

**Views on Food and Drugs (Composition and Labelling) (Amendment) (No.2) Regulation 2014  
Submitted to Legislative Council Subcommittee by Wyeth Nutrition Hong Kong**

As one of the industry players in manufacturing quality milk formula and nutrition products, Wyeth Nutrition is committed to improving nutrition and wellness for young children, women and adults.

In principle, Wyeth Nutrition is in support of the captioned amendment regulation which governs the requirements and standards of nutritional composition and nutrition labelling for formula products and prepackaged food for infants and young children under the age of 36 months in Hong Kong.

- We have a common goal with the government to protect the health of the vulnerable consumer groups of infants and young children.
- We recognize that the measures ensuring the safety and adequate nutrition of formula products and prepackaged food for infants and young children under the age of 36 months are feasible ways to achieve the abovementioned common goal.
- We believe that the captioned amendment regulation with respect to the aforementioned category of products developed based on international standards/guidelines provides an effective means to fill in the gap that the initial Nutrition Labeling Scheme for prepackaged food products under the Food and Drugs (Composition and Labeling) Regulations (Cap 132W).
- We are convinced that a reliable nutrition labeling system can enable parents to gain access to the nutritional information of the products and thus facilitate them to make informed choices for their children.

However, regarding the implementation of the amendment regulation, we would like to put forward our additional views as below:

**1. Provide sufficient grace period to allow full compliance**

In response to the new requirements under the amendment regulation as well as relevant requirements such as the proposed tolerance limits, it is foreseen that a series of actions, including product reformulation, trial production and shelf life stability tests, which take 3-6 months for each step, is needed to be performed by the manufacturer. In addition, further working period for label development and commercial production is also needed.

Given such complex procedures involved, a reasonable and sufficient grace period of 24 months, same period given for Nutrition Labelling Scheme in 2010, is required to ensure a full compliance of the amendment regulation by all products in the market.

We understand that there are some requests for a shorter grace period. To strike a balance between the public concern and the practical need that the trade is facing, we would make the greatest possible concession in accepting the currently proposed grace periods, i.e. 18 months for infant formula while 24 months for follow-up formula and prepackaged food for infants and young children, if there is no other choice. However, any further shortening of the grace period may render the industry not able to meet the timeline of the regulation implementation and lead to a possible tight in product supply.

**2. Release the technical guidance for the industry to follow**

We appreciate the Government's effort in organizing several technical meetings with the industry to discuss the details of the amendment regulation. Yet, against the backdrop that the finalized technical guidance is not yet released, necessary details such as the testing method to be employed by the Government are still remain unclear to the industry. Given that the documents in important to facilitate the industry to promptly start the series of work such as formula calibration, we will be very grateful if the technical guidance will be released as soon as possible to facilitate the industry's preparation.

To conclude, Wyeth Nutrition appreciates the government's commitment to protect the health of infants and young children in Hong Kong and we also support the amendment regulation to provide clear nutrition information to parents to facilitate them to make informed choices.

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