



**Statement
Submitted by Nickelodeon
For the “Food Marketing to Kids Workshop” – Comment, P034519
Washington, D.C.
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We welcome the opportunity to participate in the process and to share our perspective in advance of this valuable workshop on food marketing, self-regulation and childhood obesity. The joint effort of both the Federal Trade Commission (FTC) and the Department of Health and Human Services (HHS) to address this topic in such a productive way will no doubt provide an essential foundation for key stakeholders as we work toward solutions to help kids and parents make better lifestyle and diet choices.

At Nickelodeon, kids have been—and always will be—our top priority. For over 25 years, we’ve proactively put the needs and desires of our audience first. We are proud of the impact our pro-social initiatives have had on kids over the years – from Nickelodeon’s The Big Help campaign to our current Let’s Just Play initiative that supports and encourages active, healthy lifestyles for kids.

When the childhood obesity issue emerged, our approach was no different. Because it was clearly an issue affecting our audience, we believed it was our responsibility to understand it and outline the role we should take. We sponsored research, held focus groups, consulted with experts, engaged nutritionists and academics, met with our marketing partners, and reached out to a number of governmental and regulatory agencies.

This in-depth reconnaissance mission resulted in our taking specific steps that applied key learnings about health and wellness to our messaging and outreach to kids.

Here’s just a snapshot of the steps we’ve taken to date:

- Committed over \$20 million (10 percent) of our total media time annually to nutritional literacy aimed at kids and parents including creating our own—“Health and Wellness” spots.
- Launched one of the most aggressive and committed efforts to date, Let’s Just Play, an initiative to get kids connected to more active and physical play through partnerships with community-based organizations and cities across the country.
- Awarded \$600,000 in direct Let’s Just Play grants to communities in all 50 states to provide support for physical education, nutrition, and other recreational programs, and will more than double that amount in the coming year.

- On-air, Nickelodeon ‘went dark’ (no programming or ads) on our designated Worldwide Day of Play to get kids away from the TV and out exercising, playing and moving. This is a global initiative, which will take place for a second straight year this October.
- Created Healthy Marketing Principles as a guidepost for all of our Nickelodeon brand-related advertising and marketing relationships. These are guidelines for the kinds of foods and activity portrayed in ads, the sequencing of food ad placement, the portion sizes portrayed, and much more...and we’re strongly encouraging food “advertisers” on our channel to get on board.
- Supplemented existing Children’s Advertising Review Unit (CARU) guidelines and used our Board membership to prod for more self-assessment and further movement on the self-regulatory front. Specific Nickelodeon efforts include stipulating that ads for food should not condone excessive consumption; should illustrate portion sizes appropriate to the setting portrayed; and depict children in a manner that suggest that they are in control of their behavior.

Our commitment to this effort extends to our regular programming as well. On our Nick Jr. pre-school block, we have launched the ironically-named “LazyTown,” an action-adventure series that is explicitly designed to motivate kids to make healthier choices in their everyday lives. It also gives kids the power to go play, move, dance sing, make new choices, and to feel good about it. Like real kids, the kids in Lazy Town often have trouble navigating between making a healthy choice and opting for the easy way out. But through humor, movement, dance and adventure, the show sends a powerful message that kids ‘can do it!’ Lazytown has emerged as one of the most popular preschool programs in television, and its stars are the cornerstone of our summer programming lineup this year. Additionally, we have just committed to a multi-city Lazytown Tour this summer, which will feature the stars of the program interacting directly with kids.

Most importantly, we have adopted this philosophy: **let the kids lead . . . by empowering them with information.**

This is the core of our approach. Once empowered with the right information, kids themselves will lead the charge against obesity, if we let them. That’s what they did on the Big Help. That initiative was created by kids who wanted to volunteer but found adults standing in their way. It was so successful precisely because it was kid-inspired and kid-led.

We have seen the same phenomenon with Let’s Just Play. Additionally, Nick News produced ½ hour specials on diet, nutrition, exercise, and media literacy, a core component of kids’ understanding media, advertising, and their world. We are airing health and wellness PSAs throughout our schedule. Our interstitials between shows also feature real kids who tell other kids how to be active and make smart food choices.

Our NickJr.com website which is primarily a parent website, offers recipes, suggested activities and information from nutritionists about ways to get picky eaters to eat healthy, using the new My Pyramid, and other valuable resources for parents. Nick.com offers portion-control guideposts and games.

Our licensed food products all have on-package tips for ways that kids and parents can improve their diet and lifestyle. In addition, all Nickelodeon licensed athletic wear and equipment features a Let's Just Play tip promoting physical play everyday.

Empowered with this information, kids really will lead. After all, kids are not just adults in training, they are citizens deserving of the very best that the community of adults can provide.

We have taken these steps and many more because Nickelodeon feels it has a responsibility to help kids and their parents navigate the issues they continue to face.

We are proud of the steps we've already taken. Going forward, we will remain laser-focused on the childhood obesity debate. What will really move the needle, however, is when all stakeholders come together and work cooperatively and in a self-regulatory manner. In our view, the health of our kids is too important for anything less.

Again, we appreciate the opportunity to address the Commission on this issue and look forward to continued dialogue and partnership with other stakeholders to help move the needle on this very important issue for kids today.