

Submission No. 87

(Inq into Obesity)

*JE 18/06/08*



**choice**

**Submission to the**

**House of Representatives**

**Inquiry into Obesity in  
Australia**

**June 2008**

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## **ABOUT CHOICE**

CHOICE is a not-for-profit, non-government, non-party-political organisation established in 1959. We work to improve the lives of consumers by taking on the issues that matter to them. We arm consumers with unbiased, expert information to make confident choices, and campaign to make consumers' lives safer, fairer and better.

## **INTRODUCTION**

CHOICE appreciates the opportunity to make this submission to the House of Representatives' Inquiry into Obesity in Australia. The consequences of unhealthy eating have concerned CHOICE for some time, specifically the rising rates of overweight and obesity, and other diet-related diseases such as type-2 diabetes, heart disease and some cancers. For many years we have campaigned for tougher restrictions on junk food marketing to children and nutrition information on food labels to help consumers to make healthy choices.

Members are likely to be aware that overweight and obesity affect about 9 million Australian adults and a further 1.5 million children, and their associated illnesses place an enormous burden on our health system and society in general. The total cost of obesity in 2005 was estimated to be as high as \$21 billion<sup>1</sup>. This includes productivity costs, costs to the health system and carer costs.

There are many factors that contribute to weight gain, and if Australia is to make any significant progress towards reversing the increasing rates of overweight and obesity, action is needed on many fronts. Governments, doctors, health experts, food regulators, food manufacturers, marketers, urban planners, teachers and individuals all have a role to play.

This submission does not attempt to cover every possible solution to increasing rates of obesity. Rather, it reflects CHOICE's expertise in focusing on areas that relate to Australians as consumers – where production, manufacturing, sale, marketing and labelling of food impact on the food choices consumers make.

CHOICE's submission therefore offers ideas in two key advocacy areas – preventing obesity in childhood, and cutting through the spin on food labels to provide sound, at-a-glance nutrition information for all consumers.

## **PREVENTING CHILDHOOD OBESITY**

While obesity prevention strategies must address the rising rates of overweight and obesity among Australian's of all ages, we believe that attempts to ensure that children develop healthy eating habits from an early age are vital to any effective obesity prevention strategy.

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<sup>1</sup> Access Economics. (2006), *The economic costs of obesity*. Report by Access Economics Pty Ltd to Diabetes Australia.

Childhood overweight and obesity have reached critical levels in Australia. About one in four Australian children are estimated to be overweight or obese<sup>2</sup>. Alarming, the cumulative health consequences mean that today's children might be the first generation to have a shorter life expectancy than their parents<sup>3</sup>.

Overweight and obesity have enormous health and social consequences. Overweight children are more likely to grow up to become overweight or obese adults, leading to an increased risk of high blood pressure and blood cholesterol levels, two factors associated with heart disease. Type 2 diabetes – often called adult-onset diabetes because it usually doesn't develop until adulthood – is now being diagnosed in children and adolescents<sup>4</sup>.

Short-term health problems associated with childhood obesity include orthopaedic problems such as back pain and flat feet, respiratory conditions such as asthma and sleep apnoea, and psychosocial impacts such as poor self-esteem, depression and learning difficulties. Longer-term health impacts of overweight and obesity include cardiovascular disease, Type 2 diabetes, stroke, cancers, osteoarthritis, and kidney and gall bladder disease<sup>4</sup>.

Poor eating habits coupled with a sedentary lifestyle over a prolonged period lead to weight gain. Over the last decade there has been increased government attention given to childhood obesity, with a series of obesity forums held by the previous Commonwealth government, as well as State and Territory governments.

There are many causes of childhood obesity. For years politicians, health professionals, academics, industry and the community have debated the extent to which unhealthy diet, lack of exercise, food marketing or poor parenting is to blame. And all the while Australian children have been getting fatter.

