



**HKRMA's Views on the Public Consultation:**  
**“Legislative Proposals Relating to Formula Products and Foods Intended for**  
**Infants and Young Children under the Age of 36 Months in Hong Kong”**

January 2013

On behalf of the Hong Kong Retail Management Association (“HKRMA”), we write to present our members’ views on the Government’s public consultation on the Legislative Proposals Relating to Formula Products and Foods Intended for Infants and Young Children under the Age of 36 Months in Hong Kong which was launched on 20 November, 2012:

- (1) The HKRMA has no objection in principle with the proposed introduction of nutritional labelling to formula products and foods intended for infants and young children below 36 months old.
- (2) However, we are concerned with the labelling requirement for food products, such as baby rusk and ready-to-eat meals in jars etc for toddlers. It is observed that many of these products do not come in Hong Kong-specific packing. While they are normally labelled with nutritional information that complies or exceeds the requirements of the country of origin, the format and definition of the nutritional data may not comply with Hong Kong’s definitions contained within its legislation/guidelines.
- (3) As such, the Association urges the Government to consider including these food products (but not including formula milk feed) intended for infants and young children under the age of 36 months to the Small Volume Exemption Scheme under the prevailing Nutrition Labelling Regulations based on the following considerations:
  - a. Infants and toddlers do not consume and rely on these products exclusively for nutritional intake.
  - b. The products currently carry appropriate nutritional data on the packing as required by the country of origin.
  - c. Hong Kong market is too small for manufacturers to reformulate and repackage their products to be allowed to sell in Hong Kong.
  - d. These products have generally a small sales volume. However, they provide consumer choice and it is important that these products are able to remain economically viable and available in Hong Kong market without a price rise resulting from reformulating or repacking in order to comply with the law.

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