



October 20, 2006

Mr. Jim Jenness
Chairman of the Board/CEO
Kellogg Co.
1 Kellogg Square
Battle Creek, MI 49017-3534
USA

Dear Mr. Jenness:

Re: Kellogg's Global Nutrition Policy

We are writing concerning the varying nutritional values of Kellogg cereals sold in the United States (US) and the United Kingdom (UK). Kellogg proudly claims a commitment to consumer health dating from its founding as a company, stating on its website: "We are a company of dedicated people making quality products for a healthier world."¹

Notwithstanding the stated policy of the company, we have learned that the sodium and sugar contents of leading brands of Kellogg cereals vary significantly between the US and the UK² (and we presume that similar variances may be true for other countries in which Kellogg does business). In some instances, the differences result in Americans consuming higher amounts of sodium and sugar than British consumers.

- Special K Red Berries contains 39% more sugar in the US than the same amount of cereal in the UK.³
- Rice Krispies in the US contains 49% more sodium than the same amount of cereal in the UK.⁴
- All Bran sold in the US contains 12% more sugar than the same amount of cereal in the UK.⁵

Conversely, some Kellogg cereals sold in the UK contain higher amounts of these nutrients than the same products sold in the US.

- Special K sold in the UK contains 31% more sugar than the same amount of Special K in the US.⁶
- All Bran sold in the UK contains 133% more sodium than the same amount of cereal in the US.⁷

- All Bran Yogurt cereal sold in the UK contains 117% more sugar than the same amount of cereal sold in the US. The cereal sold in the UK contains 63% more sodium than the same amount of cereal sold in the US.⁸

According to the World Health Organization (WHO), consumers in both the US and the UK (as well as in other countries around the world) suffer from the same diet-related diseases, such as heart disease, stroke, and diabetes⁹ and are all advised to reduce their consumption of foods containing excessive amounts of unhealthy amounts of added sugars and sodium.¹⁰ In light of the WHO's recommendations, and the varying nutrient levels of Kellogg cereals sold worldwide, the company's global commitment to good nutrition seems to be more rhetorical than substantive.

Kellogg may claim that differences in nutrient content are due to regional taste preferences. However, we note that Kellogg's Corn Flakes, Frosted Flakes, and Frosted Flakes Reduced Sugar sold in the US and the UK all contain similar levels of sodium and sugar.¹¹ If Kellogg can successfully market those cereals in the US and the UK, with equivalent nutritional values, it would seem that the company could do the same with many of its other cereals as well (at the lower of the two levels).

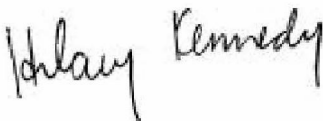
At a recent transatlantic nutrition policy conference sponsored by the European Union and the United States, it was noted that multinational companies that claim to have a global commitment to good nutrition need to do more to achieve greater consistency in the nutritional value of their products. A representative from the U.S. Grocery Manufacturers Association (GMA) stated at the meeting, "I think today's discussions show that companies doing business on both sides of the Atlantic need to make greater efforts to coordinate nutritional policy on a trans-Atlantic basis."¹²

We hope that Kellogg will respond positively to the recommendations of the GMA, establish a consistent set of best nutritional practices in the US and the UK, and live up to its commitment to market the most nutritious products world wide.

Sincerely,



Bruce Silverglade
Director of Legal Affairs



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¹ Kellogg Company Website, <http://www.kelloggcompany.com/nutrition.aspx> (Aug. 28, 2006)

² Information on product content for US products was taken from the Nutrition Facts Label. In order to make comparisons, all US serving sizes, which range from 28 grams to 56 grams, were converted to 100 grams. (US labels list serving sizes of 32 grams for Special K, Special K Red Berries, and All Bran, 33 grams for Rice Krispies, and 56 grams for All Bran Yogurt.) These values were then compared to information provided by Kellogg on the company's UK website (www.kelloggs.co.uk), which list nutritional "value per 100g." All product composition comparisons were made with dry cereal.

³ Special K Red Berries Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=57> (Aug. 23, 2006), Special K Red Berries Nutritional Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=510&company=3> (Aug. 23, 2006)

⁴ Rice Krispies Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=49> (Aug. 23, 2006) Rice Krispies Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=585&company=3> (Aug. 23, 2006)

⁵ All Bran Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=1> (Aug. 24, 2006), All Bran Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=551&company=3> (Aug. 24, 2006)

⁶ Special K Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=55> (Aug. 24, 2006) Special K Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=590&company=3> (Aug. 24, 2006)

⁷ All Bran Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=1> (Aug. 24, 2006), All Bran Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=551&company=3> (Aug. 24, 2006)

⁸ All-Bran Bran Flakes Yoghurty Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=90> (Aug. 28, 2006) All-Bran Yogurt Bites Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=5276&company=3> (Aug. 28, 2006)

⁹ World Health Organization. *Diet, Nutrition and the Prevention of Chronic Diseases*. Report of a Joint WHO/FAO Expert Consultation. Geneva, World Health Organization (WHO Technical Report Series, No. 916). http://whqlibdoc.who.int/trs/WHO_TRS_916.pdf (Aug. 28, 2006)

¹⁰ World Health Organization, *Global Strategy on Diet, Physical Activity, and Health*, 2004. http://www.who.int/dietphysicalactivity/strategy/eb11344/strategy_english_web.pdf (Aug. 28, 2006)

¹¹ Corn Flakes Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=11> (Aug. 24, 2006) Corn Flakes Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=449&company=3> (Aug. 24, 2006) Frosties Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=19> (Aug. 24, 2006) Frosted Flakes Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=450&company=3> (Aug. 24, 2006) Reduced Sugar Frosties Nutrition Information UK, <http://www.kelloggs.co.uk/products/product.asp?id=91> (Aug. 24, 2006) Reduced Sugar Frosted Flakes Nutrition Information US, <http://www.kelloggs.com/cgi-bin/brandpages/product.pl?product=2350&company=3> (Aug. 24, 2006)

¹² EU/US Conference, "Good Practices: Action on Diet, Physical Activity and Health," Brussels, Belgium, May 12, 2006, Statement of Mary Sophos, Grocery Manufacturers Association.