In order to reduce childhood obesity rates we must all take responsibility: governments, the food and advertising industries, health professionals and schools as well as parents and individual consumers. While numerous school and community initiatives have been implemented across Australia, CHOICE is concerned that progress in relation to improving food marketing and the food supply has been limited, primarily due to resistance from the food and advertising industries fearful of the impact of stricter regulation on their bottom line.

To date, the preferred approach for children and adults has been to simply encourage individuals to eat a healthy diet and exercise regularly. With respect to children, the onus for ensuring they maintain a healthy weight has been placed on Mum and Dad – thus parents become the scapegoats for the strategy's failure.

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<sup>2</sup> The Australian and New Zealand Obesity Society. *Obesity in Australian Children*. [http://www.asso.org.au/freestyler/gui/files/factsheet\\_children\\_prevalence.pdf](http://www.asso.org.au/freestyler/gui/files/factsheet_children_prevalence.pdf). Accessed 16/6/08.

<sup>3</sup> Australian Medical Association (24 April 2006). Media release, *National Nutrition Survey needed in war against obesity 'epidemic'*. <http://www.ama.com.au/web.nsf/doc/WEEN-6P69Q9>. Accessed 27/9/06.

<sup>4</sup> National Obesity Taskforce (2003). *Healthy Weight 2008: The national action agenda for children and young people and their families*. Canberra, Department of Health and Ageing.

Yes, parents are ultimately responsible for what their children eat and drink at home and at school. Children also learn healthy – or unhealthy – eating and lifestyle habits at home. Understandably, eating habits developed in childhood can be hard to break – one of the reasons marketers deliberately target kids.

Working families are busier and parents have less time to prepare meals meaning many rely on convenience foods. There is a growing abundance of kilojoule-laden snacks and fast food meals that are convenient and cheaply-priced for parents, and designed to be highly appealing to kids. Such foods are marketed heavily and are often portrayed to be healthier than they really are.

If parents are to successfully take responsibility for their children's health and food choices, then we need to genuinely assist them to make healthy choices for their children and remove some of the factors that undermine parents' authority.

## **ACTIONS TO ADDRESS CHILDHOOD OBESITY**

In our childhood obesity policy report *Little bellies, big problem – How parents, industry and government can solve Australia's childhood obesity crisis*, CHOICE outlines seven calls to action for addressing childhood obesity. They are:

### **1. Effective health promotion and healthy eating education programs for parents and children.**

Commonwealth, State and Territory, and local governments should invest in strategies to promote healthy eating messages to parents and children. Education strategies and messages should be evidence-based to ensure that they are an effective. However, education alone will not be sufficient to bring about healthy behaviours. Other strategies must create an environment that supports health choices rather than undermining them.

### **2. Food manufacturers and fast food outlets should reduce the fat, sugar, energy and salt content of children's foods.**

CHOICE's research into foods such as lunchbox snacks and children's breakfast cereals suggests that products that are targeted to children are very often high in fat, sugar or salt. If manufacturers fail to do this in a meaningful way then government should be prepared to take action.

### **3. Better alignment of the Commonwealth government's obesity prevention strategies with food regulation.**

Food regulatory decisions about fortification, new food innovations, and labelling should not undermine healthy eating messages. For example, the addition of vitamins and minerals to sugary drinks contradicts messages about limiting intake of sugary foods and drinks. It suggests that there are health benefits to be gained by consuming these drinks, and that they are an appropriate source of vitamins and minerals.

**4. A consistent nutrition labelling scheme to help consumers to make healthy choices.**

Some individual manufacturers have introduced their own front of pack labelling schemes, while the UK food regulatory proposed a traffic light labelling scheme. There is a danger that the resulting plethora of labels can confuse and frustrate consumers and make it difficult to compare foods. Government should invest in independent consumer research to determine the most effective way to convey nutrition information on food labels, and require a consistent approach across the food industry.

