



**Comments on Infant Formula Label Statements Experimental Study  
Docket No. FDA-2011-N-0098**

April 8, 2011

To Whom It May Concern:

The United States Breastfeeding Committee (USBC) is pleased to see this study regarding the interpretation of infant formula labeling. Label claims promise health outcomes similar to those seen in breastfed infants or claim that these formulations are similar to human milk. While structure/function claims are permitted by the FDA, evidence shows that consumers cannot tell the difference between these, which are permitted, and health claims, which are not.

Health care providers report parental confusion surrounding claims made on formula cans. Parents tell health providers that they purchase these products with the expectation that their infants will experience less illness, will be smarter and will see better when consuming infant formula. Many mothers give infant formula to breastfed infants because they fear their milk lacks vitamins and other nutrients that infant formula advertising implies are deficient in human milk.

Additives in infant formula are derived from non-human sources and are utilized by the infant's body in a different manner than those corresponding components in human milk. Infant formula labels should not contain text that equates it with human milk or the health outcomes of infants who consume human milk.

Misleading infant formula label claims negate the federal government's efforts to raise breastfeeding initiation, duration, and exclusivity rates. Infant formula should be labeled in a manner that reduces the false and misleading characterization of infant formula.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robin W. Stanton', written in a cursive style.

Robin W. Stanton, MA, RD, LD  
Chair