity of its use. It is important for your baby’s health that you follow all preparation instructions carefully. If you use a feeding bottle before the establishment of breastfeeding, your baby may refuse to feed from the breast.” or equivalent.
 - in the case of follow-up formula: “Before deciding to supplement or replace breastfeeding with this product, seek the advice of a health professional as to the necessity of its use. It is important for your baby’s health that you follow all preparation instructions carefully.” or equivalent;
- (v) Presence of the instructions for preparation of powdered formula milk in accordance with the WHO: “Powdered formula milk is not a sterile product and may become contaminated during preparation”; “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 12 months of age”; and “Discard any feed that has not been consumed more than 2 hours after reconstitution”;⁴
- (vi) Presence of a feeding chart in the preparation instructions;
- (vii) Presence of the source of protein contained in the formula milk;
- (viii) Presence of 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.; and
- (ix) Presence of a legible label which follows the recommendations stipulated in the “Trade Guidelines on Preparation of Legible Food Label” published by the Centre for Food Safety.

On formula milk related product

- (i) Any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation;
- (ii) Any terms such as “maternalise”, “humanise” or equivalent which makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk;
- (iii) Any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding;



- (iv) Presence of the word “IMPORTANT NOTICE” in capital letters and indicates thereunder the statement “Breastfeeding is the normal means of feeding infants and young children. Breastmilk is the natural food for their healthy growth and development. Use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infants” or equivalent;
 - (v) Presence of the statement “Warning: It is important for your baby’s health that you follow the cleaning and sterilisation instructions very carefully. If you use a feeding bottle before the establishment of breastfeeding, your baby may no longer want to feed from the breast” or equivalent;
 - (vi) Presence of the instructions for cleaning and sterilisation in words and graphics;
 - (vii) Presence of a warning that infants should not be left alone to feed on bottle because of the risk of choking and children should not be fed for long period of time because extended contact with sweetened liquids, including formula milk, may cause severe tooth decay; and
 - (viii) Presence of the name and address of the manufacturer or distributor.
- (d) Product information
- (i) Any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation;
 - (ii) Any term such as “maternalise”, “humanise” or equivalent which suggests comparison with breastmilk;
 - (iii) Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents;
 - (iv) Whether written in languages appropriate to target readership, e.g. Chinese and/ or English;
 - (v) Any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding;
 - (vi) Any image, text or other representation that makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk; and
 - (vii) Clearly and conspicuously explains 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 informational and educational materials made:



where the items are about breastfeeding –

- the benefits and superiority of breastfeeding;
- the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond;
- how to initiate and maintain exclusive and sustained breastfeeding;
- why it is difficult to reverse a decision not to breastfeed;
- the importance of introducing complementary food from the age of 6 months onwards;
- how and why any introduction of bottle feeding or early introduction of complementary food negatively affects breastfeeding;

where the items are on feeding by formula milk or the use of a feeding bottle –

- the benefits and superiority of breastfeeding;
- the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond;
- why it is difficult to reverse a decision not to breastfeed;
- instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils;
- the health risks of feeding by formula milk, feeding by using a feeding bottle and teat and improper preparation of feeding bottle and teat;
- 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;
- that formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded; and
- the financial implication of feeding an infant with formula milk.

2.5. Pilot Study

2.5.1. A pilot study was conducted prior to the main actual fieldwork to test the design of the checklists and the logistics of the fieldwork execution.

2.5.2. The pilot study was carried out between 13 and 20 November 2015. A total of 10 items were analysed based on the checklists for each category of information:



Table 3 Items analysed in the pilot study

Category	Product	Number of items analysed
Product information	Formula milk	1
	Formula milk related product	1
Product label	Formula milk	1
	Formula milk related product	1
Health education materials	Formula milk	2
Media advertisements	Formula milk	3
	Formula milk related product	1
Total		10

2.5.3. Based on the results of the pilot study, adjustments to the content of the checklists were made before conducting the main actual fieldwork. Several items were added (e.g. “duration of the television commercials” and “the website visited and the accessed date”) to the checklists.

2.5.4. The observations made in the pilot study were counted as part of the main study if the items were still available during the main fieldwork period.

2.6. Number of Items Collected

2.6.1. The number of items collected was 410 with the following breakdown by category and source of information:

Table 4 Number of items by category

Category	Number of items
Media advertisements	161
Health education materials	122
Product label	77
Product information	50
Total	410



Table 5 Number of items by source of information

Source of information	Number of items
Manufacturers' websites	157
Manufacturers' social media	81
Point of sale	79
Websites	24
Exhibitions	17
Magazines	12
Vicinity of healthcare facilities	10
Television broadcasts	7
Newspapers	8
Mobile websites and applications	6
Hotline enquiry services	4
Emails	3
Out-of-home advertising media	2
Total	410

2.7. Fieldwork Details

2.7.1. Deployment and Training of Staff

- (a) The project team consisted of 1 Project Manager, 1 Research Manager, 2 Supervisors and 4 Observers.
- (b) The Project Manager oversaw the implementation of the Study and ensured that the Study was carried out with high quality. The Research Manager conducted briefing to the team to ensure they had a thorough understanding of the Study.
- (c) The Supervisors provided training and coaching to the Observers.
- (d) Debriefing was conducted by the Research Manager with the Supervisors and Observers after completion of their first observations.

2.7.2. Fieldwork Procedures

- (a) The fieldwork was carried out between 15 February and 17 June 2016 and the data collection period was between 11 February and 10 April 2016 (para. 2.2.3 and 2.2.4).
- (b) There were 2 Observers and 1 Supervisor deployed for closely examining each item based on the checklists of criteria stated in para. 2.4.3.



- (c) Each Observer recorded the findings on a checklist independently and the Supervisor checked the 2 completed checklists. If there was any discrepancy in the observations between the 2 Observers, the Supervisors examined the item directly and made the final judgement.
- (d) The length of observation ranged from 20 to 90 minutes for each item.

2.7.3. Quality Control

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 6 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 0.82 was observed in the Study, hence suggesting that the level of agreement between the Observers was very good.

2.7.4. Data Management and Data Analysis

All items of information collected in the study were coded and the datasets were validated.



3. Study Findings – Media Advertisements

There were a total of 161 media advertisements examined, with 160 on formula milk and 1 on formula milk related products. Ten brands of formula milk and 1 brand of formula milk related products had media advertisements during the study period. Around half (81 items, 50.3%) of the media advertisements came from social media, followed by print media (40 items, 24.8%).

Table 7 Number of items by type of media advertisement

Type of media advertisement	Number of items
Social media	81
Print media	40
Website, mobile apps and email	31
Television broadcast	7
Out-of-home advertising	2
Total	161

3.1. Formula Milk

It appeared to be a common practice for manufacturers to promote their products through various representations, health benefit statements and nutritional value statements. Some items contained sales inducement devices, seeking of personal details of the infants and their parents and/ or inviting the parents to participate in relevant activities.

3.1.1. Target age range

There was no indication on the target age range in more than half (85 items, 53.1%) of the items. For these items, it was the brand of the formula milk which was being advertised rather than a specific infant or follow-up formula. The target age ranges of the products advertised for the remaining items were for children aged 6 – 36 months (72 items, 45.0%) and children aged 1 – 10 years (3 items, 1.9%). No item specifically targeted at children aged below 6 months. (Table 8)

Table 8 Number of items for formula milk by target age range (single answer)

Target age range	Percentage	Count
0 – 6 months	-	0
6 – 36 months	45.0%	72
1 – 10 years	1.9%	3
Unspecified	53.1%	85
Total	100.0%	160

Base: Number of items for formula milk (160)



3.1.2. “Any image, text or representation which may idealise the use of formula milk and formula milk related products”

Out of the 160 items, 107 items (66.9%) had images, texts or representations that might idealise the use of their product. The themes of the representations are shown in Table 9. More than half of the items (67 items, 62.6%) were about the health benefits to the child if the product was consumed. (Table 9)

Table 9 Theme of representations (multiple answers)

Theme of other representations	Percentage	Count
Child health benefits	62.6%	67
Superior nutritional quality	34.6%	37
Parent-child bonding	26.2%	28
Imagery of happy child	20.6%	22
Use of cartoon characters	17.8%	19
Imported product	15.9%	17
Quality assurance	12.1%	13
Celebrity endorsement	6.5%	7
Healthcare professional endorsement	1.9%	2
That the brand will accompany a mother silently throughout the motherhood	0.9%	1
That the brand is an expert in child nutrition	0.9%	1

Base: Number of items for formula milk with presence of representations (107)

3.1.3. “Any term such as ‘maternalise’, ‘humanise’ or equivalent which suggests comparison with breastmilk”

“Maternalise”, “Humanise”

None of the items contained the terms “maternalise” or “humanise”.

Other similar terms

Six items (3.1%) were found to contain a similar term that suggested comparison with breastmilk. Such a term suggested that the composition of the formula milk of a particular brand was human-friendly.

3.1.4. “Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents”

Health benefit statements

There were 36 items (22.5%) that had the presence of such representations.

Most of the health benefit statements were about supporting the digestive system and promoting gut health (25 items, 69.4%). Other health benefit statements included supporting general growth and development (9 items, 25.0%), supporting immune system (7 items, 19.4%), preventing allergy (6 items, 16.7%), supporting brain (4 items, 11.1%) and vision (1 item, 2.8%) development, and reducing addiction to sugar (1 item, 2.8%). (Table 10)



Table 10 Number of items by theme of health benefit statement (multiple answers)

Theme of health benefit statement	Percentage	Count
Supports digestive system and gut health	69.4%	25
Supports general growth and development	25.0%	9
Supports immune system	19.4%	7
Prevents allergy	16.7%	6
Supports brain development	11.1%	4
Supports vision development	2.8%	1
Reduces addiction to sugar	2.8%	1

Base: Number of items for formula milk with presence of health benefit statement (36)

Nutritional value statements

There were 9 (5.6%) items which contained statements about the nutritional value or quality of their products, such as “contains no added cane sugar”, “contains protein of superior quality” and “contains nutrients of superior quality”. (Table 11)

Table 11 Number of items by theme of nutritional value statement (multiple answers)

Theme of nutritional value statement	Percentage	Count
Contains no added cane sugar	55.6%	5
Contains protein of superior quality	33.3%	3
Contains nutrient of superior quality	22.2%	2

Base: Number of items for formula milk with presence of nutritional value statement (9)

3.1.5. *“Any image or text that encourages feeding by formula milk or discourages breastfeeding”*

There were 16 (10.0%) items that contained such images or texts.