CHOICE is currently working with the Cancer Council Australia on a joint research project that attempts to fill the gap in local research by assessing Australian consumers' understanding of a range of potential front of pack nutrition labelling systems.

CHOICE's principles for a simplified front of pack nutrition labelling system are outlined in more detail below.

**5. Active enforcement of the proposed nutrition, health and related claims standard.**

Manufacturers use claims about health and nutritional benefits of foods to influence consumers, including parents. These claims invariably focus on positive qualities such as added vitamins and minerals, without mentioning negative attributes such as high fat or sugar content. The proposed standard for nutrition and health claims goes part of the way to addressing this, however it will need to be proactively enforced to prevent claims that are misleading or unsubstantiated.

**6. Stronger government regulation of food marketing to children**

Children are bombarded with marketing for fast food restaurants, chocolate, confectionery and other unhealthy foods. There is growing evidence confirming what every parent already knows – food promotion influences children's preferences, diet and health. Better regulation of marketing and promotion of food to children is a vital part a comprehensive government strategy to prevent the unhealthy influence of junk food marketing and to support parents' efforts to ensure their children eat a healthy diet.

Further information on food marketing to children is provided below.

**7. A single contact point for complaints about food ads.**

The current complaints system is complex. Complaints may be directed to televisions networks, the Australian Communications and Media Authority and/or the Advertising Standards Board, depending on the nature of the complaint. Consumers shouldn't need a detailed understanding of advertising regulation and codes of practice to make a complaint.

A copy of *Little bellies, big problem – How parents, industry and government can solve Australia's childhood obesity crisis* has been provided with this submission (Appendix 1).

## FOOD MARKETING TO CHILDREN

### The business of food marketing

Food marketing is big business. In 2006, the food, drink and confectionery industries spent US\$13 billion on advertising their products worldwide<sup>5</sup>. In Australia in 2005/06, \$391 million was spent on food marketing, 71 per cent of which was for television advertising. Confectionery (19 per cent) and breakfast cereals (14 per cent) accounted for the biggest proportion of all money spent on food marketing. Fast food companies such as McDonalds, KFC, Pizza Hut, Hungry Jacks and Dominos Pizza spent \$115 – 130 million in total on food marketing<sup>6</sup>.

While on one hand representatives of the advertising industry may claim there is only a weak link between TV commercials for junk food and increased consumption of these products<sup>7</sup>, they also claim that advertising can – and does – play a positive role in influencing healthy choices<sup>8</sup>.

A report by the Coalition on Food Advertising to Children<sup>9</sup> shows that one in three television advertisements during children's viewing times in Australia are for food. Of those, between 55 – 81 per cent are for foods high in fat and/or high in sugar. For example, a 2006 study by the Australian Centre for Health Promotion<sup>10</sup> found that advertisements for high fat/high sugar foods were most frequent during programs that rated highly with children, equating to 65.9% of food ads during programs popular with 5-12 year olds.

But it's much more than TV ads. Supermarket shelves carry a range of products featuring kids' favourite characters like Nemo, Bratz and Barbie. At the movies, in magazines or online – games, toys, celebrities and popular cartoon characters are used to promote an array of sugary and high-fat snacks. On the sporting field, sponsorship deals mean the logos of fast-food companies are emblazoned on children's chests as they sprint towards the finish line.

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<sup>5</sup> Advertising Age. (19 November 2007), *21<sup>st</sup> Annual Global Marketers – Part I: Global ad spending by marketer*, <http://adage.com/images/random/datacenter/2007/globalmarketing2007.pdf>, accessed 28/4/08.

<sup>6</sup> Nielsen Media Research. (8 September 2006), *Special Report: 2006 Top 50 Advertisers*, [nielsenmedia.com.au/files/Top%2050%20Fiscal%2005%2006%20B&T.pdf](http://nielsenmedia.com.au/files/Top%2050%20Fiscal%2005%2006%20B&T.pdf), accessed 28/4/08.

