Kraft Foods

Barbara Yehling
Senior Category Insight Manager
Global Health & Wellness

February 7, 2005

Division of Dockets Management (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

Re: (Docket No. 2004N-0486) Agency Information Collection Activities; Proposed Collection; Comment Request; Experimental Study of Health Claims on Food Packages

Dear Sir or Madam:

For over 100 years, Americans have trusted the well-known brands Kraft Foods Global, Inc. (Kraft) sells. Kraft is a $30 billion company, the largest manufacturer in North America, and the second largest worldwide. Today, Kraft brands are found in more than 99% of al U.S. households and are sold in 150 countries around the world. Kraft is at the forefront of the food industry's effort to provide consumers with a broad array of choices from which to select foods consistent with a healthy diet, which of course requires the company to communicate the benefits of various foods to consumers. Accordingly, Kraft has a strong and substantial interest in the regulation of health claims and messages.

Kraft values the voice of the consumer and supports consumer research to enhance health message communication as a means to help consumers make sound dietary decisions. In response to the FDA's invitation for comments on docket number 2004N-0486, Kraft would like to comment on ways to enhance the quality, utility and clarity of the information to be collected.

While it is clear that the FDA's intent is to provide consumers information to help them make informed food choices, the current research plan appears to be exploratory in nature. Kraft research experience reinforces the need to outline objectives, action standards and an analytical plan prior to fielding research to eliminate bias and improve the qualify of the analysis.

Following are three scenarios to illustrate this point:

1. If the objective of the research is to validate the impact identifying a specific food has on communicating a diet-disease relationship, we suggest the research exclude nutrient content claims, structure/function claims and dietary guidance statements. The research proposal does not explain how inclusion of these statements will help to "generalize" the findings, and instead could make analysis cumbersome and difficult to draw conclusions. For example, what conclusion

would be made if a "food specific health claim" is better than a "nutrient content claim" or a "dietary guidance statement" at improving consumer recognition of the food component underlying a diet-disease relationship?

2. If the objective of the research is to understand how well these "food/nutrient-specific" health claims communicate compared to other health claim/message options, then we would recommend inclusion of nutrient content claims, structure/function claims and dietary guidance statements. We recommended that an action standard be set in advance to evaluate this objective, such as, "A food/nutrient-specific" health claim communicates well if it scores at parity or higher to nutrient content claims, structure/function claims and dietary guidance statements on communicating the food component underlying the diet-disease relationship and that in addition to the food product that carries the claim, there are other foods from which they can obtain the food component.

3. If the objective of the research is to understand if consumers' lack of prior knowledge of a diet-disease relationship will impact the usefulness of "food/nutrient-specific" health claims, then Kraft would recommend testing one diet-disease relationship that has low consumer awareness. This will help to isolate what is driving the differences in consumer response and eliminate the impact from prior knowledge of the diet-disease relationship.

4. If the objective of the research is to understand what impact consumers' knowledge of a diet-disease relationship will have on the usefulness of "food/nutrient-specific" health claims, then we would recommend increasing sample size in order to compare the responses of consumers with prior knowledge to those without prior knowledge within an individual cell.

There are three other areas in which we would like to offer suggestions for the FDA to consider as the agency moves ahead with this research.

1. Consider asking consumers to what degree the health message is helping them make food choices.
2. Consider increasing sample size. It is difficult to determine the appropriate sample size needed to detect small to medium effects with a power of 0.8 without knowing the questions to be asked and the scales that will be used. We recommend that sample size be re-evaluated after the questionnaire is written.
3. Consider adding a directive to the questionnaire asking respondents to read the health claim/message on the stimulus. This will help isolate differences in consumer response due to the ability of the message to communicate and help to eliminate impact from "breakthrough ability" due to graphical treatments such as font size/color and placement on package.

Once again, we applaud the agency's interest in levering consumer opinion to make policy decisions that will help consumers make sound dietary decisions. We appreciate the opportunity to comment and look forward to the results.

Respectfully submitted,

Barbara Yehling

Barb Yehling
Senior Category Insight Manager