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June 23, 2011

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

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

To Whom It May Concern:

At GolinHarris, we have provided marketing and consulting services to the food and beverage industry for decades, during which time we have worked closely with a number of food brands and commodity groups to support their responsible marketing of food products. After reading the Interagency Working Group's proposed strict guidance on food advertising to children and teens, we felt obligated to express our concerns.

Food companies in the U.S. have historically been at the forefront of nutritional and scientific advances that have helped to improve nutrient adequacy in the diet, reduce widespread nutrient deficiencies, and enable us to feed the people in America through modern food production. If the Interagency Working Group's proposed guidelines were to be adopted, we are concerned that they may have the unintended consequences of limiting educational opportunities, restricting parental choice and potentially reducing children's intake of several essential nutrients that are already underconsumed. As an example, many of the same foods that have contributed greatly to the health of young Americans (such as fortified grain products) would be subject to exclusion under the criteria as outlined in the proposed Nutrition Principles.

In conclusion, we oppose the IWG guidelines as written, and believe they should be modified to more realistically address the nutritional quality and nutrient contribution of foods as well as drivers of food choice that are most likely to make a meaningful impact on consumer behavior and promote healthy lifestyles.

Respectfully yours,

Patricia A. Groziak, MS, RD
Senior Director, Nutrition & Wellness
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