<sup>7</sup> ABC The World Today. (24 April 2006), *Fast food marketers hit back at critics*, <http://www.abc.net.au/worldtoday/content/2006/s1622810.htm>, accessed 28/4/08.

<sup>8</sup> Advertising Federation of Australia. (2007), *Submission to the Australian Communications and Media Authority Review of the Children's television Standards*. [http://acma.gov.au/webwtf/assets/main/lib310132/20\\_advertising\\_federation\\_of\\_aust.pdf](http://acma.gov.au/webwtf/assets/main/lib310132/20_advertising_federation_of_aust.pdf), accessed 28/4/08.

<sup>9</sup> Coalition on Food Advertising to Children. (2007), *Children's health or corporate wealth? A case for banning television food advertising to children*.

<sup>10</sup> Australian Centre for Health Promotion (2006). *Report to NSW Health: Food advertising on Sydney television – the extent of children's exposure*. School of Public Health, University of Sydney.

Other common marketing techniques include:

- competitions to win a holiday, bike or MP3 player;
- collecting product tokens to redeem a prize;
- fast food meal deals where you need to visit the outlet every week to collect the entire set of toys;
- the use of children's cartoon characters, media personalities and sporting heroes to promote foods to kids;
- sponsorship of school sports; and
- the use of junk foods in fundraising.

Opponents of greater government regulation of food marketing to children dismiss parents' overwhelming support for tougher restrictions on the marketing of high fat/sugar foods to children, suggesting that resisting temptation is one of life's lessons or that it would deprive children of some fundamental right to be marketed to.

We are not suggesting that chocolate, fast food, soft drinks and other unhealthy foods shouldn't exist; merely that children are not appropriate targets for their marketing campaigns.

Children today are bombarded with enticements for unhealthy food day in, day out using every conceivable tactic and media form available. Despite suggestions to the contrary, those who support tougher restrictions on junk food marketing are not proposing a 'Nanny State' that does parents jobs for them – rather they support governments meeting parents half way with policy that's designed to protect more than corporate profits.

### **Current regulations fail to protect children**

CHOICE believes that the current co-regulatory system relating to food marketing to children is ineffective in addressing the influence of advertisements for unhealthy foods for the following reasons:

- Regulation of food marketing to children is mostly left to industry codes.
- The majority of food advertisements are for unhealthy foods and the 'advertised' diet is in direct opposition to a healthy one.
- The only government regulations are the Children's Television Standards which apply only to advertisements during children's (C) programs.
- More children watch television programs outside the designated children's (C) programming.
- Existing standards and codes don't prevent the use of celebrities, cartoon characters and sporting personalities to promote unhealthy foods to children.
- There are no effective guidelines around the extensive use of competitions, prizes, giveaways and premiums are used to create incentives to buy unhealthy foods such as confectionery, soft drinks and snack foods.
- There are no standards on marketing to children in other media, in particular subscription (pay) television and the Internet.

## **Addressing the imbalance of unhealthy foods promoted to children**

Fresh food suppliers are at a market disadvantage when it comes to the funds they can spend on expensive advertising campaigns. Selling fruits and vegetables will never be as profitable as hamburgers or confectionery, and the resulting imbalance in available revenue for advertising means unhealthy foods are promoted at a far higher rate, especially to children.

CHOICE believes that we now have the capacity to help even the scales, thanks to the development of a nutrient profiling system by Food Standards Australia New Zealand (FSANZ). The system assesses the overall nutrition content of a food – weighing up healthy and unhealthy nutrients. If this model was incorporated into food marketing regulation, foods that fail these nutrition tests would be prohibited from being marketed to children.

Nutrition-based regulation should apply not only during C and P programs but also during periods when a large proportion of children are viewing, and to programs that are popular with children. It could also be used to restrict other forms of marketing that are currently used to promote unhealthy foods to children, e.g. the use of licensed characters, competitions and games, and children's material on food manufacturers' websites<sup>11</sup>.

