



November 28, 2017

Good morning, my name is Sylvia Poulos, and I am the Scientific and Regulatory Affairs Manager for the Infant Nutrition Council of America. INCA is an association representing companies that research, develop, and market formulated nutrition products for infants, children and adults. INCA members produce over 95% of the infant formula consumed in the US, and we take our responsibility of providing optimal nutrition to infants who are not exclusively breastfed very seriously.

Expanding the Dietary Guidelines for Americans to include recommendations for 0 to 24 month olds presents a significant opportunity to promote healthy growth and development as well as enhance nutrition and feeding experiences of all infants and young children. INCA believes:

- The B-24 guidelines—like all dietary guidelines—should be based on sound science.
- The Dietary Guidelines process must be transparent and allow for the submission and consideration of public comments to develop recommendations that are impactful.
- The Guidelines should be balanced and address the needs of all families with safe and nutritious feeding choices.

### Sound Science

Including recommendations for pregnant women, infants and young children is a tremendous opportunity to promote healthy development and eating patterns. However, since nutrition during the fetal and young infant periods is provided by a sole source, it is critical that the DGAC include scientists with specific expertise in the nutritional and developmental needs of these vulnerable populations.

Ideally, INCA recommends a separate sub-committee within the DGAC to specifically consider the nutritional needs of pregnant and breastfeeding women and infants/young children. A sub-committee with 12-15 experts in nutrition, pediatrics, epidemiology, biostatistics, and obstetrics that understands the strengths and limitations of the nutritional science should have the knowledge to develop guidelines that are balanced, comprehensive, accurate, and based on sound science.

### Transparency

We continue to be concerned about the lack of transparency of Dietary Guideline development. Infant nutrition research is complex and has unique limitations compared to other areas of nutrition research. Thus, transparency is essential to help develop guidelines. The Dietary Guidelines will be strengthened if expert groups participate in the consideration of research frameworks, literature review findings, and development of interim recommendations. INCA members have decades of experience in infant feeding research and would welcome the opportunity to share our knowledge in pediatric nutrition and health outcomes.

### Balance

Our final comments focus on the impact of the Dietary Guidelines for Americans. The DGAs set the scientific standard for nutrition, healthcare, and public health and education programs in the U.S. and possibly globally. Therefore, it is critical that the new guidance provided for young infants be balanced, based on science, reflect cultural sensitivities, and address the full spectrum of infant feeding (i.e. breastfeeding, pumped and donor milk feeding, and infant

formula feeding). In addition, the dietary guidelines should specifically recommend against infant feeding practices that are not safe and are potentially harmful, such as the use of homemade infant formula.

Finally, to most effectively communicate guidelines developed by DGAC, INCA requests that CNPP conduct specific consumer research to identify successful communication techniques that help ensure clear, impactful communication about the DGAs to parents and caregivers.

INCA advocates for infant health and nutrition, support mothers and families in their feeding decisions and provide education on appropriate infant feeding options. INCA appreciates the opportunity to provide comments today. Thank you for your consideration and continued opportunities to engage in the development of these important guidelines.

***\* INCA members are: Abbott Nutrition; Mead Johnson Nutrition; Gerber Products; and Perrigo Nutritionals.***