Among the items with images or texts that encouraged feeding by formula milk or discouraged breastfeeding, most (10 items, 62.5%) had images or texts that highlighted the ease of ordering and the efficiency of the delivery service. The remaining items were about improvement in the composition of the formula milk (2 items, 12.5%) or highlighted the easy preparation of the formula milk (1 item, 6.3%). (Table 12)

Table 12 Number of items by theme of image or text that encourages feeding by formula milk or discourage breastfeeding (multiple answers)

Theme of image or text that encourages feeding by formula milk or discourage breastfeeding	Percentage	Count
Highlights the ease of ordering and the efficiency of the delivery service	62.5%	10
Highlights improvement in the composition of formula milk	12.5%	2
Highlights the easy preparation of formula milk	6.3%	1
Others	25.0%	4

Base: Number of items for formula milk with presence of the image or text that encourages feeding by formula milk or discourage breastfeeding (16)



3.1.6. *“Presence of using special displays or offering prizes or gifts such as samples of formula milk or formula milk related products to any person”*

There were 33 items (20.6%) with such a presence. (Table 13)

Table 13 Number of items by type (multiple answers)

Type	Percentage	Count
Gifts	45.5%	15
Free samples	24.2%	8
Prizes	18.2%	6
Discounts	12.1%	4
Premium	3.0%	1
Product redemption	3.0%	1

Base: Number of items with such a presence (33)

3.1.7. *“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 its designated products”*

There were 39 items (24.4%) shown to seek personal details of the infants or their parents. The purposes of seeking personal details are listed in Table 14.

Table 14 Purpose of seeking personal details (multiple answers)

Purpose of seeking personal details	Percentage	Count
Registration for mother’s clubs or other activities	74.4%	29
Registration for free samples	10.3%	4
Registration for delivery services	7.7%	3
Registration for gifts or prizes	5.1%	2
Registration for hotline service	2.6%	1

Base: Number of items for formula milk with presence of seeking directly or indirectly personal details (39)

3.1.8. *“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 its designated products”*

There were 33 items (20.6%) that contained information about inviting participation in exhibitions on baby products, relevant activities (e.g. lucky draws, photo-sharing activities) or antenatal seminars. (Table 15)

Table 15 Number of items by theme of inviting participation in relevant activities (multiple answers)

Theme of inviting participation in relevant activities	Percentage	Count
Inviting participation in exhibitions on baby products	48.5%	16
Inviting participation in relevant activities (e.g. lucky draws, photo-sharing activities)	36.4%	12
Inviting participation in antenatal seminars	15.2%	5

Base: Number of items for formula milk with presence of inviting participation in relevant activities (33)



3.1.9. “Key messages of the media advertisements”

Out of the 160 items covered in the Study, the major key messages observed were promotion of or invitation to participate in relevant activities (e.g. exhibitions, photo-sharing activities) (48 items, 30.0%) and implying that there would be improvement in child health if the product was consumed (31 items, 19.4%). (Table 16)

Table 16 Number of items by key message (single answer)

Key messages	Percentage	Count
Promotion of or invitation to participate in relevant activities (e.g. exhibitions, photo-sharing activities)	30.0%	48
Improvement in child health if the product is consumed	19.4%	31
Expert advice (e.g. advice on diet)	10.0%	16
Quality assurances	8.1%	13
Promotional offers	5.6%	9
Imported goods	4.4%	7
Promotion of delivery services	3.8%	6
Antenatal classes/ seminars	3.1%	5
Recommended recipes	2.5%	4
Sending season’s greetings	1.9%	3
Promotion of new products	1.9%	3
General brand promotions	1.9%	3
Benefits of breastfeeding	1.3%	2
Others	6.3%	10
Total	100.0%	160

Base: Number of items for formula milk (160)

3.1.10. Items in video format

Out of the 160 items for formula milk, 26 (16.3%) were in video format. There were 14 online items, while 7 (7 brands) and 3 (2 brands) items were television commercials (TVCs) and appeared in social media respectively. There was 1 item that was out of home advertisement and 1 item that was received by email from a manufacturer after having joined its mother’s club.

Although only 7 TVCs related to formula milk were found, they were frequently broadcasted with a total broadcasting frequency of 37,994 times, equivalent to 16,022.1 minutes (or 11.13 days) over the 28-day period. (Table 17)



Table 17 Target age range and total durations of broadcast by each television commercial over the 28-day period

Television commercial	Target Age Range	Number of times broadcasted (spots)	Total duration of broadcast (minutes)
Television commercial A	Children aged 1-3 years	13,777	4,592.3
Television commercial B	Children aged 1-3 years	8,602	4,301.0
Television commercial C	Children aged 6-36 months	4,640	2,320.0
Television commercial D	Children aged 6-36 months	4,148	2,074.0
Television commercial E	Children aged 1-10 years	3,365	1,682.5
Television commercial F	Children aged 1-3 years	2,715	678.8
Television commercial G	Children aged 1-3 years	747	373.5

(a) *Common look and feel*

Although the TVCs did not specifically promote formula milk for babies below 6 months, they often showed brief product shots of follow-up formula milk with very similar packaging to infant formula milk. Five TVCs conveyed imageries of happy, clever and healthy child or children, and a happy family. The other two highlighted the nutritional quality of their products.

(b) *Theme of advertisement*

Half of the items highlighted a better development in children (13 items, 50.0%), followed by the superior nutritional quality of the products (7 items, 26.9%) and the image of happy child or children (4 items, 15.4%). One item (3.8%) was about parent-child bonding. (Table 18)

Table 18 Theme of items in video format (multiple answers)

Theme	Percentage	Count
Better development in children	50.0%	13
Superior nutritional quality of product	26.9%	7
Imagery of happy child or children	15.4%	4
Parent-child bonding	3.8%	1

Base: Number of items for formula milk in video format (26)

(c) *Duration of the advertisements*

Most of the items (17 items, 65.4%) had a duration of 16 - 30 seconds, followed by those with a duration of 1 – 15 seconds (5 items, 19.2%), 31 – 60 seconds (2 items, 7.7%) and over 60 seconds (2 items, 7.7%).

3.2. Formula Milk Related Products

Only 1 out of 161 media advertisements was about formula milk related products. The item was in print media.



3.2.1. *Target age range*

The item promoted products that targeted at children from birth.

3.2.2. *“Any image, text or representation which may idealise the use of formula milk and formula milk related products”*

The item showed product shots. It also displayed 2 representations: one representation was about a happy child that might idealise the use of formula milk related products, while the other was about the assurance of the product quality.

3.2.3. *“Any term such as ‘maternalise’, ‘humanise’ or equivalent which suggests comparison with breastmilk”*

The item did not contain such a term.

3.2.4. *“Any image or text that encourages feeding by formula milk or discourages breastfeeding”*

The item did not give the impression of encouraging feeding by formula milk or discouraging breastfeeding.

3.2.5. *“Presence of using special displays or offering prizes or gifts such as samples of formula milk or formula milk related products to any person”*

The item did not have such a presence.

3.2.6. *“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 its designated products”*

The item did not seek personal details of children or their parents or expectant parents.

3.2.7. *“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 its designated products”*

The item did not invite children or their parents or expectant parents to participate in relevant activities.

3.2.8. *“Key messages of the media advertisements”*

The item emphasised that the use of the product would prevent bloating, tummy pain and ear infections.



4. Study Findings – Health Education Materials

Information presented as health education materials were commonly found on manufacturer’s websites in text and video format. A total of 122 items were examined in the Study, with 58 relevant to breastfeeding or formula milk feeding, and 64 were about other matters. These items were issued by 9 different formula milk brands.

4.1. Items Relevant to Breastfeeding or Formula Milk Feeding

Although most of the items included explanations of the benefits and superiority of breastfeeding, other relevant statements (e.g. sustained breastfeeding, complementary food, risk of bottle feeding) were less prevalent.

4.1.1. Type of educational information item

Of the 58 items relevant to breastfeeding or formula milk feeding, most of them contained information on breastfeeding (45 items, 77.6%), followed by formula milk feeding (27 items, 46.6%). Some also mentioned children’s growth and development (7 items, 12.1%), weaning (4 items, 6.9%), health and illnesses (2 items, 3.4%), and other topic (1 item, 1.7%). (Table 19)

Table 19 Number of health educational information items (multiple answers)

Type of items	Percentage	Count
Breastfeeding	77.6%	45
Formula milk feeding	46.6%	27
Children’s growth and development	12.1%	7
Weaning	6.9%	4
Health and illnesses	3.4%	2
Others	1.7%	1

Base: Number of health educational information items relevant to breastfeeding or formula milk feeding (58)

4.1.2. “Presence of marketing practices of formula milk/ formula milk related products in the vicinity of the items (e.g. appearance of promotional activities on the same webpage as the health education item on manufacturer’s website)”

All of the items contained product promotional activities (e.g. appearance of products or relevant promotional activities on the same webpage as the health education item on manufacturer’s website).



4.1.3. *“Any image, text or representation which may idealise the use of formula milk and formula milk related products”*

Ten items (17.2%) contained images, texts or representations that might idealise the use of formula milk such as the use of animated characters (5 items), highlighting child health benefits (5 items), emphasis on the quality of the product (2 items) and parent-child bonding (2 items).

4.1.4. *“Any health benefit statement and nutritional value statement regarding the product or its ingredients or constituents”*

Health benefit statements

Four items (6.9%) were found to contain health benefit statements. The 4 different health benefit statements were about the following:

- Better digestion and reduction of stomach discomfort;
- Better brain development;
- Better digestion and guts health; and
- Strengthening of immunity.

Nutritional value statements

Two items (3.4%) were found to contain nutritional value statements. Both statements were about the superior nutritional quality of the product.

4.1.5. *“Any term such as ‘maternalise’, ‘humanise’ or equivalent which suggests comparison with breastmilk”*

“Maternalise”, “Humanise”

None of the items contained the term “maternalise” or “humanise”.

Other similar terms

There were 3 items (5.2%) that carried similar terms suggesting a comparison with breastmilk.

- One item stated that the digestive process of that particular brand’s formula milk was similar to breastmilk.
- There were 2 items advising consumers to choose a formula milk’s brand based on the nutrition and ingredients contained in breastmilk.



4.1.6. *“Any image, text or representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding”*

There were 9 items (15.5%) that contained such images or texts.

- Three items stated that formula milk could help to promote children’s health (e.g. infant’s healthy development required balanced diet; infant formula milk could be treated as a part of balanced diet);
- Two items mentioned that the brand of formula milk was comparable to breastmilk;
- One item mentioned that some exclusively breastfed babies might suffer from newborn jaundice for a longer time, which might discourage breastfeeding;
- One item mentioned that although breastmilk was the ideal food for babies, if mothers were not able to breastfeed, or when complementary food was introduced, experts recommended that babies should be fed with formula milk added with iron;
- One item mentioned that mothers could consider formula milk feeding if they were deemed to be unsuitable for breastfeeding by the healthcare professionals; and
- One item mentioned that the iron-rich formula milk was a good alternative to breastmilk.

