

February 3, 2004

The Honorable Tommy Thompson
Secretary
U.S. Department of Health and Human Services
200 Independence Ave., SW, Room 615F
Washington, DC 20201

Dear Secretary Thompson:

I am writing on behalf of Consumer Federation of America to express our deep concern about the Department's proposed advertising campaign that focuses on breastfeeding.

Consumer Federation of America is a nonprofit education and research organization composed of 300 local, state and national consumer groups; consumer cooperatives; senior citizen, anti-hunger and public health associations; and trade unions. Our member organizations, representing over 30 million Americans, have joined to represent the consumer's interest on a range of public policy issues.

As you are aware, CFA's Food Policy Institute actively pursues public policies that promote good nutrition and reduce the risk of obesity. We have appreciated your devotion to and efforts toward our shared goal.

Because we have a strong interest in good nutrition, CFA is aware of the important health benefits that accrue from breastfeeding. We have supported the goal of Healthy People 2010 to increase the rate of breastfeeding. We believe the HHS Blueprint for Action call for a media campaign that portrays breastfeeding as "normal, desirable and achievable" was on target.

We're at a loss to understand the process by which such a laudable goal morphed into the guilt and fear mongering campaign described in the AdCouncil's newsletter and the December 4, 2003 *New York Times* article, "Breastfeeding Ads Delayed by a Dispute Over Content."

There are millions of mothers who, in order to feed themselves and their children, must return to work shortly after the birth of a child. A substantial percentage of those women

activities during the last stages of pregnancy is misleading. While science shows the advantages of breastfeeding, there are no data to suggest that infant formula is a health risk.

In fact, the United States government through its Women, Infants and Children's (WIC) program purchases half of all infant formula sold in this country. How can the government on the one hand say that not breastfeeding your baby is tantamount to riding a mechanical bull in the late stages of pregnancy, while on the other hand fully support the use of infant formula as an alternative for those who choose not to breastfeed or who cannot breastfeed?

I do understand that this is a campaign in development. However, I'm concerned that the zealous desire to increase breastfeeding rates has lead HHS down a path that compromises FDA's standards of scientific certainty and undermines FDA's policies of strict adherence to marketing practices that accurately reflect the claims beings made.

My organization would like to join HHS and other advocates of breastfeeding in supporting a campaign that increases awareness among new mothers and their partners of the benefits of breastfeeding, educates women about the process, reduces their fears and supports their decision to breastfeed. We urge you to develop a campaign that both emphasizes the benefits of breastfeeding and respects the realities faced by women as they attempt to manage the enormous challenges of family and work.

If CFA can be of any assistance to you as you move forward to address these issues, please know that we stand ready to do so.

Sincerely

Carol Tucker Foreman
Distinguished Fellow, Director
The Food Policy Institute