

MAY 2014

Copycat Snacks in Schools

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Introduction

The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) authorized the U.S. Department of Agriculture (USDA) to set nutrition standards for all foods and beverages sold in schools.¹ Prior to the HHFKA, the USDA only promulgated rules for items sold outside of the National School Lunch Program (NSLP) that were of “minimal nutritional value,” such as soda, gum, and candy.² Starting July 1, 2014, all foods sold outside of the NSLP, such as food from vending machines and school stores, will have to meet USDA “Smart Snacks” nutrition criteria. Not wanting to lose the in-school marketing opportunity, major food companies like PepsiCo are producing reformulated versions of popular junk foods like Cheetos® and Doritos® that meet the Smart Snacks criteria, but use the same brand names, logos and spokescharacters as are used to market traditional junk food. These copycat snacks are not widely available for purchase outside of schools and are clearly designed to co-market traditional junk food to children in school. This issue brief describes copycat snacks, how they undermine nutrition education efforts, and what can be done to stop the sale and marketing of these products in schools.

Copycat Snacks

Copycat snacks are a vehicle for food companies to co-market their popular unhealthy, junk food brands in schools. Copycat snacks meet USDA Smart Snacks nutrition criteria, but are marketed using brand names, product names, logos, and spokescharacters that are also used to market junk food. Moreover, we identified a number of copycat snacks that are not widely available for purchase outside of schools. This means that if children want the snack outside of school, e.g. at their local convenience store, they are limited to the less healthy versions.

For example, PepsiCo produces and markets to school food service directors a product called Cheetos® *Flamin’ Hot Puffs Reduced Fat*. This product meets the USDA Smart Snack guidelines, but it is not widely available for retail purchase outside of schools. Instead, PepsiCo offers Cheetos® *Flamin’ Hot Puffs* to the broader public. As you can see in Figure 1 below, the product packaging is almost identical.

FIGURE 1



Cheetos® Flamin’ Hot Puffs
Reduced Fat



Cheetos® Flamin’ Hot Puffs

PepsiCo also produces the Smart Snacks compliant Doritos® Reduced Fat Nacho Cheese. The reduced fat product is not widely available outside of schools. Similar to the Cheetos® products in Figure 1, the reduced fat Doritos® are packaged almost identically to traditional Doritos® Nacho Cheese chips (see Figure 2).

FIGURE 2Doritos® Reduced Fat
Nacho Cheese

Doritos® Nacho Cheese

In order to identify examples of copycat products specially formulated to meet school nutrition standards that are not widely available for purchase outside of schools we examined the product catalogs for K-12 school snacks from General Mills (<http://www.generalmillsfoodservice.com>), PepsiCo. (<http://www.pepsicoschoolsource.com>), and Campbell's (<http://campbellsfoodservice.com/?BID=31>). We then, cross-referenced products from the catalogs with the online product finder for the national food retailer Walmart (available at www.walmart.com) to determine whether or not the Smart Snacks compliant versions of the snacks were widely available for purchase outside of schools.

Table 1 contains examples of copycat products featured in the K-12 school snack catalogs that were not widely available for purchase outside of schools, but use the same brands, logos and spokes-characters as less healthy options sold outside of schools. We provide examples of the less healthy products that were available for purchase to illustrate the differences.

Table 1

Company & Brand	Product Meeting USDA Smart Snacks Rule	Sample Product Not meeting Smart Snacks Rule for Sale at Walmart
PepsiCo., Cheetos®	 <p data-bbox="711 1465 943 1514">Cheetos® Flamin' Hot Puffs Reduced Fat</p>	 <p data-bbox="1101 1465 1409 1514">Walmart – Offers Cheetos® Flamin' Hot Puffs, reduced fat not available.</p>
PepsiCo., Reduced Fat Doritos® Nacho Cheese	 <p data-bbox="672 1898 980 1940">Doritos® Reduced Fat Nacho Cheese</p>	 <p data-bbox="1057 1898 1409 1940">Walmart – Offers Doritos® Nacho Cheese, reduced fat not available.</p>

Table 1 continued

PepsiCo., Reduced Fat
Doritos® Cool Ranch



Doritos® Reduced Fat Cool Ranch



Walmart – Offers Doritos®
Cool Ranch, reduced fat not available.

PepsiCo., Reduced Fat
Doritos® Spicy Sweet Chili



Doritos® Reduced Fat Spicy Sweet Chili



Walmart – Offers Doritos®
Spicy Sweet Chili,
reduced fat not available.

PepsiCo, Quaker®
Oatmeal Raisin
Breakfast Cookie



Quaker® Oatmeal Raisin Breakfast Cookie



Walmart – Does not offer Quaker® Breakfast
Cookies of any kind available. Similar product:
Quaker® Soft Baked Chocolate
Almond Oatmeal Cookies.

