

Comments of the Grocery Manufacturers Association/Food Products Association

Federal Trade Commission Request for Information and Comment

on

Food Industry Marketing to Children Report: Paperwork Comment; FTC File No. P064504

Introduction

The Grocery Manufacturers Association (“GMA”) is the world’s largest association of food, beverage, and consumer product companies. With annual sales of more than \$680 billion, GMA members employ more than 2.5 million workers in all 50 states. The organization applies legal, scientific, and political expertise from its member companies to vital food, nutrition, and public policy issues affecting the industry. GMA is led by a Board of member company chief executives. GMA speaks for food and consumer product manufacturers at the state, federal, and international levels on legislative and regulatory issues.

The Food Products Association (“FPA”) is the largest trade association serving the food and beverage industry in the United States and worldwide. FPA’s laboratory centers, scientists and professional staff provide technical and regulatory assistance to member companies and represent the food industry on scientific and public policy issues involving food safety, food security, nutrition, consumer affairs and international trade.

GMA/FPA is pleased to provide these comments for the record in response to the Federal Trade Commission’s (“FTC” or “Commission”) Request for Information and Comment (“Request”) (71 Fed. Reg. 62109) in connection with the Conference Report of Public Law 109-108 (Food Industry Marketing to Children Report to Congress – Comment, Project No. P064504).

In its Report, the Conference Committee directed the Commission to submit a report on marketing activities and expenditures of the food industry targeted toward children and adolescents and requested that the Commission include in its report “an analysis of commercial advertising time on television, radio and print media; in-store marketing; direct payments for preferential shelf placement; events; promotions on packaging; all Internet activities; and product placements in television shows, movies, and video games” (71 Fed. Reg. 62109 n.2).

This is the Commission’s second request for comments on the planned report. In the first, the Commission explored potential sources of data and means of collecting information. GMA’s comments identified sources of data, provided an analysis of advertising in measured media, and offered to help the Commission gather additional information. In the current request, the Commission has solicited comments on the costs and benefits of compelling fifty companies to provide data on certain categories of foods for inclusion in the report. Specifically, the Commission proposes collecting data on “quick-service restaurant items, breakfast cereals, snack foods, candy and gum, carbonated and noncarbonated beverages, frozen and chilled desserts, prepared meals, and dairy products, including milk and yogurt” (71 Fed. Reg. 62110).

