

The marketing of unhealthy food to children in Europe

A report of Phase 1 of the
'Children, obesity and associated avoidable chronic diseases' project

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National coordinators:

- Austrian Heart Foundation – Susanne Skalla, Petra Scharf
- Belgian Heart League – Jean-Pierre Willaert
- Czech Heart Association – Ivo Stolz
- Danish Heart Foundation – Dorte Fremm
- Estonian Heart Association – Mari-Liis Eeljöe
- Finnish Heart Association – Anna-Liisa Rajala
- French Federation of Cardiology – Céline dos Santos
- German Heart Foundation – Christine Raap
- Hellenic Heart Foundation – George Andrikopoulos
- Hungarian Heart Foundation – András Nagy
- Icelandic Heart Association – Vilmundur Gudnasson
- Irish Heart Foundation – Yvonne Kelly
- Italian Association against Thrombosis – Gloria De Masi Gervais
- Netherlands Heart Foundation – Karen Van Reenen
- Norwegian Council on CVD – Elisabeth Fredriksen
- Portuguese Heart Foundation – Luis Negrão
- Slovenian Heart Foundation – Danica Rotar Pavlič
- Spanish Heart Foundation – Beatriz Juberías
- Swedish Heart-Lung Foundation – Janina Blomberg
- National Heart Forum, UK – Jane Landon

Authors of this report:

- Anne Matthews, Gill Cowburn and Mike Rayner
British Heart Foundation Health Promotion Research Group, Department of Public Health,
University of Oxford, UK
- Jeanette Longfield and Charlie Powell
Sustain: the alliance for better food and farming, London, UK

Steering committee:

- Céline dos Santos, French Federation of Cardiology
- María Luisa Fernández y Jiménez, Spanish Heart Foundation
- Maura Gillespie, British Heart Foundation
- Lex Herrebrugh, International Diabetes Federation – European Region
- Paul Lincoln, National Heart Forum, UK
- Tim Lobstein, International Association of Consumer Food Organisations
- Maureen Mulvihill, Irish Heart Foundation
- Mike Rayner, British Heart Foundation Health Promotion Research Group
- Jan Van Deth, Netherlands Heart Foundation

European coordination:

- Susanne Løgstrup, Director, European Heart Network
- Marleen Kestens, Network Coordinator, European Heart Network

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Executive summary and recommendations

Increasing obesity, especially in children, is being noted with mounting concern throughout Europe. The International Obesity Task Force estimates that approximately 20% of school-age children in Europe are carrying excess body fat, with an increased risk of developing chronic disease. Of these overweight children, a quarter are obese, with a significant likelihood that some will have multiple risk factors for cardiovascular diseases, type 2 diabetes and other co-morbidities before or during early adulthood.

The “Children, obesity and associated avoidable chronic diseases” project involves national heart foundations in 20 different European countries (national coordinators) together with three other partner organisations (the British Heart Foundation Health Promotion Research Group, the International Association of Consumer Food Organisations and the International Diabetes Federation – European Region) . The project is coordinated by the European Heart Network, and part-funded by the European Commission. The national coordinators have collected the bulk of the information for this report.

The project is taking place in three phases. Phase 1 involves mapping the policy terrain; Phase 2 will disseminate the findings of Phase 1; and Phase 3 will encourage organisations to develop a pan-European programme of action to address childhood obesity.

This report - covering Phase 1 of the project - focuses on the marketing of food to children, but it is acknowledged that changes to the way foods are marketed and otherwise promoted to children are only one way in which overweight and obesity in childhood needs to be tackled. Obesity in childhood is caused both by the over-consumption of certain foods and by insufficient physical activity, so efforts need to be made both to improve children’s diets and to raise their levels of physical activity. The promotion of healthier eating in childhood will involve a range of measures in a variety of settings, not just changing the ways foods are marketed to children. These measures will be considered in the later phases of this project.

Although the quantity and quality of information about food marketing to children varies between countries across Europe, a clear picture has emerged from this project, in line with results from other research.

- Most of the food marketed to children is regarded, by those concerned with public health, as ‘unhealthy’¹ food, i.e. food that is high in fat, particularly saturated fat, sugar or salt, and low in essential minerals, vitamins and other components important for a healthy diet. The extent of unhealthy food marketing to children varies from country to country. For example, this project found that estimates of the percentage of TV advertisements for food aimed at children that were for unhealthy foods ranged from 49% in Italy to nearly 100% in Denmark and the UK.
- A considerable amount of money is spent by companies marketing unhealthy foods to children, with the great majority spent on TV advertisements. In Greece, the total budget for children’s food marketing increased by 38% between 2002 and 2003, from €1.3 million to €1.8 million. In Sweden the cost of TV advertising for high-energy products shown mainly at the hours when children watch television amounted to SEK 238 million in

¹ There is an ongoing debate about whether a food can be described as ‘healthy’ or ‘unhealthy’. Some contend that there is no such thing as healthy or unhealthy food, only healthy and unhealthy diets. This report assumes that some foods are more likely to contribute to unhealthy diets than others and for convenience these foods are described as ‘unhealthy’ foods throughout the report. An alternative term would be, for example, a food that is ‘high in fat, sugar or salt’ but besides being more cumbersome does not convey all that is conveyed by ‘unhealthy’. (See also Section 4.1 of this report.)

2003. In other countries no distinction is made between overall food marketing and food marketing to children, but the figures are impressive: in the UK £743 million was spent overall on food and drinks advertising in 2003, and some data show that the total amount spent on food marketing is increasing. In Germany, 87 % of food advertising budgets is spent on television advertising. Advertising spending in the food industry as a whole in The Netherlands grew by 128% between 1994 and 2003. However, there are signs that the proportion of advertising budgets spent on TV may be declining slightly, with small but rising proportions being diverted into marketing in schools and via the Internet.

- In all countries a variety of 'creative' marketing strategies is used to promote foods to children. These include linking food products with children's heroes and cartoons, play, fun, action-adventure, humour, magic and fantasy.
- Spending on media other than TV – such as magazines, radio, cinema, mobile phones and outdoor advertising – is usually a small proportion of total food marketing budgets. However, along with TV, schools and the Internet, these media form part of a sophisticated and integrated mix of marketing techniques used by companies to sell their products.
- Schools represent a growing marketing channel for food advertisers in most European countries. Strategies include sponsoring events, linking food product purchasing to the provision of educational or sporting equipment often involving token collection schemes, and selling unhealthy food and drink products in vending machines.
- The Internet is also a new and growing medium for food advertisers. For example, in the UK in 2003, 13% of total spending on food, soft drinks and fast food advertising was via the Internet, making the Internet the second most important promotional channel after television. Food advertisers have discovered that the addictive quality of web-surfing is an advantage to them.
- Regulation of marketing to children varies considerably, with the majority of regulatory effort focusing on TV; in all 20 countries there is at least one statutory code on broadcast advertising broadly based on the Television Without Frontiers Directive. Sweden and Norway have tried to protect their children from TV advertisements by prohibiting them within their borders. However, their efforts are being undermined by advertisements on cable and satellite TV broadcast from other countries, and by other forms of marketing.
- One way in which the regulation of marketing to children varies between countries is in the way that children are defined. The definition of a 'child' ranges from less than 12 years of age in The Netherlands, Norway and Sweden to less than 21 years of age in Estonia.
- Most countries have an incoherent patchwork of legal and voluntary controls on broadcast and non-broadcast advertising, and on marketing in schools. The Internet, as a newer medium, is among the least regulated, with promotions on food company websites virtually unregulated. The majority of countries recognise the need to protect children from advertising and marketing in general, but very few have specific rules focusing on food marketing to children.
- Food and media industries throughout Europe tend to vigorously defend their commercial interests, attempting to weaken tough regulations – where they exist – and resisting efforts to introduce or strengthen measures designed to protect children from marketing.
- Those concerned with children's health and well-being – health, consumer and other citizens' organisations – tend to argue that 'unhealthy' food marketing to children is one of