4.1.7. *“Any image, text or other representation that suggests that the product is nearly equivalent or superior to breastmilk”*

There were 6 items (10.3%) that suggested that the product was nearly equivalent or superior to breastmilk. For example,

- One item mentioned that all formula milk products used breastmilk as a blueprint for developing their formulae, with essentially the same nutritional values; and
- One item explained and compared the infant’s stool when using breast milk and formula milk, which might seem to imply that formula milk was comparable to breastmilk.



4.1.8. *“Whether it is written in languages appropriate to target readership, e.g. Chinese and/ or English”*

All items were presented in either Chinese and/ or English and were therefore appropriate to the target readership.

4.1.9. *“Presence of explanation to clearly and conspicuously explain the benefits and superiority of breastfeeding”*

The majority of the items (53 items, 91.4%) contained such explanation.

4.1.10. *“Presence of explanation to clearly and conspicuously explain the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond”*

Only 13 items (22.4%) clearly and conspicuously explained the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond.

4.1.11. *“Presence of explanation to clearly and conspicuously explain how to initiate and maintain exclusive and sustained breastfeeding”*

Only 12 (20.7%) items contained such explanation.

4.1.12. *“Presence of explanation to clearly and conspicuously explain why it is difficult to reverse a decision not to breastfeed”*

There were 24 (41.4%) items that contained such explanation.

4.1.13. *“Presence of explanation to clearly and conspicuously explain the importance of introducing complementary food from the age of 6 months onwards”*

Only 5 (8.6%) items contained such explanation.

4.1.14. *“Presence of explanation to clearly and conspicuously explain how and why any introduction of bottle feeding or early introduction of complementary food negatively affects breastfeeding”*

Only 3 (5.2%) items contained such explanation.

4.1.15. *“Presence of explanation to explain clearly and conspicuously the instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils”*

Among the 27 items that contained information about formula milk feeding, only 2 (7.4%) contained such explanation.



4.1.16. *“Presence of explanation to explain clearly and conspicuously the health risks of feeding by formula milk, feeding by using a feeding bottle and teat and improper preparation of feeding bottle and teat”*

Among the 27 items that contained information about formula milk feeding, there were 12 (44.4%) items that contained explanation about the health risks of improper preparation of feeding bottle and teat. One item also mentioned the health risk of formula milk feeding.

4.1.17. *“Presence of explanation to explain clearly and conspicuously that powdered formula milk is not a sterile product”*

None of the 27 items that contained information about formula milk feeding, explained that powdered formula milk was not a sterile product.

4.1.18. *“Presence of explanation to explain clearly and conspicuously 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”*

Among the 27 items that contained information about formula milk feeding, none of the items contained such explanation. One item mentioned that formula milk for consumption by infants under 12 months old should be prepared using boiled water, but the temperature of the boiled water should be no less than 40°C.

4.1.19. *“Presence of explanation to explain clearly and conspicuously that formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded”*

Among the 27 items that contained information about formula milk feeding, none of the items explained about this issue.

4.1.20. *“Presence of explanation to explain clearly and conspicuously the financial implication of feeding an infant with formula milk”*

Among the 27 items that contained information about formula milk feeding, 13 items (48.1%) explained clearly and conspicuously the financial implication of feeding an infant with formula milk.

4.1.21. *“Whether DH is acknowledged in the reproduced items as the source of the information”*

The majority of the items (55 items, 94.8%) did not acknowledge DH in the reproduced items as the source of information. Only 3 items (5.2%) were observed to have such acknowledgement.



Some of the items, however, acknowledged other parties as the source of information, including the medical professionals (11 items, 64.7%), midwives (3 items, 17.6%) and other sources of reference (3 items, 17.6%).

4.1.22. “If the items prepared by DH are used, whether there is any alteration of content”

The items that acknowledged DH as the source of information was not found to have any alteration of content. Nevertheless, 2 items incorrectly acknowledged another DH service instead of FHS as the source.

4.2. Items Relevant to Matters Other than Breastfeeding or Formula Milk Feeding

There were a total of 64 items concerning matters other than breastfeeding or formula milk feeding.

4.2.1. Type of items

There were 24 items (37.5%) that were about weaning. Others covered children’s growth and development (20 items, 31.3%), tips for taking care of children (13 items, 20.3%) and health and illnesses (7 items, 10.9%).

4.2.2. “Presence of marketing practices in the vicinity of the items (e.g. appearance of promotional activities on the same webpage as the health education item on manufacturer’s website)”

All of the items displayed marketing practices of formula milk.

4.2.3. “Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents”

None of the items contained such a statement.

4.2.4. “Whether written in languages appropriate to target readership, e.g. Chinese and/ or English”

All items were presented in either Chinese and/ or English and appropriate to the target readership.



5. Study Findings – Product Label

There were a total of 77 product labels examined in the Study, with 61 on formula milk and 16 on formula milk related products. Among 61 labels of formula milk, 24 came from infant formula, while 37 came from follow-up formula.

5.1. Formula Milk

It was common to display various representations, health benefit statements (mainly on supporting development of brain and digestive system) and nutritional value statements (mainly on nutritional quality) on the product label.

The instructions on preparation, warnings and displays regarding bottle feeding were available legibly, despite some missing elements.

5.1.1. “Any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation”

All product labels contained images, texts or representations which might idealise the use of their products. Such representations included emphasis on the child health benefits and on the product quality or that the product was trusted or recommended by many mothers. There were also representations of cartoon characters and parent-child bonding. (Table 20)

Table 20 Theme of the representations (multiple answers)

Theme of other representations	Percentage	Count
Child health benefits	100.0%	61
Product quality/ that the product was trusted or recommended by many mothers	75.4%	46
Use of cartoon characters	47.5%	29
Parent-child bonding	4.9%	10
Imagery of happy baby	4.9%	3
That the product is tailor-made for local babies	4.9%	3
Others	9.8%	6

Base: Number of product labels for formula milk with presence of representations (61)

5.1.2. “Any health benefit statement or nutritional value statement regarding the product or its ingredient or constituents”

Health benefit statements

All product labels contained 1 or more health benefit statements. The top 3 were about supporting the brain development (46 labels, 75.4%), supporting the digestive system and the gut health (43 labels, 70.5%) and supporting the immune system (39 labels, 63.9%). (Table 21)



Table 21 Theme of health benefit statement (multiple answers)

Theme of health benefit statement	Percentage	Count
Supports brain development	75.4%	46
Supports digestive system and gut health	70.5%	43
Supports immune system	63.9%	39
Supports eye and vision development	45.9%	28
Supports general growth and development	39.3%	24
Supports bone development	13.1%	8
Supports cognitive development/ learning	9.8%	6
Supports emotional/ social/ communications skill development	8.2%	5
Supports body coordination skills	8.2%	5
Prevents allergy	6.6%	4
Others	13.1%	8

Base: Number of product labels for formula milk with presence of health benefit statement (61)

Nutritional value statements

About one-third of the labels (20 labels, 32.8%) contained nutritional value statements such as the product having a superior nutritional value or quality. For instance, some products highlighted that they had a higher level of docosahexaenoic acid (DHA) or vitamins when compared with their previous formula milk products.

- 5.1.3. *“Any term such as ‘maternalise’, ‘humanise’ or equivalent which makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk”*

“Maternalise” and “Humanise”

None of the labels used the term “maternalise” or “humanise”.

Other similar terms

There were 3 labels (4.9%, 1 brand) that were found to contain similar terms that suggested a comparison with breastmilk. These labels claimed that their products contained a body-friendly ingredient with structure that was similar to breastmilk.

- 5.1.4. *“Any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding”*

There were 2 labels (3.3%, 1 brand) that had texts which tended to discourage breastfeeding.

- 5.1.5. *“Presence of instructions for appropriate preparation and use in words and/ or in easily understood graphics”*

Nearly all the labels (60 labels, 98.4%) gave instructions for appropriate preparation in words and/ or in easily understood graphics.



5.1.6. *“Presence of the age for which the product is recommended in Arabic numerals”*

The great majority of the labels (58 labels, 95.1%) provided the age for which the product was recommended in Arabic numerals.

5.1.7. *“Presence of a warning about the health risks of improper preparation and of introducing the product prior to the recommended age”*

Most of the labels (51 labels, 83.6%) gave a warning about the health risks of improper preparation and of introducing the product prior to the recommended age.

Only 1 label mentioned the health risks of introducing the product prior to the recommended age but not the health risk of improper preparation.

5.1.8. *“Presence of the required storage conditions both before and after opening of the product, taking into account climatic conditions”*

All labels provided the required storage conditions both before and after opening of the product taking into account climatic conditions.

5.1.9. *“Presence of batch number, date of manufacture and date before which the product is to be consumed, taking into account climatic and storage conditions”*

All labels showed the batch number, date of manufacture and date before which the product was to be consumed taking into account climatic and storage conditions.

5.1.10. *“Presence of the name and address of the manufacturer or distributor”*

All labels showed the names and addresses of the manufacturers or distributors.

5.1.11. *“Presence of the weight of milk powder in 1 level scoop”*

Among the 59 labels of powdered formula milk, the majority (56 labels, 94.9%) of the labels showed the weight of milk powder in 1 level scoop.

5.1.12. *“Presence of the word ‘IMPORTANT NOTICE’ in capital letters before 5.1.13 to 5.1.15”*

Less than half of the labels (28 labels, 45.9%) showed the words “IMPORTANT NOTICE” in capital letters.

5.1.13. *“Presence of the statement ‘breastfeeding is the normal means of feeding infants and young children’ or equivalent”*

Around three quarters of the labels (46 labels, 75.4%) contained the above statement or equivalent.

All the infant formula labels contained such a statement, compared with only 22 (59.5%) labels of follow-up formula.



5.1.14. *“Presence of the statement ‘breastmilk is the natural food for their healthy growth and development’ or equivalent”*

Around three-quarters of the labels (45 labels, 73.8%) contained the above statement or equivalent.

All the infant formula labels contained such a statement, compared with only 21 (56.8%) labels of follow-up formula.

5.1.15. *“Presence of the statement ‘use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infants’ or equivalent”*

None of the labels contained the above statement or equivalent.

5.1.16. *“Presence of the word ‘Warning’ before indicating the statements in Items 5.1.17, 5.1.18 and 5.1.19”*

There were 37 (60.7%) labels which contained the word “Warning”.

5.1.17. *“Presence of the statement ‘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”*

There were 41 labels (67.2%) that contained such a statement or equivalent.

All the infant formula labels contained such a statement, compared with only 17 (45.9%) labels of follow-up formula.

5.1.18. *“Presence of the statement ‘it is important for your baby’s health that you follow all preparation instructions carefully’ or equivalent”*

There were 48 labels (78.7%) that contained such a statement or equivalent.

5.1.19. *“Presence of the statement ‘if you use a feeding bottle before the establishment of breastfeeding, your baby may refuse to feed from the breast’ or equivalent (only for infant formula)”*

Among the 24 labels for infant formula, only 4 labels (16.7%) contained such a statement or equivalent.

