

**TESTIMONY OF THE INTERNATIONAL FORMULA COUNCIL
BEFORE THE CONNECTICUT JOINT COMMITTEE ON CHILDREN
REGARDING HB 6527 – AN ACT CONCERNING GENETICALLY-ENGINEERED BABY FOODS
MARCH 5, 2013**

My name is Robert Rankin, and I am the Associate Director of the International Formula Council. The IFC 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. We appreciate the opportunity to testify on House Bill 6527.

The primary focus of the IFC and its member companies is and will always remain the health and welfare of infants and young children. The product we manufacture, infant formula, is the most highly regulated food in the world and continues to be the only safe, nutritious and recommended alternative to breast milk. To that end, we respectfully oppose House Bill 6527, which would require labeling on all infant formulas containing genetically engineered materials. Labeling of genetically-engineered ingredients is unnecessary, provides no public health benefit and likely will create confusion and alarm – the opposite of the intended effect of this legislation.

Mandatory labeling of infant formulas that contain ingredients produced with genetic engineering may confuse and mislead consumers. The U.S. Food and Drug Administration's (FDA) labeling authority ensures that food labels are not "false or misleading," and the infant formula industry strictly adheres to these requirements. Infant formula labels are consistent throughout the nation, so requiring a certain label statement in Connecticut that is not used elsewhere may create confusion and unnecessary alarm, especially considering the frequency with which citizens in the Northeast travel and shop between states. It is also unrealistic and unnecessarily burdensome to require food manufacturers to produce different food labels based on individual state labeling laws.

The FDA has established voluntary labeling guidelines for manufacturers who wish to label and consumers who wish to purchase foods produced without genetically-engineered ingredients. Consumers also have the option to purchase products that are certified as organic under the US Department of Agriculture's National Organic Program.

As is the case with all other foods, some infant formula ingredients can be derived from widely used genetically-engineered crops. The US FDA has concluded that all genetically-engineered ingredients they have approved for use in human foods, including infant formulas, are the same in composition, nutritional value and quality as ingredients not derived through biotechnology, and that labeling of foods containing genetically-engineered ingredients is unnecessary. This position is supported by numerous regulatory and health organizations, including the American Medical Association.

Infant formula ingredients, which are sourced from the same companies who provide ingredients for all other food manufacturers, are carefully quality-controlled and produced to the highest industry and government standards. U.S. infant formula manufacturers must comply with the U.S. Infant Formula Act and its implementing regulations, which provide robust nutritional, quality and labeling requirements to ensure products are safe and nutritious.

* IFC members are Abbott Nutrition, Mead Johnson Nutrition, Nestlé Infant Nutrition and Perrigo Nutritionals.

Mandatory labeling of foods containing genetically engineered ingredients would not improve public health and safety. An extensive body of rigorous national and international scientific evidence supports the safety of these ingredients. US regulatory agencies, including the FDA, the USDA and the Environmental Protection Agency have studied genetically-engineered foods for more than 30 years, in conjunction with individual state governments, to ensure that crops produced with biotechnology are safe to eat and environmentally sound. It is relevant to note that health professional organizations, including the World Health Organization, the National Academy of Sciences, the American Medical Association and the Academy of Nutrition and Dietetics have endorsed the safety of crops enhanced through biotechnology. These positions apply to foods consumed by adults as well as infants and young children.

In summary, mandatory labeling on infant formula products containing genetically-engineered ingredients is unnecessary and does not provide any benefit to the health or welfare of consumers. In fact, such labeling will likely have the opposite effect – creating confusion and alarm. For these reasons, IFC opposes House Bill 6527.