



Via Email

March 3, 2016

Committee on Children  
Connecticut General Assembly  
State Capitol Building, Room 011  
Hartford, CT 06106

RE: Testimony of the Infant Nutrition Council of America Regarding HB 5300 – An Act Concerning the Use of Genetically Modified Organisms in Children's Food

Dear Members of the Committee on Children:

The Infant Nutrition Council of America (INCA) is an association of manufacturers and marketers of infant formula and other formulated nutrition products for young children. INCA members produce over 95% of the infant formula purchased in the U.S. We appreciate the opportunity to offer testimony on House Bill 5300.

The primary focus of the INCA and its member companies is and will always remain the health and welfare of infants and young children. Infant formula is the most highly regulated food in the world, and it continues to be the only safe, nutritious and recommended alternative to breast milk. To that end, we respectfully oppose House Bill 5300, which would require labeling on all infant formulas and foods for children containing genetically engineered (GE) ingredients that are sold in Connecticut.

While this bill may be intended to inform consumers, requiring a label on infant formulas that contain GE ingredients will provide no public health benefit and may actually confuse and mislead consumers. Further, the proposed labels are unnecessary because infant formula options already exist for those Connecticut families who wish to avoid formulas containing GE ingredients.

As is the case with many other foods, some infant formula ingredients can be derived from widely cultivated GE crops. An extensive body of rigorous national and international scientific evidence supports the safety of these ingredients for use in foods intended for adults as well as infants and young children. In addition to endorsing their safety, the U.S. Food and Drug Administration (FDA) has concluded that all GE ingredients currently permitted for use in foods, including infant formulas, are the same in composition, nutritional value and quality as ingredients not derived through biotechnology. FDA has thus determined that the mandatory labeling of foods containing GE ingredients is unnecessary, a position supported by numerous regulatory agencies and health organizations, including the American Medical Association. Therefore, there is no compelling health, safety or nutritional rationale that supports the notion of labels to disclose the presence of GE ingredients on any foods, much less only in foods for infants and young children.

Consumer demand for information about GE ingredients, which does not provide meaningful information about the safety of the product, is best addressed through voluntary labeling. In 2015, FDA finalized its clear and logical guidance on the use of label statements on foods that have not been developed through genetic engineering. Furthermore, there is currently an ongoing process at the Congressional level that would establish a national standard for labeling of GE foods and should give states pause when considering their own legislation. In 2015, the House of Representatives passed legislation that would establish federal authority over GE labeling and require the U.S. Department of Agriculture (USDA) to promulgate a robust voluntary labeling program and key definitions. On February 19, 2016, Senator Pat Roberts (R-KA) introduced Senate legislation that would also establish federal authority over GE labeling

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

and require the USDA to promulgate key definitions. On March 1, the Senate Committee on Agriculture passed Chairman Robert's bill 14 to 6 with bipartisan support. INCA supports a national standard because it will reduce confusion for Connecticut citizens who routinely purchase goods in other states and avoid the logistical problems and associated costs that would result from complying with different state-by-state labeling mandates.

In addition, in accordance with FDA's guidance and in response to consumer demand, INCA members now manufacture a variety of products intended for infants and young children that clearly indicate on their packaging that they were not made using GE ingredients. The presence of these products, as well as those certified as organic, give consumers who wish to avoid formulas containing GE ingredients the option to do so. Requiring that all other formulas specifically state that they were made with GE ingredients, however, will likely lead to misunderstandings, misinformation and unfounded fears of biotechnology, not to mention additional costs to consumers.

Finally, we note that HB 5300 could drive some caregivers, such as those unable or unwilling to purchase premium non-GE or organic formulas, to use alternative infant feeding options, such as homemade infant formula, which are not recommended by medical authorities and may be extremely dangerous to infant health. Testimonials and recommendations to use homemade formula as a means to avoid infant formulas containing GE ingredients, including numerous online recipes, abound on social media and are widely available to Connecticut consumers. Several of these recipes have been evaluated and found to be deficient in key nutrients required by federal authorities. The American Academy of Pediatrics, FDA and other health organizations unanimously and strongly recommend against the use of homemade infant formula. The use of homemade infant formula is dangerous to the health of infants, and is a legitimate unintended consequence of this legislation for consumers who are alarmed by the labeling requirement.

