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The Honorable Tommy G. Thompson  
Secretary  
U.S. Department of Health and Human Services  
800 Independence Avenue, S.W.  
Washington, D.C. 20201

Dear Tommy:

As you know, in recent months your Office of Women's Health has been working with an ad agency on an advertising campaign to boost breastfeeding in the U.S. We are writing on behalf of the International Formula Council (IFC),<sup>1/</sup> which has deep concerns about this project. The concerns lie not with the underlying substance, for the industry fully supports breastfeeding and is in no way opposed to a positive campaign to promote breastfeeding. They lie with the supposed "risk based" focus of the campaign.

As you may also know, the ad agency argues that a program focusing on the positive benefits of breastfeeding is not likely to garner nearly as much attention as one focusing on the negatives (i.e., the alleged health risks) of not breastfeeding. The agency may well be correct, but the more relevant question is whether this represents sound public policy. Negative political ads are effective too, but neither you nor I like them!

I'm told that one of the ads features a pregnant woman riding a mechanical bull, with a voice-over stating: "You would not take risks before your baby is born, why start after?" The voice then inappropriately cites recent studies purportedly demonstrating increased vulnerability to various diseases for babies not breast-fed than for those who are breast-fed.

The infant formula industry and others question the scientific validity of these claims, and they certainly generate skepticism from me as a father and grandfather. But I'm even more troubled by the concept of scaring expectant mothers into breastfeeding. There are millions of mothers in this country who cannot or choose not

<sup>1/</sup> The IFC represents the following manufacturers of infant formula: Ross Products Division, Abbott Laboratories; Mead Johnson Nutritionals; Nestlé USA, Inc., Nutrition Division; Glaxo Products; and Wyeth Nutrition.

would prefer to breast feed, but personal circumstances, often related to returning to work, make it impossible for them to do so. Many undoubtedly have guilty feelings as a result. Does the U.S. government really want to engage in an ad campaign that will magnify that guilt?

One reason I'm personally concerned about this is that thousands of low-income mothers receive infant formula and other foods their babies need through the WIC program at USDA. That's a program I launched during my first stint at USDA about 30 years ago, and it is probably the most successful government feeding program this nation has ever had. It seems to me that the ad campaign being contemplated at HHS is clearly inconsistent with the approach taken by USDA over the past three decades.

Toramy, I know that Assistant Secretary Keane has sought to correct some of the major shortcomings of this proposed ad campaign. Some helpful changes were made recently, and the most egregious statements apparently have been removed. But the supposedly final work product is still unacceptably misleading. The U.S. Breastfeeding Committee recently stated that "the risk-based campaign puts infant feeding back into the domain of public health," — obviously implying that mothers who use infant formula are placing their babies at risk. In our view, a higher level of credibility lies with the journalist who wrote in the Los Angeles Times "shaming women [into breastfeeding] is bad health policy."

The IFC is grateful for what Assistant Secretary Keane has done, but the industry simply feels that more must be done if this campaign is to be at all balanced. Personally I'm not convinced that negative, scare campaigns are worth salvaging, but I'll defer to your judgment on that. I am also concerned that this campaign will increase class action lawsuits against the medical community and the industry. The IFC would very much like to meet with you to articulate their specific concerns.

Thanks for taking time to seriously consider the policy implications of this

As you can tell it's a really important issue



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April 21, 2004

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The Honorable Tommy Thompson  
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Dear Mr. Secretary:

Many thanks for carving out so much time on your hectic schedule to meet with Joe Levitt, Wendy Thomas, Dr. Lillian Beard, Mardi Mountford and I. We were deeply grateful for your willingness to hear our concerns with respect to one of your proposed new public service programs. We are also appreciative of the good work your staff has done already to eliminate or modify the most egregious distortions in the program as it was originally outlined. It is regrettable, of course, that such action was even necessary. One would expect that a major proposal, submitted for U.S. government sponsorship, would come to you stripped of any obvious distortions. Such is not always the case, however.

As we emphasized repeatedly, no one in our group is in any way opposed to an HHS program to encourage breast feeding. We all agree that breast feeding has advantages over any of the alternatives, and you'll hear no objections from us if HHS delivers that message regularly and with enthusiasm. Our objection is to the contemplated visuals, featuring pregnant women riding a mechanical bull or engaging in log rolling. Those are catchy images, which obviously is what the advertising experts had in mind. But they are grossly misleading, and no department of our government should purposefully convey misleading information to the American public.

Mr. Secretary, those visuals say to America's mothers that if they do not breast feed the health of their babies will be at risk — and that the risk is about comparable to that of a pregnant woman riding a bull or rolling logs. That is erroneous, of course, but think of the message that delivers to the thousands of mothers who believe what their government tells them. As you well know, and as Dr. Beard emphasized in our meeting, many mothers simply cannot breast feed, or cannot do so for as long as would be desired, or elect not to do so for persuasive reasons (often economic). For our government to give all those mothers a guilt trip would just be appalling.

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NEW YORK BALTIMORE McLEAN MIAMI DENVER BOULDER COLORADO SPRINGS LOS ANGELES

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In that group of mothers just mentioned will be many of the thousands of lactating women who participate in USDA's Women, Infants, & Children (WIC) program. We began that program when I was serving as an Assistant Secretary of Agriculture a good many years ago, and most observers would rate it as the most successful nutrition program ever sponsored by our government. Lots of infant formula is used in the WIC effort, for compelling reasons that I need not delineate here. It would be most unfortunate if HHS were to send a risk-oriented message to these women that most of them will find incompatible with what they're being told by USDA, and will at best confuse them, at worst frighten them.

Mr. Secretary, there just has to be a way to deliver the breast feeding message with positive visual images. I know that you and your staff are being told that cannot be done; positive images have been used in the past and they've fallen flat. Perhaps so, but someone somewhere has the creativity to get this done. As valuable as this effort may be, it is not one that should be built on a foundation of distortions, fear and guilt, particularly where a vulnerable segment of our population is at issue.

Thanks again for giving this your personal consideration.

Cordially,

  
Clayton Yeutter

P.S. Special thanks for the tour of your anti-terrorism facilities. They're most impressive, and quite a tribute to your leadership.