

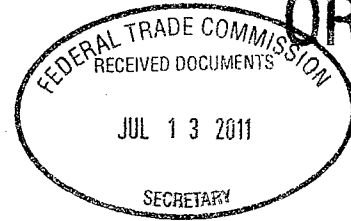


MINNESOTA GROCERS ASSOCIATION

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July 7, 2011

U.S. Federal Trade Commission
Office of the Secretary
Room H-113 (Annex Q)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580



To Whom It May Concern,

The Minnesota Grocers Association has concerns with the proposed voluntary guidelines for advertising and marketing within the food industry. The grocery business is directly tied to the issues discussed by the Interagency Working Group, and these stringent rules would effectively tie our hands in reaching out to customers.

Grocers care deeply about the health and well-being of customers. There are several voluntary programs that help consumers make appropriate dietary choices. Limiting freedom of speech through these "voluntary guidelines" will have no meaningful impact on the health of the public. In fact, many of the foods most affected by these stringent guidelines are lower-calorie, nutrient-rich foods that the government has encouraged people to eat through WIC and other programs.

This proposal will have a negative impact on the economy and jobs in the retail, food, advertising and media industries. Furthermore, these restrictions are arbitrary and not based on science, contradict nutrition guidance provided by other federal agencies and ignore the research of your own agency – the FTC Bureau of Economic Research – that shows that while obesity rates were going up in this country, food advertising was going down. The constitutionality of limiting advertising is also questionable.

I request that the federal government further review the impact these broad guidelines would have on a critical sector of our economy. These regulations affect not only grocery retailers and wholesalers but industries that work to package, distribute and advertise to consumers.

The Minnesota Grocers Association stands ready to assist you in gathering more information about this or any other issue that affects the food retail industry. Again, thank you for your consideration and we strongly urge you to withdraw this proposal.

Sincerely,

Jamie L. Pfuhl
President

The MGA is a state trade association representing the food retail industry since 1897. We have over 200 retail members with nearly 1,100 stores statewide, as well as approximately 100 distributors and manufacturers. Our member companies employ over 125,000 union and non-union Minnesotans. We actively advance the common interest of all those engaged in any aspect of the retail food industry as a leader and advocate in government affairs.