

*An Analysis of the Economic Impact of the
Dietary Specifications of the Interagency Working Group
on Food Marketed to Children*

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Overview

- **The Interagency Working Group on Food Marketed to Children (composed of the Federal Trade Commission, the Food & Drug Administration, the U.S. Department of Agriculture, and the Centers for Disease Control) recently proposed a series of nutrition standards for foods marketed to children and teens. Foods not meeting the standards were characterized by the Interagency Working Group (“IWG”) as “of little or no nutritional value.” The stated purpose of the standards is to discourage the consumption of those foods.**
- **Georgetown Economic Services (“GES”) undertook an analysis to determine the economic impacts if Americans switched to a diet consisting of foods meeting the IWG's standards (the “IWG Diet”).**
- **GES also examined the economic costs associated with additional food preparation time under with the IWG Diet, which is significantly more weighted toward unprepared foods than the current American diet.**
- **Finally, because the mix of foods permissible under the IWG Diet is much more heavily weighted toward fresh fruits and vegetables (which are disproportionately sourced from outside the United States) and away from grain-based foods (which are almost exclusively sourced from domestic sources) than the current diet, GES calculated the impact on American agriculture of varying degrees of adoption of the IWG Diet.**

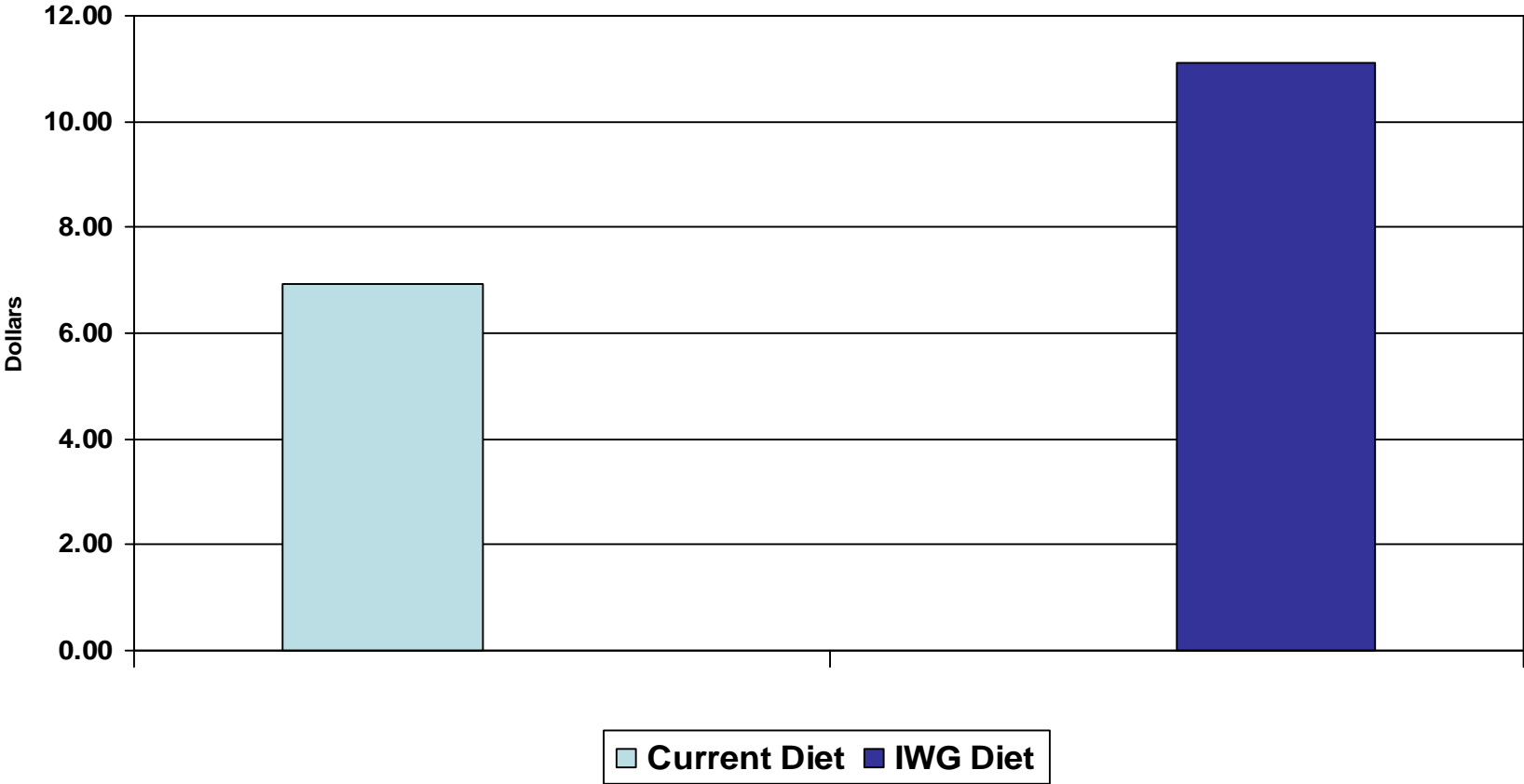
Summary

- **GES's analysis indicates adoption of the IWG Diet would conservatively result in a 60.3% increase in the cost of a 2000 calorie daily diet.**
- **On a per capita basis, the average American consuming the IWG Diet would spend an additional \$1,632 per year on food. For the American population as a whole, the increased cost of feeding the population, including both food for at-home consumption and food service consumption, is estimated to range from \$101 billion (at a 20% adoption rate of the IWG Diet) to \$503 billion (at a 100% adoption rate) per year.**
- **Using a conservative estimate of increased food preparation time of 20 minutes per day for the average American adult age 18 or older, the IWG Diet would require between 5.7 billion hours (20% adoption rate) and 28.4 billion hours (100% adoption rate) of in-home food preparation time at an estimated cost to the American economy of between \$129 and \$643 billion per year**
- **Summing the increased costs related to dietary shifts and increased preparation time, the total economic cost of a 100% shift to the IWG Diet is estimated at \$1.15 trillion per year for American consumers. If the IWG Diet were adopted by 50% of American consumers, the total annual cost would stand at \$573 billion, and at a 20% adoption rate, total costs would reach \$229 billion.**
- **If fully adopted, the IWG Diet would result in a 71.8% reduction in the value of consumption of grain-based foods (versus today's diet), a 1,009% increase in fruit consumption, and a 226% increase in vegetable consumption. Even under a 20% adoption rate, current fruit and vegetable expenditures would more than double while those for cereal and bakery products would fall 14%.**
- **A full shift to the IWG Diet would result in \$30.3 billion in reduced demand for American grain, and the need for the American economy to expend an additional \$489 billion on imported fruits and vegetables.**

Cost to Consumers of the IWG Diet

- **GES determined the potential economic impact of the IWG's standards on American consumers by comparing the cost of the 100 most frequently consumed foods and beverages in the American diet today (the "Top 100 Foods") versus the cost of a diet composed of the most frequently consumed foods that would meet the IWG's proposed guidelines (the "IWG Diet"). Alcoholic beverages were excluded from the analysis.**
- **The list of the Top 100 Foods was obtained from an independent market research firm, the NPD Group, Inc. (an alphabetized list of the Top 100 Foods and detailed information regarding the content of the NPD rankings and the processes used to analyze the NPD data are summarized in the methodological notes at the end of this report).**
