



MAY 24, 2011

**IWG PUBLIC FORUM ON PROPOSED PRINCIPLES
FOR FOOD MARKETED TO CHILDREN**

My name is Kristin Pearson Wilcox. I am appearing today on behalf of the American Frozen Food Institute (AFFI). AFFI is the sole national trade association that promotes the interests of all segments of the frozen food industry.

America's food and beverage companies are committed to offering increasingly nutritious foods to children and teens. Our industry has responded to the call of consumers by voluntarily introducing more than 20,000 healthier product choices to the marketplace in just the last eight years, according to the Georgetown Economic Services.

AFFI supports the goal of improving childhood nutrition and reducing childhood obesity. However, I want to express our reservations about the wisdom and direction of this undertaking – the Interagency Working Group's proposed principles for food marketed to children.

The Working Group's principles would ban advertising for numerous foods that U.S. Food and Drug Administration (FDA) regulations define as "healthy" and that the U.S. Department of Agriculture promotes for consumption under its Dietary Guidelines and the Women, Infants and Children nutrition program. In addition, the proposed principles would prohibit advertising for products that the FDA has explicitly authorized for promotion using various health claims.

We are extremely troubled that the proposal would prevent the advertising of certain wholesome, healthy and nutritious frozen foods to children. In particular, we fear the proposal's impact on the advertising of frozen vegetables.

Frozen vegetables are a vitally important food option for children, and restrictions on the promotion of these vegetables would be detrimental to efforts aimed at improving childhood nutrition.

Like fresh vegetables, frozen vegetables deliver key nutrients and contribute to an overall healthy lifestyle. In fact, according to FDA, the nutrient profiles of select raw fruits and vegetables and frozen, single-ingredient versions of the same fruits and vegetables are relatively equivalent.

Recent data have shown that the nutrient content level for certain nutrients is actually higher in the frozen version of certain vegetables because they are packed at the peak of freshness.

It is worth noting that USDA's recent Dietary Guidelines urge citizens to eat more vegetables and explicitly reference frozen vegetables as being just as healthy as their fresh counterparts.

Under the IWG principles, companies may not be able to advertise certain frozen vegetables to children because they may not meet the stringent and unrealistic sodium limitations endorsed by the IWG. In fact, the IWG acknowledges that its sodium level recommendations, along with many other requirements it proposes, cannot be met by numerous products in the marketplace if fully implemented.

It is entirely counterintuitive to prevent advertising of frozen vegetables to children under a scheme that purports to improve childhood nutrition, when the advertising prohibited covers products the federal government acknowledges are beneficial to childhood nutrition. This is not a responsible public policy.

Despite the "voluntary" label used to describe IWG's principles, we believe they would effectively prohibit advertising many healthy products, a result not supported by nutrition science, and directly at odds with the IWG's stated goal of promoting healthy diets.

In closing, AFFI and its members believe the federal government should not prohibit the selling or advertising of food.

We respectfully submit that the IWG should withdraw this proposal. I appreciate the chance to share AFFI's views and I would be happy to provide answers to any questions you may have in writing after conferring with my members.

Thank you.