For more information see CHOICE's submission to the Australian Communications and Media Authority (ACMA) review of the Children's Television Standards at Appendix 2.

## **AN INTERNATIONAL CODE ON JUNK FOOD MARKETING TO CHILDREN**

The problem of childhood obesity and the influence of food marketing on children is not unique to Australia. The World Health Organisation's Global Strategy on Diet, Health and Disease recognises that unhealthy diets and lack of physical activity have contributed to the increasing burden of non-communicable diseases worldwide. It highlights the role of marketing, advertising, sponsorship and promotion of foods, and encourages the food and advertising industries to support the Strategy by marketing unhealthy foods responsibly, particularly when it comes to children<sup>12</sup>.

At the 60<sup>th</sup> World Health Assembly in 2007 member states agreed to the development of a set of recommendations on the marketing of food and non-alcoholic beverages to children. Earlier this year, Consumers International – the global federation of consumer organisations – in partnership with the International Obesity Taskforce, presented a set of *Recommendations for an International Code of the Marketing of*

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<sup>11</sup> Centre for Health Initiatives. (2007), Food Marketing to Children in Australia: A report prepared for the Cancer Council Australia's Nutrition and Physical Activity Committee, <http://www.cancer.org.au/File/PolicyPublications/FoodMarketingtoChildreninAustralia.pdf>, accessed 13/6/08.

<sup>12</sup> Consumers International and the International Obesity Taskforce. (2008), Recommendations for an International Code on Marketing of Food and Non-Alcoholic Beverages to Children, [http://consint.live.poptech.coop/shared.asp\\_files/GFSR.asp?NodeID=97478](http://consint.live.poptech.coop/shared.asp_files/GFSR.asp?NodeID=97478) accessed 13/6/08.



*Food and Non-Alcoholic Beverages to Children* to the 61<sup>st</sup> World Health Assembly. The key elements of the recommendations are as follows:

1. The Code should apply to TV advertisements as well as other forms of promotion such as internet, text messages, on pack and in-store promotions.
2. There should be no advertising or promotion to children of energy dense, nutrient poor foods high in fat, salt and sugar.
3. A nutrient profiling system (such as the one developed by UK Food Standards Agency and adapted by FSANZ) would be used to assess whether a product is healthy or unhealthy, and therefore appropriate for promoting to children.
4. Restrictions should apply to broadcast advertisements and promotions when a significant proportion of children are watching and when children make up a significant proportion of the overall audience – between 6am and 9pm.
5. Non-broadcast media that may be considered within the scope of the Code may include the use of personalities and celebrities; cartoon characters (licensed or created by manufacturers); free gifts or toys; competitions and games; novel shapes and packaging.
6. Energy dense, micronutrient poor foods high in fat, salt and sugar should not be promoted to parents or carers as being suitable for children.

As an active member of Consumers International, CHOICE supports these recommendations and the development of an international code on food marketing to children by the World Health Assembly. We call on the Australian Government to support this work and the Consumers International recommendations. A copy of the recommendations is at Appendix 3.

## **SUPPORT FOR REGULATING AND/OR BANNING FOOD ADVERTISING TO CHILDREN**

There is strong community support for tougher restrictions on junk food advertising to kids.

A May 2006 Newspoll survey commissioned by CHOICE asked 1200 consumers about their attitudes to childhood obesity<sup>13</sup>. A third of the participants were parents or legal guardians of at least one child under the age of 18.

Most parents (88 per cent) said that parents themselves could be doing more to help overcome the problem, while 69 per cent said governments could do more. The survey also investigated attitudes towards three potential government initiatives, revealing overwhelming support for government action in all cases.

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<sup>13</sup> CHOICE (2006). *Childhood Obesity Research – CHOICE/Newspoll Survey*. CHOICE.