the significant contributors to, among other things, childhood obesity. Protecting children from this influence is therefore often proposed as a key measure in any child health programme.

- Governments have reacted differently to these conflicting pressures. Norway and Sweden have opted for a ban on TV advertisements to children, but most other governments have introduced a variety of incomplete and sometimes overlapping educational and promotional initiatives, alongside nutrition guidance.
- Independent organisations also operate a range of similar initiatives, sometimes in partnership with government and/or industry. Some are designed specifically to counter the negative effects of the marketing of 'unhealthy' food to children, but many are not. The few media literacy projects that exist tend to be funded by media industries and other commercial companies, including toy and food manufacturers.

Despite the lack of agreement over what should be done about 'unhealthy' food marketing to children, there are some apparent areas of consensus, particularly concerning the importance of education. Moreover, all parties acknowledge that childhood obesity has many causes, so a sophisticated programme of measures will be needed, including promoting physical activity as well as changing diets. However, despite agreement in principle, in practice no countries (except Finland and Norway) have introduced comprehensive policies designed to ensure that all children have:

- education and practical skills provided in schools that will encourage and enable them to eat a healthy diet, and equip them to deal effectively with conflicting messages in a multi-media world; and
- healthy food provided for them in schools, as a result of high quality standards for food in schools, whether provided as part of a meal or from vending machines or other outlets.

The Treaty of the European Union provides a legal basis allowing inclusion of health protection in European policies. In theory, there should be no difficulty in extending these principles to ensure that the health of all children in Europe – not just some – is adequately protected, including by prohibiting 'unhealthy' food marketing. The experience in Norway and Sweden – where a ban on TV advertisements to children has been undermined by broadcasting from outside their border and by marketing in other media – demonstrates why a Europe-wide approach is necessary. Thus:

- **The TV Without Frontiers Directive should be amended to prohibit TV advertising of 'unhealthy' food to children, thereby protecting the existing legislation in Norway and Sweden and extending this protection to the rest of Europe's children.**
- **Additional measures should be introduced to protect children from all other forms of 'unhealthy' food marketing, including through schools and the Internet (where it is increasing), and through any other broadcast and non-broadcast media (even though these are currently minor outlets, compared to TV).**

The national coordinators for this project noted that there is no commonly agreed definition for an 'unhealthy' food or even a food that is 'high in fat, sugar or salt'. Some countries (such as the UK and France) are developing methods of nutrient profiling so that working definitions of 'unhealthy' (or 'foods high in fat, sugar or salt') and 'healthy' foods can be agreed. Any future plans to protect children throughout Europe from the marketing of 'unhealthy' foods will need a common EU definition of 'unhealthy' food. Therefore:

- **A common EU definition of an unhealthy food needs to be agreed.**

Development of a common definition is in any event necessary in view of the current development of EU legislation on nutrition and health claims and a forthcoming review of the EU's Nutrition Labelling Directive.

In most instances the coordinators had difficulty in collecting information relevant to this report, particularly information about the type and amount of food marketing to children in their country. Relevant data could – in many cases – only be found with much difficulty and was often buried within reports written for other purposes. Therefore in order to inform policy making:

- **Effective structures and procedures should be established to monitor the nature and extent of food marketing to children and its regulation throughout Europe.**

Comprehensive strategies to combat obesity in children need to address all the causes of obesity, including measures to encourage children to be more physically active. While more evidence about the effectiveness of different policies – both in isolation and in combination – would undoubtedly be helpful, there is general agreement that action to address obesity in children is a matter of urgency.

This report gathers together wide-ranging information on the extent and nature of food marketing to children, collected by national co-coordinators in 20 countries. This information demonstrates that children are exposed to the marketing of 'unhealthy' food on a massive scale and stresses the need to protect children from such marketing as an important measure to address one critical influence on childhood obesity.

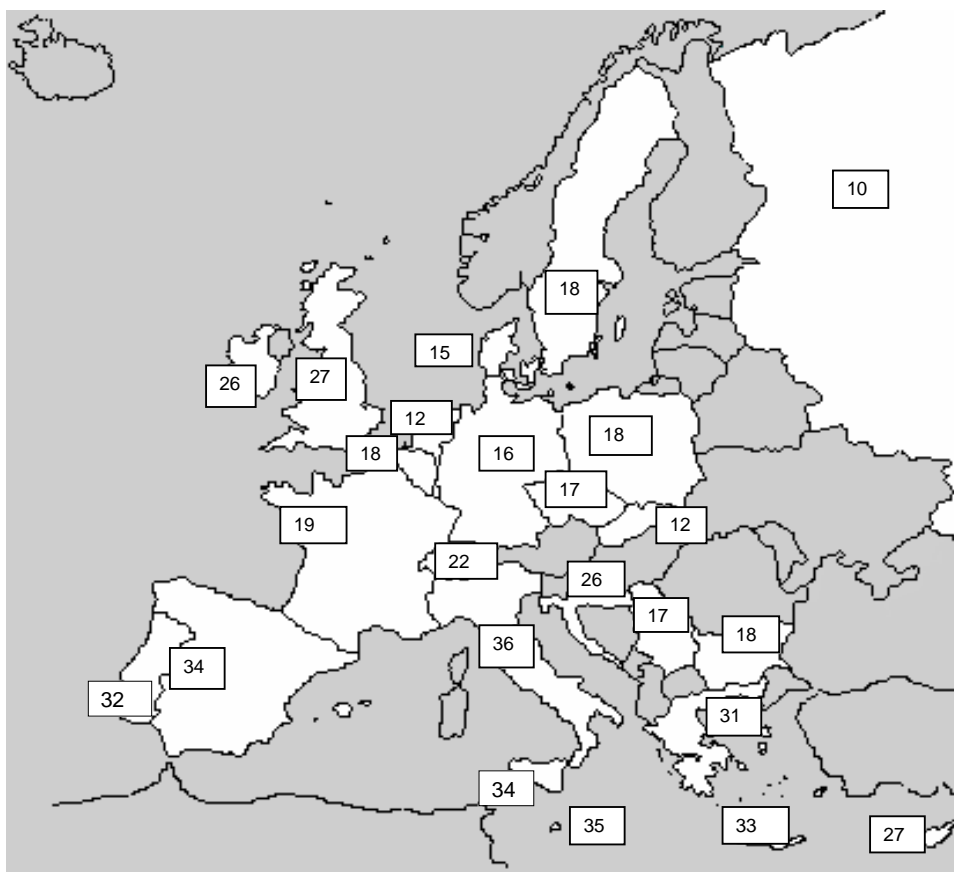
1. Introduction

Increasing obesity, especially in children, is being noted with mounting concern throughout Europe. The aim of the Children, obesity and associated avoidable chronic diseases project – a project co-ordinated by the European Heart Network, and part-funded by the European Commission, - is to contribute to addressing the obesity epidemic and associated avoidable chronic diseases in European children.

