

July 15, 2011

Dear committee members of the Interagency Working Group on Food Marketed to Children,

I want to thank you for the opportunity to provide comments on this proposal. As a person who encountered a significant quantity of food marketing as a child, and as a new parent, I appreciate the chance to provide feedback to you to shape how both my son, and all children in the U.S., will encounter food marketing as they grow up.

In regards to the general questions on proposed nutrition principles, starting on page 20, I will number and address the relevant question below:

#### Proposed Nutrition Questions

# 2: general product lines should not be advertised, rather than specific products. Advertising product lines would provide too much opportunity to promote unhealthy foods under the broad concept of a healthy product line, and doesn't incentivize making all advertised foods healthier for children.

# 3: a distinction should be made clear to children and anyone viewing food advertising whether the nutrients available are from fortification, or are naturally occurring. As fortification is a second-best option for consuming nutrients, it should be clear to the viewer if the nutrients are added.

# 4, about portion size: the Working Group should require calorie counts or specific portion size information for foods, as the Principles A & B are too vague to provide adequate guidance on whether someone is eating the appropriate amount of a food.

#### Food Categories

#5: The advantages of addressing on the most-advertised foods to children are significant. You have the ability to influence most foods that children gain the impulse to buy via marketing, and the list includes the most egregious and misleading forms of marketing that are displayed to children. The categories themselves, as listed, sounds appropriate, and provide the ability to reshape the more challenging areas where children and parents may have diverging opinions about healthy eating habits (e.g. the marketing of breakfast foods to children first starting to gain their own preferences at 2-11, and the marketing of restaurant foods, which if consumed more than on occasion, represent an unhealthy diet for any children, 2-17). Foods like hot dogs should be considered as an addition, since it is a convenient fast food or snack food, but otherwise, foods like sauces and jams are more often supplemental to other more unhealthy foods, and so could be left off. The disadvantage of the list is that food producers might be incentivized to find ways of increasing profit in those areas left off the most marketed list, and the principles wouldn't address this producer shift.

#### Main Dishes/Meals

#7: The only recommendation I have concerning marketing of meals to children here is that, in addition to the proposal that two out of three components meet nutritional principles, it would be beneficial to highlight foods which provide nutrients naturally, via whole or cooked foods, rather than if foods are fortified. Any encouragement of the use of whole foods rather than additives is positive.

## Nutrition Principle A

#8: Aggregating foods only allows producers to create foods that do not provide enough nutrients to children for a healthy diet.

#10: If there is any recommendation that should be followed, it is this one. Please provide specific guidance on the consumption of dark green, red, or orange vegetables.

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While there is much else to be discussed, as I am sure the committee will be dealing with a wide array of public comment, I want to thank you again for the opportunity to provide comments on an important piece of food policy. I look forward to seeing the results of our public comment, and the move forward from the Interagency Working Group to implement significant change to how food is marketed to children.

Sincerely,  
Matt Mitterko