Institute of Food Technologists
525 W. Van Buren Street., Suite 1000
Chicago, IL 60607-3830 USA

+1.312.782.8424
+1.312.782.8348 Fax
ift.org

July 14, 2011

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

Re: Interagency Working Group on Food Marketed to Children: Proposed Nutrition Principles: FTC Project No. P094513

Submitted via: https://ftcpublic.commentworks.com/ftc/foodmarketedtochildreniwg

Founded in 1939, the Institute of Food Technologists (IFT) is a community of food professionals from across the globe who have come together to advance the science of food. As the premiere food science and technology organization, IFT brings together thousands of professionals working in all disciplines of the food industry, encouraging the exchange of knowledge, providing both formal and informal educational opportunities, and championing the use of sound science through advocacy efforts to ensure a safe and abundant food supply.

IFT recognizes the critical value of improving children's diets and addressing the high rates of childhood obesity. We commend the Interagency Working Group for seeking public comment on the preliminary proposal for voluntary principles to guide industry self-regulatory efforts to improve the nutritional profile of foods marketed to children, and offer the following responses to select specific questions posed in the Working Group's preliminary proposal.

Question 4: The proposed nutrition principles do not include limits on portion size or calories for foods marketed to children. Should the Working Group recommendations address portion size or calories directly or is over-consumption adequately addressed by the recommendations that all foods marketed to children make a meaningful contribution to a healthful diet and minimize consumption of saturated fat, trans fat, and added sugars?
Answer: Obesity is a complex issue. The recommendation that all foods marketed to children make a meaningful contribution to a healthful diet and minimize consumption of saturated fat, trans fat, sodium, and added sugars is easily understood by all key stakeholders and is a positive step forward. Although fats, oils, and sugars contribute significant functionality and nutritive value to food products, food technologists are working diligently and successfully to develop products with alternative sweeteners, and reduced sodium, saturated fatty acids, and manufactured trans fatty acids. Addressing calorie consumption through calories per package or

serving may be of particular interest to parents. Thus, introduction of new food products and improved current formulations will continue to help allow successful weight-control interventions, such as through small changes in the energy density of foods. Small changes in a person's diet or lifestyle can have a significant impact on weight gain and maintenance (Lund and Clemens, 2009).

Question 9: The list of food groups that make a meaningful contribution to a healthful diet under Principle A includes both the basic food groups to encourage as identified in the 2010 DGA – fruits, vegetables, whole grains, fat-free and low-fat milk products – as well as other food categories that are compatible with an overall healthful diet – fish, lean meat and poultry, beans, nuts and seeds, and eggs. Are there food categories that should be added to or eliminated from Principle A?

Answer: Identifying and incorporating food groups is important, but doing so at the exclusion of other dietary constituents, such as fiber (soluble and insoluble), omega-3 fatty acids (particularly DHA for children), tree nuts, vitamins and at-risk minerals, does not recognize the positive impacts that processed foods make in a diet. An underlying concern is the potential of unintended consequences as noted in the 2010 DGA. A focus on foods comprising the food groups may limit technologic advancement at the research and development level that would otherwise allow reformulation or development of new affordable foods that are more nutrient dense or which would make valuable nutritive contributions to children's diets.

Question 13: Principle B provides that any nutrients naturally occurring as part of the food contributions under Principle A are not counted toward the proposed limits for specific nutrients under Principle B. This exemption is intended to resolve any inherent inconsistencies between Principle A and Principle B. At the same time, the Working Group recognizes that the calculations involved in partially "netting out" certain nutrients would entail a detailed knowledge of the product recipe or formulation and make it difficult for any third party to verify whether a product meets Principle B. Are there alternative approaches the Working Group should consider in reconciling the provisions of Principles A and B?

Answer: The body does not physiologically distinguish a nutrient occurring in one product from the same nutrient in another (e.g., the sodium in low-fat milk or French fries); thus the exemption in Principle B is not science-based. Additionally, in the event of a third party verification of whether products meet Principle B, trade secret or proprietary information would need to be protected as confidential.

Question 16: The Working Group proposal recommends a target for added sugars for foods marketed to children. What are the advantages and disadvantages of the proposal for limited added sugars content as opposed to total sugars content?

Answer: There is no scientific basis on which to discriminate between added sugars and those inherent in a product, e.g., fruit juice or an apple. The limits on nutrients of concern should be based on levels, irrespective of source. As indicated in the 2010 DGA, the evidence indicated total calories is fundamental, and not the source of carbohydrate calories.

Question 17: The Working Group proposal recommends an interim goal for limiting sodium content for foods marketed to children of 210 milligrams per serving for individual foods and 450 milligrams per serving for main dishes and meals, with a target date of 2016. Is there a nutrition-based rationale for an alternative interim goal for sodium that the Working Group should consider? The Working Group's final value for sodium is 140

milligrams per RACC for individual foods and 300 milligrams per serving for main dishes and meals, with a target date of 2021. Is there a nutrition-based rationale for an alternative final goal on sodium that the Working Group should consider?
Response: Sodium can only be reduced to a certain extent without affecting safety and other important functions that it provides in food formulations. Food manufacturers must balance the multiple functions of microbiological safety, taste, flavor balance and quality, texture, mouthfeel, preservation, color, and nutritional properties of a product. These points are emphasized in many Federal food regulations that stipulate the importance of sodium in foods to assure product safety and preservation. Tremendous progress has been made in development of lower sodium formulations of products that consumers enjoy, yet significant scientific and processing challenges remain. While IFT is supportive of a graduated reduction of sodium in foods, there is a need to explore further the minimum sodium level in foods acceptable to consumers.

IFT appreciates the opportunity to assist the Interagency Working Group on Food Marketed to Children by providing comments on improving children's diets and addressing the high rates of childhood obesity. IFT is ready and willing to help parents and other consumers understand the science behind food and translate that information into making healthier food choices. IFT would be happy to assist the Working Group in any other way deemed appropriate. Please contact William Fisher, Vice President of Science and Policy Initiatives, if IFT may provide further assistance. Mr. Fisher may be reached at 1025 Connecticut Avenue, NW, Suite 503, Washington, DC 20036; telephone number: 202-330-4977; or email address: wfisher@ift.org

Sincerely,

Robert Gravani, Ph.D.
IFT President

Lund, D, Clemens, R.2009. Small changes may have a big effect. *J. Food Science* 74(2): vii. Available at: http://onlinelibrary.wiley.com/doi/10.1111/j.1750-3841.2009.01113.x/full. Accessed on Jun. 28, 2011.