



Jon Leibowitz, Chairman
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

Dear Chairman Leibowitz,

On behalf of Cargill and the many leading food companies we serve, I want to raise concerns with the Voluntary Principles for Marketing Food to Children proposed by the Federal Interagency Working Group (IWG). As a global producer of food and food ingredients, Cargill is committed to helping our customers produce safe, affordable, and nutritious foods. We are deeply concerned that the standards proposed by the IWG would discourage efforts to promote many of the healthful foods that help children and adults meet the *U.S. Dietary Guidelines for Americans*.

Specifically, the IWG proposal fails to accept that foods including most cereals, breads, cheeses, and soups, are among the healthiest diet choices for young people, as suggested by the Government's own nutrition programs, including the National School Lunch Program, the School Breakfast Program, and WIC, which encourage consumption of these very foods. While we applaud the IWG's intent, the proposal is so restrictive we fear widespread adoption would reduce children's consumption of foods that support their healthy growth and development.

As an innovation partner, Cargill conducts research and develops solutions that enable leading food and beverage companies to make affordable and nutritious products that consumers enjoy. With operations in 66 countries, Cargill works closely with customers worldwide to meet the growing demand for healthier foods. Cargill solutions have removed trans- and saturated fat, lowered sodium and reduced calories from added sugars in a wide array of products available in the marketplace. For instance, we are the makers of Truvia®, the leading natural, zero-calorie sweetener derived from the stevia leaf. We also offer solutions that improve flavor and add nutrients, as well as fiber and whole grains, to various recipes. Cargill takes our role in the science of food very seriously and want to make sure that any efforts to improve consumers' diets are based on science and not on perceptions or politics.

While the food and beverage industry has made significant strides, we acknowledge that companies can and should do more to formulate healthful foods and adopt responsible marketing practices. But we are concerned that the IWG proposal goes too far, and urge its withdrawal in favor of a plan that together with industry and other stakeholders can effectively meet its aim to improve child health.

Sincerely,

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Vice President, Corporate Affairs

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