



November 8, 2006

J. Alexander M. Douglas, Jr.
President and Chief Operating Officer
North America Group
The Coca-Cola Company
One Coca-Cola Plaza
Atlanta, GA 30313

Re: Disclosing calories per serving on fronts of beverage labels

Dear Mr. Douglas:

We understand that Coca-Cola has decided to include the number of kilojoules per serving (calories) on the front label of each of its beverages sold in Australia. We believe that Coca-Cola should take the same step in the United States (U.S.)

According to a September 8, 2006 edition of Coca-Cola's *Health and Wellness News*, Coca-Cola Australia believes "the new labels will empower Australians with the facts to make informed choices for their health and wellbeing" and will provide "valuable nutrition information in a more meaningful, user-friendly, and visible way."¹ The new labels will appear on [Australian] supermarket shelves in the coming months, once existing label inventories sell out.

This step means that the amount of calories per serving will be prominently disclosed on all beverages produced by Coca-Cola in Australia. In contrast, calorie information in the U.S. is disclosed only on the back or side labels of Coca-Cola and other beverages and foods. An American headquartered multi-national company like Coca-Cola should provide American consumers with the same calorie information, in "a more meaningful, user-friendly and visible way,"² that is now being provided to Australian consumers.³


Recent data from the Organisation for Economic Co-operation and Development (OECD), released in June 2006, shows that obesity rates are higher in the U.S. than in Australia. The OECD data shows that while 21.7% of Australian adults were obese (BMI >30 kg/m²) in 2000, more than 30% of American adults were obese in that same year,⁴ a level in the U.S. that continues to this day.⁵ If anything, American consumers are in greater need of front label calorie content disclosures than Australian consumers.

Carbonated soft drinks provide about 7% of the total calories consumed in the average American's diet, making them Americans' single most-consumed food.⁶ Not surprisingly, the

figures for American teenagers are even higher. In 1999-2000, carbonated soft drinks and fruit drinks/ades totaled 13% of teenagers' calories.⁷ American consumers would most certainly benefit from having the calorie information of those beverages clearly displayed on the front label particularly when increasing research is demonstrating that soft drinks promote weight gain.⁸

We urge Coca-Cola to follow through on the company's global commitment to "adhering to the right policies in . . . the marketplace . . . and promoting nutrition education"⁹ and begin disclosing caloric content on the front labels of all Coca-Cola products sold in the U.S.

Sincerely,

A handwritten signature in black ink that reads "Michael F. Jacobson". The signature is written in a cursive, flowing style with a long, sweeping tail on the final letter.

Michael F. Jacobson, Ph.D.
Executive Director

¹ The Coca-Cola Company, Health and Wellness News. *Product Labels in Australia and New Zealand to Feature Enhanced Nutrition Data* (September 8, 2006). http://www2.coca-cola.com/ourcompany/wn_includes/wn20060908_labels_include.html (Accessed October 5, 2006).

² *Ibid.*

³ Such steps are permissible under U.S. Food and Drug Administration regulations. *See*, 21 CFR § 101.12(c), 21 CFR § 101.13(i)(3).

⁴ Organisation for Economic Co-operation and Development. *Obesity, Percentage of Adult Population With a BMI > 30 kg/m²*, June 2006. <http://www.oecd.org/dataoecd/7/38/35530193.xls> (Accessed October 4, 2006).

⁵ The latest data from the National Center for Health Statistics show that 30 percent of U.S. adults 20 years of age and older—over 60 million people—are obese. Department of Health and Human Services (US), Centers for Disease Control and Prevention. *Overweight and Obesity: Home*. <http://www.cdc.gov/nccdphp/dnpa/obesity/index.htm> (Accessed October 6, 2006).

⁶ Block, G. Foods Contributing to Energy Intake in the US: data from NHANES III and NHANES 1999-2000. *J Food Comp Anal.* 2004, Vol. 17, pg. 439-447.

⁷ Murphy, M., *et al.* Beverages as a Source of Energy and Nutrients in Diets of Children and Adolescents. *Exper Biol.* 2005, Abstract No. 275.4. Also see: New Study Documents the Detrimental Impact of Teen Beverage Choices. *Market Wire.* April 3, 2005.

⁸ Malik, VS, *et al.* Intake of sugar-sweetened beverages and weight gain: a systematic review. *Am J Clin Nutr.* 2006, Vol. 84, pg. 274-288.

⁹ The Coca-Cola Company, Your Health and Our Beverages. *Our Commitment to Consumers*. http://www2.coca-cola.com/ourcompany/hal_yourhealth.html (Accessed October 6, 2006).