In summary, mandatory labeling of infant formula products containing GE ingredients is unnecessary, does not provide any benefit to the health or welfare of consumers, and may result in a number of unintended consequences. With a variety of voluntarily labeled non-GE and certified organic products available in Connecticut, INCA seriously questions the need for HB 5300, particularly as the U.S. Congress is in the midst of considering establishment of a national standard for GE labeling. For these reasons, INCA strongly opposes House Bill 5300.

For your reference, we are enclosing a list of non-GE and organic infant formulas that are available in Connecticut. We appreciate your consideration of this testimony.

Sincerely,



Mardi K. Mountford, MPH  
Executive Vice President  
Infant Nutrition Council of America

Enclosures: INCA List of Non-GMO and USDA-Certified Organic Infant Formulas Available in Connecticut



# INFANT NUTRITION COUNCIL OF AMERICA

## Non-GMO and USDA-Certified Organic Infant Formulas Available in Connecticut

(As of March 3, 2016)

Manufacturer	Marketed By	Label Name	Formula Details
Abbott Nutrition	Abbott Nutrition	Similac Advance Organic	Milk, Liquid
Abbott Nutrition	Abbott Nutrition	Similac Advance Organic	Milk, Powder
Abbott Nutrition	Abbott Nutrition	Non-GMO Similac Advance	Milk, Liquid
Abbott Nutrition	Abbott Nutrition	Non-GMO Similac Sensitive	Milk, Liquid
Abbott Nutrition	Abbott Nutrition	NON GMO Go and Grow by Similac	Milk, Powder
Abbott Nutrition	Abbott Nutrition	Organic Similac	Milk, Powder
Abbott Nutrition	Abbott Nutrition	Similac Advance Organic	Milk, Powder
Gerber	Gerber	All Gerber Formula Products	Milk, Powder, Liquid Concentrate
Mead Johnson Nutrition	Mead Johnson Nutrition	Non-GMO Enfamil Newborn	Milk, Powder
Mead Johnson Nutrition	Mead Johnson Nutrition	Non-GMO Enfamil Newborn Ready-to-Use Nursette Bottles	Milk, Liquid
Mead Johnson Nutrition	Mead Johnson Nutrition	Non-GMO Enfamil Infant	Milk, Powder
Mead Johnson Nutrition	Mead Johnson Nutrition	Non-GMO Enfamil Infant Ready-to-Use	Milk, Liquid
Mead Johnson Nutrition	Mead Johnson Nutrition	Non-GMO Enfamil Newborn	Milk, Powder
Perrigo Nutritionals	Topco	Full Circle Organic Infant Formula	Milk, Powder
Perrigo Nutritionals	Delhaize	Hannaford Organic Infant Formula W/ Iron	Milk, Powder
Perrigo Nutritionals	Whole Foods	365 Everyday Value Organic Infant Formula with Iron	Milk, Powder
Perrigo Nutritionals	Whole Foods	365 Everyday Value Organic Soy Based Infant Formula with Iron	Soy, Powder
Perrigo Nutritionals	PBM Nutritionals	Vermont Organics Milk-Based Organic Infant Formula	Milk, Powder
Perrigo Nutritionals	PBM Nutritionals	Vermont Organics Soy Organic Infant Formula	Soy, Powder
Perrigo Nutritionals	Wegmans	Wegmans Organic Food You Feel Good About Milk-Based Infant Formula with Iron	Milk, Powder
Perrigo Nutritionals	Safeway	Baby Milk Based Infant Formula With Iron	Milk, Powder
Perrigo Nutritionals	Safeway	Baby Soy Based Infant Formula With Iron	Soy, Powder
Perrigo Nutritionals	Kroger	Comforts Organic Milk-Based Infant Formula with Iron	Milk, Powder
Perrigo Nutritionals	Kroger	Comforts Organic Infant Formula Soy- Based with Iron	Soy, Powder

Perrigo Nutritionals	Walmart	Parent's Choice - Organic Milk-Based Powder Formula with Iron	Milk, Powder
Perrigo Nutritionals	The Hain Celestial Group, Inc.	Earth's Best Organic Powder Formula, with Iron	Milk, Powder
Perrigo Nutritionals	The Hain Celestial Group, Inc.	Earth's Best Organic Soy Infant Powder Formula with Iron	Soy, Powder
Perrigo Nutritionals	The Hain Celestial Group, Inc.	Earth's Best Organic Sensitivity Infant Formula with Iron	Milk, Powder