5.1.20. *“Presence of the instructions for preparation of powdered formula milk in accordance with WHO: ‘powdered formula milk is not a sterile product’ or equivalent”*

Among the 59 labels of powdered formula milk, only 12 labels (20.3%) contained such a statement or equivalent.



5.1.21. *“Presence of the instructions for preparation of powdered formula milk in accordance with the International Code: ‘powdered formula milk may become contaminated during preparation’ or equivalent”*

None of the labels contained such a statement or equivalent.

5.1.22. *“Presence of the instructions for preparation of powdered formula milk in accordance with the International Code: ‘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 12 months of age’ or equivalent”*

Among the 39 labels of powdered formula milk targeted at infants under 12 months of age, only two-thirds of the labels (26 labels, 66.7%) mentioned using boiled water to prepare formula milk, amongst which just 7 labels mentioned using boiled water allowed to cool down to no less than 70°C in the preparation. Another 15 labels (57.7%) mentioned the required temperatures to be other than 70°C (e.g. 40°C). There were 4 labels (15.4%) that did not mention at all the required temperature for preparing formula milk.

5.1.23. *“Presence of the instructions for preparation of powdered formula milk in accordance with WHO: ‘discard any feed that has not been consumed more than 2 hours after reconstitution’ or equivalent”*

Among the 59 labels of powdered formula milk, nearly all the labels (56 labels, 94.9%) contained such a statement or equivalent under the instructions for preparation of powdered formula milk.

There was 1 label which stated that any feed should be discarded 4 hours after reconstitution.

5.1.24. *“Presence of a feeding chart in the preparation instructions”*

Almost all labels (59 labels, 96.7%) provided a feeding chart in the preparation instructions.

5.1.25. *“Presence of source of protein contained in the formula milk”*

More than half (40 labels, 65.6%) of the labels did not state the source of protein contained in the formula milk.

Among the 21 labels that stated the source, the main source was milk (18 labels, 85.7%), followed by soy (3 labels, 14.3%).



5.1.26. *“Presence of the information that infants should receive complementary food in addition to formula milk from an age, as advised by an independent health worker, that is appropriate for their specific growth and development needs, and in any case from the age over 6 months”*

Of the 23 product labels (37.7%) that contained such information, there were 3 labels that did not mention the required age of over 6 months.

5.2. Formula Milk Related Products

It was common to find various representations and functions of the products on the product labels of formula milk related products. The use of the term "maternalise" was quite common, and some of the products even discouraged breastfeeding by including the disadvantages of breastfeeding.

Contrary to the items related to formula milk, most of the necessary instructions and warnings regarding breastfeeding and bottle feeding were not available in words and graphics, except for the instructions for cleaning and sterilisation.

5.2.1. *“Any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation”*

Most (14 labels, 87.5%, 2 brands) labels contained images, texts or other representations which might idealise the use of their products. (Table 22)

Such representations were mainly about the following:

- functions/ quality of the products (11 labels, 78.6%, 2 brands): for example, 1 label claimed that its teat satisfied baby’s suckling desire and stimulated saliva secretion, thereby helping better digestion and healthy development of jaw muscles, and some labels (3 labels, 21.4%, 1 brand) claimed that the design of the bottle might help to prevent ear infection or stomach discomfort;
- comparison with breastfeeding (9 labels, 64.3%, 1 brand): this representation compared the teat with breastfeeding on the nipple by stating that the teat enabled the baby to mimic the natural suckling pattern, or to mimic the baby’s latch-on to the breast; and
- the products were dedicated to the benefits of breastmilk (3 labels, 21.4%, 1 brand), which might idealise the use of formula milk related products.



Table 22 Number of product labels by theme of representations (multiple answers)

Theme of other representations	Percentage	Count
Function/ quality of product	78.6%	11
Comparison with breastfeeding	64.3%	9
Parent-child bonding	28.6%	4
Dedication to benefits of breastmilk	21.4%	3
Others	21.4%	3

Base: Number of product labels for formula milk related product with presence of representations (14)

- 5.2.2. *“Any term such as ‘maternalise’, ‘humanise’ or equivalent which makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk”*

“Maternalise”

Nearly all the labels (15 labels, 93.8%, 2 brands) contained the term “maternalise” or equivalent.

“Humanise” and other similar terms

None of the labels included the term “humanise” or equivalent.

- 5.2.3. *“Any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding”*

Three (18.8%, 1 brand) labels contained texts mentioning that breastfeeding might be inconvenient, which appeared to discourage breastfeeding.

- 5.2.4. *“Presence of the words of ‘IMPORTANT NOTICE’ in capital letters before 5.2.5 to 5.2.7”*

None of the items showed the words “IMPORTANT NOTICE” in capital letters.

- 5.2.5. *“Presence of the statement ‘breastfeeding is the normal means of feeding infants and young children’ or equivalent”*

Only one-quarter of the labels (4 labels, 25.0%, 1 brand) showed the above statement or equivalent.

- 5.2.6. *“Presence of the statement ‘breastmilk is the natural food for their healthy growth and development’ or equivalent”*

None of the labels showed the above statement or equivalent.

- 5.2.7. *“Presence of the statement ‘use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infants’ or equivalent”*

None of the labels showed the above statement or equivalent.



5.2.8. *“Presence of the word ‘Warning’ before indicating the statements in Items 5.2.9 and 5.2.10”*

The majority of the labels (14 labels, 87.5%) contained the word “Warning” before indicating the statements in Items 5.2.9 and 5.2.10.

5.2.9. *“Presence of the statement ‘it is important for your baby’s health that you follow the cleaning and sterilisation instructions very carefully’ or equivalent”*

The above statement equivalent was observed in half of the labels (8 labels, 50.0%, 2 brands).

5.2.10. *“Presence of the statements ‘if you use a feeding bottle before the establishment of breastfeeding, your baby may no longer want to feed from the breast’ or equivalent”*

None of the labels showed the above statement or equivalent.

5.2.11. *“Presence of the instructions for cleaning and sterilisation in words and graphics”*

The vast majority of the labels (15 labels, 93.8%) provided instructions for cleaning and sterilisation in words and graphics.

5.2.12. *“Presence of a warning that infants should not be left alone to feed on bottle because of the risk of choking and children should not be fed for long period of time because extended contact with sweetened liquids, including formula milk, may cause severe tooth decay”*

The majority of the labels (14 labels, 87.5%) contained such a warning or equivalent.

5.2.13. *“Presence of the name and address of the manufacturer or distributor”*

All the labels showed the names and addresses of the manufacturers or distributors.



6. Study Findings – Product Information

There were 50 items of product information collected from 10 formula milk brands. Among these 50 items, 44 contained information about follow-up formula and 6 contained information about infant formula. In general, the items provided information specific to the products for potential consumers' reference. It might contain information on product specifications, instructions of usage, materials or ingredients, and condition of storage. There was no product information for formula milk related product available since there was no official website for the brands selected and no product information item was issued. Product information found in the product inserts of formula milk related products were categorised and analysed under product labels.

6.1. Formula Milk

The majority of the items contained representations and health benefit statements about supporting the development of the digestive system and the brain. Some items contained nutritional value statements about an enhanced level of DHA.

6.1.1. *“Any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation”*

Most of the items (48 items, 96.0%, 10 brands) had images, texts or representations which might idealise the use of formula milk and formula milk related products. (Table 23)

The more common themes of these representations were as follows:

- better development and growth of children (43 items, 89.6%, 10 brands) (e.g. 1 representation contained an image of children growing up which gave the impression that the product supported children's healthy growth and development, and 1 representation contained an image of footprints with the word “growth” which gave the impression that the product supported healthy growth and development of the child);
- the products being imported (20 items, 41.7%, 5 brands) which gave the impression of better quality; and
- better nutrition quality / production technology (17 items, 35.4%, 7 brands) (e.g. a symbol which gave the impression that the product was of excellent quality, an image of the grassland and the cow gave an impression that the formula milk product was natural).



Table 23 Number of product information items by theme of representations (multiple answers)

Theme of other representations	Percentage	Count
Better development of children/ child health benefits	89.6%	43
Emphasis on the products being imported	41.7%	20
Better nutrition quality/ production technology	35.4%	17
Parent-child bonding	27.1%	13
Product was trusted by customers	18.8%	9
Use of cartoon characters	14.6%	7
Better protection for babies	12.5%	6
Medical endorsement	10.4%	5
Product was specially designed for local babies	4.2%	2

Base: Number of product information items with presence of representations (48)

6.1.2. “Any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents”

Health benefit statements

Most of the items (43 items, 86.0%) contained health benefit statements.

The health benefit statements were mainly about supporting the digestive system and gut health/ better absorption (37 items, 86.0%), supporting brain development (31 items, 72.1%) and supporting the immune system (25 items, 58.1%). (Table 24)

Table 24 Number of product information items by theme of health benefit statement (multiple answers)

Theme of health benefit statement	Percentage	Count
Supports digestive system and gut health/ better absorption	86.0%	37
Supports brain development	72.1%	31
Supports immune system	58.1%	25
Supports eye development	34.9%	15
Supports general growth and development	27.9%	12
Prevents allergy	14.0%	6
Supports bone development	14.0%	6
Supports nervous system development	9.3%	4
Supports development of communication/ language skills	9.3%	4
Supports social/ emotional development	9.3%	4
Supports development of body movement	7.0%	3
Supports development of intelligence quotient	7.0%	3
Others	18.6%	8

Base: Number of product information items with presence of health benefit statement (43)



Nutritional value statements

Around one-third of the items (17 items, 34.0%) contained nutritional value statements.

Most of the nutritional value statements were about general nutrition quality (7 items, 41.2%), followed by protein of high quality (3 items, 17.6%) and DHA of high quality/ higher amount of DHA (3 items, 17.6%). (Table 25)

Table 25 Number of product information items by theme of nutritional value statement (multiple answers)

Theme of nutritional value statement	Percentage	Count
Highlights general nutrition quality	41.2%	7
Highlights protein of high quality	17.6%	3
Highlights DHA of high quality/ higher amount of DHA	17.6%	3
Highlights no added cane sugar	11.8%	2
Highlights prebiotics of high quality	11.8%	2
Highlights fat of high quality	5.9%	1

Base: Number of product information items with presence of nutritional value statement (17)

6.1.3. *“Any term such as ‘maternalise’, ‘humanise’ or equivalent which suggests comparison with breastmilk”*

None of the items was found to contain the term “maternalise” and “humanise”.

There were 4 items (8.0%, 1 brand) that were found to contain similar terms that suggested a comparison with breastmilk. These items claimed that their products contained a body-friendly ingredient with structure which was similar to that of breastmilk, or their products adopted a formula close to the human body.

6.1.4. *“Any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding”*

Promote bottle feeding

Nine items (18.0%, 4 brands) contained such texts.