The International Obesity Task Force estimates that approximately 20% of school-age children in Europe are carrying excess body fat, with an increased risk of developing chronic disease. Of these overweight children, a quarter are obese, with a significant likelihood that some will have multiple risk factors for cardiovascular diseases, type 2 diabetes and other co-morbidities before or during early adulthood.¹

Figures for different countries and member states suggest that children are at particular risk in the countries around the Mediterranean and in the British Isles (see Figure 1) but the trend of rising prevalence rates is occurring in all countries for which data are available.

Fig 1. Percentage of children aged 7-11 years who are overweight. Data collected from national surveys 1995-2003.



Source: International Obesity Task Force (www.iof.org) 2004.

Within the enlarged European Union of 2004, there are an estimated 14 million overweight children, and this figure is increasing by around 400,000 each year. Of these children, 3 million are obese, and that figure is rising by some 85,000 children each year.²

The objectives of the Children, obesity and avoidable chronic diseases project are to:

- Measure and analyse food marketing to children and young people, building on earlier surveys. The project will focus on the extent and nature of marketing of 'unhealthy' foods such as foods high in fat, sugar or salt through various media and in different settings, and trends in marketing strategies.
- Consider policy options to address obesity in children by reviewing current options (such as legislation and self-regulation of food marketing), action designed to compensate for any adverse effects of the marketing of food to children, including media literacy programmes, marketing alternative 'healthier' products, and initiatives to promote physical activity.
- Complement activities and approaches at national level and stimulate concerted action among concerned organisations. A proposal for a programme of pan-European action addressing childhood obesity will be developed.

The project is taking place in three phases. Phase 1 involves mapping the policy terrain; Phase 2 will disseminate the findings of Phase 1, and Phase 3 will encourage organisations to develop a pan-European programme of action to address childhood obesity.

This report – a report of Phase 1 of the project - focuses on the marketing of food to children but it is acknowledged that changes to the way foods are marketed and otherwise promoted to children are only one way in which overweight and obesity in childhood needs to be tackled. Obesity in childhood is caused both the over-consumption of certain foods and insufficient physical activity so efforts need to be made both to improve children's diets and to raise their levels of physical activity. The promotion of healthier eating in childhood will involve a range of measures in a variety of settings: not just changing the ways foods are marketed to children. These measures will be considered in the later phases of this project.

This report also focuses on one aspect of the marketing of foods to children: promotion. Marketing consist of four components (four P's): 'promotion', 'product', 'price' and 'place'.³ We acknowledge that all four components are important but we have focused on promotion as central to marketing and it is this aspect of marketing which is currently of most concern.

Phase 1 took place during the initial twelve months of the thirty-two month long project, starting in March 2004. Phase 1 was led by the British Heart Foundation Health Promotion Research Group of the University of Oxford, one of the partners in the project.

The aims of Phase 1 were to:

- provide a context for the project by reviewing existing international evidence on the nature and extent of food marketing to children and the scope of relevant regulations.
- collect and analyse data from the 20 European countries participating in the project about:
 - the nature and extent of commercial marketing to children of foods high in fat, sugar or sugar and trends in marketing strategies,
 - the nature and extent of the regulation of food marketing to children,
 - attitudes towards food marketing to children amongst the various interested parties,

- the nature and extent of counterbalancing measures, i.e. activities which may compensate for any negative impact of food marketing to children.
- draw conclusions and make recommendations about food marketing to children across Europe.

In the final phase of the project, these recommendations will contribute to an integrated policy programme, to be developed by the European Heart Network, to tackle childhood obesity in the European Union.

References

- ¹ International Obesity Task Force (2004) Obesity in Children and Young People: A Crisis in Public Health (eds Lobstein T, Baur L, Uauy R). Obesity Reviews 5 (Supplement 1): 1-104.
- ² Lobstein T, Baur L. Policies to prevent childhood obesity in the European Union. European Journal of Public Health (in press).
- ³ Baker M J (1999) One more time – what is marketing? In: The Marketing Book. 4th edition (ed MJ Baker). Butterworth Heinemann: Oxford.

2. Research methods

In the first instance a review of the international literature on the nature and extent of the marketing of food on children's diets, its effects on children's diets and its regulation was carried out. This review focused on reviews of the literature rather than individual studies.

However the main aim of Phase 1 of this project was the collection and analysis of national level information relating to food marketing to children, the regulatory environment and measures taken to compensate for any negative effects of the marketing in 20 European countries: Austria, Belgium, the Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, The Netherlands, Norway, Portugal, Slovenia, Spain, Sweden and the UK. The aim was to provide a snapshot of the situation at the end of 2004, but we have added details of initiatives and reports since then, where to do so would have meant the omission of important developments.

The collection of information was undertaken by the national co-ordinators for the project using a specifically designed questionnaire. See Acknowledgements for a list of the national co-ordinators.

Development of the questionnaire began in March 2004. A draft questionnaire was discussed during a project workshop with co-ordinators in April 2004, and following revisions the final version was agreed and distributed in May 2004. The questionnaire was developed with accompanying Guidelines and a Glossary to assist co-ordinators with its completion and to ensure standardised responses from respondents.

To complete the questionnaire co-ordinators had to use a variety of methods, including searching electronic databases and the World Wide Web, to find relevant reviews, individual studies or reports of projects. The studies or reviews had to be published since 1990. The studies or reviews had to provide some detail of the methods used. This meant that they had to be published in academic journals or in reports published by established bodies (which included government departments and agencies, market research companies and public interest organisation) and that newspaper or magazine reports were excluded. The projects had to be ongoing at the end of 2004. The measures taken to compensate for any negative effects of the marketing of food to children had to be measures where children were a target audience (i.e. general measures, such as improvements to food labelling, or general campaigns to improve healthy eating or promote physical activity, were excluded).

Co-ordinators were asked to translate summaries of the relevant research reports and to produce summaries of the details of projects in English.

Co-ordinators collected information using the questionnaire from May to September 2004. Following a presentation of initial findings at a workshop in October, a process of data clarification was undertaken to provide confirmation or further details about information supplied. Thematic analysis of the information provided was undertaken from September to December 2004.

