

To: Federal Trade Commission, Office of the Secretary

From: Susan Coburn MPH, RD, Nutrition and Physical Activity Chief

Re: Interagency Working Group on Food Marketed to Children

Date: July 6, 2011

I commend the working group for proposing standards to encourage the food industry to develop new products and reformulate existing products to increase the availability of products that contribute to a healthful diet while limiting the consumption of nutrients that may have a negative impact on health or weight.

This is a laudable charge and is essential now that childhood obesity has reached epidemic proportions. The evidence is clear that marketing greatly influences the foods that children choose and consume. I encourage the working group to consider stringent nutrition standards to assure that foods of minimal nutritional value are not marketed to our nation's youth.

The consumption of excess calories is one of the primary contributors to the rapid rise in obesity. This rapid rise in obesity combined with the known effects of marketing on youth warrants limits on food marketing for youth of all ages.

Recommendations (in response to select questions for comment)

(1) Establish age appropriate standards for calories.

The working group's proposed nutrition principals are based on a 2,000 calorie diet which is excessive for children age 2-11. The average caloric intake for 2-11 year olds is ~1,600 calories, 400 calories lower than for 12-17 year olds. Overconsumption of calories contributes to excessive weight gain, consuming an extra 400 calories a day is the equivalent of 41 pounds of weight per year. In addition, basing the standards on a 2,000 calorie diet allows for too much saturated fat and sugar in foods intended for younger children.

(3) Include targets for nutrients to encourage.

The 2010 dietary guidelines emphasize nutrients to encourage including calcium, potassium, fiber, magnesium and vitamins A, C, and E. The marketing recommendations should include foods that contain these nutrients at a level that provides a significant contribution to the daily diet. Foods that are naturally high in nutrients are preferable however; fortified foods can play a role in assuring adequate intake of these nutrients.

(4) Establish age appropriate standards for portion sizes.

Foods that make a meaningful contribution to a healthful diet may be appropriate in terms of nutrient content however; large portions are a significant contributing factor to caloric intake. Consumers do not have a clear understanding of age appropriate calorie levels and portion sizes. Foods marketed to youth should include appropriate portion sizes for 2-11 year olds and for 12-17 year olds.

(5) Focus on the foods most heavily marketed to children.

Foods that are most heavily marketed are those most frequently consumed by youth and the largest contributors of calories to children's' diets. This will have the greatest impact on the goal of encouraging the food industry to reformulate existing products, and creating new products that follow the nutrition principles outlined. It is not feasible to have all foods such as jams and jellies, sauces and dressings reformulated in a manner to provide a meaningful contribution to a healthful diet therefore it is acceptable to exclude them from the nutrition principles.

(6) Assure that main dishes and meals provide meaningful contributions from more than one food group.

Main dishes and meals marketed to youth should mirror the USDA requirements for school meals. Main dishes should include at least two food groups with one being a meat or meat alternative; meals should include at least three with one being a meat or meat alternative. The food groups should be based on standard serving sizes that are age appropriate for younger or older children.

(7) Restaurant meals marketed to children should adhere to stringent nutrition standards.

Restaurants should assure that meals marketed to children provide no more than 1/3 of the recommended daily calorie intake and require that healthier sides such as fresh fruit, or vegetables and non-fat milk or water are the default option instead of fries and soda for all meals marketed to children. It should also assure that they include at least one protein source, a whole grain serving and fruit or vegetable serving.

(8) Assure that individual foods contain adequate nutrients from one food group.

Foods marketed should contain the meaningful target amount from each food group. Smaller amounts from multiple groups should not be aggregated. The nutrient content of each group differs so that smaller amounts combined in the aggregate would diminish the nutrient content available for consumption.

(10) Include recommendations for subgroups of vegetables.

Encourage consumption of dark green, red and orange vegetables as recommended by the Dietary guidelines. Creative marketing encouraging colorful foods has been successfully used to encourage youth to consume more fruits and vegetables. This is a strategy that could be adopted by the food industry.

(11) Base the meaningful contribution to the diet on the Reference Amount Customarily Consumed.

Under Principle A, Option 2 is preferable for establishing the contribution based on the RACC not on weight. This option addresses portion size assuring that the food makes a

meaningful contribution to the diet within an appropriate calorie range. A reference level of 1,600 calories is preferred for youth ages 2-11.

(12) Base Option 2 foods on a 2,000 calorie diet

Given that not all children eat four times a day and Option 2 foods provide a meaningful contribution to the diet it is appropriate to base the amounts on a 2,000 calorie diet for foods to encourage.

(16) Limit added sugars not total sugars.

Total sugar content includes sugars such as lactose that are naturally occurring in foods. Added sugars contribute to weight gain through excess caloric intake. The 2010 Dietary Guidelines recommend a reduction of added sugars. The limit for added sugars should be adjusted to be age appropriate for younger children. Using the same method to calculate 13 grams of added sugars for a 2,000 calorie diet the limit for younger children based on a 1,600 calorie diet would be no more than 6 grams of added sugars.

(17) Implement the sodium limits as proposed

The sodium recommendation of 140mg per RACC for individual foods and 300mg for per serving of main dishes and meals aligns with federal guidelines and is more stringent than the proposed changes for the National School Lunch and School Breakfast Programs. This is an appropriate goal given the negative health impact of excessive sodium intake. The interim goal of 50% is appropriate.