Among the texts which promoted bottle feeding, the most common content was about the easy preparation of formula milk (6 items, 66.7%, 2 brands), followed by the product being able to improve appetite of babies (2 items, 22.2%, 1 brand) and scientific production process, which implied that the manufacturer excelled in making formula milk products for baby’s consumption (1 item, 11.1%, 1 brand). (Table 26)



Table 26 Number of product information items by theme of text which promotes bottle feeding (multiple answers)

Theme of text which encourages feeding by formula milk	Percentage	Count
Easy preparation of formula milk	66.7%	6
Product could improve appetite of babies	22.2%	2
Scientific production process	11.1%	1

Base: Number of product information items with presence of text which promotes bottle feeding (9)

Undermine or discourage breastfeeding

None of the items contained a text which undermined or discouraged breastfeeding.

6.1.5. *“Any image, text or other representation that makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk”*

There were 7 items (14%, 4 brands) that contained such an image, text or other representation. All these items were follow-up formulae.

Of these 7 items, 5 of them mentioned that the product contained ingredients that could also be found in breastmilk. The other 2 items (28.6%), which belonged to the same brand, mentioned that the product had digestion time comparable with breastmilk.

6.1.6. *“Whether written in languages appropriate to target readership, e.g. Chinese and/ or English”*

All items were presented in either Chinese and/ or English, which could be considered languages appropriate to target readership.

6.1.7. *“Presence of explanation to clearly and conspicuously explain the benefits and superiority of breastfeeding”*

There were 31 items (62.0%) that had such an explanation.

6.1.8. *“Presence of explanation to clearly and conspicuously explain the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond”*

There were only 10 items (20.0%) that clearly and conspicuously explained the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond.

Although there were 11 other items that explained the value of exclusive breastfeeding for the first 6 months, they did not mention “sustained breastfeeding for 2 years or beyond”. There were 2 more items that did not show such explanation clearly and conspicuously due to the small font size and the location of the statement (placed at the bottom of the last page of the booklet).



6.1.9. *“Presence of explanation to clearly and conspicuously explain how to initiate and maintain exclusive and sustained breastfeeding”*

None of the items mentioned how to initiate and maintain exclusive and sustained breastfeeding.

6.1.10. *“Presence of explanation to clearly and conspicuously explain why it is difficult to reverse a decision not to breastfeed”*

None of the items explained why it was difficult to reverse a decision not to breastfeed.

6.1.11. *“Presence of explanation to clearly and conspicuously explain the importance of introducing complementary food from the age of 6 months onwards”*

Less than one quarter of the items (11 items, 22.0%) explained clearly and conspicuously the importance of introducing complementary food from the age of 6 months onwards.

In addition to these 11 items, although there were 6 items that explained the importance of introducing complementary food, they did not mention the appropriate time (i.e. from the age of 6 months onwards) to introduce complementary food. There were 2 more items that had illegible explanation due to small font size or the statement being placed at the bottom of the last page of booklet.

6.1.12. *“Presence of explanation to clearly and conspicuously explain how and why any introduction of bottle feeding or early introduction of complementary food negatively affects breastfeeding”*

Only a small proportion of the items (13 items, 26.0%) had such an explanation.

6.1.13. *“Presence of explanation to explain clearly and conspicuously instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils”*

Only 1 item (2.0%) explained the instructions for the proper preparation and use of feeding bottle and teat.

6.1.14. *“Presence of explanation to explain clearly and conspicuously the health risks of feeding by formula milk, feeding by using a feeding bottle and teat and improper preparation of feeding bottle and teat”*

The great majority of the items (45 items, 90.0%) did not have such an explanation.

6.1.15. *“Presence of explanation to explain clearly and conspicuously that powdered formula milk is not a sterile product”*

None of the items had such an explanation.



6.1.16. *“Presence of explanation to explain clearly and conspicuously 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”*

None of the items had such an explanation.

6.1.17. *“Presence of explanation to explain clearly and conspicuously that formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded”*

None of the items had such an explanation.

6.1.18. *“Presence of explanation to explain clearly and conspicuously the financial implication of feeding an infant with formula milk”*

Most of the items (44 items, 88.0%) did not mention the financial implication of feeding an infant with formula milk.



7. Conclusions

It was common for the manufacturers of formula milk and formula milk related products for infants and young children up to the age of 36 months to produce information in various formats for marketing and promotion to parents and the general public. Such information often contained texts, images or other representations to attract consumers to purchase the products, thereby encouraging formula feeding and discouraging breastfeeding.

Recurrent themes portraying benefits to the child health and development, such as improving immunity and digestive system, supporting brain development, supporting general growth and development, and emphasising the high nutritional quality were observed for promotion of the formula milk products. Formula milk related product manufacturers tended to promote their products by drawing comparison with breastfeeding.

In this study, it was found that formula milk manufacturers commonly used social media platform as a means to advertise their products. An overseas study also showed that infant formula manufacturers used various social media tools to promote products, thereby creating communities among users, and making discussions about infant feeding. The social media based content examined had little to nil compliance to the International Code.⁵ Therefore, the impact of social media for marketing formula milk should not be underestimated.

Although there were only 7 TVCs of formula milk during the 28-day survey period, the frequency and the total air time of these TVCs was 37,994 times and 16,022.1 minutes (or 11.13 days) respectively, reflecting a very aggressive marketing strategy. According to the private advertising monitoring company used in this study, milk powder for infants and children had the fourth highest advertising spending in 2016.⁶ Although the television commercials did not specifically promote formula targeted for infants below 6 months, the commercials often showed brief product shots of follow-up formula with very similar appearance to infant formula, which might give the impression that the advertisement promoted infant formula as well.

Although most items acknowledged that breastfeeding is best for infants, many did not mention other optimal infant and young child feeding practices such as sustaining breastfeeding and the importance of introducing complementary food from the age of 6 months.

WHO advised that boiled water cooled down to no less than 70°C water should be used to prepare formula milk for consumption by infants under 12 months of age. Only a few formula milk labels displayed this instruction. Instead, because a lower temperature could maintain the active cultures in the milk powder, some labels



recommended a lower temperature to prepare the formula milk. This might pose a health risk to children because powdered formula milk is not a sterile product.

Breastfeeding confers many health benefits to mothers and their babies. Mothers' decision to initiate and sustain breastfeeding depends on a variety of factors. Nonetheless, exposure to prevalent marketing practices of formula milk and formula milk related products does not foster a promotive and supportive breastfeeding community. According to the principles of the International Code and the subsequent relevant Health Assembly's resolutions, steps should be taken to ensure that there is no advertising, or any form of promotional activities to promote formula milk for children under 36 months and its related products. Manufacturers of formula milk and formula milk related products should be encouraged to follow these principles so as to create an environment that is conducive to breastfeeding.



8. Limitations

The Study only covered items advertised/ available between February and April 2016. The observations were hence only snapshots of the situation within that period. .

Due to limited resources, not all brands of formula milk and formula milk related products marketed in Hong Kong were covered in the Study.

The monitoring on the media advertisements 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 in the Study.

Some product information items and promotions were targeted at members who joined the mother's clubs organised by formula milk manufacturers. As pregnancy proof was required for joining some mother's clubs, some of these information items and promotional materials might have been missed.

Certain types of promotion in social media were not covered (e.g. viral marketing).



9. References

1. World Health Organization. International Code of Marketing of Breast-milk Substitutes. Geneva, WHO, 1981.
2. World Health Organization. Resolution WHA 35.26, 37.30, 39.28, 41.11, 43.3, 45.34, 47.5, 49.15, 54.2, 55.25, 58.32, 59.21, 61.20, 63.23, 65.6. Geneva, WHO, 1982-2012.
3. admanGo (2017), Adspend on Infant and Young Child Formula Milk, available at: <http://www.admango.com> (accessed on 12 May 2017).
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5. SW Abrahams. Milk and social media: Online communities and the International Code of Marketing of Breast-milk Substitutes. *J Hum Lact* 2012;28:400–406.
6. admanGo (2017), “Hong Kong Adspend Market - Top 10 Subcategories in 2016”, available at: <http://www.admango.com> (accessed on 12 May 2017).
7. Food and Drugs (Composition and Labelling) Regulations (Cap. 132W).



10. Glossary

“follow-up formula”⁷

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”⁷

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.

Appendix 1 – Coverage of the private advertising monitoring company

Newspapers and Magazines

am730	Metropolis Daily
Apple Daily	Ming Pao Daily
*China Daily (Hong Kong Edition)	Oriental Daily News
Classified Post (Weekly)	Sing Pao
Good News	Sing Tao Daily
Headline Daily	Singtao District Post
Headline Finance	Sky Post
Hong Kong Commercial Daily	South China Morning Post
Hong Kong Economic Journal	Sunday Morning Post
Hong Kong Economic Times	Ta Kung Pao
*Macao Daily News	*The Financial Times
*International New York Times / International Herald Tribune	Baby
The Standard	Baby-mo
The Sun	Milk B
* Asian Wall Street Journal	Ours Magazine
Wen Wei Po	Pregnancy Magazine
Audiophile	Pre-mo
AV Magazine	Smart Parents
DC Photo Magazine	Super Parents
Automobile Magazine	e-zone
Car Plus + Him	PC Market
Caz Buyer	Baccarat Magazine
Men's Machines	Cosmopolitan
Motoz Trader	Elle Accessories
Top Gear	Elle Hong Kong
*Bloomberg Businessweek (Asia Edition)	Elle Man / Elle Men
Bloomberg Businessweek	Esquire (Hong Kong Edition)
*Fortune (Asia Edition)	Gafencu Men
*Forbes Asia	Harper's Bazaar (Chinese Edition)
*Macau Business	J Men
*The Economist (Asia / Pacific Edition)	Jessica
*Time (Asia Edition)	Jessica Code
*Yazhou Zhoukan	Jet

Capital	Manifesto
Capital CEO + Capital Entrepreneur	Marie Claire (Hong Kong Edition)
Capital Weekly	Marie Claire 2 (Hong Kong Edition)
Economic Digest	Men's Uno
Hong Kong Economic Journal Monthly	Milk
iMoney	Milk X
Property Browser	Mina
Property Times	MR
Singtao Investment Weekly	MR Style
Squarefoot.com.hk	una (Hong Kong Edition)
ViVi	The Peak
with Hong Kong	Three Weekly
Zip	TimeOut
Zip Homme	TVB Weekly
Cable Guide Monthly	U Magazine
100 Most	Weekend Weekly
Culture	Wine Now Monthly
Harper's Bazaar Art	where Magazine
Harper's Bazaar Deluxe	Elle Decoration (stopped from 1-Jan-09 to 31-Jul-13)
Connoisseur Report	Home Journal
*Style / Cotai Style Macao	Hong Kong Tatler Homes
*Macau Tatler	Modern Home
Centurion	My Home
City Magazine	Interior Beaute / Pace Interior Beaute
Cup Magazine	Perspective
East Touch	Today's Living
East Week	Montres
FACE	Ming Watch
FlashOn / Flash On Weekly	Revolution
HK Magazine	Spiral
Hong Kong Tatler	The Watch / International Watch
Hong Kong Tatler Society	Tic Talk Hong Kong
Hong Kong Walker (stopped from 1-Jan-07 to 28-Feb-09)	Time Square
Magazine P	Watch Critics
Metro Prosperity / Metrobox	Watch Report
Metropop	Dogs Magazine

