



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: Proposed Nutrition Principles: 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 proposal drafted by 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 and 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.

JPA believes there is no scientific justification for including 100% fruit juice in the proposal and we recommend that 100% fruit juice be removed. A staple in healthy diets for generations, 100% juice is a nutrient-dense beverage choice that is rich in many of the nutrients found naturally in whole fruit. In addition, 100% fruit juices are a smart addition to any well-balanced diet, providing vitamins and minerals like potassium, vitamin C and folate. Fruit juice is also a convenient way for adults and children to help reach the recommended number of daily servings of fruits and vegetables.

The scientific literature reveals that appropriate consumption of 100% juice is associated with a more nutritious diet overall. Data from publicly available national datasets on food consumption supports the fact that children who include 100% fruit juice in their diet have higher quality diets.

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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).

In addition, *MyPlate*, the federal government's new food icon and guidance based on the *Dietary Guidelines for Americans 2010*, includes 100% fruit juice as part of the "Fruit Group."

Children and adolescents can enjoy 100% fruit juice as part of a healthful diet.

JPA appreciates your consideration of these comments.

Sincerely,

Patricia Faison
Technical Director