

TO: Federal Trade Commission
FROM: Margo G. Wootan, D.Sc., Nutrition Policy Director, Ameena Batada, Dr.P.H., Nutrition Policy Fellow, Center for Science in the Public Interest
RE: Food Marketing to Children and Adolescents Report to Congress – Comment, Project No. P064505
DATE: April 3, 2006

The Center for Science in the Public Interest (CSPI) is pleased that the FTC is undertaking this important study on food and beverage marketing to children and adolescents. The study questions outlined in the notice requesting information and comment look excellent. We have a few suggestions to make the results more useful to decision makers and public health and child health professionals. In addition, we suggest several data sources for the study.

Suggested Revisions to Study Questions

First, and most importantly, we suggest that you include in your study the collection of information on **the nutritional quality of products marketed to children**. Beginning with question 1a, in which you request of companies the categories or subcategories used to describe the types of products they market to children and adolescents, we suggest that you ask for more detailed product information. The FTC should request that companies provide either:

1. **specific brand names of products** they market to children so that the FTC can determine the nutritional quality of the marketed products; and/or
2. **nutrition information on the products** marketed to children. Some examples of ways to ask for information on the nutritional quality of products include:
 - a) to which Food Pyramid food group the product belongs and if the product meets the Food and Drug Administration's definition of "healthy"¹ and is moderate in sugars (35% by weight);² or
 - b) which products are of poor nutritional quality according to specified criteria, such as those in CSPI's *Guidelines for Responsible Food Marketing to Children* (www.cspinet.org/marketingguidelines.pdf).

The FTC study should **investigate the nutritional quality of products covered under each of its questions**, including types of media (question 2b), techniques (question 3b) and internet marketing (question 4). It is essential to know the nutritional quality of the product mix marketed to children.

¹ Foods that qualify for a "healthy" claim must be low in fat and saturated fat, have less than 480 mg of sodium per serving, and contain at least 10% of the Daily Value for vitamin A, vitamin C, calcium, iron, protein, or fiber (except for in many fruits and vegetables) (see <http://www.cfsan.fda.gov/~dms/flg-6-2.html#healthy>).

² The U.S. Department of Agriculture's Healthier US School Challenge recommendation for school foods sold outside of meals is that products contain no more than 35% of their weight from sugars (<http://teamnutrition.usda.gov/HealthierUS/index.html>).

Second, we recommend a more thorough evaluation of web-based marketing. Within question 4, we suggest that you again ask companies to **specify which food and beverages they market**, as well as ask them to provide the **number of unique hits and visits to the sites**, and the **range and average length of time per visit**.

Suggested Resources for the Study

Below is a list of documents that may assist you in preparing the report:

- *Pestering Parents*, a CSPI report on food marketing to children, is available at:
http://cspinet.org/new/pdf/pages_from_pestering_parents_final_pt_1.pdf,
http://cspinet.org/new/pdf/pages_from_pestering_parents_final_pt_2.pdf, and
http://cspinet.org/new/pdf/pages_from_pestering_parents_final_pt_3.pdf.
- The following reports on foods sold in schools, an important way that food is marketed to children:
 - *Dispensing Junk* reports findings from a national study on the content of middle and high school vending machines and is available at:
http://www.cspinet.org/dispensing_junk.pdf.
 - The *Community Health Partnership Beverage Contract Study* reports on the extent and nature of school vending contracts in Oregon and is available at:
<http://www.communityhealthpartnership.org/publications/reports/reports.html>.
 - The Robert Wood Johnson Foundation's *State Actions to Promote Nutrition, Increase Physical Activity and Prevent Obesity: A Legislative Overview* outlines new state policies regarding nutrition in schools, including food sales, in the section on School Nutrition (beginning on page 17). The report is available at:
<http://www.rwjf.org/files/research/July%202005%20-%20Report.pdf>.
- The *Food and Beverage Marketing on California High School Campuses Survey* describes food marketing in schools and is available at:
http://www.phi.org/news_NEAN/marketing_report.pdf.
- CSPI analysis of food marketing practices and the nutritional quality of foods marketed to children by the Kellogg and Viacom companies. These documents will be sent confidentially and separately to the FTC.

In closing, we emphasize the importance of requesting not only information on marketing activities and expenditures, but also on the nutritional quality of the products marketed to children. In order to get a full picture of food marketing to children, it is essential to know the nutritional quality of the marketed products.