In most instances the co-ordinators had difficulty in collecting relevant information: particularly in relation to the type and amount of food marketing to children in their country. Relevant information could – in many cases - only be found with much difficulty and was often buried within reports written for other purposes. Some information – again particularly the type and amount of food marketing – was in most cases only collected by commercial bodies who were reluctant to divulge the information for commercial reason. This means that

the information presented in the following sections is probably incomplete. It should therefore be regarded as representative rather than comprehensive.

3. Food marketing to children: the European and global context

3.1. Introduction

This review complements the research conducted by the national co-ordinators for this project reported in the remainder of this document. It examines international surveys which have been conducted into the nature and extent of food marketing to children and reviews of the impact of children's diets on their diet and health. It examines reports which have reviewed the scope and impact of the regulation of food marketing to children in different countries.

3.2. Nature and extent of food marketing to children

3.2.1. Consumers International surveys

In 1996, Consumers International (CI) published a comparative survey of television advertising aimed at children and its regulation in thirteen industrialised countries: Australia, Austria, Belgium, Denmark, Finland, France, Germany, Greece, Netherlands, Norway, Sweden, United Kingdom and the USA¹. The study found that in virtually all countries, food advertising comprised the largest category of advertised products during programmes for children. A wide variation was found in the number of food advertisements broadcast – four countries had between 8 and 12 an hour (including France and the UK), whilst four countries had between one and two per hour (Norway, Sweden, Belgium and Austria), with the remainder falling between these extremes. Combining the data from this study with data on the prevalence of obesity a further study showed that exposure to food advertising and prevalence of overweight in children are correlated².

Whilst adverts for healthier foods such as fruit and vegetables were either non-existent or extremely few in number, confectionery, sweetened breakfast cereals and fast food restaurants accounted for over half of all food adverts. Other types of widely advertised food products were savoury snacks, dairy products, ready prepared foods, soft drinks, cakes, biscuits and desserts. It was noted that in the UK, 95% of foods advertised on television to children were for products high in fat sugar, or salt and that this finding was broadly consistent with studies in other countries.

The survey also monitored the use of programme sponsorship as a means of advertising to children and found that children's programming in five countries (Austria, Belgium, France, Greece, and the UK) had commercial sponsors. Once again, these sponsors were largely manufacturers of confectionery, sugary breakfast cereals, savoury snacks and fast foods.

A 1999 Consumers International survey of television food advertising to children in four Central European Countries (Hungary, Poland, Slovakia and Slovenia)³, also found that food comprised the largest category of advertised products to children in each country. Mirroring the earlier study, the foods advertised during children's programming were those unlikely to encourage a healthy, balanced diet, with adverts for confectionery, pre-sweetened cereals,

savoury snacks and soft drinks accounting for three-quarters of all food adverts. Confectionery advertising comprised, on average, over a third of all food adverts, a higher proportion than in Western European countries.

That the promotion of “unhealthy” food to children is a global phenomenon is reinforced by the publication in 2004 of a third Consumers International report, entitled, ‘The Junk Food Generation – A multi-country survey of the influence of television adverts on children’⁴. This report details the impact of food advertising directed at children in six countries in the Asia-Pacific region (India, Indonesia, Malaysia, Pakistan, the Philippines and South Korea). It shows that a high percentage of adverts during children’s programming (between 40 and 75%) are for foods of low nutritional quality.

3.2.2. The Hastings systematic review

The findings detailed in the three CI surveys are remarkably consistent with those presented in the 2003 review of research on effects of food promotion to children commissioned by the UK Food Standards Agency (FSA)⁵. This systematic review of the international literature, conducted by a team of researchers from four British Universities led by Professor Gerard Hastings at Strathclyde University, is commonly referred to as ‘the Hastings review’. The systematic review methods yielded 65 articles (describing 50 studies) on the extent and nature of food promotion to children and 55 articles (describing 51 studies) on the effects of food promotion on children’s knowledge, preferences and behaviour, all of which passed stringent relevance and quality criteria.

The Hastings review confirmed the results of CI’s surveys by concluding that television food advertising to children is dominated by pre-sugared breakfast cereals, soft drinks, confectionery, savoury snacks and fast foods. The researchers note that the currently advertised diet contrasts sharply with that recommended by public health advisers. Uniquely – and importantly – this review not only examined the extent and nature of food marketing to children, but also rigorously assessed evidence on the impact of that marketing. The review concluded that food promotion does affect children’s food preferences, purchase behaviour and consumption at both a brand level (e.g. which chocolate bar) and category level (e.g. confectionery versus fruit). Acknowledging that the literature focuses principally on television advertising the researchers explain that the cumulative effect of TV advertising when combined with other forms of food promotion and marketing is likely to be significantly greater than that found in many of the studies reviewed. The team also noted that the studies only considered the direct effects on individual children and not the indirect influences, such as advertising’s effects on parental behaviour, so their findings were likely to be further understated.

Since the publication of the Hastings review there have been several reviews of the review published and indeed reviews of those reviews. Firstly in October 2003 the Food Standards Agency published a report of an academic seminar set-up to compare the results of the Hastings review and a similar – but unsystematic review – of the literature commissioned by the Food Advertising Unit of the Advertising Association in the UK⁶. More recently the communications regulator – Ofcom – in the UK has published its own review of the Hastings review, industry commissioned reviews and Food Standards Agency and industry commissioned reviews of the reviews⁷. Both the FSA and the Ofcom commissioned reviews have endorsed the findings of the Hastings review.

3.2.3. BEUC and Consumentenbond survey

A picture of the wide range of commercial practices used to market food and other products to children is given in a 1996 survey of EU Member States on commercial communications directed at children and of regulations that control commercial communications, published by the Bureau Européen des Unions de Consommateurs (BEUC) and Consumentenbond⁸. The report details sales promotions including free gifts or collectable toys, character merchandising (for example, establishing a link between children's favourite film or TV characters) and competitions. Other strategies identified include sponsoring children's television programmes and product placement in programmes, adverts in children's comics and magazines, the growing use of the Internet, and in-school marketing.

The BEUC survey notes an increase in companies in the EU using schools as promotional channels, particularly in Belgium, Finland, Greece, Ireland, the Netherlands, Sweden and the United Kingdom. Examples of in-school marketing given in the report include direct advertising, provision of educational materials, sponsorship of school equipment and the use of inappropriate branding in school canteens.

The authors of the BEUC report conclude that for marketing professionals it has become less effective to reach children only through conventional television, radio and print media. Other advertising and marketing techniques are now simultaneously applied as part of an integrated marketing mix. Advertising is so ubiquitous it has become part of the fabric of children's lives and often children may not even notice that it is directed at them.

3.2.4. IACFO report

The scale and sophisticated nature of marketing strategies employed by international food companies is also detailed in a 2003 report by the International Association of Consumer Food Organizations (IACFO)⁹. The report contains many examples of child-orientated food promotions, which are designed to increase sales and build brand loyalty. It explains how a number of these techniques are often implemented as part of a food company's integrated marketing strategy to target children. They include competitions in children's comics, collectable tokens or wrappers, the use of sports heroes, character licensing, children's clubs, free collectable toys, interactive websites with games and downloads (see below), and targeting children in schools.

