



June 20, 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:

Gold Medal Bakery is very concerned about the government's proposed attempt to ban advertising of certain food products to children. Gold Medal is a family-owned company headquartered in Fall River, MA that employs over 500 people. We develop and sell all-natural variety breads, including whole wheat bread.

Although the USDA food guidance system, MyPlate, released recently, recommends eating whole wheat bread, the proposed regulations would ban advertising of most whole wheat breads to children. Many other food products that the government considers "healthy" would also be subject to the ban. We find this to be extremely troubling. Gold Medal has a long tradition of providing healthy food for Americans as determined by the USDA standards. Now this new proposal arbitrarily changes the standards for advertising food that has already been designated by the government as healthy. Such conflicting definitions of what constitutes "healthy" food are extremely detrimental to our business. We have not seen any scientific basis for this change in the standards. They are certainly not substantiated by the new MyPlate guidelines. Beyond this, the proposal's definition of "marketing to kids" is incredibly overbroad. We would literally be precluded from using the word "kids" on our packages, even in communications directed to adults. That makes no sense.

Furthermore, banning advertising of food products to children will not solve the problem of childhood obesity. There is no scientific evidence that advertising food products to children causes obesity. Obesity is the result of a number of different factors such as lack of physical activity and economic conditions. This proposal distracts attention and resources from these factors that have been shown to impact weight gain in children.



Gold Medal has been proudly baking and selling nutritious breads for almost 100 years. The damage to our business that this arbitrary and misguided proposal could inflict cannot be overstated. We strongly urge you to reconsider adopting this proposal.

Respectfully,  
Brian R. LeComte  
Treasurer

