

**COMMENTS TO THE INTERAGENCY WORKING GROUP
ON FOOD MARKETED TO CHILDREN
FTC Project No. P094513**

Submitted July 1, 2011 – The Obesity Society appreciates the opportunity to comment on the Interagency Working Group's proposed guidelines for food marketing to children. As a Society that uses peer reviewed research on obesity to help develop best practices, we applaud the Working Group for spearheading the efforts to ensure that foods marketed to children makes a meaningful contribution to a healthful diet, or at least does not promote obesity.

We appreciate the difficulty in determining cut-offs in saturated fat, sodium, and added sugar that distinguishes healthy from unhealthy foods. Thus ideally those difficult decisions could be circumvented if all food marketing to children was prohibited, just as all marketing of tobacco products to children is prohibited. However, we realize that may not be a viable option. Given the large proportion of food marketing focuses on unhealthy foods as measured by the 2010 US dietary guidelines advisory committee, it would be wise to focus future efforts on a complete ban on marketing of food and beverages to US children as has been accomplished in a half dozen major European countries.

Of the two options proposed, the Obesity Society strongly prefers the approach taken in option 2 for Principal A. However, some changes will need to be made to the option to ensure that obesogenic foods do not meet the proposed standards. Moreover, we strongly urge the criteria to combine Principal A and B, to remove fruit and vegetable juices as healthy food components, and to not count potatoes as a vegetable. Our rationale for suggesting that potatoes not count as vegetables is that potatoes have a high glycemic rating. A baked white potato has a glycemic index considerably higher than that of table sugar. Moreover, among children over 80% of potatoes are eaten as french fries or other fried versions, which are even less healthy than baked potatoes. Potatoes have been excluded as a vegetable in Europe (EEU, all countries in Western Europe). Similarly there is increasing evidence that fruit juices contribute adversely to child health and they have been banned already from schools in a dozen European nations and severely limited in consumption under IOM and US dietary guidelines for children.

We also recommend that it be explicitly stated that even if foods, or main dishes, meet the criteria in option B they would not be considered appropriate for marketing to youth if they were fried or contained sauces that add a substantial number of calories. We therefore propose the following revised definition:

Option 2: Individual foods should contain one of the following, or a proportionate combination of more than one of the following, per Reference Amount Customarily Consumed (RACC)¹¹; main dishes and meals should contain one or more of the following, or a proportionate combination, per 100 g, with main dishes fulfilling at least two of the following and meals fulfilling at least three of the following:

- 0.5 cups fruit or fruit juice;

- 0.6 cups vegetables ~~or vegetable juice~~ **not including potatoes;**
- 0.75 oz equivalent of 100% whole grain;
- 0.75 cups fat-free or low-fat (1%) milk or yogurt; 1 oz fat-free or low-fat (1%) natural cheese; 1.5 oz fat-free or low-fat (1%) processed cheese
- 1.4 oz meat equivalent of fish or extra lean meat or poultry;
- 0.3 cups of cooked dry beans;

AND

- **Not be fried or contain components that are fried**
- Contain no more than 1 g per RACC[§] of saturated fat and 15% or less of calories for individual foods (per 100 g and less than 10% of calories for main dishes and meals)
- Contain < 0.5 g of *Trans* Fat per RACC[§] for individual foods (per labeled serving for main dishes and meals)
- Contain no more than 10 g of added sugars per RACC[§]
- Contain no more than 210 mg per serving for individual foods (450 mg per serving for main dishes and meals).
- **Not contain sauces that add more than 15% of calories to the individual food or main dish.**

In addition to specify the components of individual foods and main dishes, it is also essential that portion size information be standardized in order to ensure that unhealthy products are not allowed to meet these criteria. We propose the following criteria be added:

- **All breakfast cereals should have the same serving size, rather than the current practice of listing a small portion size for calorie-dense cereals, such as granola.**
- **Individual packages of frozen entrees should be considered to be one portion, thus if there are two enchiladas in a frozen entrée, it should be listed as one portion rather than two.**
- **Sugar-sweetened beverages, including sports drinks, and their reduced calorie counterparts should be considered to be packaged as a single serving if the container is less than 2 liters.**

The Obesity Society also urges the Interagency Working Group on Food Marketed to consider a broad definition of marketing, including product placement, advergames, viral marketing, and partnering between food companies/restaurants and characters popular with children (e.g., Disney[®] princesses, Pixar[®] toys, etc.). In addition, we suggest that the Working Group make related recommendations regarding how to support, monitor and regulate the food industry's adherence to the guidelines.

[¶]For individual foods, if the amount of the specific food group exceeds the RACC, the RACC can be substituted as the amount necessary to make a meaningful contribution to a healthful diet.

[§]For foods with a small RACC (30 g or less), the recommendations refer to the amount per 50 g of food.