The IACFO report also details how new technologies, including the Internet, text messaging and e-mail are increasingly used by advertisers to obtain direct access to children, usually unmonitored by parents. Many food companies are using the Internet as an attractive and cost-effective way of reaching young people with their marketing messages. Web sites typically feature branded games, competitions, promotions, characters, sports sponsorship and 'kids only' zones that enable children to interact directly with the company, for instance voting on new flavours and pack designs.

3.2.5. WHO review

A WHO review published in 2002, primarily of the marketing activities of global soft drink and fast food companies in emerging markets, also details the large number and comprehensive nature of their marketing strategies¹⁰. The report notes that TV adverts for fast foods feature

young children, animation, good-looking youth, and celebrities popular with children, whilst those for soft drinks portray glamour, magic, excitement, rebellion and romance. (The Hastings review also noted the strong association between the use of animation techniques with children's food advertising and the use of humour, action-adventure and fun.) The WHO review points to the sale of 'Kids Meals' with a free toy as a means of instilling loyalty in young customers, the development of websites with games, promotions and prizes, and the sponsoring of music, sports and education among the multitude of tactics.

The report notes that via 'pester power' children have a major influence over parental buying decisions and that children have become "market makers" for global companies. It argues that the younger generation is targeted to encourage a culture of regular and frequent soft drink and fast food consumption, and to promote habits that will persist into adulthood.

3.3. Regulation of food marketing to children

3.3.1. The 2004 WHO review

In 2004 the World Health Organisation (WHO) published a review by Dr Corinna Hawkes of the global regulatory environment for the marketing of food to children, covering 73 countries from all regions of the world¹¹. This is the most comprehensive review of the regulation of food marketing to children undertaken to date and is therefore extensively cited in the following sections.

According to this review, regulation can be categorised into three types: statutory regulation (enshrined in law); non-statutory government guidelines (not enshrined or mandated by law); and self-regulation (where industry is responsible for its own regulation). The review explains that a wide range of regulations have the potential to affect the techniques used to market food to children, including those that apply to all age groups and all products, those that are specific to children and those that are specific to food marketing. (The 1996 CI report was unable to find specific rules on food advertising to children beyond the rules which must apply to all advertising.)

Although when specified in national broadcast legislation, the definition of a 'child' ranges from under 12 years of age to under 16 years of age, the review notes that most regulations do not specify criteria for defining 'child-directed marketing'. Exceptions include those that operate in Canadian Quebec, Norway and Sweden, but these apply only to television advertising (see below).

The review comments on six marketing techniques widely used by companies to promote food to children: television advertising, in-school marketing, sponsorship, product placement, sales promotions and Internet marketing. Dr Hawkes notes that regulations tend to focus on television advertising and in-school marketing in richer countries, and less on non-traditional forms of marketing. The growing use of promotional activities in poorer countries is also largely unregulated.

3.3.2. International Chamber of Commerce codes

In the review, Dr Hawkes explains that globally, the development of self-regulatory codes has been influenced by the International Chamber of Commerce (ICC) codes of practice, which many countries have adapted to form their own national systems of advertising self-regulation.

The stated objective of the part of the ICC International Code of Advertising Practice specific to children (revised in 1997)¹² is to protect children from advertising that is exploitative of their credulity, is misleading, harmful or damaging to health, makes children feel inferior compared to their peers, or makes a direct appeal to children. A similar provision for children exists in an ICC International Code on Sponsorship (revised in 2002)¹³ and the need for child protection is acknowledged in ICC Guidelines on Internet marketing¹⁴.

In 2004 the ICC reviewed its codes and guidelines in relation to the marketing of food and drink – particularly to children - and published a 'Framework for responsible food and beverage communications'¹⁵. This Framework supports the principle of the freedom of commercial speech but recognises that children deserve 'careful treatment' 'because of their lack of experience as consumers'. It emphasises that commercial communications must be legal, decent, honest and truthful, but maintains that parents are primarily responsible for their children's choices. It asserts the need for all parties to help children develop a critical understanding of advertising.

The Framework suggest that adverts should not

- advocate nutrition and health benefits without sound scientific evidence
- undermine the importance of healthy lifestyles
- mislead the consumer about the nature or composition of products
- use broadcast or print media personalities when directed to children, so that the distinction between programmes and adverts is blurred
- create a sense of urgency in children, suggest that the product will increase popularity with peers or success in school or sports
- undermine the role of parents or directly encourage children to persuade parents to buy advertised products for them.

In 2004 the Confederation of the Food and Drink Industries of the EU (CIAA) published their 'Principles of food and beverage product advertising' based largely on the ICC Framework but with a few minor differences. Like the ICC the CIAA considers that children should be regarded as a special category of consumer, stating that 'advertisers must take into account the abilities and judgement of children at various stages of development'¹⁶.

It should be noted that the ICC Codes do not prohibit the advertising or sponsorship of any specific product type, nor prohibit or control advertising to any particular age group, nor control the frequency and/or volume of advertising or the time of adverts in children's programming.

BEUC (1996) notes the lack of a regulatory framework in EU Member States on advertising and children. It explains that specific provisions to protect children from advertising and marketing are laid down in various pieces of legislation, in self-regulatory codes, or a combination of both. It further reports that self-regulation of advertising to children exists in all Member States (in 1996), partly because the ICC guidelines apply in each of them. It notes however that the nature and impact of self-regulation can differ substantially between Member States, depending on whether the rules have been developed by industry alone, or in consultation with consumer groups.

3.3.3. Television advertising

The review found that television advertising was the most common means of promoting food and drink products and was also the most regulated. Of the 73 countries surveyed in the WHO report, 85% (62 countries) have regulations on television advertising that specifically refer to children. Almost half - 32 countries (44%) - have specific restrictions (all but two being statutory) on television advertising to children, restricting the timing and content of television adverts directed at children.

The report explains that the objective of statutory regulations on television advertising is usually to ensure that advertisers abide by certain guidelines and to restrict the timing and content of adverts. Usually there is also an underlying principle that advertising should not be deceitful or misleading. Regulations often recognise children as a category in need of special consideration and national legislation often states that adverts must not:

- exploit the credulity of children
- be harmful to their physical, mental or moral health
- make them feel inferior to other children who possess the product
- induce children to pressurise their parents into purchasing a product

The review details that all 33 European countries reviewed have some form of regulation on television advertising. Twenty-seven countries have self-regulatory codes which are based upon the ICAP principles and which coexist with statutory guidelines on advertising to children. The remaining six countries have stand-alone legislation that sets statutory guidelines and/or restrictions on advertising to children. For the most part, legislation in Europe is guided by the EU Television without Frontiers Directive which prescribes protective - but non-food related - criteria which must be observed when advertising to children¹⁷.

