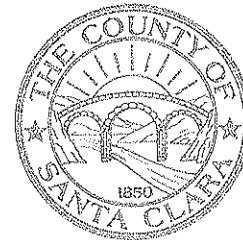


County of Santa Clara

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Jeffrey V. Smith
County Executive

June 30, 2011

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

**RE: Interagency Working Group on Food Marketed to Children: Proposed
Nutrition Principles: FTC Project No. P094513**

Dear Mr. Clark:

On behalf of the Santa Clara County, California, I am writing with comments on the preliminary proposed nutrition principles developed by the Interagency Working Group on Food Marketed to Children.

First, we commend the FTC, CDC, FDA and USDA on working collaboratively to address this most important topic, and one that our Board of Supervisors believes is a significant contributor to childhood obesity. Unfortunately, despite the relative wealth of our own community, childhood obesity is a serious problem in the County of Santa Clara. In 2007, nearly 22 percent of children between the ages of 2-5 years participating in our WIC program were either already, or at risk of becoming, overweight. In 2006, 26 percent of local children in grades 7-12 were overweight, or at risk of being overweight. As a result of their obesity, children can also suffer from a variety of additional health problems including obstructive sleep apnea, hypertension, non-alcoholic fatty liver disease, asthma, insulin resistance or pre-diabetes, and Blount's disease.

Our comments focus on the Group's proposed nutrition principles. We wholeheartedly agree with the proposed principles, which recommend that "...the food industry, through voluntary self-regulatory efforts, make significant improvements in the nutritional quality of foods marketed to children and adolescents ages 2-17 years. By the year 2016, all food products within the categories most heavily marketed directly to children should meet two basic nutrition principles. Such foods should be formulated to: (A) make a meaningful contribution to a healthful diet; and (B) minimize the content of nutrients that could have a negative impact on health and weight."

Additionally, we believe that a nutritional labeling system should be *comprehensive*, including not only calories but other critical dietary information such as sodium or fiber content. At the same time, we feel strongly that the system should be *simple*, easy to understand, and user-friendly. Therefore, we would propose a new labeling system which, based on comprehensive nutritional information, places food in three categories: poor, adequate, and optimal. Ideally, the label would also be reflected in an icon, such as a green/yellow/red light, for ease of use and quick comprehension. This sort of simple system could even be understood by young children – allowing children and young adults to themselves be informed consumers and make the "healthy choices" that other educational campaigns are encouraging them to make.

Again, we appreciate your efforts on this important topic, and thank you for the opportunity to comment.

Sincerely//

Jeffrey ~~W.~~ Smith
County Executive

c: Santa Clara County Congressional Delegation
Board of Supervisors
Dan Peddycord, Director, Public Health Department
Martin Fenstersheib, MD, Public Health Officer
Jerry Klepner, Prime Policy Group