



African American Collaborative Obesity Research Network

Envisioning healthy weight, freedom from obesity-related health problems
and high quality of life for African American youth, adults and elders.

November 23, 2009

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex J)
600 Pennsylvania Avenue, N.W
Washington, D.C. 20580
(Filed electronically)

Re: Food Industry Marketing to Children and Adolescents Study: Paperwork Comment
Project No. P094511

The African American Collaborative Obesity Research Network is a national research network based at the University of Pennsylvania School of Medicine in Philadelphia, PA. The Network's mission is to improve the quality, quantity, and effective translation of research to address weight related issues in African American communities. Our Network and members have engaged in an extensive amount of research to identify the key directions for addressing obesity and related health disparities in African American communities with a particular focus on food marketing environments. Therefore, we are pleased to offer comments to the Federal Trade Commission on the proposal to collect information from food and beverage companies and quick-service restaurants on promotional activities, nutrition information, and expenditures for products marketed to children and adolescents. We believe a critical aspect of the new study will be capturing information on marketing to youth of a specific gender, race/ethnicity and income level. This information is important to understanding the relationship of food marketing to childhood obesity among ethnic minority children and youth (Grier & Kumanyika 2007; 2009). The following comments consider the different components of research on this topic including content, exposure and effects of exposure (e.g., opinions, attitudes and actions as a result of food marketing).

Substantial research suggests that relative to youth in white or general populations, African American and Hispanic youth, are exposed—as individuals and in their communities—to more food and beverage marketing that tends to promote less healthful foods and is less likely to support recommended eating behaviors (Kumanyika & Grier, 2006; Grier & Kumanyika, 2008; Hillier et al, 2009; Yancey et al, 2009). Further, the evidence indicates that ethnic minorities are more responsive to targeted ads, and that this differential response is driven by different underlying processes (Grier & Brumbaugh, 1999; Aaker et al., 2000; Grier & Brumbaugh, 2003). Research suggests that black youth and young adults are likely to pay more attention to and identify with black characters and to respond more favorably to black targeted ads (Aaker et al., 2000; Appiah, 2004; Grier & Brumbaugh, 1999). Advertisers use racial and ethnic cues such as minority models, ethnic symbols, linguistic styles and music to link cultural values, beliefs, and norms with the consumption of specific food products. For example, one campaign co-sponsored by a fast food company and a beverage company distributed black history materials in schools to black children. The frequency and resonance of identity-linked targeted marketing which promotes less healthful products may support the development of less healthful eating patterns and result in adverse health effects.

Although the public discussions of food and beverage marketing in the context of the obesity epidemic often note the higher levels of obesity among ethnic minority children and youth, ethnic target marketing is rarely detailed given a lack of relevant information on industry practices (Grier & Kumanyika, 2008). The population of ethnic minority youth is growing faster than other youth populations, and is predicted to comprise almost half of all U.S. children within the next 5 years (U.S. Census Bureau). A 2006 report noted that African Americans comprise the nation's largest ethnic minority market in terms of numbers, and it was projected that black buying power will rise from the \$761 billion in 2005, to \$1.1 trillion in 2011, accounting for 61% of combined ethnic minority spending (Humphreys, 2006).

Industry observers also note that ethnic minority families are an especially attractive target market given that they are young and tend to have more children than the general market. So, from a business perspective, the growing size and purchasing power of racial and ethnic minorities make these groups an appealing target market for the food and beverage industry. In light of the strong incentives of the food and beverage industry to continue current marketing strategies, it is imperative that measures be implemented to protect children and youth at greatest risk.

Therefore, we urge the Commission to seek information that is sensitive to ethnic differences in all major and emerging types of food marketing directed at children and youth. This includes ethnicity-specific information on market research, including expenditures that include sponsorship and community involvement as well as money paid to non-industry scientists who produce favorable research. The Commission should require companies to produce data concerning audience reach; and obtain ethnic breakdowns of the targets and recipients of food and beverage marketing.

As identified in our Network's 2005 published research priorities, further examination is still needed to clarify the role of marketing that is specifically targeted to African Americans and how marketing as a system influences food and beverage consumption (Kumanyika et al., 2005). The Commission's proposed study will have the potential to identify future intervention strategies and policy recommendations to favorably influence food marketing directed at African American children and youth.

We appreciate the opportunity to comment on this important issue.

Respectfully submitted,

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