

June 16, 2011

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex W)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Re: Interagency Working Group on Food Marketed to Children:
FTC Project No. P094513

To Whom It May Concern:

CBX is submitting this Comment to express our concerns about the scientific validity and economic impact of the proposed ban on advertising many foods to children and teens, as well as to express our concerns about the overreaching nature of the governmental intervention here. CBX is proud to be a business partner to the food industry, and we are concerned about the unwarranted impact of this proposal on our business.

We would be interested in seeing an in-depth assessment of the impact that this proposed change in the way commerce is conducted, and in the way Americans make food choices, would have on the economy and on jobs. The food industry provides millions of jobs in this country, either directly or indirectly. Aside from the concrete and immediate impacts this proposal would have on jobs in these industries, has any thought been given to the cost of the overall dietary shift that is being proposed here? It appears that, if these Federal agencies have their way, we would be eating products that are in limited supply (or even absent) from our domestic food supply today. Indeed, very few commonly eaten foods in today's American diet meet these agencies' incredibly onerous standards. Though there is nothing wrong with whole produce items that meet these standards, there has to be a role for packaged food products in the diet. Without these foods, we would likely have a much more serious hunger problem in America and Americans would be spending a vastly higher portion of their income just to avoid the risk of hunger. It seems apparent that the ultimate goal of the Federal agencies is to propose such a shift in the diet away from these important foods – after all, there really can be no point to a food advertising ban but to suppress consumption of certain “banned” foods in favor of other foods. Before embarking on this experiment, and leaving a trail of lost jobs and economic damage, the impact on American families (and on American business) should be seriously considered.

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