- **Only 12 of the NPD Top 100 Foods met the nutritional standards set by the IWG. In order to achieve a reasonably balanced diet, the IWG Diet was defined to include additional foods from the NPD Top 150 list as well as qualifying variations of products under the NPD Top 100 (see methodological notes).**
- **Once the content of the Top 100 Diet and IWG Diet were established, GES applied NPD's proprietary "eating occasion" data to apply a weighting to each food to correspond with its relative prevalence in the diet. GES also determined current market pricing for each food item and applied the appropriate serving sizes, weights and calories to calculate the cost that each food item contributes to the two diets on a cost-per-calorie basis.**
- **Finally, GES reviewed the collective cost of the food items to determine the average cost-per-calorie for the Current Diet and the IWG Diet (\$.00346, and \$.00555, respectively) which amounts to \$6.92 versus \$11.10 for a daily diet of 2000 calories. The shift to the IWG diet, therefore, would result in a 60.3% increase in consumer food costs, as summarized in the following chart. These cost estimations are actually conservative because they do not account for the likely price increases that would be associated with increased demand for fresh fruits and vegetables under the IWG Diet.**

Cost of 2000 Calories



Increased U.S. Food Expenditures Under the IWG Diet

- **GES then used the 60.3 percent increase in daily consumer food costs under the IWG Diet to estimate the economy-wide costs of adoption of the diet. GES employed data from the Bureau of Economic Analysis of the U.S. Department of Commerce (“BEA”) on annual consumer expenditures on food purchased for in-home consumption and food purchased outside the home via food services.**
- **Because the BEA data for food service expenditures reflected the full cost of those purchases, GES endeavored to estimate the food cost element of the total expenditures on food services. GES used information from the food service industry on average restaurant food costs as a percentage of total sales (31.5%) and applied that figure to the BEA total expenditure figure for food services,**
- **As shown in the following table, if the IWG Diet were to be adopted by 100% of the U.S. population, the 60.3 percent increase in individual food costs would result in an estimated economy-wide increase in expenditures on food for consumption at home of \$412 billion and in food for consumption away from home of \$91 billion, for a total increase in U.S. food expenditures of \$503 billion.**
- **Assuming lesser degrees of adoption of the IWG diet, the total food expenditure costs associated with a 20% adoption rate would be \$101 billion, while those at a 50% rate of adoption would reach \$252 billion (see slide 10).**

**Estimated Impact of IWG Diet on Total U.S. Consumer Expenditures
on Food and Nonalcoholic Beverages 100% Adoption**
(in millions of dollars)

	<u>2010 Actual</u>	<u>% Change</u>	<u>Post-IWG Diet</u>	<u>\$ Change from Current Diet</u>
Food and non-alcoholic beverages purchased for off-premises consumption (total)	683,072	60.3%	1,094,964	411,892
Food services				
Purchased meals and nonalcoholic beverages	463,019			
Food furnished to employees (including military)	15,140			
Total food service food and nonalcoholic beverages	478,159			
Estimated cost of food and nonalcoholic bevs. as % of purchase price	31.5%			
Estimated expenditures on food service food and nonalcoholic beverages	150,620	60.3%	241,444	90,824
Total food and nonalcoholic beverages expenditures	833,692	60.3%	1,336,408	502,716

Source: 2010 Data, Table 2.4.5U. Personal Consumption Expenditures by Type of Product, U.S. Bureau of Economic Analysis and GES estimation of cost impact of IWG diet. Estimated cost of food and nonalcoholic beverages as % of food service purchase price average of range (28-35%) reported in Restaurant Report (www.restaurantreport.com/features/ft_inventory.html).

