OPHA
Ohio Public Health Association

July 12, 2011

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

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

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.

At least two-thirds of American adults and one third of children are overweight or obese, with Ohio having one of the highest rates. Obesity prevention and intervention is a complex problem requiring a comprehensive approach across multiple settings. Reducing unhealthy food marketing to children is part of the solution. The Ohio Public Health Association 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.

The Ohio Public Health Association also supports the IWG's comprehensive view of marketing to children, covering the wide range of approaches companies use. We strongly support the overall proposed nutrition principles and marketing definition, but urge several changes to clarify and strengthen them.

Just a few changes in the nutrition standards would make them stronger:

- 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.
- Combine fish, meat, poultry, eggs, nuts, and beans into one food group, as they are in MyPlate and the Dietary Guidelines, so that the standards do not overemphasize marketing meat.

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.
- 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.

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- Include PG-rated movies in the definitions of product placements and movie advertising. Child-directed movies have undergone a noticeable "ratings creep" over the past several years, with many child-directed movies now rated PG.

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.

Best regards,

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