PepsiCo, Smartfood®
Reduced Fat White Cheddar
Flavored Popcorn

Smartfood® Reduced Fat
White Cheddar Flavored Popcorn

Walmart – Offers Smartfood®
White Cheddar Cheese,
Reduced Fat not available.

Campbell's, Pepperidge Farm®
Goldfish® Made with Whole Grain Pretzel

Pepperidge Farm® Goldfish®
Made with Whole Grain Pretzel

Walmart – Sells Pretzel Baked Snack
Crackers, but not the whole grain
pretzel goldfish.

Table 1 continued

Campbell's, Pepperidge Farm®
Goldfish® Giant Grahams – Vanilla



Pepperidge Farm® Goldfish®
Giant Grahams – Vanilla



Walmart – Does not sell this product.
Similar Product:
Goldfish Grahams: S'mores.

Campbell's, Pepperidge Farm
Goldfish® Giant Grahams – Oats & Honey



Pepperidge Farm® Goldfish®
Giant Grahams – Oats & Honey

Walmart – Does not sell this product.

Campbell's, Pepperidge Farm®
Goldfish® Giant Grahams – Cinnamon



Pepperidge Farm® Goldfish®
Giant Grahams – Cinnamon

Walmart – Does not sell this product.

Campbell's, Pepperidge Farm®
Goldfish® Giant Grahams – Chocolate



Pepperidge Farm® Goldfish®
Giant Grahams – Chocolate

Walmart – Does not sell this product.

Table 1 continued

General Mills, Betty Crocker



Fruit By The Foot Berry Tie Dye Reduced Sugar



Walmart – Large quantity of Fruit By The Foot products, but none are reduced sugar

General Mills, Betty Crocker



Reduced Sugar Fruit Roll-Ups



Walmart – Various traditional Fruit Roll-Ups products

General Mills, Simply Chex



Strawberry Yogurt (Reduced Fat and Whole Grain)



Walmart – Various Simply Chex and Chex Mix options but no Strawberry Yogurt Simply Chex

General Mills, Gardetto's



Gardetto's Reduced Fat Original Recipe



Walmart – Only Gardetto's Original Recipe, not Reduced Fat

Table 1 continued

General Mills, Cinnamon Toast Crunch

25% Less Sugar
Cinnamon Toast Crunch BowlpakWalmart – Cinnamon Toast
Crunch Cereal**Copycat Snacks Undermine Child Nutrition Education & Threaten Child Health**

USDA nutrition standards for all foods sold in schools have a dual purpose: (1) improve the nutritional profile of products consumed by children in school; and (2) promote healthy eating habits for life. Copycat snacks have been reformulated to meet USDA nutrition standards, but undermine healthy eating education efforts by co-marketing junk food in schools. This is especially of concern because snacking on junk food is a major contributor to poor diet quality.

Snacking and Poor Diet

Over the past three decades, the deterioration of the food environment has led to a rapid rise in diet-related chronic diseases like type-II diabetes. Children are consuming more candy, fruit drinks, and salty snacks than ever before,³ making snack foods a key culprit of poor diet quality. Snacking has steadily increased over time.⁴ American children typically consume about three snacks per day, which accounts for approximately 27% of daily energy consumption.⁵ In 2005-2006, 83% of teens reported consuming at least one snack per day.⁶ The main sources of energy from snacks are from nutrient poor sources such as desserts, sugary beverages, and candy.⁷ Snacking interventions that replace energy dense snacks with healthy options like fruits or vegetables are needed to improve child diet quality.⁸ Copycat snacks do the exact opposite by co-marketing energy dense products like Doritos®, Cheetos® and Fruit Roll-Ups® for children and teens to snack on outside of school. As discussed in the next section, this is done primarily through branding.

The Impact of Branding on Food Purchases

Most of the food advertising directed at young children can be categorized as an attempt to brand rather than an attempt to sell a specific product.⁹ Jingles, slogans, logos, and spokes-characters like Chester Cheetah are examples of techniques used to establish food brands with children. Brand recognition starts as early as age two or three, and by eight years of age most children are able to recognize most, if not all, of the popular brand logos they are shown.¹⁰ The use of licensed characters to brand foods has been shown to greatly influence young children's preferences and snack selection.¹¹ These popular characters are particularly influential on children in relation to junk food.¹² Exposure to food branding on television and via other food marketing tools impacts food preferences,¹³ and food advertising to children is linked to increased consumption and intake of calories.¹⁴ When it comes to actual product purchases, branding influences children's and teens' attempts to influence family grocery shopping,¹⁵ and which foods they choose to purchase for themselves. This impact starts very young with some children making independent purchases around age five, and some children between ages five and seven make purchases and store visits without parents or guardians.¹⁶ Copycat snacks are a relatively new form of branding that appears to be an unintended consequence of the USDA's Smart Snacks rule.

What Can Be Done About Copycat Snacks?

