



1187 Industrial Road
Cold Spring, KY 41076
t: 859.781.6161
f: 859.781.6339

www.cclind.com

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:

CCL Label recently became aware of the proposal, by the Interagency Working Group (consisting of the Federal Trade Commission, the Food & Drug Administration, the Department of Agriculture, and the Centers for Disease Control) that would ban the advertising of virtually all foods to children and adolescents. At CCL, we are proud of our relationship with the food industry and are very concerned about what appears to be an arbitrary, unscientific, and economically destructive regulatory assault on the food industry.

While addressing the problem of childhood obesity is certainly a laudable goal, there do not appear to be any facts that would support the notion that advertising to kids is the cause of the problem. In fact, there is strong evidence to the contrary. While childhood obesity has been on the rise, advertising directed at children has been on the decline. This shows that there could not be any causal connection between child advertising and childhood obesity. Also, other countries that have tried food advertising bans have not seen any positive results. It is difficult to understand what makes the Interagency Working Group believe that the ban they are proposing will yield a different result in this country. Banning advertising without any genuine expectation of success seems like bad public policy, especially given that there will be significant economic damage done to the food industry and those who do business with it.

Respectfully,

Bobby Everett
CCL Label
Cold Spring, Kentucky