



June 16, 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

Dear Sir:

We are writing to express our deep concern about the recent proposal by Federal Trade Commission, the Food & Drug Administration, the Department of Agriculture, and the Centers for Disease Control that would ban the advertising of nearly all foods to children and adolescents. At Schawk, Inc. we are proud of our relationship with the food industry and are very troubled by this proposal.

Though we fully appreciate and support the fight against childhood obesity, we fail to see how banning advertising of foods, many of which are healthy foods critical to child nutrition in the U.S., will help the cause. Indeed, all the evidence we have seen indicates that food advertising has been declining in recent decades while obesity has been on the rise. And food-advertising bans in other countries have not impacted the incidence of obesity in children. Is it not more likely that the rise in obesity can be attributed to a decrease in physical activity in our society? Before the fairly radical step of banning advertising, it seems that the government would need strong evidence of the link between food advertising and childhood obesity. The proposed guidelines fail to provide any evidence of this. Advertising seems to be a convenient scapegoat here, but restricting economic activity (affecting not only the food industry, but downstream suppliers like us) in pursuit of a scapegoat seems hard to justify.

Additionally, for many years we have devoted a significant amount of our philanthropic activities to elementary and secondary education primarily in urban schools. In this regard we have seen first hand the importance that good nutrition has on our children. To this point many of the foods that would be directly impacted by this legislation provide significant portions of necessary nutrients vital to the development of physical and mental acuity of our nation's children. Furthermore, many of these same products also provide a variety of fund raising programs that have become vital to the operation of many schools. We believe that if implemented, this well intentioned but overreaching proposed legislation has significant potential to create severe negative consequences for many schools and the children educated in those schools.

On January 18, 2011, President Obama issued an Executive Order requiring that all federal regulations be "based on the best available science" and promote "economic growth, innovation, competitiveness, and job creation." There appears to be no science behind this proposal. And an advertising ban hardly fuels economic growth, innovation, competitiveness, or job creation. To the contrary, it does the exact opposite.

  
Very truly yours,

A. Alex Sarkisian  
Executive Vice President and Chief Operating Officer  
Schawk, Inc.  
1695 River Road  
Des Plaines, IL 60018