

June 9, 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:

This Comment is in response to the FTC's request for feedback on its proposal to dramatically alter how food companies can market their products. My company, Leader Enterprises, Inc does significant work with food brands in the promotions arena, and these proposed changes would dramatically affect our business. We believe that the proposed standards are unwarranted and would do more harm than good in reducing childhood obesity.

Addressing the problem of childhood obesity is an important goal. But there does not appear to be a basis to support the notion that advertising is the cause of this problem. There is actually evidence to support the opposite. Advertising directed at children has been on the decline, while childhood obesity has been on the rise—calling into question any sort of causal relationship between advertising and childhood obesity. Also, we understand that other countries that have tried banning food advertising have not seen any of the results they had hoped for. It is difficult to understand what makes the Interagency Working Group think this proposed ban will be any different. This is bad public policy, especially in light of the significant economic damage that would be done to the food industry and to those of us who do business with it.

Particularly alarming to us are the proposed definitions of “marketing to children.” These definitions are so broad as to ban much of what we do—even though the promotions we handle on behalf of food brands are adult targeted. Under the proposed definitions, adult marketing would be hit in a big way, because prohibited marketing activities would include advertising directed to audiences where the majority (up to 80% in some cases) may be adults. This goes too far. Parents should be trusted to make their own decisions about the food products they buy for their families.

In conclusion, we oppose this intrusion on the rights of food companies to advertise their products.

Sincerely,

Clark Adkins  
Group President, Marketing Solutions