

Submission No. 41  
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## Coalition on Food Advertising to Children

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*Speaking out against unhealthy food advertising to children*

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# Submission to the House of Representatives Standing Committee on Health and Ageing Inquiry into Obesity in Australia

May 2008

## **The Coalition on Food Advertising to Children**

The Coalition on Food Advertising to Children (CFAC) is pleased to offer this submission to the Inquiry into Obesity in Australia being conducted by the House of Representatives Standing Committee on Health and Ageing.

The CFAC was formed in July 2002 and includes key organisations that recognise that the commercial promotion of foods and beverages high in fat, sugar and salt to children is a significant concern to their nutrition and future health. The Coalition's goal is to improve the diets and overall health of Australian children through a marked reduction in the commercial promotion of foods and beverages to children. The vital first step is to extend statutory regulations to prohibit unhealthy food and beverage advertising during television programs where a significant number of children are watching. This does not preclude the promotion of healthy eating messages to children through non-commercial social marketing.

The member organisations of the CFAC are:

- Australian Dental Association
- Australian Dental and Oral Health Therapists Association
- Australian Medical Association
- Australia and New Zealand Obesity Society
- Health Promotion Association of Australia
- Home Economics Institute of Australia
- Nutrition Australia
- Public Health Association of Australia
- Royal Australasian College of Physicians, Paediatric Branch
- Royal Australian College of General Practitioners
- The Cancer Council Australia
- Young Media Australia
- Ms Kaye Mehta, Senior Lecturer in Nutrition and Dietetics, Flinders University
- Dr. Rosemary Stanton, OAM
- Professor Mike Daube, Curtin University of Technology

## **Background**

Food\* advertising to children impedes the ability of parents and government programs to promote healthy eating. Food advertising to children contributes to an obesity-promoting environment, whereby unhealthy food choices are increasingly normalised and become the routine food choices.

The CFAC does not suggest that food marketing is the only factor contributing to childhood obesity, and we support a comprehensive approach to the prevention of obesity, and many of the member organisations of the CFAC will be providing separate submissions on the range of actions that are required to address obesity in Australia.

However there is compelling evidence that improved food marketing regulations have the potential to be an important and cost-effective strategy to address childhood obesity in Australia.<sup>1</sup> Systematic reviews on food marketing to children show that advertising works<sup>2-4</sup> – it leads to children preferring advertised foods, requesting their parents purchase the advertised foods and consuming more of these foods. As the majority of foods marketed to children are high in fat, sugar, and salt (estimates of unhealthy TV food advertising range

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\* In this submission, the word “food” refers to food and beverages

from 55-81% of total food ads),<sup>5-8</sup> this marketing of foods is detrimental to children's health and wellbeing. Restrictions on food marketing to children are a necessary ingredient for change and important strategy, as part of a comprehensive approach to obesity prevention. The CFAC urges the Government to take action on food marketing and protect children.

### **Food Marketing to Children - High levels and unfair tactics**

Food marketing directed at children occurs across a variety of media, including television, cinema, magazines, internet, sport sponsorship, in-school marketing, packaging promotions, etc. Food companies use a variety of advertising practices that have a detrimental impact upon children, including:

- high levels of food advertisements during programs of popular appeal to children and at times when a significant number of children are watching (Australian studies have reported that unhealthy foods make up between 55-80% of total food advertisements<sup>5-8</sup>);
- repetition of food advertisements during programs of popular appeal to children and at times when a significant number of children are watching;
- offers of premiums with products, such as collectable cards, free toys and entry into competitions;
- endorsement of products by personalities or characters popular with children;
- manipulation of peer pressure by using techniques to make children think consumption of products is socially desirable or will attract peer admiration or acceptance;
- association of unhealthy products with improved energy levels, performance, strength, skill or abilities;
- appeals to children's imagination through use of fantasy characters and scenes;
- association of food products with fun, happiness, adventure;
- food shaped, coloured and packaged in ways designed to appeal to children;
- use of techniques, such as catchy jingles, animation and special effects, to attract children's attention;
- 'tie-in' promotions of unhealthy food products with popular children's films;
- 'advergames' (computer games on food company websites which promote unhealthy products);
- the portrayal of nutrition as tiresome or 'nagging';
- manipulation of "pester power" by use of techniques, such as those described above, to make children want products so they will pester parents to buy them; and
- by arming children, or providing parents, with information about 'beneficial' attributes of products (such as nutritional characteristics that suggest products are good for children, when in fact they are unhealthy) to reduce parents' resistance to pester power.

In summary, children are exposed to the dual risk of high volumes of unhealthy food advertisements and unfair advertising techniques. The Government should act to protect children from these risks.

### **Community Support**

There is strong community support, particularly among parents, for more effective regulations on unhealthy food marketing to children. Last year the CFAC commissioned an independent survey of 400 representative parents across Australia, and found:<sup>9</sup>

- 86.2% supported a ban on advertising of unhealthy foods at times when children watch TV
- 88.7% agreed the government should introduce stronger restrictions on unhealthy food advertising at times when children are watching

- 74.6% were concerned about advertising using toys and giveaways to promote unhealthy food to children
- 67% were concerned about advertising via the sponsorship of children's sporting activities to promote unhealthy food to children.

