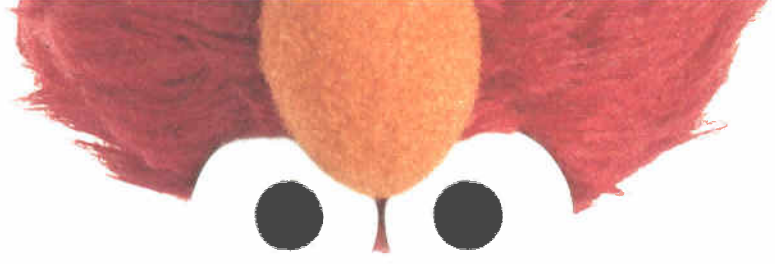


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July 14, 2011

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

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Director Thomas Frieden
Centers for Disease Control and
Prevention
1600 Clifton Road
Atlanta, GA 30333

Commissioner Margaret Hamburg
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Re: Interagency Working Group on Food Marketed to Children: General Comments and Proposed Marketing Definitions: FTC Project No. P094513

Dear Chairman Leibowitz, Secretary Vilsack, Director Frieden and Commissioner Hamburg:

Sesame Workshop, the nonprofit educational organization behind *Sesame Street*, would like to offer the following comments as requested by the Interagency Working Group on Food Marketed to Children (Working Group) on the preliminary proposed nutrition principles to guide industry self-regulatory efforts.

Based on our experience in using media to reach young children and their families with health messaging, Sesame Workshop commends the Working Group's efforts to develop food marketing nutritional guidelines for the industry. In doing so, the Working Group has demonstrated a strong commitment to improving the media environment for our children's health.

The Working Group's leadership on this issue is essential as our country faces a growing childhood obesity epidemic. Children today are the first generation whose life expectancy may be lower than that of their parents due to childhood obesity.¹ While many factors contribute to this public health crisis, the Institute of Medicine has stated that food marketing is one of them. Research shows that advertising for food of poor nutritional quality has a strong influence on

¹ S. Jay Olshansky, et al, "A Potential Decline in the Life Expectancy in the United States in the 21st Century," *New England Journal of Medicine*: 352: 11: 1138-1145.



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children’s food preferences.² Thus it is essential that the food and beverage industry, as well as media companies, do their part by supporting uniform nutritional guidelines for food marketing to children.

Sesame Workshop acknowledges the difficulty of the Working Group’s mission in developing such guidelines; we faced a similar challenge six years ago when we developed our own nutritional standards for licensed food products. While it was not easy to determine the criteria for these guidelines, the Workshop recognizes how essential they are if we are to promote healthy habits among young children and help parents and caregivers to make healthier choices for their families.

While we recognize that much work remains to be done in considering input from interested parties and refining the guidelines, we believe that, by creating these preliminary principles, the Working Group has taken an important and critical step in working to improve the nutritional profile of foods that are most heavily marketed to children.

Sesame Workshop supports the continued development of uniform nutritional principles for food marketing to children based upon two main considerations. First, media can play a powerful, positive role in delivering health messages for children of all ages, particularly young children and their parents, which can contribute to healthier choices. Secondly, there is room for considerable improvement of health messages targeted to children, especially upon closer examination of: a) the current use of licensed characters to promote food/beverage products; and b) the wide range of nutrition standards for food marketing that are currently used by individual food and beverage companies.

The Benefits of Building Healthy Habits in Young Children

Research shows that there is much opportunity in the early years to use media to positively impact children’s eating habits. Specifically, research shows that young children’s food habits and preferences are generally shaped between the ages of two to four.^{3,4} If healthy habits are not formed by age five, children tend to develop poor nutritional preferences and attitudes.⁵ This leaves a critical window of opportunity during the preschool years in which children’s healthy

² Institute of Medicine. “Food Marketing to Children and Youth: Threat or Opportunity?” (Washington: National Academy of Sciences Press, 5 Dec 2005).

³ S.S. Guo, et al. “Predicting Overweight and Obesity in Adulthood from Body Mass Index Values in Childhood and Adolescence.” *American Journal of Clinical Nutrition*. 76 (2002): (3), 653-685.

⁴ J.D. Skinner, et al. “Children’s Food Preferences: A Longitudinal Analysis.” *Journal of the American Dietetic Association*. 102. (2002): 1638-47.

⁵ J.D. Skinner, et al. “Children’s Food Preferences: A Longitudinal Analysis.” *Journal of the American Dietetic Association*. 102. (2002):1638-47



habits can be positively shaped by their early social environments. Research also reinforces that preschoolers can learn to like a variety of wholesome foods and develop healthy practices through repeated exposure,^{6,7} engaging in positive dietary practices^{8,9} and having positive role models.^{10,11,12}

Studies have shown that popular characters can be a positive role model for children and a partner for parents and caregivers in conveying healthy messaging. In an early evaluation of Sesame Workshop's health and wellness initiatives, a study was conducted examining the connection between character branding on children's food products and their appeal. Research found that preschoolers' preference for nutritional foods, such as broccoli, increases when they are paired with Muppet characters.¹³ This highlights the "window of opportunity" to sway children at a very young age to like healthy foods through the power of media.