Ming Pao Weekly
 New Monday
 Next Magazine
 Oriental Sunday
 Prestige Hong Kong
 AsiaTrail
 Go Out
 Golf Digest
 China Golf
 Golf Magazine
 Golf Vacations

*Regional Publications

My Pet
 Pets Magazine
 Jijik
 JobMarket
 Recruit
 *Business Traveller Asia Pacific
 Cosmopolitan Bride / Cosmo Bride
 Darizi
 Elle Wedding
 Jessica Dream Wedding (stopped
 from 1-Aug-09 to 31-May-11)
 Wedding Message

Television broadcast

TVB Jade	Cable TV hd202
TVB Pearl	Cable TV hd203
TVB HD Jade	Cable TV Nat Geo Wild
TVB J2	Cable TV Cine.p
TVB iNews	Cable TV Animal Planet
ATV Home	Cable TV Drama / Cable Drama
ATV World	Cable TV Entertainment / Fan. Entertainment
Cable TV Channel 18	Cable TV TLC
Cable TV Channel A / Cable No. 1	Now TV Business News Channel
Cable TV Children	Now Sports 1
Cable TV HMC / Cable HMC 1 / Movie 3	Now Sports 2
Cable TV Movie 1	Now Sports 3
Cable TV Movie 2	Now TV News
Cable TV News 1 / Cable Finance Info Channel	Now Animax
Cable TV News 2 / Cable News Channel	Now AXN
Cable TV Sports	Now Discovery Channel

Cable TV Super Soccer

Cable TV AXN

Cable TV Discovery

Cable TV Top News

Cable TV Soccer Betting

Cable TV CNN

Cable TV Channel 63

Now Sports 6

Now Sports 7

Now Sports HD

Now STAR Chinese Movies

Now STAR Chinese Movies 2

Now STAR Movies

Now STAR Sports

Now The Golf Channel / Now Golf 1

Now Golf 3

Now 101

Now Sports Prime

Now Entertainment

Now HaiRun

Now Discovery Travel And Living

Now ESPN / FOX Sports

Now Golf Tour Channel / Now Golf 2

Now Hong Kong

Now National Geographic Wild

Now Sports 4

Now Sports 5

Now Popcorn Movie Channel / now
Baogu Movies

Now CNBC

Now CNN

Now 621

Now 622

Now 623

Now 624

Now 625

Now National Geographic Channel

Now STAR World

Now 668

Now Jelli

Radio Broadcast

Commercial Radio 1
Commercial Radio 2
HMV864 / AM864
Metro Finance 104
Metro Plus
Metro Showbiz 997
Metro Finance Digital
Metro Music Digital
Metro Life Digital

Mobile Websites and Applications

881903.com	Money 18
AASTOCKS	Movie Express
am730	myTV
Apple Daily Animated News	Nextplus
Baby Kingdom	now Finance
Beauty Exchange	now News
Broadway / PALACE / AMC Ticketing	on.cc
Cityline	OpenRice Hong Kong
discuss	Sing Tao Daily
Eat & Travel Weekly	TVB Finance
ETNet	TVB fun
Headline Daily	UA Cinemas
HKEJ	Webus
Hong Kong Movie	Yahoo!
Hong Kong Toolbar	YouTube
i-cable.com	ETNet
Metro Daily	Yahoo! Wap
Ming Pao	

Websites

28car.com	Cardom.com.hk
28Hse.com	CarPlus.com
3weekly.com	CINEMA.com.hk
881903.com	Cityline
AASTOCKS.com	Cnp.hk / Cybernet Property Information
am730	Cosmopolitan
A-Performers.com	cpjobs.com / Classified Post Online
Asiadog.com	CTgoodjob.hk / Careertimes.com.hk
AsiaXPAT	Darizi Hong Kong
Baby Kingdom	dbc.hk
Baby Mo.HK	DCFever.com
Beauty Exchange	Discuss.com.hk
CAPITAL	Education Kingdom
CAPITAL CEO	EDUplus.com.hk
CAPITAL Entrepreneur	Elle Online
CAPITAL WEEKLY	ePrice / PhoneDaily
CAPTIAL MONEY	ESDLife
Car And Driver	ETNet
Facebook	PhoneHK
Finet.hk	Oriental Sunday
Flyday.hk	My-Magazine
foodeasy.com	NextMedia.com / Atnext.com
Get Jetso	now
GoalGoalGoal	on.cc / Orisun.com
GoHome	Price.com.hk
HIM	Property.hk
HKEJ	Qooza
HKET	Quamnet
HKGGolden.com	Recruit Online
Hong Kong Tatler.com	RingHK.com
hutchgo.com / Priceline	She.com
i-CABLE	SINA.com HK
JESSICA	South China Media
JESSICA CODE	South China Morning Post Online
Jetso.com.hk	Squarefoot.com.hk
Jiujik	stheadline.com
JobsDB.com - Hong Kong	Style-tips.com
LaluLalu	The Standard

Lifestyle Asia
Lisa.com
Luxury Insider
MAREEE.COM / 100FUN.COM
Marie Claire
Metro Radio Online / FM99.7 METROINFO
Ming Pao Online
Ming Pao Weekly Online
MonsterParent.com
MSN Hong Kong
my903.com
OpenRice.com

Timway Hong Kong
TopGear
Travellife.org
TVB.com
U-SOCCER.COM
Uwants.com
Weekendhk.com
Whiz-kids Express Weekly
Yahoo! Hong Kong
Youtube HK
yp.com.hk / YP Yellow Page Online
ZUJI

Out-of-home Advertising Media

Airport

Billboards

Causeway Bay
Central
Main Subway connecting TST and East TST
East Tunnel
Harbour Tunnel
Jordon
Mongkok
Prince Edward
Sheung Wan
Tai Lam Tunnel
Tsim Sha Tsui
Wanchai
West Tunnel
Yau Ma Tei
Lantau Island

Bus Body

Citybus
New World First Bus
Kowloon Motor Bus

Bus Shelters

buzplay

Focus Media

KCRC

East Railway
Light Railway
Ma On Shan Railway

West Railway

Feeder Bus

MTR (incl. AEL)

Newsline Express

Roadshow

Tram Body

Tram Shelters

Video Wall

Chungking Express, Tsim Sha Tsui (CTV)

Broadway Cinema, Mongkok (BTV)

Richmond, Mongkok (RTV)

Harbour City, TST (Harbour)

Times Square, Causeway Bay (TSTV)

Infinitus Plaza, Central (DTV)

Outdoor

Mini-bus

POP

Taxi

Appendix 2 – Four checklists used in the Study

Promotional Information or Materials

Observation Checklist

Reference No.: _____

Observer No.: _____ Supervisor No.: _____

Date of conducting content analysis: _____

Part A: Basic Information

Material's reference no.: _____

Manufacturer: _____

Brand: _____

Product: _____

Product type:

*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 (i.e. suitable for baby of any age up to and including 12 months), please specific the age range _____	1 <input type="checkbox"/>
- Follow-up formula (i.e. suitable for baby of any age from 6 months to under 36 months), please specific the age range _____	2 <input type="checkbox"/>
Formula milk related product	
- Feeding bottle	3 <input type="checkbox"/>
- Teat	4 <input type="checkbox"/>

Source of information:

Observer to note: If there are multiple sources of information, select the first launch media

- Newspaper or other publication	01 <input type="checkbox"/>	Bus Shelters	11 <input type="checkbox"/>
- Television broadcast;	02 <input type="checkbox"/>	Busplay	12 <input type="checkbox"/>
- Radio	03 <input type="checkbox"/>	Focus Media	13 <input type="checkbox"/>
- Mobile websites and application	04 <input type="checkbox"/>	KCRC / MTR (incl. AEL)	14 <input type="checkbox"/>
- Interactive	05 <input type="checkbox"/>	Newsline Express	15 <input type="checkbox"/>
- Websites of manufacturers and distributors	06 <input type="checkbox"/>	Outdoor (i.e. mini-bus, POP, taxi)	16 <input type="checkbox"/>
- Social media	07 <input type="checkbox"/>	Roadshow	17 <input type="checkbox"/>
- Airport	08 <input type="checkbox"/>	Tram Body	18 <input type="checkbox"/>
- Billboards / Video Wall	09 <input type="checkbox"/>	Other, please specify: _____	97 <input type="checkbox"/>
- Bus Body	10 <input type="checkbox"/>		

(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 photos where relevant;

1. Frequency of promotional information or materials

Observer to note: Different units of measurement are used to measure the frequency of the materials

Please write down	Remarks

2. Your first impression on the promotional information or materials:

Observer to note: Only materials in video format are required to fill in Item 2

	First impression	Remarks
(i) Target age range		
(ii) Look and feel		
(iii) Duration of the material:		

3. Presence of any image, text or representation which may idealise the use of formula milk and formula milk related products

▪ Yes No Go to Q4

	Presence	Remarks
(i) Company logo	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo		
(ii) Trade mark	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo		
(iii) Product shot	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo		
(iv) Others, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo		

4. Presence of the term such as “maternalise”, “humanise” or equivalent which suggests comparison with breastmilk

▪ Yes No Go to Q5

	Presence	Remarks
(i) “maternalise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) “humanise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) equivalent term, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo		

5. Presence of any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents (*Only applicable to formula milk*)

▪ Yes 0 No 1 Go to Q6

	Remarks
(i) Health Benefit Statement 1 Text and/or photo _____	
(ii) Health Benefit Statement 2 Text and/or photo _____	
(iii) Health Benefit Statement 3 Text and/or photo _____	
(i) Nutritional Value Statement 1 Text and/or photo _____	
(ii) Nutritional Value Statement 2 Text and/or photo _____	
(iii) Nutritional Value Statement 3 Text and/or photo _____	

6. Presence of any image or text that encourage feeding by formula milk or discourage breastfeeding

▪ Yes 0 No 1 Go to Q7

	Remarks
(i) 1 Text and/or photo _____	
(ii) 2 Text and/or photo _____	
(iii) 3 Text and/or photo _____	
(iv) 4 Text and/or photo _____	

7. Presence of using special display or offering prizes or gifts such as samples of formula milk or formula milk related products to any person

▪ Yes 0 No 1 Go to Q8

Text and/or photo	Remarks
-------------------	---------

8. 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 No Go to Q9

Text and/or photo	Remarks
-------------------	---------

9. 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 No Go to Q10

Text and/or photo	Remarks
-------------------	---------

10. Record content of promotional information or materials

Type of content	Content (attach photos and / or summarise content)	Remarks
(i) Key messages		
(ii) Theme of advertisement		