The Cost of Additional Consumer Preparation Time Under the IWG Diet

- The IWG Diet encourages increased consumption of unprocessed, raw foods, and discourages consumption of commercially processed foods. Because commercially processed foods allow consumers to reduce preparation time for meals while raw foods require additional at-home preparation, any move away from commercially processed foods will result in an economic cost to American consumers.
- GES endeavored to estimate the economic cost associated with a dietary shift toward unprocessed foods. Given the relatively high incidence of raw foods in the IWG Diet and the absence of prepared foods, it was estimated that adoption of the diet would result in an additional 20 minutes of preparation time per day per consumer over 18 years of age (estimated as 234 million citizens in 2010, based on the data of the U.S. Bureau of the Census).
- The average hourly wage rate for the U.S. economy as a whole for 2010 (\$22.61/hour, as provided by the U.S. Bureau of Labor Statistics) was used to value the additional food preparation time required by the IWG Diet. If the IWG Diet were to be adopted by 100% of the American public, it is broadly estimated that consumers would devote an additional 28.4 billion hours to food preparation at a total economic cost of \$643 billion annually.
- At lesser degrees of adoption of the IWG diet, additional food preparation costs to consumers would range from \$129 billion (20% adoption rate) to \$322 billion (50% adoption rate), as summarized in the following table.

Total Cost of the Shift to the IWG Diet at Various Levels of Adoption in billions of dollars

	20%	50%	100%
Added Cost of Food	100.6	251.5	503.0
Added Cost of Preparation Time	128.6	321.5	643.0
Total Added Cost	229.2	573.0	1,146.0

Impact of the IWG Diet on U.S. Agriculture

- **GES took the analysis of the increased costs of the IWG Diet using the BEA data a step further in order to estimate the impact on U.S. agriculture. This analysis compared the food-group composition of the current American diet to the food-group composition as projected under the IWG Diet.**
- **BEA data on expenditures on food for home consumption were used to gauge the percentage of the American diet currently devoted to each major food group (the BEA data on food service expenditures are not similarly broken out by food group, so they could not be included in the analysis). GES then reviewed its analysis of the weighted IWG Diet to determine the percentage of each major food group's representation in the IWG Diet.**
- **GES determined the total cost of the IWG Diet by multiplying the current BEA expenditure data by the calculated percentage increase in daily food costs (60.3%). Applying the percentage figures derived under the GES analysis of the costs by food group under the IWG diet, changes in consumption in terms of percentages and dollar values devoted to food groups were calculated.**

Impact of the IWG Diet on U.S. Agriculture

- As summarized in the following table, 100% adoption of the IWG diet would have a dramatic effect on the types of foods consumed and the consumer dollars spent on food groups.
- Most notably, the IWG diet would increase the percentage of total food expenditures devoted to fruits from 5.2% to 35.8%, while expenditures on vegetables would jump from 8.6% to 17.4%.
- Conversely, expenditures on grain-based cereal and bakery products would drop from the current level of 17.6% of food expenditures to just 3.1%.
- On a dollar basis, spending on fruit would increase ten-fold while expenditures on vegetables would more than triple. Dollar expenditures on grain-based cereal and bakery products would fall by \$86 billion, or 71.8%.
- Under a 20% adoption rate for the IWG Diet, fruit and vegetable expenditures would increase by \$98 billion, while those for cereals and bakery products would decline by \$17 billion.
- A 50% adoption rate would result in an increase of \$244 billion spent on fruits and vegetables and a contraction in spending on cereals and bakery products of \$43 billion.

Estimated Impact of IWG Diet on U.S. Consumer Expenditures by Food Product Category
100% Adoption
(in millions of dollars)

	<u>2010 Actual</u>	<u>% of Total</u>	<u>Post-IWG Diet</u>	<u>% of Total</u>	<u>\$ Change from Current Diet</u>	<u>% Change</u>
Food and non-alcoholic beverages purchased for off-premises consumption (total)	683,072		1,094,964		411,892	60.3%
Cereals and bakery products	120,381	17.6%	33,944	3.1%	-86,437	-71.8%
Meats and poultry	136,225	19.9%	39,419	3.6%	-96,806	-71.1%
Fish and seafood	13,531	2.0%	90,882	8.3%	77,351	571.7%
Milk, dairy products, and eggs	61,534	9.0%	89,787	8.2%	28,253	45.9%
Fats and oils	14,913	2.2%	-	0.0%	-14,913	-100.0%
Fruit (fresh)	27,036					
Fruit (processed) (e)	8,310					
Total Fruit	35,346	5.2%	391,997	35.8%	356,651	1009.0%
Vegetables (fresh)	44,691					
Vegetables (processed) (e)	13,736					
Total Vegetables	58,427	8.6%	190,524	17.4%	132,097	226.1%
Sugar and sweets	42,265	6.2%	-	0.0%	-42,265	-100.0%
Food products, not elsewhere classified	117,933	17.3%	-	0.0%	-117,933	-100.0%
Nonalcoholic Beverages	82,516	12.1%	259,507	23.7%	176,991	214.5%

Food consists of food purchased for off-premises consumption; food services, which include purchased meals, are not classified as food by BEA. Post-IWG Diet food and non-alcoholic beverages total figure is equal to 2010 figure with 60.3% increase in expenditures, as calculated in Top 100 vs. IWG Diet cost comparison.

Source: 2010 Data, Table 2.4.5U. Personal Consumption Expenditures by Type of Product, Bureau of Economic Analysis (BEA) US Department of Commerce. Processed fruits and vegetables allocated to fruit and vegetables categories based on total expenditure ratios of fresh fruit (37.7%) and fresh vegetables (62.3%) to all fresh fruits and vegetables.

