



July 14, 2011

Dear Mr. Chairman and Members of the Commission:

I am writing on behalf of the Canned Food Alliance (CFA) to express concern regarding the proposed guidelines for food marketing and advertising to children and teens published on April 29, 2011 by an Interagency Working Group comprised of the Federal Trade Commission, the U.S. Department of Agriculture, the Food and Drug Administration, and the Centers for Disease Control. Providing nutritious, convenient, canned food to our youth and adults is a long-standing objective of the CFA however, these proposed guidelines, particularly regarding sodium, run contrary to the widespread availability of many nutritious canned foods.

- The guidelines discourage advertising of products that meet the regulatory definition of “healthy,” including foods promoted by the Department of Agriculture as part of the US Dietary Guidelines and the Women, Infant, Children (WIC) program. The government should not dissuade the marketing to children and adolescents of foods that its own regulations recognize as healthy.
- The proposed guidelines state, “Making substantial changes to the formulation of a food product may present both technical difficulties and challenges in maintaining the palatability and consumer acceptance of the product. Certain elements of the proposed nutrition principles may need to be adjusted to reflect these challenges.” We encourage the Interagency Working Group to work with the food industry to fully understand and resolve these challenges.
- Sodium content, along with all other ingredients, are fully disclosed on product packages today allowing consumers to choose nutritious food that best meets their lifestyles
- The guidelines will also substantially limit communications intended for adults. In fact, if as little as 20% of the audience demographic is composed of persons ages 12-17, any communications will be considered “marketing to children” and, as a result, many communications plainly intended for adults will no longer be permissible.

We respectfully request the Interagency Working Group withhold these guidelines until they have carried out additional investigation to address the points noted above such that the ability of canned and other food producers to provide healthy products is not improperly restricted.

Sincerely,

Rich Tavoletti
Executive Director, Canned Food Alliance