- ⇒ 82 per cent wanted government to regulate the way food and drinks are advertised and marketed to children.
- ⇒ 80 per cent were in favour of educating parents and children to develop healthy eating habits.
- ⇒ 83 per cent wanted the government to require manufacturers to make children's foods healthier.

When asked about advertising unhealthy foods and drinks during popular children's TV programs:

- ⇒ 24 per cent supported government action to stop the practice completely
- ⇒ 65 per cent thought government should restrict the practices but not stop it completely
- ⇒ 10 per cent said the practices should be not regulated by government at all

Survey participants were also asked about the use of cartoon characters, popular media personalities and toys to market unhealthy foods to children.

- ⇒ 26 per cent wanted government to stop these practices completely
- ⇒ 59 per cent thought governments should restrict these practices but not stop them completely
- ⇒ 13 per cent said these practices should be not regulated by government at all

Parents understand that they need to do more to prevent children becoming overweight. But they can't do it alone. Our research confirmed that consumers think governments should step in to help where parents are up against the goliaths of the food marketing industry.

The full report on this survey is attached at Appendix 4.

In March 2008, CHOICE commissioned a subsequent Newspoll survey, this time specifically asking parents about their experiences of junk food marketing and its impact. Of the 320 respondents:

- ⇒ 82 per cent were in favour of increasing the amount of government regulation over the way foods and drinks high in fat or sugar are advertised and marketed to children in Australia.
- ⇒ 90 per cent had experienced their children asking them for unhealthy foods, that they would prefer their children did not have.
- ⇒ 82 per cent had experienced their child asking for a specific food or drink as a result of marketing, including advertisements; giveaways, collectibles or competitions; or the use of characters or celebrities in promotions.
- ⇒ 88 per cent believed that food marketing contributes to parents' difficulties have in ensuring that their children eat healthier foods.
- ⇒ 64 per cent said it contributed to their own difficulties in ensuring their children eat healthier foods.

A summary of the result can be found in Appendix 5.

### **CHOICE's *Fed Up!* storybook**

In addition to the Newpoll survey CHOICE invited consumers to share their own stories about junk food marketing to children. Here are some of their stories:

*"My son is only 17 months, not old enough to actually ask for products but he certainly reacts to characters he recognises such as Bob the Builder and The Wiggles. While shopping he'll constantly reach out towards products with recognisable characters and starts to get frustrated if I don't give him what he wants."*

*"My son idolises the Australian cricket team. Because they promote KFC in the ad breaks he demands KFC to be just like his heroes. This is disturbing as cricketers should be promoting sport and physical activity, not junk food!"*

CHOICE has compiled parents' stories in a 'storybook' *Fed Up! A tale of junk food marketing to kids*. A copy of the Fed Up! Storybook has been provided with this submission (Appendix 6).

Clearly, there is strong community recognition that the food industry is not going to solve the childhood obesity crisis, or commit to strategies that lead to reduced consumption of their existing products. Expecting the food industry to self-regulate with respect to children's health has led to an array of public relations exercises and token gestures, rather than meaningful improvements to public health.

Under the current self-regulatory approach, a company such as Kellogg's that tries to implement nutrient-based restrictions on product promotions to children may be unfairly disadvantaged compared to its competitors. The market by itself is rewarding all the wrong behaviours.

### **SIMPLIFIED NUTRITION LABELLING**

On an average trip to the supermarket we are bombarded with thousands of products claiming to be cholesterol free, 97 per cent fat free, packed full of vitamins and minerals or containing no added sugar. Yet these statements are often made about products that aren't as healthy as the claims make them out to be.

Increasingly, food labels are being used as a vehicle for providing consumers with nutrition information, healthy eating messages, and advice about the potential health benefits of consuming particular foods. Factual nutrition information required by governments and claims made by manufacturers to increase product sales compete for label space and the consumer's attention.

