



July 14, 2011

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex W)
600 Pennsylvania Avenue, N.W.
Washington, DC 20580

Via Electronic Mail

RE: Interagency Working Group on Food Marketed to Children: General Comments and Proposed Marketing Definitions: FTC Project No. P094513

Dear Sir or Madam:

The Juice Products Association (JPA) is a trade association whose international membership consists of major packers and distributors of a wide variety of fruit and vegetable juices, juice beverages, drinks, jams, jellies, fruit spreads and other fruit products. Our members represent a significant majority of the juice and juice beverage processors in the United States. JPA submits the following comments regarding the proposed recommendations drafted by the Interagency Working Group on Food Marketed to Children, "Preliminary Proposed Nutrition Principles to Guide Industry Self-Regulatory Efforts."

The proposed nutrition principles are intended to "guide the industry in determining which foods would be appropriate and desirable to market to children to encourage a healthful diet and which foods industry should voluntarily refrain from marketing to children." The Working Group has identified ten categories of food products most heavily marketed to children and adolescents, 2 – 17 years of age: fruit juice and non-carbonated beverages, carbonated beverages, breakfast cereals, snack foods, candy, dairy products, baked goods, prepared foods and meals, frozen and chilled desserts, and restaurant foods.

The federal government has recognized the health benefits of 100% fruit juices, which are included in the United States Department of Agriculture's (USDA) School Breakfast, National School Lunch, and Afterschool Snacks programs as well as the Special Supplemental Nutrition Program for Woman, Infants, and Children (WIC).

The report notes that Congress directed the Working Group to consider children who are 17 years old or younger as it developed the nutrition principles. The report also states that the proposed voluntary principles apply similarly broad definitions of what constitutes marketing to children ages 2 – 11 years and adolescents ages 12 – 17 years. JPA supports limiting the messages directed to children aged 2-11 years old; however, we would not support limiting messages to children 12 – 17 years. Adolescents are learning to make independent decisions and should be able to interpret marketing and advertising messages. Messages related to food nutrition provide adolescents with the information they need to make more wholesome choices.

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JPA appreciates your consideration of these comments.

Sincerely,

Patricia Faison
Technical Director