



## INTERNATIONAL FORMULA COUNCIL

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April 12, 2007

*Via Fax and US Mail*

CDC Desk Officer  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Re: Additional IFC Comments on the  
Proposed CDC Survey of Breastfeeding-  
Related Maternity Care Practices

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Dear Sir or Madam,

This letter is submitted by the International Formula Council\* (IFC) as a follow up to our March 9, 2007 comments addressing the February 8, 2007 *Federal Register* 30-day notice regarding the Center for Disease Control and Prevention's (CDC) revised draft proposed hospital survey: *Assessment and Monitoring of Breastfeeding Maternity Care Practices in Intra-partum Care Facilities in the United States and Territories—New—National Center for Chronic Disease Prevention and Health Promotion (NCCDPHP), CDC*. We appreciate your sharing a copy of the revised draft survey and allowing us to submit additional comments at this time.

IFC believes the survey has been improved by expanding the scope of some survey questions from breastfeeding to infant feeding. However, we are disappointed that more of our comments regarding infant feeding were not incorporated into the revised survey and reiterate our earlier position that, if this survey will form the basis for infant feeding guidelines, information on all infant feeding practices should be included. In order to best serve the needs of all infants, no matter what feeding option their mother chooses, the scope of the survey should be expanded to assess all infant feeding-related maternity care practices in intra-partum care facilities.

We understand the survey CDC has proposed is focused with breastfeeding-related practices in hospitals. IFC agrees with the American Academy of Pediatrics (AAP) that breastfeeding is best and offers specific child and maternal health benefits. However, there are instances when mothers cannot or choose not to breastfeed their infants. In these instances, IFC also agrees with the AAP, the US Food and Drug Administration, the United States' Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the American Dietetic Association, and other leading health professional organizations that infant formula is the only safe, nutritious, and recommended feeding option for babies who are not breastfed or do not receive breast milk. Thus, a survey assessing both breastfeeding practices as well as formula feeding

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\* The International Formula Council is an association of manufacturers and marketers of formulated nutrition products, e.g., infant formulas and adult nutritionals, whose members are predominantly based in North America. IFC members are: Abbott's Ross Products Division; Mead Johnson Nutritionals; Nestlé Nutrition – USA; Solus Products; and Wyeth Nutrition.

practices would provide the most comprehensive information on hospital infant feeding practices.

We thank CDC for allowing us the opportunity to again comment on the 30-day notice associated with its proposed breastfeeding survey. If CDC has any questions or requires clarification of any aspects of these comments, please contact me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mardi K. Mountford". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mardi K. Mountford  
Executive Vice President

cc: Paulette Murphy, MLIS, Deputy Chief, Maternal and Child Nutrition Branch, Division of Nutrition and Physical Activity, Centers for Disease Control and Prevention