



AMERICAN CHAMBER
OF COMMERCE IN NORWAY

Department of Health
Att: Anne-Grete Strøm-Erichsen
Postboks 8011 Dep
0030 OSLO

Oslo, September 13th, 2012

Proposed ban on marketing of unhealthy food and beverages aimed at children

Dear Ms. Strøm-Erichsen,

The American Chamber of Commerce in Norway (AmCham), an organization dedicated to the promotion of business relationships between Norway and the United States, feels obliged to take this opportunity to contribute to the Government's assessment of a draft regulation to ban the marketing of energy-dense, salty and nutrient poor foods and beverages to children under eighteen years of age. The Government's proposal is cause for profound concern for our members and the overall trade relationship between Norway and the US.

AmCham supports the World Health Organization's goal of "reducing the impact of certain food types to children," but the dominant policy response in the United States for doing so has been to facilitate self-regulation by the food, beverage, advertising and media industries, with limited government oversight. Self-regulation in the US has proven effective and is overseen by a number of organizations, such as the Children's Advertising Review Unit (CARU)*. Across Europe, countries have signed up for the EU Pledge, an initiative by leading food and beverage companies to change the way they advertise to children. It is our understanding that the EU Pledge is in place in Norway by default. Furthermore, the food and beverage industry in Norway has taken additional responsibility by developing self-regulation guidelines together with Forbrukerrådet for the marketing of food and beverages.

Along with industry, we see enhanced self-regulation as an effective, targeted and financially sound tool. It is our belief that industry understands the need for responsible marketing and takes this very seriously. This view is not reflected, however, within the Government's proposal. We respectfully submit that **the proposal, in its current form, should be withdrawn and/or postponed until a better and more realistic alternative is in place.**

Your time and consideration is greatly appreciated. We would be pleased to discuss any of the abovementioned points with you.

Sincerely,

Jason Turflinger
Managing Director

The American Chamber of Commerce in Norway (AmCham) is an independent business networking, information and assistance organization promoting the interests of 220 Norwegian, American and international member companies. AmCham Norway is a fully accredited member of the US Chamber of Commerce, headquartered in Washington D.C. – the world's largest non-profit business federation.



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*See http://www.ascreviews.org/category/caru/about_caru/ for more information

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