Two countries (Sweden and Norway) and one province (Quebec) have banned television advertising to children. Whereas CI (1996) states that the effect of these bans is to limit to a great extent the exposure of children to TV advertising, Dr Hawkes explains that the effect of such bans on children's diets is difficult to evaluate. This is because these bans are increasingly undermined by cross-border TV advertising (i.e. advertising on satellite or cable TV that originates from another country) and by other marketing techniques.

Although 22 countries have specific regulatory or self-regulatory provisions on food advertising, Dr Hawkes notes in the review that she was unable to find any national regulations which explicitly banned or restricted food advertising to children. However, 13 countries have clauses about food that are specific to children, the purposes of which are generally to prevent adverts targeted at children promoting an unhealthy diet, to prohibit misleading adverts about the nutritional value of food and, in three countries, to promote good dental hygiene. However implementation of these clauses and their effects on children's diets has not been evaluated, and in most countries it is not clear how these guidelines are applied, interpreted or enforced.

3.3.4. Marketing in schools

The review notes that the practice of in-school marketing is growing on a global scale and food companies are a very visible part of this approach. Techniques used include direct advertising (e.g. posters), indirect advertising (e.g. sponsorship of school materials) and product sales.

Most countries do not have specific regulations on in-school marketing and, in Europe, this area is treated more leniently than direct advertising. Regulations were noted in only 24 of the 73 (33%) countries surveyed (not including voluntary guidelines) and only a handful of countries restricted sales of particular food products in schools.

Such regulations as exist include statutory restrictions, non-statutory government guidelines or voluntary guidelines developed by educational organisations or industry. The stated aim of such regulations is to restrict marketing in schools and/or to ensure that marketing conforms to ethical principles and include:

- an outright ban on commercial activities in schools,
- restrictions on specific forms of advertising, such as advertising in school television programmes, sales promotions and textbook branding, and
- general guidelines on advertising and/or sponsorship.

A report published by the European Commission in 1999¹⁸ on the impact and regulation of advertising and direct marketing in schools, suggests that bodies responsible for regulating advertising take the view that there is no reason for them to apply specific rules to schools. They regard themselves as responsible only for the content of the advertising message, irrespective of the way in which it is transmitted. Consequently, codes of good conduct have been adopted at the initiative of organisations such as consumers', parents' or teachers' associations. In the UK, the Incorporated Society of British Advertisers has recognised its role and worked with the Consumers Association in 2001 to draw up guidelines¹⁹.

The report of study carried out for the European Commission explains that where rules exist, they are the responsibility of the Ministries of Education of the countries concerned. However, it further explains that even though such rules tend to ban all 'commercial practices' in schools, because of a lack of clear and precise definitions of what constitutes a 'commercial practice', such bans are, in practice, very easy to circumvent. Hawkes also notes the differences in the interpretation of 'commercial activities' and gives this as a reason for the mixed impact of restrictions across Europe. The EC report states that although, in theory, advertising in schools is banned in six EU countries (Belgium, France, Germany, Greece, Luxembourg and Portugal), in practice it exists everywhere.

3.3.5. Sponsorship, product placement and sales promotions

The WHO review describes the regulation of non-traditional forms of marketing to children, such as sponsorship, product placement and sales promotions, as "patchy".

Spending on sponsorship, according to the WHO report, increased more than twelve-fold between 1984 and 2000. Although sponsorship (of sporting and musical events and television programmes) and sales promotions are widely used techniques to market food to children and regulations are common, it is noted that they are only rarely specific to children and/or food. As a consequence, regulations seldom focus on their potential effects on children's eating patterns.

The review was able to identify child-specific regulations on sponsorship in only six of the 73 countries reviewed and these covered the sponsorship of children's television, and not other media or event sponsorship. Three countries (Finland, the Netherlands and Norway) have government regulations banning the sponsorship of children's television programmes, and three countries rely on self-regulation. Where children are singled out for special treatment, regulation is based on acknowledgement of the fact that children may have difficulty in recognising sponsorship as a form of advertising.

According to Dr Hawkes, product placement is gaining in popularity as a marketing technique almost everywhere. Logos, brands and products, for instance, are now found in many forms of visual entertainment, most notably films, but also in television programmes, music videos and computer games.

In line with other indirect, non-traditional marketing techniques, the review found product placement was not widely restricted. Only 23 of the 73 countries reviewed have some form of statutory regulation on product placement and no self-regulatory approaches were identified. It was very rare for national regulations to restrict product placement targeted at children and none of the identified regulations refer specifically to food.

However, Dr Hawkes explains that any form of regulation to restrict product placement will implicitly limit food marketing to children via this technique. With this in mind, four European countries (Austria, Belgium (Flemish community), Ireland and the United Kingdom) explicitly ban product placement in television programmes. But product placement in films broadcast globally is not subject to statutory regulation. Furthermore, product placement can be hard to prove and unless regulations are robust, food brands and products may be promoted surreptitiously.

The review notes that expenditure on sales promotions is larger than advertising expenditures in many European countries. Although regulations to prevent deceptive sales promotions are widespread, children are only mentioned in five of the 73 countries reviewed and in only one country do the regulations specifically refer to food promotion. Where they exist, statutory regulations specific to children are based on the recognition that children have less experience of sales promotions and are thus less able to understand them.

3.3.6. The Internet

Children have been identified as a prime target group for Internet-based advertisers, but the WHO review concludes that as marketing on the Internet is relatively new, its regulation is still at the developmental stage in most countries. However, several countries have developed, or are in the process of developing statutory or self-regulatory approaches to Internet marketing.

On-line marketing strategies aimed at children noted in the WHO report include interactive activities, clubs, competitions, attractive sites with bold, eye-catching graphics and the use of chat rooms and e-mail facilities. Many food companies design their web sites with children and teenagers in mind, often providing sophisticated interactive sites with games and promotions.

Although the ICC guidelines recognise that children require special consideration from Internet marketers, most existing laws and self-regulatory codes covering the Internet do not appear to contain clauses on marketing to children. The review identified regulations (mostly in the form of general guidelines) specific to Internet marketing to children in only 13 of the 73 countries surveyed. Although the general guidelines may implicitly limit the ability of food companies to market to children and, in particular, obtain information from them, none of the Internet marketing regulations identified mentions food specifically. Some European countries' national laws on advertising and consumer protection may, however, also apply to the Internet.

3.4. Summary

It is clear from the review of the international literature that, in general, the commercial marketing to children of food and drink is dominated by unhealthy products. Manufacturers of these foods are increasingly using integrated and sophisticated marketing strategies to promote their products directly and indirectly to children.

The only relevant international surveys of the nature and extent of television advertising aimed at children were carried out in 1996 and 1999 by Consumers International. The European countries covered were: Austria, Belgium, Denmark, Finland, France, Germany, Greece, The Netherlands, Norway, Sweden and the United Kingdom,²⁰ Hungary, Poland, Slovakia and Slovenia²¹. These surveys found that in virtually all countries, food advertising comprised the largest category of advertised products during programmes for children, with between one (Sweden) and eight (France) advertisements an hour. The foods advertised were generally confectionery, pre-sweetened cereals, savoury snacks or soft drinks, with up to 95% of food advertisements on television being for products high in fat, sugar or salt.