As well, the CFAC collected 20,521 postcards from Australians supporting the need for better regulations to protect children from food advertising, which were forwarded the Australian Communications and Media Authority (ACMA) during the review of the Children's Television Standards.

### **Parental responsibility**

Parents have a key role in guiding their children's food choices, and government regulation should support them in that role. There have been frequent assertions by some politicians and members of the food and advertising industries that a child's eating is solely the responsibility of parents and that education is the way to address the rising rates of obesity. The CFAC and its member organisations believe that this is a naïve and overly simplistic solution to a complex problem. Strategies are needed that focus on the environmental factors that induce obesity-promoting behaviours in individuals. It is unrealistic and impracticable to expect parents to exercise the necessary control, such as requiring televisions to be switched off at each advertisement break or selectively prohibiting their children from watching television channels which show advertisements, or refusing all subsequent requests for the products advertised, no matter how insistent. The CFAC believes it is unacceptable that advertisers have the right to manipulate and exploit children with high volumes of appealing food ads, and yet the onus of responsibility is solely placed on parents to monitor and moderate the consequences of advertisements. Even the most cautious and conscientious parent cannot monitor their child's viewing behaviour constantly.

As television is the largest source of media messages about food to children, and while it disproportionately promotes high-energy low nutrient foods, it is imperative that standards be put into place to more effectively ensure food advertising to children is appropriate. Education campaigns are always important, but as we saw with anti-smoking campaigns, it was attending to factors such as advertisements for cigarettes and changing the environment so that smoking was no longer seen as 'normal' that were most effective in reducing smoking rates.

Ineffective regulation of food marketing effectively ties parents' hands behind their backs in the fight to maintain healthy diets for their children, in a way that, in our view, is impossible to justify.

### **Conclusion**

Marketing restrictions would be a proportionate response to the issue. Current Australian regulations and industry codes of practice are ineffective at protecting children from high volumes of TV advertisements for foods high in fat, sugar and salt. The main limitations are that the current regulations and industry codes of practice do not cover the *volume* of food marketing or the *types of foods* advertised; apply to *all forms of media*; or effectively deter *breaches*.

Increased regulation would still allow the food industry to innovate and develop healthier products.

The time for action is now, especially as turning childhood obesity rates around is going to be a long process. The Government should not assume that bodies like ACMA will introduce the necessary restrictions. We need a specific piece of legislation, similar to a Tobacco Advertising Prohibition Act that puts the welfare of children above any commercial need to market foods and beverages to vulnerable children.

The CFAC urges the Government to make a commitment to urgent reform to address food marketing directed at children.

### **Recommendations**

The CFAC call on the Australian government to:

- Place the interests of children and parents above commercial interests
- Introduce restrictions to limit the marketing of unhealthy food and beverages across all media (both broadcast and non broadcast)
- Introduce restrictions on TV food marketing so that unhealthy food and beverage advertisements are not shown until after 9pm at night
- Introduce regulations that restrict the use of persuasive marketing techniques in particular the use of premium offers, and cartoon and celebrity endorsements.

### **Contact Information**

Should you wish to discuss any of the issues raised in this submission, please contact the Chair of the CFAC, Ms Kathy Chapman, at the address below.

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## Reference List

1. Moodie M, Carter R, Haby M, Swinburn B. ACE-Obesity: Assessing cost-effectiveness of obesity interventions in children and adolescents. VIC, Australia, Department of Human Services, VIC. 2006.
2. Committee on Food Marketing and the Diets of Children and Youth. Food marketing to children and youth: threat or opportunity. McGinnis.M, Gootman, J, and Kraak V. Washington DC, USA, Institute of Medicine of the National Academies. 2005.
3. Hastings G, McDermott L, Angus K, Stead M, Thomson S. The extent, nature and effects of food promotion to children: a review of the evidence. Geneva, World Health Organisation. 2006.
4. Livingstone S. New research on advertising foods to children: an updated review of the literature. Published as Annex 9 to Ofcom Television Advertising of Food and Drink Products to Children consultation. Ofcom. 28-3-2006.
5. Chapman K, Nicholas P, Supramaniam R. How much food advertising is there on Australian television? *Health Promot Int.* 2006; **21**(3): 172-180.
6. Hattersley L, Kelly B, King L. Food advertising on Sydney commercial television: The extent and nature of children's exposure 2006-2007. [http://www.coo.health.usyd.edu.au/pdf/2007\\_food\\_advertising.pdf](http://www.coo.health.usyd.edu.au/pdf/2007_food_advertising.pdf). NSW Centre for Overweight and Obesity. 13-7-2007.
7. Kelly B, Smith B, King L, Flood V, Bauman A. Television food advertising to children: the extent and nature of exposure. *Public Health Nutr.* 2007; **10**(11): 1234-1240.
8. Neville L, Thomas M, Bauman A. Food advertising on Australian television: the extent of children's exposure. *Health Promot Int.* 2005; **20**(2): 105-112.
9. Morley B. National community survey of TV food advertising to children. Centre for Behavioural Research in Cancer, The Cancer Council Victoria. Coalition on Food Advertising to Children. 2007.