



July 16, 2014

W. Anthony Vernon  
Chairman and Chief Executive Officer  
Kraft Foods Group, Inc.  
Three Lakes Drive  
Northfield, IL 60093

Dear Mr. Vernon:

When Kraft Foods joined the Children's Food and Beverage Advertising Initiative (CFBAI) in 2006, it committed to advertise only healthier dietary choices, including some varieties of Lunchables, directly to children. However, a recent [report](#) from the Yale Rudd Center for Food Policy & Obesity examined the nutritional quality and marketing of Kraft Lunchables and found that just five out of 42 varieties meet CFBAI's nutrition standards for advertising to children. In the supermarket, less nutritious versions of Lunchables outnumber the healthier ones by six to one, and the healthier varieties are most likely to be stocked on the top shelf, above eye level for both children and adults.

We write to ask that Kraft Foods reform its marketing for the Lunchables product line and take the following steps to strengthen its policies regarding marketing directed to children.

Adopt a comprehensive policy on brand advertising and marketing. Although Lunchables advertisements only promote varieties that meet CFBAI nutrition standards, 88 percent of Lunchables do not meet those standards. It is unrealistic to expect that children will choose the healthier versions of Lunchables in the supermarket when the unhealthy varieties far outnumber the healthier ones. Further, the advertised varieties appear on the top shelf while the products that contain candy, cookies, and sugary drinks are placed directly at children's eye level. This practice means that Kraft markets unhealthy Lunchables to children, at the same time you pledge to advertise only healthy foods and beverages in child-directed advertising. Only healthy brands—those that consist only of products meeting CFBAI nutrition standards—should be marketed directly to children through all marketing techniques.

Update Kraft's food marketing policy to cover in-store and on-package marketing. The Federal Trade Commission (FTC) considers in-store and on-package marketing that prominently features child-oriented characters, themes, activities or celebrities or athletes popular with children to be child-directed marketing. In-store and on-package marketing is the sixth-leading category of food marketing to children and should be covered by Kraft's marketing policy, just as it covers child-oriented character use on television, radio, Internet, video, and computer games. In-store, the practice of placing unhealthy varieties of Lunchables that include bright packages covered with child-appealing features makes it harder for families to feed their children healthfully.

Extend Kraft's marketing policy to cover children ages 12 to 14. We are pleased that Kraft—and CFBAI—recognize that companies should not market unhealthy foods directly to children 11 years and younger due to their vulnerability to advertising. However, children ages 12 to 14 are also vulnerable, and are increasingly targeted by food and beverage companies. Children ages 12 to 14 face a heightened risk from the influence of unhealthy food marketing because of their higher level of independence than younger children and high levels of media consumption. This age group is also heavily targeted with newer forms of social and mobile media marketing that is often disguised as messages from peers, making it difficult for children ages 12 to 14 to recognize and taking advantage of this age group's susceptibility to peer pressure. Your UPLOADED varieties of Lunchables designed to appeal to this vulnerable age group should also meet CFBAI nutrition standards.

Kraft Foods was the first food company to adopt nutrition standards for food marketing to children. We ask that you ensure that commitment covers all of your marketing to children, and reform Lunchables marketing to children. We look forward to your response and welcome the opportunity to discuss these issues further with you or your staff.

Sincerely,



Jennifer Harris, PhD, MBA  
Director of Marketing Initiatives  
Rudd Center for Food Policy & Obesity



Margo G. Wootan, D.Sc.  
Director, Nutrition Policy  
Center for Science in the Public Interest

cc: Elaine Kolish, JD  
Vice President & Director  
Children's Food and Beverage Advertising Initiative