Impact of the IWG Diet on U.S. Agriculture

- GES then endeavored to determine the impact of the shift in consumer food expenditures under the IWG Diet on U.S. agriculture, specifically to estimate the costs and benefits to growers of grain and fruits and vegetables.
- Assuming that the decline in consumer expenditures on cereal and bakery products under the IWG Diet (71.8%) would proportionately affect demand for grain, GES calculated the decline in the value in U.S. grain for domestic food use.
- GES used data from the U.S. Department of Agriculture (“USDA”) on the value of grain production and uses of that output. Based on these data, GES derived an estimate of the value of U.S. grain for food use by grain type. The 71.8% decline was then applied to derive the value of grain for domestic food use if the IWG Diet were to be adopted by the U.S. population.
- Based on this methodology, the total impact of the IWG Diet on the value of grain production was derived. As shown in the following table, at a 100% rate of adoption, the IWG Diet would result in a \$30.3 billion decline in the value of grain produced for food consumption by U.S. growers.
 - At an adoption rate of 20% for the IWG Diet, the value of grain for food use would fall by \$6.1 billion, while under a 50% adoption rate, such decline would total \$15.2 billion.
- These estimates are conservative in that they do not account for the price declines that would likely be associated with a major contraction in U.S. grain consumption.

**Estimated Value of US Grain Production for Domestic Food Use,
2010 and Post-IWG Diet 100% Adoption**
(in thousands of dollars)

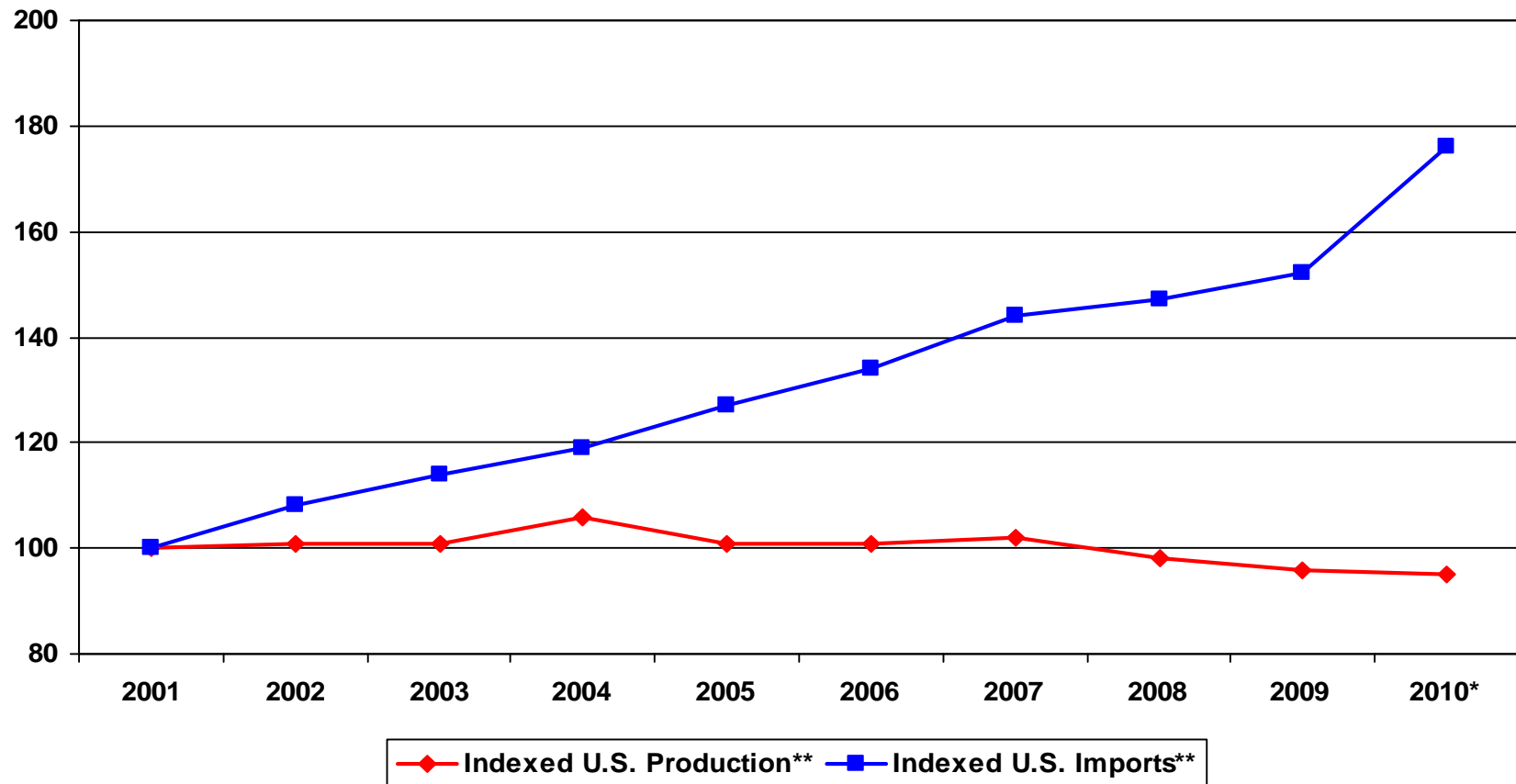
	<u>Total 2010 Value</u>	<u>% Domestic Food Use</u>	<u>Estimated Value Dom. Food Use</u>	<u>Estimated Decline Post IWG Diet</u>	<u>Estimated Value Post IWG Diet</u>
Barley	691,131	88.9%	614,339	-441,113	173,225
Corn for grain	66,650,160	51.4%	34,270,188	-24,607,004	9,663,184
Oats	213,570	93.8%	200,387	-143,884	56,503
Rice	3,074,990	53.3%	1,639,320	-1,177,080	462,240
Rye	39,036	71.9%	28,052	-20,142	7,910
Wheat, all	<u>12,992,156</u>	42.1%	<u>5,472,240</u>	<u>-3,929,229</u>	<u>1,543,010</u>
Total	83,661,043		42,224,524	-30,318,452	11,906,072

Source: USDA Crop Values, 2010 Summary (Feb. 2011). Percentage reduction in value of grain for domestic food use (71.8%) derived from table "Estimated Impact of IWG Diet on U.S. Consumer Expenditures by Food Product Category" (All Cereals and Bakery Products).

