



October 24, 2016

Susan T. Mayne
Director, Center for Food Safety and Applied Nutrition
c/o Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket Number FDA-2016-D-2241 for "Substantiation for Structure/Function Claims Made in Infant Formula Labels and Labeling."

Dear Dr. Mayne,

I am writing in support of this proposal. Structure/function claims should not be permitted on the labels and in the advertising of infant formulas. These products already meet rigorous nutrition standards and are virtually identical. The purpose of structure/function claims is to appear to differentiate one product from another and to convey the impression that formula products are superior to breast milk for feeding infants.

Plenty of evidence indicates clearly that human milk is the best source of nutrition for human infants and that infants should be breastfed whenever possible. While Infant formula is an adequate substitute for human milk, it is not the first choice and should not be permitted to advertise, suggest, or imply that something added to the formula makes it superior to human milk.

If claims are made for infant formula, they must be substantiated with trials of safety and efficacy.

Thank you for the opportunity to comment.

Yours truly,

Marion Nestle, PhD, MPH
Paulette Goddard Professor