Improving the Media Environment for Our Children's Health

While media can and should be a partner in helping to ensure the good health of our next generation, some gaps remain between the use of positive health messaging and the practices of some companies today.

One area that requires significant improvement from media companies is the use of licensed characters for food and beverage product promotion. In 2009, Children Now examined the progress of industry self-regulation in working to improve the nutritional quality of foods marketed to children. In the area of licensed characters for product promotion, the study found that food and beverage companies have nearly doubled their use of licensed characters over the past four years, from 8.8 percent in 2005 to 15.2 percent in 2009, and roughly half of all ads with

⁶ L.L. Birch and D.W. Marlin. "I Don't Like It; I Never Tried It: Effects of Exposure on Two-year-old Children's Food Preferences." *Appetite*. 3 (1982): 353-360.

⁷ L.L. Birch, et al. "What Kind of Exposure Reduces Children's Food Neophobia? Looking vs. Tasting." *Appetite*. 9 (1987): (3), 171-8.

⁸ L.L. Birch. "The Role of Experience in Children's Food Acceptance Patterns." *Journal of the American Dietetic Association*. 87 (1987): (9), S36-40.

⁹ L.L. Birch and J.O. Fisher. "Development of Eating Behaviors Among Children and Adolescents." *Pediatrics*. 101 (1998): (3), 539-549.

¹⁰ L.L. Birch. "Effects of Peer Model's Food Choices and Eating Behaviors on Preschooler's Food Preferences." *Child Development* 51 (1998): 489-496.

¹¹ T.A. Nicklas, et al. "Family and Childcare Provider Influences on Preschool Children's Fruit, Juice, and Vegetable Consumption." *Nutrition Reviews*. 59 (2001): (7), 224-235.

¹² T. Tibbs, et al. "The Relationship between Parental Modeling, Eating Patterns, and Dietary Intake among African-American Parents." *Journal of the American Dietetic Association*. 101 (2001): 535-41.

¹³ Cole, C.F., Kotler, J. & Pai, S. (2010) Happy healthy Muppets: A Look at Sesame Workshop's health initiatives around the world. In. P.A. Gaist (ed.), *Igniting the Power of Community: The Role of CBOs and NGOs in Global Public Health*. Springer: New York, NY, pp.277-295.



such characters (49.4%) are for nutritionally poor products, as defined by the Department of Health and Human Services criteria.¹⁴

Licensed characters can be particularly effective at influencing children because children trust and like the characters they see in program content. Consequently, the Institute of Medicine's report on food marketing recommended that licensed characters should be used "only for the promotion of foods and beverages that support healthful diets."¹⁵

Media companies should strive to associate their licensed characters only with healthy food and beverage products. Uniform nutritional principles for food marketing to children could go a long way in positively guiding media companies' use of these characters.

Sesame Workshop believes that the adoption of uniform nutritional guidelines for food marketing to children is essential. In 2006, Sesame Workshop was asked to lead a multi-sector, bipartisan joint Senate/Federal Communications Commission Task Force on Media and Childhood Obesity aimed at examining the role media plays in childhood obesity and collaborating on voluntary recommendations to help address the problem. While the Task Force made progress in achieving some voluntary industry commitments, one key issue that was left unresolved was the uniform definition of a healthy food; five years later, this issue still remains critical.

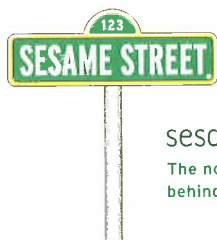
Currently, food and beverage companies each have a different definition for what constitutes healthy food. This is ultimately confusing to parents and creates a situation in which a food product would be considered "healthy" by one company's criteria while "unhealthy" by another company's criteria. As such, Sesame Workshop supports the continued development of uniform nutritional principles and encourages their eventual adoption by food and beverage companies, as well as media companies.

Conclusion

The Interagency Working Group on Food Marketed to Children's commitment to improving the media environment for our children's health is commendable. By drafting preliminary proposed nutrition principles to guide industry self-regulatory efforts, the Working Group has taken an important and critical first step in working to improve the nutritional profile of foods that are marketed to children.

¹⁴ Dale Kunkel, et al. "The Impact of Industry Self-Regulation on the Nutritional Quality of Foods Advertised on Television to Children" (Oakland: Children Now, 2009 Dec).

¹⁵ Institute of Medicine. "Food Marketing to Children and Youth: Threat or Opportunity?" (Washington: National Academy of Sciences Press, 5 Dec 2005).



Sesame Workshop applauds the Working Group's efforts to-date and acknowledges the difficulty of its mission in creating nutrition principles for the industry. As the Working Group continues its work to develop the final guidelines, we encourage its members to continue to recognize the potential media holds in delivering powerful, poignant health messages for children, and their parents which can contribute to healthier choices. We look forward to working with you on our shared commitment to improve children's health and nutrition.

Sincerely,

Gary E. Knell
President and CEO



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