CHOICE strongly supported the introduction of mandatory nutrition information panels. In fact, CHOICE was instrumental in lobbying for their introduction. Nutrition

information panels enable consumers to assess the nutrition content of packaged foods and compare products based on the particular nutrients of importance to them.

There are calls for Australia to follow the UK's lead and introduce traffic light labelling that would award red, amber or green traffic lights to individual foods based on their total fat, saturated fat, sugar and salt content. A red light for saturated fat would mean the product was high in saturated fat, while a green light for sugar would indicate low sugar content. The West Australian and South Australian health ministers are among those pushing for traffic light labels to help consumers make healthier choices<sup>14 15</sup>.

Instead of using traffic lights, some manufacturers here and overseas have introduced an alternative 'per cent daily intake' labelling system that indicates the extent to which one serve of a product meets the average adult's daily requirement for a whole range of nutrients. Consumer research conducted by the UK Food Standards Agency<sup>16</sup> and CHOICE's UK counterpart Which?<sup>17</sup> suggests that fewer consumers are able to interpret this system correctly in comparison to the coloured traffic light system. The traffic light system was also better understood by lower socioeconomic consumer who we know suffer a greater burden of overweight and obesity and all the health problems associated with excess weight.

The system that works best for British consumers will not necessarily be the most helpful for Australian consumers, but it looks promising. If Australian governments want food labels to help Australians make healthier choices and reduce the impact that obesity and diet-related diseases have on our health system and our economy, then they need to implement the system that helps the greatest number of consumers, not the one that causes the least offence to the food industry and its bottom line.

Below is a set of principles that CHOICE believes should underpin a simplified nutrition labelling system.

### Development

1. It should be based on scientific criteria developed by independent experts and endorsed by relevant independent health authorities such as the National Health and Medical Research Council.
2. It should be based on independent consumer research, comparing a range of different options. International research may provide guidance on the range of potential nutrition labelling schemes however research must be conducted on

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<sup>14</sup> Government of Western Australia. (2 May 2008), *Complicated food labels hard to digest*, <http://www.mediastatements.wa.gov.au/Pages/CurrentMinistersSearch.aspx?ItemId=130088&minister=McGinty&admin=Carpenter>, accessed 13/6/08.

<sup>15</sup> Government of South Australia. (13 September 2007), *Green = Go for healthy food in school canteens*, <http://www.ministers.sa.gov.au/news.php?id=2144>, access 13/6/08/

<sup>16</sup> Synovate (2005), *Quantitative Evaluation of Alternative Food Signposting Concepts*, prepared for COI on behalf of Food Standards Agency, <http://www.foodstandards.gov.uk/multimedia/pdfs/signpostquanresearch.pdf>, accessed 13/6/08.

<sup>17</sup> Which? (2006), *Campaign Report: Healthy Signs*, Consumers Association UK.

Australian consumers to ensure that it is appropriate for the Australian population.

3. It should be developed in consultation with industry, consumers, health experts, enforcement agencies and communications experts.

### **Consumer benefit**

4. It should be simple and an easily understood by the majority of consumers including those who may find nutrition information panels difficult to understand.
5. It should complement, not replace, nutrition information panels currently on the back or side of packs. This does not exclude possible refinement of the current nutrition information panel.
6. To avoid consumer confusion, there should be only one agreed nutrition labelling program rather than a variety of initiatives across the food industry.
7. It should be mandatory on all packaged foods and for fast food chains with standard menu items, recipes and processes.
8. It should enable consumers to make comparisons between different products within the same food category as well as across different food categories.

