Public Comments on the Proposed Collection of Information on the Development of Nutrition Education Messages and Products for the General Public

October 7, 2015

On behalf of The Dannon Company, we thank you for the opportunity to submit comments regarding proposed information collection for development of nutrition education messages and products for the general public. As a leading yogurt manufacturer for more than 70 years, we are committed to bringing health through food to as many people as possible. In addition, we recognize and appreciate the important work of the USDA CNPP in developing nutrition education messages and resources that support the Dietary Guidelines for Americans.

Collection of consumer feedback in development of nutrition education messaging is a critical step toward ensuring that the messages developed are practical, actionable, simple and specific, and may hopefully help result in Americans shifting to healthier dietary habits including the consumption of more nutrient dense foods. Research should include efforts to determine message actionability that motivates behavior change in order to have the greatest practical utility both at the individual level as well as from a broader public health population perspective. We agree that the proposed consumer research should address both general population and special population groups as mentioned in the federal register notice, with the following thoughts for additional consideration.

While general population insights and messages are needed, specific target groups as mentioned in the Federal Register (including low-income consumers, children, older Americans, educators and students) are important audiences. We also believe that the inclusion of ethnic populations – as food choices and food behaviors vary greatly among ethnic cultures – would provide additional valuable insights. As highlighted by the 2015 Dietary Guidelines Advisory Committee, the disparities in obesity and chronic disease rates exist not only for the low income population but are also prevalent for certain ethnic and racial groups. So it is critical messages and tools developed for those populations be efficient in creating behavior change and help close health disparity gaps as well.

The ages and life stages between childhood and older adult years, namely the young adult, young and growing families and middle-age years, are also important audience segments that we believe would be beneficial to include in the evaluation. These life stages are critically important groups to understand when it comes to developing nutrition education messages that are relevant, workable and that can drive scale among consumers. In addition to ethnicity/culture and life stage, household size significantly impacts food preparation behaviors. Accounting for these factors would also enhance the insights gleaned from the study.

In short, it would be helpful to ensure that the sample used for the research be as representative as possible to that of the U.S. population, in gender, age, income, education level, ethnic and cultural background, and any other feature that can be distinguished during the course of consumer research. This should help ensure that the messages developed are as practical, actionable, simple and specific as possible, and may hopefully help result in Americans shifting to healthier dietary habits including the consumption of more nutrient dense foods.

In closing, we believe that the increasing diversity of the American population suggests that ethnicity, culture and life stage are important elements for inclusion in the nutrition messaging study design in order to yield results with the greatest practical utility. We appreciate the opportunity to provide comments and look forward to the results of the proposed information collection for the development

of nutrition education messages and products.

Sincerely,

Philippe Caradec Vice President, Corporate Affairs The Dannon Company