



July 12, 2011

Chairman Jon Leibowitz
Federal Trade Commission
600 Pennsylvania Avenue NW
Washington, DC 20580

Dear Chairman Leibowitz,

On behalf of the Healthy Weight Commitment Foundation (HWCF), I am writing to express our opposition to adoption of the Preliminary Proposed Nutrition Principles to Food Marketed to Children by the Interagency Working Group (IWG), and to urge the withdrawal of these marketing restrictions.

We are all concerned about the growth of obesity, especially among children. However, we believe a more effective way to address the problem would be for the IWG to complete its study of food marketed to children and teens, and report to Congress – as Congress originally intended in its 2009 legislation. Moreover, the study should be based on peer-reviewed science, with careful consideration of benefits and costs.

HWCF was founded with the goal of addressing this problem. By bringing together food and beverage manufacturers, retailers, restaurants and trade associations with non-governmental organizations, sporting goods and insurance companies, professional sports organizations, and the U.S. Army, we have built a coalition of over 170 members committed to the goal of tackling the problem of obesity. We want to help consumers lead active, healthy lives by promoting one of the most important tools people can use to combat obesity: Energy balance – balancing calories consumed with calories expended through physical activity. Our goal is to make energy balance a part of Americans' daily routine. We are pursuing this goal by encouraging access and opportunities for physical activity and healthier nutrition options, and by raising awareness of the need for energy balance —in the marketplace, in the workplace and in schools.

HWCF is convinced the best way to encourage healthy eating and healthy lifestyles is not “top down” but “bottom-up” – bringing people together around practices they can embrace and adapt to their own needs. That is why one of our priorities is our ***Together Counts™*** program, which encourages families to eat meals and engage in healthy

physical activities together more frequently as a way of promoting an active, healthy lifestyle among children.

We believe education is one of the best tools to curb obesity. For that reason we have formed an alliance with Discovery Education to deliver Energy Balance 101, free curriculum available online and through Discovery Education's network that reaches over 21,000 elementary schools in the United States. The website-- www.energybalance101.com – takes advantage of Discovery Education's demonstrated ability to provide educators with useful tools to help their students.

Additionally, we believe one of the most effective ways to counter obesity is through marketplace programs that marshal the commitment of food and beverage companies. In that context, HWCF is conducting a multi-year effort under which manufacturing member companies have pledged to reduce annual calories by 1.5 trillion from the marketplace by the end of 2015, and sustain that level. The initiative will be pursued while still providing consumers with options that will appeal to them; that is the only way it can succeed. Companies are reducing portion sizes of existing single-serve products, developing lower-calorie options, or reformulating recipes to lower the calorie content of current products. But of course, these new offerings will require marketing support. We are concerned that such efforts may be undermined by the proposed marketing restrictions – especially since the IWG's standards are more restrictive than the standards for foods sold under the school lunch program, the WIC program, and even contradict the Administration's own food recommendations to Americans. These recommendations could also potentially chill philanthropic activities that promote physical activities.

To summarize, we believe the IWG should withdraw its proposed food marketing restrictions, and resume the effort to meet the congressional mandate to produce a comprehensive report – one that will advance the objective of combating obesity and promoting consumer awareness.

Best regards,

Lisa Gable
President
Healthy Weight Commitment Foundation



HEALTHY WEIGHT COMMITMENT FOUNDATION

1350 I Street, NW, Suite 300 | Washington, DC 20005 | www.healthyweightcommit.org