~~ END OF OBSERVATION CHECKLIST~~

Health Education Information

Observation Checklist

Reference No.: _____

Observer No.: _____ Supervisor No.: _____

Date of conducting content analysis: _____

Part A: Basic Information

Material's reference no.: _____

Manufacturer: _____

Type of information:

Formula Milk Feeding	1 <input type="checkbox"/>
Breastfeeding	2 <input type="checkbox"/>
Weaning	3 <input type="checkbox"/>
Others, please specify: _____	4 <input type="checkbox"/>

Title of the materials: _____

Brand: _____

Product (if any): _____

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 (i.e. suitable for baby of any age up to and including 12 months)	1 <input type="checkbox"/>
Follow-up formula (i.e. suitable for baby of any age from 6 months to under 36 months)	2 <input type="checkbox"/>
Formula milk related product	
Feeding bottle	3 <input type="checkbox"/>
Teat	4 <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 photos where relevant;
If the material is about breastfeeding and formula feeding, go to
Item 1. Otherwise, go to Item 14.*

B1. Information about breastfeeding and formula feeding

1a) Presence of marketing practices of formula milk/ formula milk related products in the vicinity of the items (e.g. appearance of promotional activities on the same webpage as the health education item on manufacturer's website)

▪ Yes 0 No 1 Go to Q1b

Text and/or photo	Remarks

1b) Mentioning of the manufacturers' names, manufacturers' logos, or other information of the manufacturers

▪ Yes No Go to Q2

	Mention	Remarks
(i) Name of manufacturer	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) Name of brand	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) Logo of manufacturer	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iv) Logo of brand	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(v) Trade mark	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(vi) Product shot	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(vii) Any image, text or representation which may idealise the use of the formula milk and formula milk related products, except for graphics to illustrate methods of preparation	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(viii) Other information of the manufacturers, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		

2. Presence of any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents (*Only applicable to formula milk*)

Yes
 No
 Go to Q3

	Remarks
(i) Health Benefit Statement 1 Text and/or photo _____	
(ii) Health Benefit Statement 2 Text and/or photo _____	
(iii) Health Benefit Statement 3 Text and/or photo _____	
(i) Nutritional Value Statement 1 Text and/or photo _____	
(ii) Nutritional Value Statement 2 Text and/or photo _____	
(iii) Nutritional Value Statement 3 Text and/or photo _____	

3. Presence of any term such as “maternalise”, “humanise” or equivalent which suggests comparison with breastmilk

▪ Yes No Go to Q4

	Presence	Remarks
(i) “maternalise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) “humanise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) equivalent term, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		

4. Presence of any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding

▪ Yes No Go to Q5

	Remarks
(i) 1 Text and/or photo _____	
(ii) 2 Text and/or photo _____	
(iii) 3 Text and/or photo _____	
(iv) 4 Text and/or photo _____	

5. Presence of any image, text or other representation that suggests that the product is nearly equivalent or superior to breastmilk

- Yes 0 No 1 Go to Q6

Text and/or photo	Remarks
-------------------	---------

6. Whether it is written in languages appropriate to target readership, e.g. Chinese and / or English

- Yes 1 No 0 Go to Q7

Text and/or photo	Remarks
-------------------	---------

7. 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 items made:

	Presence	Remarks
(i) the benefits and superiority of breastfeeding	Yes ₁ <input type="checkbox"/> No ₀ <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 ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) How to initiate and maintain exclusive and sustained breastfeeding	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iv) why it is difficult to reverse a decision not to breastfeed	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(v) the importance of introducing complementary food from the age of 6 months onwards	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(vi) how and why any introduction of bottle feeding or early introduction of complementary food negatively affects breastfeeding	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

8. Presence of explanation to explain clearly and conspicuously the instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils

▪ Yes ₁ No ₀ Go to Q9

Text and/ or photo	Remarks

9. Presence of explanation to explain clearly and conspicuously 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 No Go to Q10

Text and/or photo	Remarks

10. Presence of explanation to explain clearly and conspicuously that

- i) powdered formula milk is not a sterile product;
- ii) 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; and
- iii) formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded.

	Presence	Remarks
(i) Powdered formula milk is not a sterile product;	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) 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; and	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) Formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded.	Yes <input type="checkbox"/> No <input type="checkbox"/>	

Text and/or photo:

11. Presence of explanation to explain clearly and conspicuously the financial implication of feeding an infant with formula milk

- Yes No Go to Q12

Text and/or photo	Remarks
-------------------	---------

12. If the items prepared by the Department of Health (DH) are used, whether there is any alteration of the content

- Yes No Go to Q13

Text and / or photo of the relevant content	Remarks
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13. Whether DH is acknowledged in the reproduced items as the source of the information

- Yes No

Text and/or photo	Remarks
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~~ END OF B1 OBSERVATION CHECKLIST~~

B2 – Information about matters other than breastfeeding and formula feeding

14a) Presence of marketing practices in the vicinity of the items (e.g. appearance of promotional activities on the same webpage as the health education item on manufacturer’s website)

- Yes 0 No 1 Go to Q14b

Text and/or photo	Remarks
-------------------	---------

14b) Any mention of the manufacturers’ names, manufacturers’ logos, or other information of the manufacturers

- Yes 0 No 1 Go to Q15

	Mention	Remarks
(i) Name of manufacturer	Yes 0 <input type="checkbox"/> No 1 <input type="checkbox"/>	
(ii) Name of brand	Yes 0 <input type="checkbox"/> No 1 <input type="checkbox"/>	
(iii) Logo of manufacturer	Yes 0 <input type="checkbox"/> No 1 <input type="checkbox"/>	
(iv) Logo of brand	Yes 0 <input type="checkbox"/> No 1 <input type="checkbox"/>	
(v) Trade mark	Yes 0 <input type="checkbox"/> No 1 <input type="checkbox"/>	
(vi) Product shot	Yes 0 <input type="checkbox"/> No 1 <input type="checkbox"/>	
(vii) Other information of the manufacturers, specify: _____	Yes 0 <input type="checkbox"/> No 1 <input type="checkbox"/>	
Text and/or photo:		

15. Presence of any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents (*Only applicable to formula milk*)

- Yes No Go to Q16

	Remarks
(i) Health Benefit Statement 1 Text and/or photo _____	
(ii) Health Benefit Statement 2 Text and/or photo _____	
(iii) Health Benefit Statement 3 Text and/or photo _____	
(i) Nutritional Value Statement 1 Text and/or photo _____	
(ii) Nutritional Value Statement 2 Text and/or photo _____	
(iii) Nutritional Value Statement 3 Text and/or photo _____	

16. Whether written in languages appropriate to target readership, e.g. Chinese and / or English

- Yes No

Text and/or photo	Remarks
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~~ END OF B2 OBSERVATION CHECKLIST~~

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: _____

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 (i.e. suitable for baby of any age up to and including 12 months)	1 <input type="checkbox"/>
- Follow-up formula (i.e. suitable for baby of any age from 6 months to under 36 months)	2 <input type="checkbox"/>
Formula milk related product	
- Feeding bottle	3 <input type="checkbox"/>
- Teat	4 <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;

B1. FORMULA MILK

1. Presence of any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation

▪ Yes No Go to Q2

	Presence	Number of occurrence	Remarks
(i) Company logo	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo			
(ii) Trade mark	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo:			
(iii) Others, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo:			

2. Presence of any health benefit statement or nutritional value statement regarding the product or its ingredients or constituents

▪ Yes 0 No 1 Go to Q3

	Number of occurrence	Remarks
(i) Health Benefit Statement 1 Text and/or photo _____		
(ii) Health Benefit Statement 2 Text and/or photo _____		
(iii) Health Benefit Statement 3 Text and/or photo _____		
(i) Nutritional Value Statement 1 Text and/or photo _____		
(ii) Nutritional Value Statement 2 Text and/or photo _____		
(iii) Nutritional Value Statement 3 Text and/or photo _____		

3. Presence of any term such as “maternalise”, “humanise” or equivalent which makes a containing to breastmilk, or suggests that the product is nearly equivalent or superior to breastmilk

- Yes 0 No 1 Go to Q4

	Presence	Number of occurrence	Remarks
(i) “maternalise”	Yes <input type="checkbox"/> No <input type="checkbox"/>		
(ii) “humanise”	Yes <input type="checkbox"/> No <input type="checkbox"/>		
(iii) equivalent term, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo:			

4. Presence of any image, test or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding

- Yes 0 No 1 Go to Q5

	Remarks
(i) 1 Text and/or photo _____	
(ii) 2 Text and/or photo _____	
(iii) 3 Text and/or photo _____	
(iv) 4 Text and/or photo _____	

5. Presence of instructions for appropriate preparation and use in words and / or in easily understood graphics

▪ Yes 1 No 0 Go to Q6

Text and/or photo	Remarks
-------------------	---------

6. Presence of the age for which the product is recommended in Arabic numerals

▪ Yes 1 No 0 Go to Q7

Text and/or photo	Remarks
-------------------	---------

7. Presence of warning about the health risks of improper preparation and of introducing the product prior to recommended age

▪ Yes 1 No 0 Go to Q8

Text and/or photo	Remarks
-------------------	---------

8. Presence of required storage conditions both before and after opening of the product, taking into account climatic conditions

▪ Yes 1 No 0 Go to Q9

Text and/or photo	Remarks
-------------------	---------

9. Presence of batch number, date of manufacture and date before which the product is to be consumed, taking into account climatic and storage conditions

- Yes No Go to Q10

Text and/ or photo	Remarks
--------------------	---------

10. Presence of the name and address of the manufacturer or distributor

- Yes No Go to Q11

Text and/or photo	Remarks
-------------------	---------

11. Presence of the weight of milk powder in one level scoop

- Yes No Go to Q12

Text and/or photo	Remarks
-------------------	---------

12. 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;
- iii) “Breastmilk is the natural food for their healthy growth and development” or equivalent; or
- iv) “Use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infant” or equivalent.

▪ Yes No Go to Q13

	Presence	Remarks
(i) “IMPORTANT NOTICE” in capital letters	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(ii) “Breastfeeding is the normal means of feeding infants and young children” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) “Breastmilk is the natural food for their healthy growth and development” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iv) “Use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infant” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

13. 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 Q14

	Presence	Remarks
(i) “Warning”	Yes ₁ <input type="checkbox"/> No ₀ <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 ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) “It is important for your baby’s health that you follow all preparation instructions carefully” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <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 ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

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.