Whilst television continues to be used as a powerful food marketing method and in-school marketing is increasingly exploited, many other non-traditional marketing strategies are becoming more prominent. One of the fastest growing ways to market food to children is via the Internet, which is also one of the least regulated advertising channels. It is becoming common for food companies to use an integrated marketing mix of traditional and non-traditional techniques when targeting children.

There are several reviews of the effects of food marketing on children's diets. The most important of these – because it used systematic methods – is the Hastings review, commissioned by the UK Food Standards Agency and published in 2003²². The review concluded that food promotion does affect children's food preferences, purchase behaviour and consumption at both a brand level (e.g. which chocolate bar) and category level (e.g. confectionery versus fruit).

A 2002 World Health Organization (WHO) review noted that via 'pester power', children have a major influence over parental buying decisions and children have therefore become 'market makers' for global companies. The review also argues that the younger generation is targeted in order to encourage a culture of regular and frequent soft drink and fast food consumption and to promote habits that will persist in adulthood²³.

The most important review of the regulation of food marketing to children is a review commissioned by the WHO and published in 2004²⁴. It establishes that there are clear differences in the nature, scope and enforcement of regulations between countries and identifies significant gaps in the global regulatory environment. For instance, existing regulations tend not to recognise food as a category in need of special consideration from a public health standpoint. Thus regulations rarely aim to minimise consumption of 'unhealthy' foods.

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4. Results

4.1. Types of unhealthy foods that are commonly consumed by children

Given that the focus of this project is the marketing of 'unhealthy' foods to children and particularly of foods that are high in fat, sugar or salt to children, national co-ordinators were asked to provide information about the types of foods that are high in fat, sugar or salt that are commonly consumed by children in their country. Most used government reports of nutritional surveys for this information. Table 4.1 provides a summary of the foods reported as most commonly consumed by children in the participating countries.

Table 4.1 Foods high in fat, sugar or salt commonly consumed by children

Food type	Number of countries (n=17)
Potato crisps/chips	17
Chocolate/confectionery	17
Cakes/biscuits/croissants etc.	15
Fast food (e.g. burgers, sausages, hot dogs etc)	13
Sugary carbonated drinks	13
Savoury snacks (e.g. nuts, pretzels, popcorn)	13
Sugar or chocolate coated breakfast cereals	11
Full fat milk/flavoured milks	7
Ice cream	7
Sugary/high fat yoghurt products	6
Sweetened desserts	5
Chocolate spread/jams etc.	5
Margarine/butter/oils	4
Meat/meat products	3
Other (dressings, full fat cheese, pre-prepared meals, canned fish, pizza, high salt mineral water)	11

Table 4.1 shows that the national co-ordinators identified a number of common food products that were high in fat, sugar or salt and commonly consumed by children – i.e. savoury snacks, confectionery, cakes and biscuits, fried foods, sugary drinks and breakfast cereals.

UK data shows that these foods make up eight of the top ten sources of calories in children's diets, accounting for over 50% of a typical child's energy intake (See Table 4.1a).

Table 4.1a: Top 10 sources of energy from food for UK children aged 7-14 years

		energy provided
1	milk, milk products	10-12%
2	biscuits, cakes, pastries	10-12%
3	bread	10-11%
4	sausages, burgers etc	8-9%
5	breakfast cereals	5-7%
6	potato chips (frites)	5-7%
7	chocolate candy	5-6%
8	savoury snacks	5-6%
9	soft drinks	4%
10	sugar candy	3-4%

The range is for different age groups and genders

Source: Gregory et al, 2000¹

However the co-ordinators noted that there is no commonly agreed definition for an 'unhealthy' food or even a food that is high in fat, sugar or salt. Some countries (such as the UK and France) are developing methods of nutrient profiling so that working definitions of 'unhealthy' (or 'foods high in fat, sugar or salt') and "healthy" foods can be agreed.

Any future plans to protect children throughout Europe from the marketing of 'unhealthy' foods will need either mutual recognition of different national definitions, or a pan-European definition of "unhealthy" food.

Reference

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4.2. Type and amount of food marketing to children

4.2.1. Introduction

Research undertaken post-1990 in each country, on the type and amount of food marketing to children is categorised in this section by the main promotional channels used by advertisers – television, schools, and other media such as radio, cinema, magazines and the Internet. Although the marketing of foods to children is of growing concern, many of the national co-ordinators reported that little or no independent or publicly available research on the issue had been conducted in their countries, and those that were able to report had mainly current figures, with very little available on recent or historical trends.

4.2.2. Spending on advertising

Television advertising dominates the food advertising market in **Germany**, taking 87% of the advertising spend. 6% of total food advertising spending in Germany is for magazine advertising, 2% for radio and only 0.66% for Internet, though no data is available specifically for food or for children^{1,2}. However, in a survey which showed the growth in importance of the Internet for advertising two thirds of German companies surveyed used the Internet and half of these companies advertised food to children, mainly through direct advertising and games³.

In **France** the total amount of money spent by the food industry on advertising in 2003 was €1.9 billion⁴, of which about 70% was spent on TV advertising⁵.

In **Greece** spending on TV advertising dominates food advertising spend: 41% of the spending on all food advertising in the first 6 months of 2004 was on TV advertising⁶. Spending on the marketing of snacks rose from €4.6million in 2002 to €5.6 million in 2003 and the total budget for children's food marketing increased by 38% from €1.3million in 2002 to €1.8 million in 2003⁷. Only €5.6 million out of total spending on advertising of €1,050 million (6%) in Greece was for radio advertising⁸.

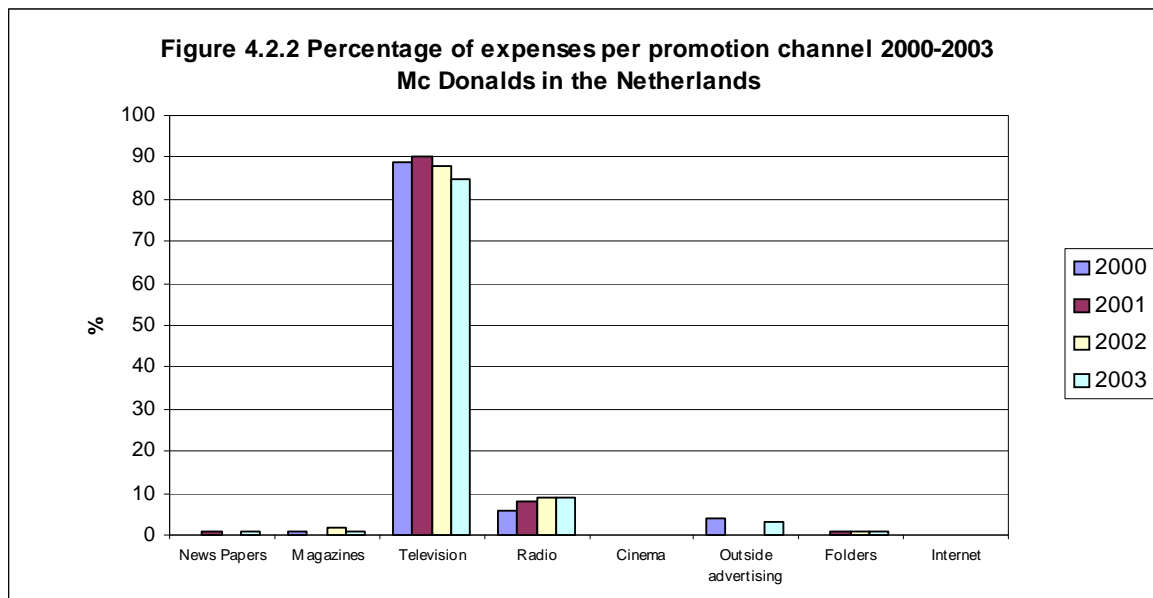
In **Italy** the total spending on food advertising from January to November 2004 was €1,052,986 of which 88% was for television advertising (see Table 4.2.2a). Internet advertising only accounted for about 1.2% of advertising spend in 2004 though this was 30% more than in 2003⁹. In 2004 only 3.7% of the food advertising budget was for the promotion of 'healthy' food such as fresh fruit and vegetables, frozen vegetables and canned fruit, vegetables and pulses¹⁰.