In order to ensure that in-school food marketing does not undermine nutrition education efforts, the USDA has proposed a rule that would require schools to include policies in their Local Wellness Plans that only permit marketing of foods and beverage-

es that meet current Smart Snacks nutrition standards.¹⁷ As recently as 2012, most US elementary, middle, and high school students were exposed to commercialism at school that was aimed at obtaining food or beverage sales or developing brand recognition and loyalty for future sales.¹⁸ Indeed, in 2012, over 70% of elementary and middle school students went to schools with some form of food-based commercialism present.¹⁹ For high school students this number was almost 90%.²⁰ In the 2010-2011 school year, a majority of schools had no policy or a weak policy when it came to the marketing of unhealthy foods and beverages in schools.²¹ Co-marketing of junk foods via copycat snacks can be stopped by the USDA in its current rulemaking effort, by state governments, by individual school districts and by the food industry itself.

The USDA and States Governments Can Ensure that Schools Prohibit In-School Marketing of Copycat Snacks

In order to prevent co-marketing of junk foods in schools, the USDA can include in its rule for local school wellness policy implementation a definition of marketing that includes product packaging and an express exclusion of copycat snacks. The following two provisions would effectively prevent co-marketing of junk food in schools via copycat snacks:

210.30(b)(1) Food and Beverage Marketing and Advertising: Food and Beverage Marketing and Advertising means an oral, written, or graphic statement or representation, including a company logo or trademark, made for the purpose of promoting the use or sale of a product by the producer, manufacturer, distributor, seller, or any other entity with a commercial interest in the product. This covers such representations made on product packaging, school controlled-traditional and digital media, and on any property or facility owned or leased by the school district or school (such as school buildings, athletic fields, transportation vehicles, parking lots, or other facilities).

Policies for Food and Beverage Marketing: Local Education Authorities shall include in their local wellness plans policies that only allow marketing and advertising as defined in Section 210.30(b)(1) of foods and beverages that (1) meet the requirements set forth in the Smart Snacks rule, and that (2) use company brands, product names, logos, spokes-characters or mascots that are only used on food and beverage products that meet Smart Snacks standards (or the more restrictive standards adopted by the LEA, if applicable).

The practical effect of such a policy would be to prohibit sales of products that are part of brand portfolios that include junk food. In order to be sold in schools, reformulated products would have to bear a different product name, packaging design, and brand name. All foods and beverages associated with that brand would have to meet minimum USDA Smart Snacks nutrition standards. State governments and authorized state regulators can include similar language in school nutrition bills and regulations.

Schools Can Choose Not to Purchase Copycat Snacks for Resale in Schools

In order to maintain the integrity of school nutrition education efforts and promote overall healthy eating, school districts and school food service directors can choose not to purchase copycat snacks in the first place. Our research revealed these products currently are almost exclusively sold wholesale to schools. School food service directors can send a strong message to these companies that copycat snacks are not appropriate products for sale in schools by simply not procuring them. Irrespective of the final rule promulgated by the USDA on food marketing in schools, schools also can adopt policies that prohibit the practice of food companies marketing copycat snacks to children in schools.

Food Companies Can Stop Selling Copycat Snacks

Food companies are well aware of the research showing the negative impact of increased marketing of unhealthy products and brands directed at children and teenagers. The correlation between these marketing practices, the increase in obesity in children and the adults they grow up to be, and the physical and financial toll that diet-related chronic disease is taking on public health is undisputed. Parents, teachers, schools and regulators should therefore be skeptical of efforts by the food industry to seemingly promote healthy products in schools when they use brands, logos, and images linked to their other junk food products. If the food industry is serious about reformulating its popular snack brands, the reformulated versions would be widely available for sale to the public. At present, sales of copycat snacks to school food service programs is a naked form of branding designed to encourage unhealthy snacking outside of school.

Conclusion

Major food companies desperately want to be perceived as part of the solution to the public health crisis facing the nation. This is especially true with respect to the school food environment. School food and drink has continually improved, but copycat snacks are a step in the wrong direction. PepsiCo's launch of copycat versions of its "megabrands" Doritos® and Cheetos® is especially disappointing given prior comments made by its CEO about the company's commitment to developing healthier products for the US market. In a 2011 *New Yorker* article Ms. Nooyi was asked about the tension between maintaining sales of her company's products and fighting obesity. In response, she stated "[i]t's not a question of selling less...It's a question of selling the right stuff." The article profiled innovative PepsiCo products like bottled vegetable soups available in Europe. The nationwide overhaul of snack foods sold in schools presents a massive opportunity for food companies like PepsiCo to launch "the right stuff" to an entire generation. Given the food industry's response to the Smart Snacks rule, it likely will take clear action from the USDA, individual states and school districts to get companies like PepsiCo to actually live up to their commitments to develop and deliver the right stuff.

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