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In response to the growing childhood obesity epidemic, the following organizations applaud the White House for taking on the issue of childhood obesity, and offer the following suggestions to the White House Task Force on Childhood Obesity in its initiative to directly address unhealthy food marketing directed to children. We submit these comments in response to the White House Task Force on Childhood Obesity request for information (Federal Register number 2010-05719) to assist in creating a comprehensive interagency national action plan to solve the challenge of childhood obesity within a generation.

We are especially concerned about the dominance of unhealthy food advertising targeting children during children's television programming. American families continue to struggle with the influx of media advertising that make creating a healthy environment for their children difficult. With childhood obesity rates reaching epidemic proportions, a national effort must be taken to protect our children from the preventable threats presented by unhealthy food advertising.

Unhealthy food marketing plays a prominent role in the obesity crisis for children.

Children are consuming more media and advertising than ever before. According to the Kaiser Family Foundation, children will spend the equivalent of three school years in front of the television by the time they enter the first grade. In the July 2009 'Bridging the Gap' study (funded by the Robert Wood Johnson Foundation and published in the Journal "Pediatrics") researchers found 97.8 percent of all food advertisements viewed by children ages 2 to 11 and 89.4 percent of food ads viewed by adolescents ages 12 to 17 were for products high in sugar, fat or sodium.

In the Children's Television Act, Congress recognized the unique role television and the media can have on children. Specifically, Congress noted that, by the time the average child is 18 years old, he or she has spent between 10,000 and 15,000 hours watching television and has been exposed to more than 200,000 commercials. Congress also noted that it is well established by scientific research that children are uniquely susceptible to the persuasive messages contained in television advertising. In their 2004 Report on the Task Force on Advertising and Children, the American Psychological Association found that children under 7-8 years of age cannot discern persuasive intent in advertising.

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In addition, young children do not distinguish between marketing messages and their favorite show, especially when the ad campaigns feature favorite TV characters like SpongeBob.

In the recent report by U.S. Surgeon General Regina M. Benjamin, entitled *The Surgeon General's Vision for a Healthy and Fit Nation*, “limiting advertising of less healthy foods and beverages” was cited as a key strategy for reducing childhood obesity.

As unhealthy food advertising to children has increased and childhood obesity has tripled over the past 30 years, the marketplace has failed to serve our children’s best health interests.

As First Lady Michelle Obama stated in her recent speech to the Grocery Manufacturers of America, “Parents are working hard to provide a healthy diet and to teach healthy habits — and we'd like to know that our efforts won't be undermined every time our children turn on the TV or see a flashy display in a store. What does it mean when so many parents are finding that their best efforts are undermined by an avalanche of advertisements aimed at their kids? That it's okay to eat unhealthy foods because they're endorsed by the cartoon characters our children love and the celebrities our teenagers look up to?”

Recent reports by Children Now and Yale University’s Rudd Center on Food Policy and Obesity have demonstrated the failure of the marketplace to best serve children’s interests. Industry self-regulatory programs designed to limit the marketing of unhealthy foods to children have failed American families. Industry initiated responses, such as the ‘Children’s Food and Beverage Advertising Initiative (CFBAI)’ and other misleading messaging about food connected to health - have sanctioned promises such that low nutrient, high calorie foods such as ‘Cocoa Krispies’ will boost children’s immunity (which has prompted a Food and Drug Administration investigation).

Despite the CFBAI’s claim that it has produced healthier food advertising, a December 2009 Children Now research report found nearly three out of four (72.5 percent) foods advertised on television to children are for products in the poorest nutritional category, according the United States Department of Health and Human Services (HHS). The CFBAI’s 16 different definitions for “healthy” confuse parents looking for healthy foods for their children, especially when 72.5 percent of those foods are in HHS’s worst nutritional category. This is a clear failure of the marketplace and these programs to support American families and healthy children.

The response from media companies to address childhood obesity in their own advertising practices to children has been poor.

Given the enormous impact of the media – specifically television - on children, in 2007 the FCC, along with Senators Harkin and Brownback, convened the Joint Task Force on Media and Childhood Obesity. The Federal Communications Commission Task Force sought to bring together government officials, media companies, advertisers, the food and beverage industry, child

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advocates, and representatives of public health organizations to work on behalf of America's children.

Over the two year term of the Task Force, it failed to produce a significant outcome. Ultimately industry and advocates could not reach an agreement on two key issues:

- a uniform standard of what constitutes healthy versus unhealthy foods for children; and,
- the refusal of media companies to place any limit on advertising unhealthy foods during children's programs.

Citing a December 2009 Children Now study, Federal Communications Chairman Julius Genachowski asked recently, "How often do you see an ad for a healthy food product during children's programming? Let me tell you the answer. A child has to watch ten hours of children's television programs to find one truly healthy food ad. In that same time period, he or she would have seen 75 other foods ads, 55 for unhealthy foods. No wonder that childhood obesity rates have tripled over the past 30 years." In his closing comments before the Joint Senate Committee hearing on the FCC Task Force on Media and Childhood Obesity in 2008, former FCC Chairman Kevin Martin stated that he was "left to conclude that, sadly, no limit was even close to being presented" by the media companies to address unhealthy food advertising to children.

As momentum builds for greater action on childhood obesity and reducing unhealthy food marketing to children, we are delighted that the White House has decided to take leadership in this vital area. The failure of the marketplace to support healthy food choices for children and the efforts of the marketplace to work against American parents trying to make healthy decisions for their families are at critical stages.

The following organizations look forward to the White House Task Force report and offer our support, expertise, and resources as we move forward in addressing this vital issue for our children's health, now and in the future.

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Supporting Organizations

American Academy of Child and Adolescent Psychiatry
American Academy of Pediatrics
American Alliance for Health, Physical Education, Recreation, and Dance
American Psychological Association
American Society of Bariatric Physicians
Benton Foundation
Berkeley Media Studies Group
Beverly LaHaye Institute
Black Women's Health Imperative

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California Center for Civic Participation
California Center for Public Health Advocacy
California Food Policy Advocates
California Pan-Ethnic Network
California WIC Association
CANFIT
Center for Commercial Free Childhood
Child Care Food Program Roundtable
Children Now
Common Sense Media
Concerned Women for America
Contra Costa Child Care Council, Child Health and Nutrition Program
David V. Britt, Retired CEO, Sesame Workshop
Disciples Center for Public Witness
Ellen Wartella, PhD, Professor of Communication, Northwestern University
First Focus
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Healthy Kinder, Inc.
Islamic Society of North America
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Mary Story PhD, RD, Professor, School of Public Health, University of
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Medical Fitness Association
Morality in the Media
National & Policy Legal Analysis Network to Prevent Childhood Obesity
NAACP
National Association of State Boards of Education
National Indian Health Board
National PTA
Parents Television Council
Public Health Advocacy Institute at Northeastern University School of Law
Rainbow PUSH Coalition
Samuels and Associates
The Food Trust
The Prevention Institute
United Church of Christ, Office of Communication, Inc.
Voice for Utah Children
Voices for America's Children