



June 5, 2020

Sarah Ludmer
Senior Director, Wellbeing and Regulatory
Kellogg Company
1 Kellogg Square
Battle Creek, MI 49014

Dear Ms. Ludmer:

Due to COVID-19, teachers and families have come to depend on online learning platforms and apps. Now that children of all ages have transitioned to online learning, homes have replaced school buildings and tablets and computers have replaced classrooms. With that in mind, the Center for Science in the Public Interest, the Campaign for a Commercial-Free Childhood, the Center for Digital Democracy, The Laurie M. Tisch Center for Food, Education & Policy, and the Rudd Center for Food Policy and Obesity, and prominent child health researchers Jennifer Emond from the C. Everett Koop Institute at Dartmouth and Michele Polacsek from the University of New England, are concerned about the potential increase in children's exposure to junk food marketing through digital learning platforms. Together, we ask CFBAI member companies, including Kellogg's, not to place food and beverage advertisements on online learning platforms, including ABCya and others, now and in the future.

More than one-third of children in the United States are overweight or obese. Children's diets are often too high in calories, saturated fat, sodium, and added sugars and too low in fruits, vegetables, and whole grains. While a number of factors contribute to poor diets and childhood obesity, food and beverage marketing plays a key role. Marketing affects children's food and beverage choices, purchase requests, diets, and health. Children are uniquely vulnerable to food and beverage marketing; they are often unable to comprehend advertising's persuasive intent and the long-term health consequences of their food choices. This is concerning, as the majority of foods and beverages advertised to children are of poor nutritional quality.

Parents and caregivers have shared advertisements for foods and beverages on online learning games with us. These advertisements distract from a positive learning experience. At the end of this letter is an example of an advertisement that children viewed of your company's product on an online learning platform. While we recognize that the product advertised meets your CFBAI pledge; through CFBAI, your company has pledged not to advertise any foods and beverages to children in elementary schools. Similarly, your company should not advertise on online learning platforms.

Advertising on ABCya also creates an inequitable learning environment and may exacerbate racial, ethnic, and socioeconomic disparities in child-directed food marketing and health. ABCya provides

advertisement-free content with paid subscriptions; however, those costs can be prohibitive for many lower-income families and families struggling financially during this COVID-19 pandemic.

We ask you to commit to supporting children's health by pulling all food and beverage advertising on digital learning platforms and committing to no advertisements of this nature on these platforms in the future. This will help to create a food and beverage advertisement free learning experience for all children.

We welcome the opportunity to discuss this further. You can reach us via email at policy@cspinet.org and by telephone at 202-777-8352.

Sincerely,



Sara Ribakove
Policy Associate
Center for Science in the Public Interest



Sally Mancini, MPH
Director of Advocacy Resources
UConn Rudd Center for Food Policy & Obesity



Josh Golin
Executive Director
CCFC: Campaign for a Commercial-Free
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Frances Fleming-Milici, PhD
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Jeffery Chester
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Jennifer A. Emond, PhD
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Julia McCarthy, J.D.
Food-Ed Hub Director
Laurie M. Tisch Center for Food, Education &
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Michele Polacsek, PhD MHS
Professor, Public Health
Director, Center for Excellence in Public Health
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Appendix:

The screenshot shows the ABCya website interface. At the top, there is a navigation bar with the ABCya logo, a search bar, and links for 'Common Core Standards', 'Parents & Teachers', 'Help', 'Join Now For Premium', and 'Log In'. A cookie notice is displayed above the navigation bar. The main content area features a grid of colorful buttons for different grade levels: 'ALL GAMES', 'PRE-K', 'GRADE K', 'GRADE 1', 'GRADE 2', 'GRADE 3', 'GRADE 4', 'GRADE 5', 'GRADE 6+', and 'VIDEOS'. A 'JOIN NOW for PREMIUM' button is also present. A featured storybook titled 'Henry and the Sugarbugs!' is highlighted with a play button icon. At the bottom, there is a banner for Kellogg's Honey Nut Frosted Flakes with the slogan 'THEY'RE GR-R-REAT!'.