



REPRESENTING THE RESTAURANT INDUSTRY
The Cornerstone of the Economy, Career Opportunities and Community Involvement

April 3, 2006

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

Food Marketing to Children and Adolescents Report to Congress Comment Project No. P064504

Dear Sir or Madam:

Founded in 1919, the National Restaurant Association is the leading business association for the restaurant industry. Together with the National Restaurant Association Educational Foundation, the Association's mission is to represent, educate and promote an industry that is comprised of over 925,000 restaurant and foodservice outlets employing more than 12.5 million people, making us the largest private sector employer in the country. As such, diversity, customer service and high quality foods are top priorities for the ever-growing restaurant industry.

The National Restaurant Association would like to thank you for this opportunity to comment on Food Marketing to Children and Adolescents Report to Congress Comment, Project No. P064504.

We understand the importance of the Commission's request and need for relevant information, including empirical data, on the nature and extent of marketing activities and expenditures directed to children and adolescents. We support your efforts in obtaining more specific information from food and beverage companies. As a nonprofit trade association, the National Restaurant Association's role is to represent, promote and educate the restaurant industry. We do not poll or collect this specific information from our membership. We would, however, like to take this opportunity to provide you with information regarding the proactive things that our industry is doing to promote nutrition and healthy lifestyles to children and adults alike. We would like to request that this information be included in your report to Congress.

The restaurant industry has a longstanding commitment to promoting healthy lifestyles, which can best be obtained via balance and moderation in diet combined with physical activity. Healthy options have always been available on restaurant menus everywhere. While 76 percent of meals are eaten at home, when individuals do dine out, the nation's 925,000 restaurants are responding to consumer demand with even more menu options.

As an industry of choice, restaurants offer myriad menu options to satisfy the diverse needs of a diverse population. In addition, 75 percent of consumers customize their meals by asking for alternative preparation methods, off-the-menu orders and substitutions -- requests which virtually all restaurants welcome and encourage.

To cater to increasingly health-conscious diners, restaurants across the country are increasing their efforts to provide what their guests ask for, including developing special menu items for those watching their calorie, carbohydrate and/or fat intake, voluntarily providing nutritional information in brochures and on Web sites, and establishing their own initiatives to assist consumers live a healthy lifestyle. Such examples can be viewed on our website, under our "Market-Driven Solutions" section at http://www.restaurant.org/pressroom/market_solutions.cfm.

As we spoke to our members about this Report, we received a great deal of positive feedback about how our nation's restaurants are promoting nutrition and healthy lifestyles. Some specific initiatives include:

- Continually maintaining company websites to display their most up-to-date nutrition information via the internet. This includes useful information on selecting foods that are moderate in calories, fat and carbohydrates. These company websites show a range of choices and allow guests to customize their meals for their taste and diet preference.
- Displaying nutrition information via nutrition posters, brochures, tray liners, or other materials in their U.S. restaurants.
- In their children's advertising, restaurants have made a conscious effort to include the options they have available for children. These include 100% orange and apple juices, sliced fruit, apple sauce, carrot sticks, and many other alternatives.
- Some have provided schools across the nation with activity kits including items such as jump ropes, frisbees, balls, etc. in support of the President's Challenge fitness award. Many of these schools had limited physical fitness budgets and with these restaurants' support, the schools may not have been able to fund these initiatives.
- To help motivate and engage children in physical activity, some restaurants have developed physical education curriculum. Children in grades 3-5 will learn about and play games from 15 countries around the world.

Many of our members work with and follow guidelines set by the Children's Advertising Review Unit (CARU). CARU is the self-regulatory arm of the children's advertising industry that is a division of the Council of Better Business Bureaus (CBBB). The industry's self-regulatory system is effective, efficient, robust, independent and

transparent. CARU policies are set by the National Advertising Review Council, relying on the practical experience of industry advertising experts and the self-regulatory experience of the CBBB. CARU staff monitors roughly 1,000 commercials each month, in addition to print and radio ads and Websites.

We are committed to providing nutritious food choices to our customers. To this end, we have taken substantive steps to encourage the expansion of menus to offer a variety of options. Restaurants have risen to the growing demands of consumers, including great demand for more nutritious foods, fresh ingredients, and fusion of flavors. We look forward to working with FTC in the future towards our common goal of educating consumers and making nutritious and wholesome food choices available.

Please feel free to call on us with any questions you may have regarding this issue, at (202) 331-5986.

Sincerely,

Donna M.Garren, Ph.D.
Vice President, Health and Safety Regulatory Affairs