



Champions For Our Children

July 11, 2011

COMMISSIONERS

Los Angeles County Mayor

Michael D. Antonovich

Chair

FTC Commission

**RE: Efforts Through The Interagency Working Group**

Dear Secretary Vilsack; Chairman Leibowitz; Director Frieden; Commissioner Hamburg:

Thank you for your efforts through the Interagency Working Group (IWG) to reduce unhealthy food marketing to children. The proposed marketing guidelines are strong, based in nutrition science and comprehensive in scope. They will do much to encourage food and entertainment companies to limit junk-food marketing to children and support parents' efforts to feed their children a healthy diet.

First 5 LA supports the IWG's proposal to use a food-based approach in the nutrition standards to ensure that the foods marketed to children make a meaningful contribution to a healthful diet. We also support the IWG's comprehensive view of marketing to children, covering the wide range of approaches companies use. I strongly support the overall proposed nutrition principles and marketing definition, but urge several changes to clarify and strengthen them.

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A public entity.

- Clarify that the proposed nutrition principles apply to all foods marketed to children, not just those most heavily marketed to kids. It doesn't make sense to apply the standards to some marketed foods and not others.
- Revise the timeframe for implementation to two years (with a five-year timeline for the final sodium standards).
- Include calorie limits to better address childhood obesity.

It's important that the marketing definitions accommodate the full range of approaches food companies use and that they:

- Provide a clear set of model marketing definitions that could be easily adopted by companies.
- Define brand marketing and require brand marketing to meet IWG nutrition principles. Many marketing efforts aimed at children do not promote individual products, but instead promote a line of products, one brand within a company, or a whole company.

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- Provide a more detailed definition of in-school marketing and apply it to preschools and elementary, middle, and high schools on the whole campus for the extended school day.
- Include PG-rated movies in the definitions of product placements and movie advertising.

We thank the IWG for its strong nutrition and marketing guidelines, and urge you to finalize them by the end of the year. We also hope that our nation's food and entertainment companies will take children's health seriously and adopt these voluntary principles.

Sincerely,     *EV*

*for* Evelyn V. Martinez  
Chief Executive Officer

EVM:ks