Impact of the IWG Diet on U.S. Agriculture

- **GES finally considered whether the losses to U.S. grain growers under the IWG Diet would be compensated by commensurate growth in demand for fresh fruits and vegetables grown in the United States.**
- **Review of USDA data on U.S. production, consumption, and imports of fresh fruits and vegetables indicates that U.S. growers would not be able to meet increased demand for fruits and vegetables under the IWG Diet. As shown in the following graphs, since 2001, U.S. output of fresh fruits and vegetables has declined, while imports have increased significantly.**
- **Based on these trends, it is clear that growth in U.S. consumption of fresh fruits and vegetables in recent years has not been served by U.S. growers of these products, but by foreign growers whose products must be imported into the United States.**
- **Given these facts, most of the increased demand for fruits and vegetables under the IWG Diet would likely be sourced from outside the United States. As a result, consumption changes under the IWG Diet would likely add to the U.S. trade deficit.**
- **In contrast to the market for fresh fruits and vegetables, the U.S. market for grain has been and remains predominantly domestically sourced (see slide 18). Unless farmers found new markets, the decline in grain consumption that would result from adoption of the IWG Diet would be a direct loss to the U.S. economy.**

Indexed Volume of U.S. Fresh Market Vegetable Production and Imports

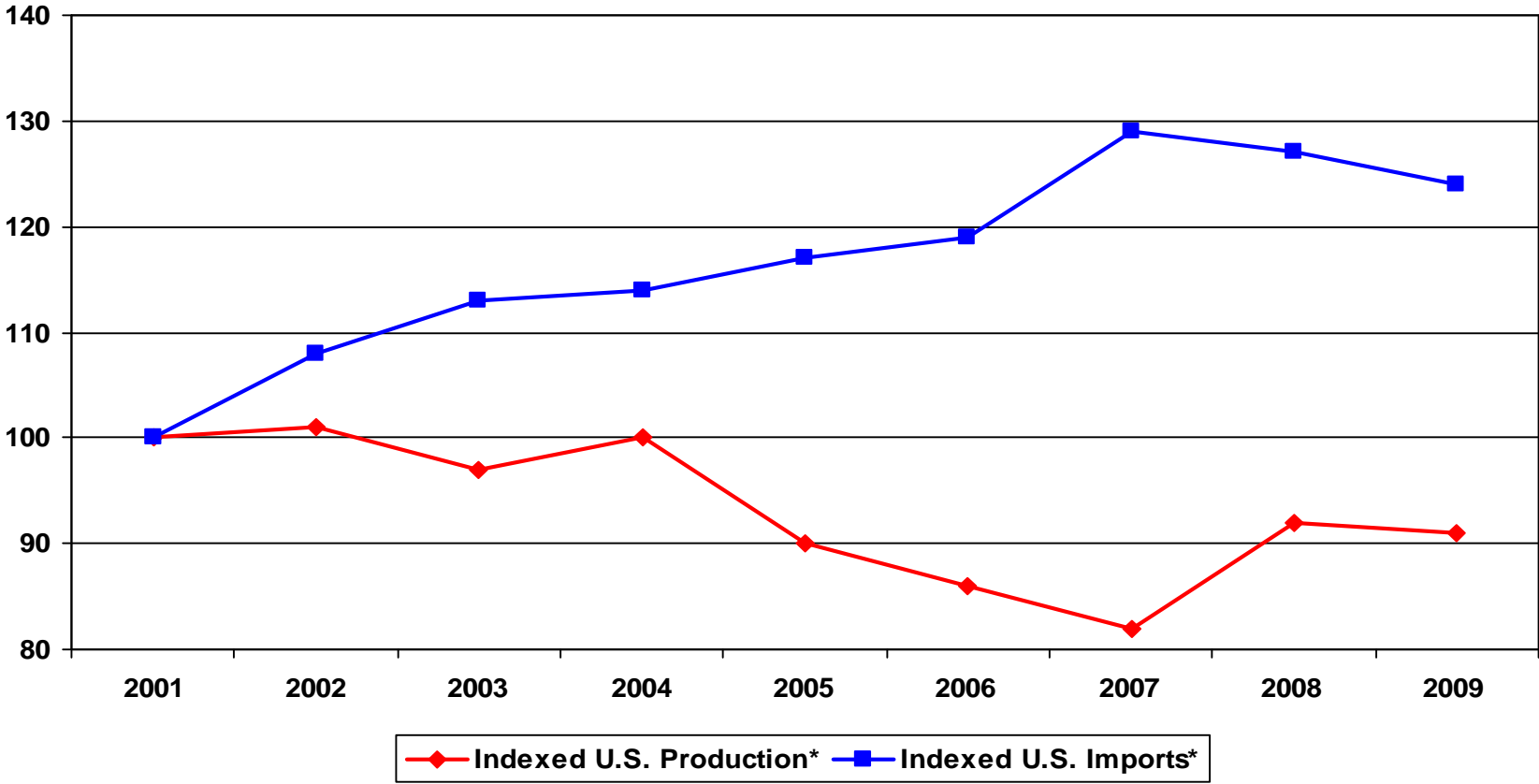


*- preliminary data

** - base year is 2001

Source: USDA Vegetable and Melon Outlook

Indexed Volume of U.S. Production of Fruit and Fresh Market Imports



*- base year is 2001

Source: USDA Fruit and Nut Outlook

Import Market Share of Total US Domestic Grain Use

(in millions of bushels and 1000's of metric tons except as noted)

	<u>Barley</u>	<u>MT Equiv.</u>	<u>Corn</u>	<u>MT Equiv.</u>	<u>Oats</u>	<u>MT Equiv.</u>	<u>Rice *</u>	<u>MT Equiv.</u>	<u>Wheat</u>	<u>MT Equiv.</u>	<u>Total Grain, MT</u>
Production	180	3,919	12,447	316,166	81	1,176	243	11,027	2,208	60,093	334,496
Imports	10	218	25	635	83	1,205	18	816	100	2,722	2,974
Exports	8	174	1,900	48,262	3	44	114	5,171	1,295	35,245	54,946
Change in Stocks	(22)	(479)	(978)	(24,842)	(14)	(203)	20	907	(167)	(4,545)	(24,784)
Total Domestic Use	204	4,441	11,550	293,382	175	2,540	127	5,765	1,180	32,115	307,308
Import Market Share	4.9%	4.9%	0.2%	0.2%	47.4%	47.4%	14.2%	14.2%	8.5%	8.5%	1.0%

* Rice volume in millions of hundredweight. Data for rye not available.

