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March 21, 2016

RE: Further comment on proposed Policy 45-16-1

Washington State Parks and Recreation Commission
1111 Israel Road S.W.
Tumwater, WA 98501-6512

Dear Commissioners:

On behalf of the Childhood Obesity Prevention Coalition, a state-wide coalition with 51 member organizations dedicated to protecting our children from the obesity epidemic, we are writing to provide comment on your revised draft advertising policy found [here](#), starting on p. 26.

We are cheered by your amendments to the policy regarding unhealthy food and beverages but would like to provide additional comment. In short, we believe that the current draft provision does not go far enough. The currently draft language is as follows:

“Staff will limit advertising for food and drink products to those that are consistent with healthy nutrition guidelines developed by the Washington State Department of Health whenever practicable.”

We like this language except for those last two very key words “whenever practicable.” Those words essentially provide Parks staff complete discretion on this issue. We believe that the health harms caused by unhealthy food and beverages clearly justify categorizing these products under **Section F, Prohibited Advertising Content**, similar to alcohol, tobacco and marijuana.

How severe is this obesity epidemic? For the first time in two centuries, the current generation of children in America may have shorter life expectancies than their parents. The large amount of added sugar in our diet is a primary cause of this shift and sugary drinks are the single largest source of added sugar, with little to no nutritional benefit. Consumption of one sugary drink per day increases the risk of diabetes by 26 percent, and of dying from heart disease by almost a third.

Prohibiting unhealthy food and beverage products clearly aligns with language in RCW 79A.05.087, which gave rise to this proposed agency policy:

(2) The commission is encouraged to use its advertising authority to promote ... (b) Wellness, healthy food options, healthy behaviors, and any other public health goals to principles adopted by the state”.

It is imperative that the citizens of our state receive clear and consistent messages about the importance of healthy food and beverages. As public entities, state agencies should play under a higher standard to ensure that their messages, intended or otherwise, do not undermine the multiple publicly-funded efforts in this state to achieve better health for all, especially our next generation. Please modify Policy 45-16-1 to add unhealthy food and beverages to your list of prohibited advertising content.

Sincerely,

Victor Colman, JD -- Director, Childhood Obesity Prevention Coalition
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COALITION MEMBERS

ACTION FOR HEALTHY KIDS – WA CHAPTER
 AMERICAN ACADEMY OF PEDIATRICS – WA CHAPTER
 AMERICAN CANCER SOCIETY – CANCER ACTION NETWORK
 AMERICAN CANCER SOCIETY, INC.
 AMERICAN DIABETES ASSOCIATION
 AMERICAN HEART ASSOCIATION
 AMERICAN PLANNING ASSOCIATION -- WA CHAPTER
 ARTHRITIS FOUNDATION
 BEECHER’S PURE FOOD KIDS FOUNDATION
 CASCADE BICYCLE CLUB EDUCATION FOUNDATION
 CHILDREN’S ALLIANCE
 COALITION FOR SAFETY AND HEALTH IN EARLY LEARNING
 FEET FIRST
 FORTERRA
 FOUNDATION FOR HEALTHY GENERATIONS
 GROUP HEALTH COOPERATIVE
 HEALTHY KING COUNTY COALITION
 HOPE HEART INSTITUTE
 LET’S MOVE CHENEY
 MULTICARE HEALTH SYSTEMS
 NUTRITION FIRST
 ODESSA BROWN CHILDREN’S CLINIC
 PHYSICAL THERAPY ASSOCIATION OF WASHINGTON
 PUBLIC HEALTH ROUNDTABLE
 SAN JUAN COUNTY HEALTH AND COMMUNITY SERVICES
 SCHOOL’S OUT WASHINGTON

SEA MAR COMMUNITY HEALTH CENTERS
 SEATTLE CHILDREN’S
 SEATTLE AND KING COUNTY PUBLIC HEALTH
 SEATTLE PARKS AND RECREATION
 SKAGIT COUNTY HEALTHY COMMUNITIES PROJECT
 SNOHOMISH HEALTH DISTRICT
 SPOKANE REGIONAL HEALTH DISTRICT
 TACOMA PIERCE COUNTY HEALTH DEPARTMENT
 TRANSPORTATION CHOICES
 WA ASSOC. OF COMMUNITY & MIGRANT HEALTH CNTRS
 WASHINGTON BIKES
 WA COALITION FOR PROMOTING PHYSICAL ACTIVITY
 WASHINGTON DENTAL SERVICE FOUNDATION
 WASHINGTON RECREATION & PARK ASSOCIATION
 WASHINGTON SCHOOL NUTRITION ASSOCIATION
 WA ST ASSOCIATION OF LOCAL PUBLIC HEALTH OFFICERS
 WA STATE ACADEMY OF NUTRITION AND DIETETICS
 WASHINGTON STATE DAIRY COUNCIL
 WASHINGTON STATE PTA
 WASHINGTON STATE PUBLIC HEALTH ASSOCIATION
 WASHINGTON SUSTAINABLE FOOD & FARMING NETWORK
 WASHINGTON TRAILS ASSOCIATION
 WITHINREACH
 YAKIMA COUNTY MEMORIAL HOSPITAL
 YMCA – GREATER SEATTLE