

I wholeheartedly support the fight against childhood obesity in our country. However, I do not support the Working Group's recommendations, as stated, to limit otherwise quality foods being marketed to children. The Working Group may have set out to promote healthier eating habits amongst children, but this initiative, as written, needs to be reevaluated with more scrutiny. The current recommended standards are overreaching. The data supporting these standards effectiveness is unproven and understudied.

The Working Group's recommendations would prohibit (not limit) companies ability to market a wide range of food products to children under 18. While the idea of limiting target ads to children seems reasonable, the criteria used to deem food "healthy" and "unhealthy" in this initiative are extremely limiting. Foods commonly considered "healthy" such as canned corn and peas, rice, whole wheat bread, and nearly all breakfast cereals (including Cheerios) would be banned under the Working Group standards. Products such as Gatorade could not be promoted during family targeted events such as NCAA athletic games. Local tee ball teams could not be sponsored by companies such as Dunkin Donuts. Let's not forget, America Runs on Dunkin. Most mothers have a bag of Cheerios they feed their toddlers as a snack. And most parent's of young athletes understand that Gatorade, including it's sugar, has beneficial nutrients young bodies need after periods of exercise.

The current recommendations suggest that marketing and advertising to children has a direct impact on the rising levels of obesity and health related problems in our youth. However, statistics show that the food and beverage advertising on children's programming has decreased by 50% from 2004 and 2010. Yet, childhood obesity has continued to rise throughout this period. This data shows that there is little if any direct correlation between food advertising and childhood obesity. In contrast, we really should be focusing on how much time children are spending doing sedentary activities. Similar studies show that on average kids spend 5 hours a day on media driven activities. Of those 5 hours 3.5 are spent watching television. Instead of assuming that Cheerios, Gatorade, and Green Giant canned corn advertisements are causing our youth's health decline, we may be better served at limiting the advertisements of television programs and video games that are causing our youth to spend increasing hours sitting on couches and bean bag chairs.

Solid data suggests that the major cause of our youth health decline is due to sedentary lifestyle and our society's inability to be self limiting and selective in our food choices. The problem is not the food available to us because even the "healthiest" Working Group qualified foods, like apple juice, can be unhealthy if not limited. 1 cup of apple juice has an average 117 calories and 27 grams of sugar while 1 cup of Gatorade has 50 calories and 14 grams of sugar. While

apple juice is good for your health it can lead to childhood obesity and juvenile diabetes if not limited. I don't believe most adults would agree to regulating our favorite local restaurant from offering the dessert menu at the end of a nice meal. Why, because we know that on occasion we like to indulge in such "guilty" pleasures. The problem is not the menu advertising a sinfully delicious ice cream covered brownie. The problem is our inability to be self limiting in our indulgence and make the right choice for our current health situation. A problem that for most can be tracked back to bad habits formed at some point in our lives. Eliminating advertising of "unhealthy" food to children or adults will never be the answer to creating a healthier society. Educating future generations at a young age to make the right choices while enjoying the occasional indulgence is a much better approach. Promoting future generations to get up and "Play 60" should be our primary focus. Calorie budgeting, eating within our means, and setting a solid food limit is something we all, as a society, need to learn sooner or later.

I suggest that the Working Group reevaluate the true impact imposing such far reaching regulations would have on creating healthier youth. I also suggest that it reevaluate the parameters for advertising to youth. While the Working Group may have a worthwhile goal, it needs to reevaluate and further study it's current recommendations before moving forward.