Source: Data and metric ton conversion factors, USDA World Agricultural Supply and Demand Estimates (June 9, 2011).

Methodological Notes

A public summary of the NPD Top 100 Foods list follows these notes. Because the specific rankings and the numerical prevalence weightings of the individual food items in the list of Top 100 Foods are the proprietary information of the NPD Group, an alphabetized list of these products is employed.

The original data source for this information is The NPD Group, Inc. National Eating Trends® (NET®) in-home food consumption for the two years ending February 2011. NET® classifies all base dish foods and beverages into 88 standard categories; e.g. Vegetables, Fruits, Sandwiches, etc. (Base dish is defined as the final dish consumed). For this study, because there are differences between foods within given categories within the 88 standard categories, further sub-classifications of foods were required (e.g., ham sandwich vs. peanut butter & jelly sandwich; carrots vs. corn; etc.), resulting in over 400 expanded categories.

This list of over 400 commonly consumed foods, as provided by NPD, reflects not only the names of these foods, but their relative prevalence in the American diet, expressed in total share of “eatings.” From the final list of over 400 foods, ranked in order of prevalence, the determination was readily made of the top 100 most commonly consumed food types.

The NPD Top 100 Foods listing was used as a proxy for the composition of the current American diet (“Current Diet”). In addition to providing the list of the Top 100 most commonly consumed foods, ranked by prevalence in the diet, NPD was able to provide further detail about the most commonly consumed form of each food (with respect to those foods that may take a variety of forms). For instance, the NPD data establishes that most corn is from canned corn (vs. frozen or fresh) whereas most apples are fresh. This additional data allowed for the most commonly consumed form of a given food type to be examined against the IWG requirements. From the general food type listed in the NPD rankings (Column A), the most commonly consumed specific food product was chosen for analysis (Column B) to determine whether it met the IWG’s nutrition standards (note that the specific foods within Column B, often brand-name foods, were chosen as popular foods that well represent the most common form within the given food type as determined from NPD data, but the specific branded foods and products were not listed in the NPD data). This analysis compared readily available information on the nutrition and composition of these food items to the 2021 IWG standards. The results of this analysis are shown in Column C, with a “yes” signifying that the food listed meets the IWG standards and a “no” indicating that the food fails the IWG standards. For those foods that fail the standards, the grounds for the failure are provided in Column D, although the reasons shown are not necessarily exhaustive.

GES endeavored to compare the retail cost of the Current Diet to a diet of foods that meet the IWG standards (the “IWG Diet”). Because only 12 of the NPD Top 100 Foods met the nutritional standards set by the IWG, however, in order to achieve a reasonably balanced diet, the IWG Diet was defined to include additional items, including less-popular forms of certain foods in the Top 100 (e.g., fat-free milk, rather than 2% milk, the most popular form of milk consumed) and other foods from NPD’s expanded top 150 foods list to ensure that the IWG Diet would include items from all major food groups. Also included in the diet were any other IWG-compliant items within the top 150 list. As a result, the following items were added to the 12 items originally meeting the IWG criteria: boiled eggs, boneless skinless chicken breast, brown rice, cantaloupe, fat free milk, fresh green beans, fresh corn, frosted shredded wheat cereal, frozen green peas, pears, salmon, squash, sweet potatoes, tomatoes, and watermelon (resulting in a total of 27 items in the IWG Diet)

Attachment 1: NPD Top 100 Table

<u>(A) Top 100 Commonly Consumed Product List*</u>	<u>(B) Representative Food Used to Assess**</u>	<u>(C) Meets 2021 Target Criteria</u>	<u>(D) Selected Reason(s) food does not meet 2021 target criteria***</u>
Alcoholic Beverages	Beer (regular)	No	<50% of a food group
All Family Cereal	Honey Nut Cheerios	No	sodium, added sugar
AO Italian Dishes – Pasta, Macaroni, Noodles, Parmesan etc (Ex Can/Frz)	Lasagna	No	sat fat, sodium
Baby Food	<i>Too varied to assess</i>	N/A	N/A
Bacon	Bacon (pork, cooked)	No	sat fat, sodium
Bagels	Bagel, plain	No	sodium
Baked Beans & Pork n Beans	Baked beans, canned, with pork and sweet sauce	No	sodium
Beef Burger	Beef burger, hamburger (95% lean, 1 patty cooked) + bun	No	sat fat
Biscuits	Biscuits (plain/buttermilk, commercially prep)	No	sat fat, sodium
Bottled Water Non-Carb	Bottled water	No	<50% of a food group
Bran+Natural Cereal	Kellogg's Raisin Bran	No	sodium
Bread: All Other Flavors	Bread (rye)	No	sodium
Bread: Pan Tostado revise	Bread (wheat, toasted)	No	sodium
Brkfst/Gran/Fruit/Cereal Bars	Strawberry Nutrigrain Bar	No	<50% of a food group
Buns/Rolls	Hamburger bun, plain	No	sodium

