

**Submission to National Obesity Taskforce, Consultative Forum, 23 September 2003.**

**Coalition on Food Advertising to Children.**

**Recommendations for National Action Plan.**

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

The Coalition on Food Advertising to Children (CFAC) was formed in July 2002. It includes key organisations and prominent individuals who recognise that food advertising to children can be problematic for children's eating habits and future health. The Coalition aims to enhance the health of Australian children by calling for a ban on all commercial television food advertising during programs where children (aged 0-12 years) make up a substantial proportion of the viewing audience. This ban will not preclude the promotion of healthy eating messages via Community Service Announcements.

CFAC membership includes:

Royal Australasian College of Physicians, Paediatric Branch

Royal Australian College of General Practitioners

Australasian Society for the Study of Obesity

Cancer Council of Australia

Australian Consumers Association

Public Health Association of Australia

Nutrition Australia

Young Media Australia

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**Children deserve to be protected from an obesogenic environment: Ban or severely restrict television food advertising to children.**

1. **Growing international and national movement calling for bans or severe restrictions on television food advertising to children.**

Television food advertising is recognised as contributing to an obesogenic environment for children. Childhood obesity is a major public health problem, with 25% of Australian children currently overweight or obese.

The Coalition on Food Advertising to Children (CFAC) joins with international groups calling for bans or severe restrictions on marketing of energy-dense nutrient-poor foods to children.

The World Health Organisation Report on 'Diet, Nutrition and the Prevention of Chronic Disease, 2003, (1) found that there was sufficient scientific evidence on the

harmful effects of marketing of high-energy low-nutrient foods to young children, to warrant a call to governments to intervene in this area.

A recent report by the International Association of Consumer Food Organisations to the World Health Organisation (IACFO), concluded that, industry self-regulation is unlikely to be adequate to protect children against heavy marketing of high-energy low-nutrient foods (2). The IACFO called on the World Health Organisation to assist and support national governments to restrict or ban advertising of these foods to children.

The Coalition on Food Advertising to Children is calling for a ban on all commercial television food advertising during programs where children (aged 0-12 years) make up a substantial proportion of the viewing audience. This ban will not preclude the promotion of healthy eating messages via Community Service Announcements.

## **2. Industry self-regulation occurs alongside the Broadcasting Services Act and ABA Standards. A review of the Commercial Television Industry Code of Practice cannot meaningfully occur without a concomitant review of the CTS.**

The current co-regulatory system in Australia does not adequately protect children from the obesogenic effects of television food advertising. Industry self-regulation coupled with government regulation for 'C' and 'P' programs has not thus far protected children from heavy marketing of high-energy low-nutrient foods. Latest research by Zuppa et al, 2003, found one-third of advertisements directed at children, to be for food and of those, 80% were for non-core foods using the Australian Guide to Healthy Eating. (3)

The current review of the Television Industry Code of Practice provides an opportunity for the television and advertising industries to demonstrate their commitment to socially responsible practices.

2.1 The Australian Association of National Advertiser's has issued a new Code of Advertising to Children. The Television Industry Code of Practice will adopt the Australian Association of National Advertiser's new Code.

CFAC considers that neither the AANA Code nor the Television Industry Draft Code provide clear and strong guidelines for advertisers or television stations to adopt socially responsible marketing to children.

The AANA Code, which is adopted by the Industry Draft Code, provides no additional protection above what already exists through the Children's Television Standards. The one section relating to Food & Beverages. (*Section 2.10.1: "Advertisements to children for food and/or beverages: (a) should not encourage or promote an inactive lifestyle combined with unhealthy eating or drinking habits"*) contains vague and potentially confusing wording which would not assist advertisers.

2.2 Review of Commercial Television Industry Code of Practice.

2.2.1 Children's Television Standards.

The Draft Code specifies that advertisements directed to children must comply with Children's Television Standards 17 –21.

Based on research and subsequent complaint of alleged breaches of CTS 18 and 20.2a, undertaken by CFAC in 2002, we consider that:

- (a) the CTS do not provide adequate protection to children with respect to advertising of energy-dense, low nutrient foods, and
- (b) do not provide guidelines that are clearly and unambiguously understood by advertisers and consumer advocacy groups alike.

**As the Industry Code of Practice requires compliance with the CTS, it is imperative that the CTS are reviewed and strengthened to provide unequivocal clarity on the standards required to protect children's interests.**

2.2.2 New Advisory Note: Commercials or Community Service Announcements directed to children.

CFAC considers that the Advisory Note does not provide adequate guidance to television staff because it does not address the problem of content of advertisements directed at children. It simply lists criteria for a 'commercial or CSA directed to children.'

2.2.3 Monitoring and surveillance of compliance to Industry Code & CTS.

The current system relies on complaints to monitor compliance with the Industry Code. This does not provide the public with sufficient assurance of protection. In fact, it is left to the public to lodge complaints of breaches of the Code. Members of CFAC who work with the public believe that community members (a) do not have an adequate understanding of the details of the Industry Code to make informed complaints, (b) do not fully understand the process for making complaints, and (c) in relation to television advertising fear litigation from the food companies may arise out of their complaint. Relying on complaints as the mechanism for monitoring compliance with the Code therefore falls short of a true commitment to ethical and responsible practice by government, advertising and television industries.

**CFAC considers that the Industry Code of Practice and the ABA Children's Television Standards should be monitored regularly by an independent body and the results should be a condition of licensing, and made public.**

### **3. Measures by the television and advertising industries to promote healthy eating and exercise do not go far enough.**

Strategies focussing on education of parents and children are not adequate interventions for obesity. Multiple strategies are needed that also focus on environmental factors that induce obesity-promoting behaviours in individuals (4). Television is the largest source of media messages about food to children (5) and it disproportionately promotes high-energy low-nutrient foods.

## Conclusions.

Children deserve to be protected from an obesegenic environment:

- ◆ The Coalition on Food Advertising to Children is calling for a ban on all commercial television food advertising during programs where children (aged 0-12 years) make up a substantial proportion of the viewing audience. This ban will not preclude the promotion of healthy eating messages via Community Service Announcements.
- ◆ There is a growing international and national movement calling for bans or severe restrictions on television food advertising to children.
- ◆ The review of the Industry Codes of Practice is a good opportunity for television and advertising industries to demonstrate their commitment to socially responsible practices. As the Industry Code of Practice requires compliance with the CTS, it is imperative that the CTS are reviewed and strengthened to provide unequivocal clarity on the standards required to protect children's interests.
- ◆ The Commercial Television Industry Code of Practice and the Children's Television Standards should be monitored regularly by an independent body and the results should be a condition of licensing, and made public.
- ◆ Strategies focussing on education of parents and children are not adequate interventions for obesity. Multiple strategies are needed that also focus on environmental factors that induce obesity-promoting behaviours in individuals

## References

1. World Health Organisation. Diet, Nutrition and the Prevention of Chronic Disease. Technical Report Series #916. Who, 2003.
2. International Association of Consumer Food Organisations to the World health Organisation. Broadcasting Bad Health. Why food marketing to children needs to be controlled. Report to World Health Organisation. July 2003), [www.foodcomm.org.au](http://www.foodcomm.org.au)
3. Zuppa JA, Morton H, Mehta KP. (2003) TV food advertising: Counterproductive to children's health? A content analysis using the Australian Guide to Healthy Eating. Nutrition & Dietetics, 60:2; 78 – 84.
4. World Health Organisation. Obesity. Preventing and managing the global epidemic. WHO, 1997
5. Coon K A, Goldberg J, et al. 2001. Relationships between use of television during meals and children's food consumption patterns. Paediatrics. 107 (1).