



November 9, 2018

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

RE: Docket Number 30Day-19-0950 titled "The National Health and Nutrition Examination Survey (NHANES)"

Dear Dr. Jeffrey Zirger,

The Infant Nutrition Council of America (INCA) is responding to the notice published October 10, 2018 in the *Federal Register* by the U.S. Centers for Disease Control and Prevention (CDC) entitled, "The National Health and Nutrition Examination Survey (NHANES)," which is a 30 day extended comment period from the original notice published May 11, 2018 entitled "Proposed Data Collection Submitted for Public Comment and Recommendations." INCA is an association of manufacturers of infant formula, follow-up formula and growing up milks, whose member companies¹ produce over 95% of the infant formula consumed in the U.S. INCA advocates for optimal infant nutrition to ensure positive health outcomes, while supporting families in their feeding decisions and educating them on appropriate infant feeding options. Following are INCA comments on proposed revisions to the NHANES Questionnaire.

INCA supports the inclusion of a birth to less than 24-month (B-24) questionnaire module and collecting information on the use of infant and toddler formula. We agree this is important data to collect and thank CDC for including this population in the NHANES Questionnaire. With regard to the definition of "formula" in question DBQ.041 of section 3.19, INCA recommends using the following Codex definition, which is more specific and would align with other international standards: "infant formula means a breast-milk substitute specifically manufactured to satisfy, by itself, the nutritional requirements of infants² during the first months of life up to the introduction of appropriate complementary feeding."³

In addition, we request CDC collect information on the use of "commercial" or "homemade" infant formula, and to distinguish between the two. The American Academy of Pediatrics (AAP), the U.S. Food and Drug Administration (FDA), and several other government agencies and non-government organizations recognize there are safety and nutrition concerns with using homemade infant formula, which is why they recommend the use of commercial infant formula when breast milk is not available. If families are using formula, we ask CDC to add a question to clarify if they are using homemade or commercial infant formula, and to quantify this use.

We also ask CDC to add clarifying questions around breastfeeding and the use of breastmilk, as there is growing popularity in "breastmilk sharing" or purchasing breastmilk online. As with homemade infant formula, there are safety and nutrition risks with using another mother's breastmilk, and FDA and several other organizations do not recommend "breastmilk sharing." If families are using breastmilk, we ask CDC to add a question to specify the source of the breastmilk.

¹ INCA members are Abbott Nutrition, Gerber Products Company, Perrigo Nutritionals, and Reckitt Benckiser.

² The term infant means a person not more than 12 months of age.

Source: Food and Agriculture Organization of the United Nations (FAO) and World Health Organization (WHO). (1981). Codex Alimentarius. Standard for Infant Formula and Formulas for Special Medical Purposes Intended for Infants. Retrieved from https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjhz7CvZDeAhVJqlkKHS4DBo8QFjAAegQlCRAC&url=http%3A%2F%2Fwww.fao.org%2Finput%2Fdownload%2Fstandards%2F288%2FCXS_072e_2015.pdf&usg=AOvVaw3lEYHEFHfrHs-7DhbLDPlD

³ Ibid.



INCA is supportive of the Pregnancy and Birth to 24 Months Project (B-24) and including this population in the development of the Dietary Guidelines for Americans (DGA). We are also supportive of the proposed NHANES questions on the use of infant formula:

- Pg. 180: "How old was {SP} when {he/she} was first fed formula?"
- Pg. 181: "How old was {SP} when {he/she} completely stopped drinking formula?"

Since B-24 is a new population in the DGAs, there is opportunity for the NHANES Questionnaire to include more questions that would support data collection and complement the research and guidance of the Dietary Guidelines Advisory Committee (DGAC). The DGAC is charged with investigating the following questions, to name a few:

- What is the relationship between the duration of exclusive human milk and/or infant formula consumption and 1) growth, size, and body composition; 2) food allergies and atopic allergic diseases; 3) micronutrient status; and 4) developmental milestones, including neurocognitive development?
- What is the relationship between the frequency and volume of human milk and/or infant formula consumption and 1) micronutrient status; and 2) growth, size, and body composition?

Therefore, in order to support the B-24 initiative and work of the DGAC, INCA recommends CDC add questions to the NHANES Questionnaire to help determine: what is the frequency and volume of human milk and/or infant formula fed to the infant? We recommend adding questions around type, frequency, and quantity of infant feeding.

INCA is seeking clarification from CDC on who will be responding to the NHANES Questionnaire. Will answers be accepted from only mothers, or will other caregivers (fathers, grandparents, other guardians) be responding to these questions?

While this is a convenient opportunity for NHANES to find out more about infant feeding practices, this data remains limited in its ability to draw conclusions about infant feeding practices and long-term health outcomes. It is critical to be asking questions regarding infant feeding practices.

Thank you for the opportunity to provide comments on CDC's National Health and Nutrition Examination Survey. Please contact me with any questions you may have.

Sincerely,

A handwritten signature in black ink, appearing to read "Mardi K. Mountford".

Mardi K. Mountford, MPH
President