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April 3, 2006

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex H)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Food Marketing to Children and Adolescents Report to Congress – Comment,
Project No. P064504

Dear Sir or Madam,

The Food Marketing Institute¹ is pleased to respond to the Federal Trade Commission's (FTC's) request for information and comments on the nature and extent of marketing activities targeted toward children and adolescents. 71 Fed. Reg. 1055 (March 1, 2006). In particular, the FTC was directed to prepare a report to Congress regarding the marketing activities of the food industry that focused on children. As discussed more fully below, the retail food industry has long recognized the importance of sound nutrition for all consumers, including children and adolescents. As a result, FMI and many of its members have programs geared toward providing children and families with information to assist them in making sound nutritional choices.

Nutrition is very important to all consumers. In FMI's Supermarket Trends 2005 report, eighty-five percent of consumers said that they were very or somewhat concerned about the nutritional content of the foods that they eat. Seventy to ninety percent of consumers surveyed said that they read nutrition labels and ingredient statements to look for some or all of the following: fat content, cholesterol, trans-fats, calories, salt, sugars, whole grains and fiber.

Given the high consumer demand for this information, retailers provide it regularly and in a wide variety of forms, increasingly emphasizing foods with higher nutritional values

¹ FMI conducts programs in research, education, industry relations and public affairs on behalf of its 1,500 member companies — food retailers and wholesalers — in the United States and around the world. FMI's U.S. members operate approximately 26,000 retail food stores with a combined annual sales volume of \$340 billion — three-quarters of all retail food store sales in the United States. FMI's retail membership is composed of large multi-store chains, regional firms and independent supermarkets. Its international membership includes 200 companies from 50 countries.

to all consumers, not just children. Brochures, recipes, columns written by in-house nutritionists and dietitians are all common fare to help consumers understand how to make the best nutritional choices for themselves and their families. Indeed, eighty-four percent of consumers believe that it is the consumer's responsibility to ensure that the food that they buy is nutritious so retailers are providing them with the information that consumers need to make informed, responsible choices.

FMI and the food retailing industry provide information on food nutrition for children. For example, FMI's website includes an entire section related to obesity in general and provides several resources specific to children, including the MyPyramid for Kids program developed by the U.S. Department of Agriculture and the Food and Drug Administration. (<http://www.fmi.org/health/>)

Almost a decade ago, FMI in cooperation with the American Academy of Pediatrics and the American Dietetic Association developed the "Healthy Start: Food To Grow On" supermarket kit program, a copy of which is enclosed. The kit includes a parent-child activity book geared toward children ages 5 to 8 years old to help them understand the importance of nutrition. The booklet includes "kid-friendly" recipes for healthy foods, information on the food groups, and tips for involving children in the kitchen. Pamphlets on sound nutritional practices for children and tips for helping parents encourage children to eat foods that will best provide for their nutritional needs are also included. FMI and other food-related trade associations are working directly with the U.S. Department of Agriculture and the Food and Drug Administration to update the program to reflect the latest "My Pyramid" recommendations from USDA and FDA.

Many of our members use the FMI program or have developed their own in-store programs geared toward children. In this regard, some members hold "healthy kids" cooking classes and others conduct store tours, in which they utilize the 'My Pyramid for Kids' messages. Tours are designed for elementary school classes, scout groups, and other groups of children. The purpose of the tours is to introduce children to the healthy choices that are available at their local supermarkets. Healthy eating habits begin in childhood, so our members recognize that it is important for parents, schools and the community to help children learn to eat healthy.

In addition, several of our members take healthy food programs to groups of children, either in schools or to scout troop meetings. For example, one member conducts a "MyPyramid" classroom presentation that includes age-appropriate nutrition information, a healthful snack, and follow-up activities. Others have prepared programs to help scouts qualify for different badges. One such program starts with education about food labels and the information on nutrients, sodium, sugar, calcium, protein and vitamin C that the labels give to consumers. The children are encouraged to read the labels and compare the foods, identifying the foods that are better for them. The children also prepare several dishes, including a bean burrito and fruit yogurt, foods that are then served to the children with milk.

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Many members offer newsletters with information on healthy eating habits and sections addressing children's nutritional needs. Tips on how parents can encourage children to exercise, help children eat balanced meals, and serve as good nutritional role models are regular messages are featured in many. Helping parents serve adequate healthy breakfasts that emphasize key food groups – such as dairy, whole grains, and fruit – are also utilized regularly.

Healthy private label lines developed by retailers and geared toward children are among the most recent trends in child-oriented nutritional programs. One retailer's line is free of hydrogenated oils, artificial flavors or colors and is consistent with the government's recommendations for fat, sodium and calorie intake. "Good for you" foods do not always appeal to children so the line comes in colorful packaging with cartoon figures and age-appelling names. These products are promoted in secondary displays and integrated fully in their respective categories.

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We hope you will find the foregoing information of use. If you have any questions regarding our submission, or if we may be of assistance in any other way, please do not hesitate to contact us.

Sincerely,

Dagmar T. Farr
Group Vice President
Legislative & Consumer Affairs