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Cakes	White cake (prepared from recipe without frosting-9" diameter)	No	sat fat, sodium, added sugar
Cheese (Ex Crm Cheese)	Kraft American cheese	No	sat fat, sodium
Chicken Breast:Bone-In (Default)	Chicken breast, bone in & skin on	No	sat fat, sodium (added in prep)
Chicken:Nuggets/Stick/Fingers	Chicken nugget, frozen-cooked (Schwan's Chicken Pattie Nuggets)	No	sat fat, sodium
Chips	Lay's Original Potato Chips	No	sat fat, sodium
Chocolate Candy Bars	Hershey's chocolate bar	No	sat fat, added sugar
Chocolate Covered Candy	M&M's (chocolate)	No	sat fat, added sugar
Coffee	Coffee, Black	No	<50% of a food group
Commercial Frozen Novelties	Nestle Drumstick	No	sat fat
Cookies (Ex Rte Treat Bars)	Nabisco Oreo	No	sat fat, sodium, added sugar
Diet/Low-Cal Carbonated Soft Drink)	Diet Coke (12 oz can)	No	<50% of a food group
Donuts	Donuts (yeast-leavened, glazed)	No	sat fat, sodium
Eggs:Fried	Egg, fried w/ added fat	No	sat fat/trans (added in prep)
Eggs:Scrambled	Eggs, scrambled (made w/ added fat & salt)	No	sat fat, sodium (added in prep)
Flavored Rice	Rice-a-Roni, Herb & Butter	No	sat fat, trans, sodium

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Frozen Dinners/ Entrees	Stouffer's Mac n Cheese (frozen meal)	No	sat fat, sodium
Fruit Drinks/Ades/Lemonade	Fruitade/fruit drink - orange bkfst drink, RTD	No	added sugar
Fruit Juice	100% Apple Juice	Yes	MEETS
Fruit: Total Apples (fresh is most common)	Apple, raw w/ skin	Yes	MEETS
Fruit: Total Applesauce (canned is most common)	Applesauce (sweetened)	Yes	MEETS
Fruit: Total Bananas (fresh is most common)	Banana, medium raw	Yes	MEETS
Fruit: Total Grapes (fresh is most common)	Grapes, Red or Green, raw	Yes	MEETS
Fruit: Total Oranges (fresh is most common)	Orange, raw navel	Yes	MEETS
Fruit: Total Peaches (fresh is most common)	Peach, raw	Yes	MEETS
Fruit: Total Strawberries (fresh is most common)	Strawberries, raw	Yes	MEETS
Garlic Bread	Frozen, ready-to-heat garlic bread (Schwan's garlic Texas Toast)	No	sat fat, sodium

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Ground Beef/Hamburger Dish	Hamburger Helper (Cheeseburger Mac)	No	sat fat, trans, sodium
Ham/Ham Lunchmeat	Ham/Ham lunchmeat (sliced, regular ~11% fat)	No	sat fat, sodium
Homemade/Mix Variety:AO Appl	Microwaveable Casserole (Italian Pasta & Beef Bake: pasta, ground beef, tomato sauce, mushrooms, cheese)	No	sat fat, sodium
Hot Cereal	Quaker Raisin Spice instant oatmeal, prepared with water	No	sodium, added sugar
Hot Dog Sandwich	Hot dog (beef, pork) + bun	No	sat fat, sodium
Hot Dogs Not In Bun	Hot dog (beef, pork)	No	sat fat, sodium
Hot Tea	Brewed tea, prepared with water	No	<50% of a food group
Ice Cream	Breyer's All Natural (vanilla)	No	sat fat, added sugar
Iced Tea	Lipton Brisk iced tea, with lemon flavor	No	added sugar
Leaf Salad	Iceberg lettuce (chopped) w/ salad dressing (Light Ranch)	No	sodium (from dressing)

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<u>(A) Top 100 Commonly Consumed Product List*</u>	<u>(B) Representative Food Used to Assess**</u>	<u>(C) Meets 2021 Target Criteria</u>	<u>(D) Selected Reason(s) food does not meet 2021 target criteria***</u>
Mac/Pasta/Noodles(Plain)	Spaghetti noodles, plain (boiled in salted water)	No	sodium (added in prep)
Macaroni & Cheese (Ex Frz)	Kraft Original Macaroni & Cheese (prepared)	No	sat fat, sodium
Meat/Fish/Poultry/Egg Salad	Egg salad: home prepared with eggs, mayonnaise, onions, peppers, celery, salt	No	sodium
Mixed/Combination Vegetables (frozen is most common)	Mixed frozen vegetables (peas/corn/carrots/lima, boiled, drained, no additives)	Yes	MEETS
Nuts/Seeds	Mixed nuts/seeds (dry roasted, salted)	No	sodium
Other Legumes (canned is most common)	Beans, canned (Ortega Black Beans)	No	sodium
Pancakes	Pancake (plain, frozen, ready-to-heat)	No	sodium
Pies	Apple pie, commercially prepared	No	sat fat, trans, sodium, added sugar
Pizza: Restaurant	Pizza (cheese, reg crust)	No	sat fat, sodium
Pizza:Pepperoni (No Sausage)	Pizza (pepperoni, reg crust)	No	sat fat, sodium