▪ Yes No Go to Q14

	Presence	Remarks
(i) “Warning”	Yes ₁ <input type="checkbox"/> No ₀ <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 it its use” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) “It is important for your baby’s health that you follow all preparation instructions carefully” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

14. Presence of the instructions for preparation of powdered formula milk in accordance with the World Health Organisation (WHO):

- i) "Powder formula milk is not a sterile product" ;or
 - ii) "Powder formula milk may become contaminated during preparation"
- Yes No Go to Q15

	Presence	Remarks
(i) "Powder formula milk is not a sterile product" or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(ii) "Powder formula milk may become contaminated during preparation" or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

15. Presence of the instructions for preparation of powdered formula milk in accordance with the World Health Organisation (WHO): "It is necessary for formula milk to be prepared one fed at a time using boiled water allowed to cool down to no less than 70°C for consumption by infants under 12 months of age" or equivalent

- Yes No Go to Q16

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

Text and/or photo	Remarks

16. Presence of the instructions for preparation of powdered formula milk in accordance with the World Health Organisation (WHO): “Discard any feed that has not been consumed more than two hours after reconstitution” or equivalent under the instructions for preparation of formula milk in powder form

▪ Yes No Go to Q17

Text and/or photo	Remarks

17. Presence of a feeding chart in the preparation instructions

▪ Yes No Go to Q18

Text and/or photo	Remarks

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

▪ Yes No Go to Q19

Text and/or photo	Remarks

19. 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 No Go to Q20

Text and/ or photo	Remarks

20. Presence of a legible label with follows the recommendations stipulated in the “Trade Guidelines on Preparation of Legible Food Label”² published by the Centre for Food Safety

(Provide comments on presentation of label areas, e.g. font size, colour contrast, etc.)

▪ Yes No

Text and/or photo	Remarks

~~ END OF B1 OBSERVATION CHECKLIST~~

² Available from:
http://www.cfs.gov.hk/sc_chi/programme/programme_nifl/files/Trade_Guidelines_on_Preparation_of_Legible_FL_c.pdf

B2 FORMULA MILK RELATED PRODUCT

21. Presence of any image, text or representation which may idealise the use of formula milk and formula milk related products, except for graphics to illustrate methods of preparation

▪ Yes 0 No 1 Go to Q22

	Presence	Number of occurrence	Remarks
(i) Company logo	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo			
(ii) Trade mark	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo			
(iii) Others, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo			

22. Presence of any term such as “maternalise”, “humanise” or equivalent which makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk

▪ Yes No Go to Q23

	Presence	Number of occurrence	Remarks
(i) “maternalise”	Yes <input type="checkbox"/> No <input type="checkbox"/>		
(ii) “humanise”	Yes <input type="checkbox"/> No <input type="checkbox"/>		
(iii) equivalent term, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Text and/or photo			

23. Presence of image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding

▪ Yes No Go to Q24

	Remarks
(i) 1 Text and/or photo _____	
(ii) 2 Text and/or photo _____	
(iii) 3 Text and/or photo _____	
(iv) 4 Text and/or photo _____	

24. 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;
- iii) “Breastmilk is the natural food for their healthy growth and development” or equivalent; or
- iv) “Use of breastmilk substitutes may put infants at risk of diarrhoea and other illnesses, when compared with breastfed infants” or equivalent.

▪ Yes No Go to Q25

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

25. Presence of the following statements regarding “Warning”:

- i) The presence of “Warning”;
 - ii) “It is important for your baby’s health that you follow the cleaning and sterilisation instructions very carefully” or equivalent; or
 - iii) “If you use a feeding bottle before the establishment of breastfeeding, your baby may no longer want to feed from the breast” or equivalent.
- Yes 1 No 0 Go to Q26

	Presence	Remarks
(i) The presence of “Warning”	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(ii) “It is important for your baby’s health that you follow the cleaning and sterilisation instructions very carefully” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) “If you use a feeding bottle before the establishment of breastfeeding, your baby may no longer want to feed from the breast” or equivalent	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

26. Presence of the instructions for cleaning and sterilisation in words and graphics

- Yes 1 No 0 Go to Q27

Text and/or photo	Remarks

27. Presence of a warning that infants should not be left alone to feed on bottle because of the risk of choking and children should not be fed for long period of time because extended contact with sweetened liquids, including formula milk, may cause severe tooth decay

▪ Yes 1 No 0 Go to Q28

Text and/or photo	Remarks
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28. Presence of the name and address of the manufacturer or distributor

▪ Yes 1 No 0

Text and/ or photo	Remarks
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~~ END OF B2 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: _____

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 (i.e. suitable for baby of any age up to and including 12 months)	1 <input type="checkbox"/>
Follow-up formula (i.e. suitable for baby of any age from 6 months to under 36 months)	2 <input type="checkbox"/>
Formula milk related product	
Feeding bottle	3 <input type="checkbox"/>
Teat	4 <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

B1 – FOR FORMULA MILK

1. Presence of image, text or representation which may idealise the use of formula milk and formula milk related products except for graphics to illustrate methods of preparation

▪ Yes No Go to Q2

	Presence	Remarks
(i) Company logo	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo		
(ii) Trade mark	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		
(iii) Product shot	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		
(iv) Others, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		

2. Presence of health benefit statement or nutritional value statement regarding the product or its ingredients or constituents

▪ Yes 0 No 1 Go to Q3

	Remarks
(i) Health Benefit Statement 1 Text and/or photo _____	
(ii) Health Benefit Statement 2 Text and/or photo _____	
(iii) Health Benefit Statement 3 Text and/or photo _____	
(i) Nutritional Value Statement 1 Text and/or photo _____	
(ii) Nutritional Value Statement 2 Text and/or photo _____	
(iii) Nutritional Value Statement 3 Text and/or photo _____	

3. Presence of any term such as “maternalise”, “humanise” or equivalent which suggests comparison with breastmilk

▪ Yes No Go to Q4

	Presence	Remarks
(i) “maternalise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) “humanise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) equivalent term, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		

4. Presence of any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding

▪ Yes No Go to Q5

	Remarks
(i) 1 Text and/or photo _____	
(ii) 2 Text and/or photo _____	
(iii) 3 Text and/or photo _____	
(iv) 4 Text and/or photo _____	

5. Presence of any image, text or other representation that makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk

- Yes 0 No 1 Go to Q6

Text and/or photo	Remarks
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6. Whether written in languages appropriate to target readership, e.g. Chinese and / or English

- Yes 1 No 0 Go to Q7

Text and/or photo	Remarks
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7. 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 informational and educational materials made:

	Presence	Remarks
(i) the benefits and superiority of breastfeeding	Yes ₁ <input type="checkbox"/> No ₀ <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 ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) How to initiate and maintain exclusive and sustained breastfeeding	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iv) why it is difficult to reverse a decision not to breastfeed	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(v) the importance of introducing complementary food from the age of 6 months onwards	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(vi) how and why any introduction of bottle feeding or early introduction of complementary food negatively affects breastfeeding	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

8. Presence of explanation to explain clearly and conspicuously the instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils

▪ Yes ₁ No ₀ Go to Q9

Text and/ or photo	Remarks

9. Presence of explanation to explain clearly and conspicuously 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 No Go to Q10

Text and/or photo	Remarks

10. Presence of explanation to explain clearly and conspicuously 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 informational and educational materials made:

- i) powdered formula milk is not a sterile product;
- ii) 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; and
- iii) formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded.

	Presence	Remarks
(i) Powdered formula milk is not a sterile product;	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(ii) 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; and	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) Formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded.	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

11. Presence of explanation to explain clearly and conspicuously the financial implication of feeding an infant with formula milk

▪ Yes No

Text and/or photo	Remarks
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~~ END OF B1 OBSERVATION CHECKLIST~~

B2. For FORMULA MILK RELATED PRODUCT

12. Presence of any image, text or representation which may idealise the use of formula milk and formula milk related products except for graphics to illustrate methods of preparation.

- Yes No Go to Q13

	Presence	Remarks
(i) Company logo	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo		
(ii) Trade mark	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		
(iii) Product shot	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		
(iv) Others, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		

13. Presence of any term such as “maternalise”, “humanise” or equivalent which suggests comparison with breastmilk

▪ Yes No Go to Q14

	Presence	Remarks
(i) “maternalise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(ii) “humanise”	Yes <input type="checkbox"/> No <input type="checkbox"/>	
(iii) equivalent term, specify: _____	Yes <input type="checkbox"/> No <input type="checkbox"/>	
Text and/or photo:		

14. Presence of any image, text or other representation that promotes bottle feeding or that is likely to undermine or discourage breastfeeding

▪ Yes No Go to Q15

	Remarks
(i) 1 Text and/or photo _____	
(ii) 2 Text and/or photo _____	
(iii) 3 Text and/or photo _____	
(iv) 4 Text and/or photo _____	

15. Presence of any image, text or other representation that makes a comparison to breastmilk, or that suggests that the product is nearly equivalent or superior to breastmilk

- Yes No Go to Q16

Text and/or photo	Remarks
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16. Whether written in languages appropriate to target readership, e.g. Chinese and / or English

- Yes No Go to Q17

Text and/or photo	Remarks
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17. Presence of explanation to clearly and conspicuously explain the benefits and superiority of breastfeeding 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 informational and educational materials made

- Yes No Go to Q18

Text and/or photo	Remarks
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18. Presence of explanation to explain clearly and conspicuously the value of exclusive breastfeeding for the first 6 months followed by sustained breastfeeding up to 2 years or beyond 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 informational and educational materials made

▪ Yes No Go to Q19

Text and/or photo	Remarks

19. Presence of explanation to explain clearly and conspicuously why it is difficult to reverse a decision not to breastfeed 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 informational and educational materials made

▪ Yes No Go to Q20

Text and/or photo	Remarks

20. Presence of explanation to explain clearly and conspicuously the instructions for the proper preparation and use of feeding bottle and teat, including cleaning and sterilisation of feeding utensils 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 informational and educational materials made

▪ Yes No Go to Q21

Text and/ or photo	Remarks

21. Presence of explanation to explain clearly and conspicuously the health risks of feeding by formula milk, feeding by using a feeding bottle and teat and improper preparation of feeding bottle and teat 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 informational and educational materials made

▪ Yes No Go to Q22

Text and/or photo	Remarks

22. Presence of explanation to explain clearly and conspicuously 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 informational and educational materials made that

- i) powdered formula milk is not a sterile product;
- ii) 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; and
- iii) formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded.

	Presence	Remarks
(i) Powdered formula milk is not a sterile product;	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(ii) 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; and	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
(iii) Formula milk should be prepared 1 feed at a time and that the reconstituted formula milk should be consumed within 2 hours after preparation and any unused milk must be discarded.	Yes ₁ <input type="checkbox"/> No ₀ <input type="checkbox"/>	
Text and/or photo:		

23. Presence of explanation to explain clearly and conspicuously the financial implication of feeding an infant with formula milk 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 informational and educational materials made

▪ Yes 1 No 0

Text and/or photo	Remarks

~~ END OF B2 OBSERVATION CHECKLIST~~