### **Information**

9. It should address only those nutrients of greatest public health significance such as total fat, saturated fat, sugar and sodium, and potentially energy and fibre. It should not include information about nutrients of lesser significance such as carbohydrates, protein, and other vitamins and minerals as too many fields may confuse consumers and divert attention away from the nutrients of greatest public health concern.
10. It should require all products to list information for all agreed nutrients. It should not allow manufacturers to display only those nutrients that present a product most favourably. For example, providing information on energy content alone is potentially misleading as it is important for consumers to know the source of kilojoules – that is fat, protein, complex carbohydrates or sugar.
11. To enable consumers to make assessments at a glance, it should include an interpretive element such as traffic light colours and/or high/medium/low indicators depending on the levels of key nutrients in each product.
12. Ideally, there should a single set of criteria applied across all food categories or two separate sets of criteria developed for solid foods and drinks or liquid

foods. However, consumer research may indicate that it would be more appropriate to have separate criteria for a range of food categories.

13. In addition to interpretive information, it may also include factual information such as the contribution to an average consumer's daily intake of key nutrients or the amount of each key nutrient per 100g/ml. Guidance should be given about appropriate serving sizes to prevent manipulation of serving sizes designed to present nutrition information in the most favourable way.

### **Government support**

14. It should be accompanied by a government consumer education and health promotion campaign on healthy eating and how to use food labels to make healthy food choices.
15. It should be easily enforced. Government funding should be allocated to monitor and enforce the simplified nutrition labelling scheme.

CHOICE welcomes the development of a simplified nutrition labelling scheme that further assists consumers to identify healthier options and easily distinguishes them from foods that are high in fat, sugar or sodium. CHOICE believes that a scheme offering an element of judgement about the healthiness of individual products would be most helpful in assisting consumers to choose healthier foods. A scheme like this would also provide an incentive for the food industry to reduce the fat, sugar and sodium content of processed foods.

### **CLOSING REMARKS**

The causes of obesity are complex – yet it is tempting to believe that the solutions should be simple. Better self-control and self-discipline, “just saying no” and urging consumers to make time to exercise and prepare healthy meals are appealing arguments – sometimes they are also ideologically driven; or driven to protect profits.

Yet as Ruth Colagiuri and Roger Magnusson wrote in the Medical Journal of Australia<sup>18</sup>:

*“The food, tobacco and alcohol industries have lucrative markets to protect, and there is a pervasive assumption that the solution to galloping rates of obesity, diabetes and other lifestyle diseases lies in individuals exercising greater self control. But preaching self-control will not work if healthy choices are constantly being undermined by other, more powerful influences. While the law is not a complete answer, it can help to create supportive environments for changing the average behaviour of populations.”*

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<sup>18</sup> Magnusson, RS and Colagiuri, R. (2008), The law and chronic disease prevention: possibilities and politics, Medical Journal of Australia, 188 (2), p104-5.

Once again, CHOICE appreciates the opportunity to provide these comments to the House of Representatives Inquiry into Obesity in Australia. We trust that the issues we have raised will be given due consideration. The ideas outlined in this submission are by no means the only actions that need to be taken.

CHOICE commends the new Commonwealth Government for prioritising preventative health. We look forward to working with governments, health experts, industry representatives and other organisations in the future to develop effective strategies to address rising rates of obesity and create environments that support consumers to make healthy choices for themselves and their families.

Should you wish to seek further information on CHOICE's position please do not hesitate to contact Ms Clare Hughes, Senior Food Policy Officer on (02) 9577 3375 or at [chughes@choice.com.au](mailto:chughes@choice.com.au).

## **LIST OF APPENDICES**

- Appendix 1: CHOICE Campaign Report: Little bellies, big problem – How parents, industry and government can solve Australia's childhood obesity crisis
- Appendix 2: CHOICE submission to the ACMA Review of Children's Television Standards (August 2007)
- Appendix 3: Recommendations for an International Code of the Marketing of Food and Non-Alcoholic Beverages to Children.
- Appendix 4: Report on the 2006 CHOICE/Newspoll childhood obesity survey
- Appendix 5: Summary of results from the 2008 CHOICE/Newspoll survey on food marketing to children
- Appendix 6: Fed Up! A tale of junk food marketing to kids