Attachment 1: NPD Top 100 Table

<u>(A) Top 100 Commonly Consumed Product List*</u>	<u>(B) Representative Food Used to Assess**</u>	<u>(C) Meets 2021 Target Criteria</u>	<u>(D) Selected Reason(s) food does not meet 2021 target criteria***</u>
Plain/Fluid Milk (Ex Alternatives)	2% Milk	No	sat fat
Popcorn	Orville Reddenbacher Butter Popcorn, microwave	No	sat fat, sodium
Pork Cut:Chops	Pork, center loin (chops), bone-in, cooked, pan-fried	No	sat fat
Potatoes:AO/Unidentified Types	Potato salad, home prepared	No	sat fat, sodium
Potatoes:Baked	Baked potato, flesh w/ skin, margarine added	No	sat fat (from margarine)
Potatoes:Fried	French fries, frozen, oven prepared	No	sodium
Potatoes:Mashed/Creamed	Mashed potatoes w/ milk or water, margarine & salt	No	sat fat, sodium (added in prep)
Pre-Sweet Cereal	Lucky Charms	No	sodium, added sugar
Pretzels	Pretzels, salted	No	sodium
Pudding/Custard/Tapioca	RTE Jell-O Pudding Snacks, Chocolate	No	sodium
Regular Carbonated Soft Drink	Coke (12oz can)	No	added sugar

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<u>(A) Top 100 Commonly Consumed Product List*</u>	<u>(B) Representative Food Used to Assess**</u>	<u>(C) Meets 2021 Target Criteria</u>	<u>(D) Selected Reason(s) food does not meet 2021 target criteria***</u>
Rice:Reg/White	Short grain white rice, made per instructions w/ salt	No	sodium (added in prep)
Saltines	Saltines, regular	No	sodium
Sandwich:Chicken	Chicken patty (frozen, cooked) + bun	No	sat fat, sodium
Sandwich:Chs/Crm Chs	Cheese (2 slices American) + wheat bread (2 slices)	No	sat fat, sodium
Sandwich:Ham	Ham & Cheese Sandwich (Fast Food)	No	sat fat, sodium
Sandwich:Pntbtr/PJ	2T PB + 1T jam + 2 slices bread (wheat)	No	sat fat, sodium, added sugar
Sandwich:Tuna/Salad	Tuna salad + wheat bread (2 slices)	No	sat fat, sodium
Sandwich:Turkey	Natural Choice Deli-Style Turkey (3 slices) + wheat bread (2 slices)	No	sodium
Sausage	Sausage (pork, cooked)	No	sat fat, sodium
Sandwich W/Proc Meat:Bologna	Oscar Mayer bologna: chicken/pork/beef (2 slices) + wheat bread (2 slices)	No	sat fat, sodium

Attachment 1: NPD Top 100 Table

<u>(A) Top 100 Commonly Consumed Product List*</u>	<u>(B) Representative Food Used to Assess**</u>	<u>(C) Meets 2021 Target Criteria</u>	<u>(D) Selected Reason(s) food does not meet 2021 target criteria***</u>
Spaghetti/Angel Hr (Ex Can/Frz)	Spaghetti noodles (boiled in salted water) + pasta sauce (RTS)	No	sodium
Steak	Beef, short loin, top loin, steak, all grades, cooked, broiled	No	sat fat
Sweet Muffins	Muffins (blueberry, commercially prep)	No	sat fat, sodium, added sugar
Sweet Rolls/Danish/Coffee Cake	Sweet rolls/danish/coffee (danish pastry, fruit)	No	sat fat, sodium, added sugar
Tacos/Burritos	Beef taco, prepared from kit (2 shells, 1 tbsp taco sauce, 2 tsp seasoning mix)	No	sat fat, sodium
Toaster Pastries	Kellogg's Strawberry Poptart, unfrosted	No	sat fat, sodium, added sugar
Total Broccoli (fresh is most common)	Broccoli (cooked, boiled, drained, no additives)	Yes	MEETS
Total Carrots (fresh is most common)	Baby carrots (raw)	Yes	MEETS
Total Corn (canned is most common)	Green Giant Whole Kernel Sweet Corn, canned	No	sodium
Total Green Beans (canned is most common)	Green Giant Cut Green Beans, canned	No	sodium
Total Peas (canned is most common)	Green Giant Young Tender Sweet Peas, canned	No	sodium

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<u>(A) Top 100 Commonly Consumed Product List*</u>	<u>(B) Representative Food Used to Assess**</u>	<u>(C) Meets 2021 Target Criteria</u>	<u>(D) Selected Reason(s) food does not meet 2021 target criteria***</u>
Total Wheat Breads	Bread (wheat)	No	sodium
Unspecified Type Of Bread	English muffin, plain	No	sodium
Waffles	Waffle (homestyle, frozen, ready-to-heat)	No	sat fat, sodium
White/Butter(Milk) Bread	Bread (white)	No	sodium
Yogurt: All Other/Not Rprtd Yogurt	Dannon Activia, strawberry	No	added sugar
Yogurt: Non-Fat Yogurt	Yoplait Light, strawberry	Yes	MEETS
Yogurt: Reduced/Low Fat Yogurt	Original Lowfat Yoplait, strawberry	No	added sugar

Attachment 1: NPD Top 100 Table Footnotes

*Source: The NPD Group, Inc. National Eating Trends® (NET®) in-home food consumption for the two years ending February 2011. NET® classifies all base dish foods and beverages into 88 standard categories; e.g. Vegetables, Fruits, Sandwiches, etc. (Base dish is defined as the final dish consumed). For this study, further sub-classifications of foods were required (e.g. Carrots, Corn, Apples, Oranges, etc.), resulting in over 400 expanded categories. For further information, see accompanying Description of Methodology.

Note: Bolded terms indicate that the food product is one of NPD's standard 88 food categories. Remaining items are also based upon NPD data, but required more specific identification to facilitate nutritional and other analysis.

** Column B reflects the precise food (from within each food type) that was used for the IWG compliance analysis. Please note that these specific foods within Column B (often brand-name foods) were chosen as popular foods that well represent the most common form within the given food type (as determined from NPD data), but these specific foods and branded products were not specifically listed in the NPD data.

***Many foods are disqualified under the IWG guidelines for a variety of reasons. This list includes at least one reason that the specified food does not meet the guidelines, but is not exhaustive.

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