Table 4.2.2a Promotional Channels used by Advertised Food Brand by Spend in Italy

	2003 (Jan-Nov) (€)	2003 (%)	2004 (Jan-Nov (€)	2004(%)
Press	93,341	8.6	82,500	7.8
Cinema	10,314	1	11,340	1.1
Radio	17,886	1.6	23,546	2.2
Outdoor	12,542	1.1	11,805	1.1
Television	957,130	87.7	923,796	87.8
Total (all Promotional Channels)	1,091,213	100	1,052,986	100

Source: Nielsen Media Research¹¹

Figure 4.2.2 analysing McDonalds expenditure on advertising in **The Netherlands** shows that as with total expenditure on food advertising in the UK (see below), spending on television advertising appears to be falling as a proportion of the total, although its dominance over other promotional channels is still clear. However advertising spend in the food industry as whole in The Netherlands grew by 128% between 1994 and 2003¹².



Source: BBC, 2003

In **Sweden** in 2003, the TV advertising budget for high energy food products (such as chocolate, sugared breakfast cereals, ice-cream, soft drinks, confectionery and fast food) during the hours when many children are watching amounted to SEK 238 million – SEK 25 million for advertising during the hours 07.00 - 08.00 and SEK 213 million for the advertisings during the hours 7.00 - 20.00¹³. (Note that in Sweden there is technically a ban on advertising to children under12).

Market research data for the **UK**¹⁴ shows that the advertising spend for all food and drinks accounted for 7% (£743m) of the total advertising spend (£10b) in 2003. TV took the largest market share as a promotional medium in 2003, taking 36% of the total advertising spend. Of this share, 72% was devoted to the promotion of all food, soft drinks and fast food. There is some UK data¹⁵ to show that the total amount spent on food marketing is increasing (see Table 4.2.2) but the amount spent on TV advertising may be falling.

Table 4.2.2b Promotional Channels used by Advertised Food Brand by Spend in the UK

	1994 £	1994 %	1998 £	1998 %	2002 £	2002 %
Press	27,725,675	7.7	42,475,694	9.5	42,678,099	9.4
Cinema	4,599,387	1.3	6,996,346	1.6	11,543,145	2.6
Radio	2,737,497	0.8	8,738,025	1.9	16,242,834	3.6
Outdoor	12,863,159	3.6	25,374,517	5.6	39,582,806	8.8
Television	311,678,519	86.7	365,523,498	81.4	339,456,036	75.1
Direct mail	N/A	-	N/A	-	2,453,171	0.5
Total (all promotional channels)	359,604,237	100	449,108,080	100	451,956,091	100

Source: Hastings et al, 2003¹⁶

In comparison to spending on TV advertising, spending on other media – though rising – remains relatively low. In the UK in 2003, 13% of total spending on food, soft drinks and fast food advertising was via the Internet, making it the second most important promotional channel after television. This represents 0.94% of the total advertising budget in the UK. There is no trend data available since this is a relatively new channel available for marketing¹⁷.

4.2.3. Television advertising

Type and amount

The Danish Consumer Agency monitored children's TV in **Denmark** for a 6 month period in 2000¹⁸, and again in 2002¹⁹. In the 2000 study 1600 food commercials were noted of which 93% were for unhealthy foods, compared to 931 food commercials in 2002 all of which were unhealthy.

In **France** 70% of all TV advertising for foods is for products high in sugar such as cakes, chocolate, ice-cream, chocolate bars, cereals and sweets²⁰.

A survey of children's TV on eight TV channels in **Germany** in 2000 found that 12% of air-time was devoted to advertising, and 30% of the advertising was for food, mostly for

breakfast cereals, chocolate, ice cream and fast foods²¹. One private TV channel broadcast up to 20 food adverts per hour during times when children were typically watching TV. These adverts were mostly for unhealthy foods²².

In **Greece**, most TV food marketing takes place during early Saturday and Sunday mornings. Advertising breaks occur in programming every 20 minutes followed by roughly 8 minutes of advertising²³.

Children's programmes were surveyed for one month on **Ireland's** Network 2 in 2002. Of all adverts to children, 54% were for unhealthy products, mostly cereals, biscuits and sugary drinks²⁴.

Private TV channels show six to seven times more adverts than public TV channels in **Italy**. Of all these adverts 29% advertised food to children. Of these, 49% were for unhealthy foods with only 2% promoting fruit and vegetables²⁵.

It is estimated that **Spanish** children watch on average 2,5 hours of television per day, which implies that during this time, a child between four and twelve years old sees an average of 54 advertisements.²⁶ According to a consumer's organisation survey, a child of 4 -12 years old saw 346 food advertisements in 2004, of which 17% were for dairy products, 15% for cakes and biscuits, 14% for fast-food and 13% for candies. Thirteen of the twenty-five main companies advertising on TV during children's hours are food producers.²⁷

In **The Netherlands**, all children's TV adverts were monitored between January and August 2002 revealing that 12% were for savoury snacks, 6% for sweets, 3% for soft drinks, and 1% for candy bars²⁸. A further content analysis conducted in the Netherlands monitored 216 hours of children's TV. Of the 2500 adverts noted, 58% were for toys and games, 12% each for candies/snacks and music/videos, 6% for non-alcoholic drinks and 5% other foods²⁹.

Several studies of TV advertising aimed at children have been undertaken in the **UK**. An analysis of two batches of 35 hours of children's TV on ITV in 1995 showed that food adverts took up seven out of every ten slots. It demonstrated a huge discrepancy between the recommended diet and the advertised diet, with only two out of the 549 adverts recorded promoting fruit and vegetables³⁰.

A recent study comparing references to food in television programmes with those in advertisements found that references in programmes were much more likely to be to healthy foods than those in adverts. For example 33% of references in programmes were to fruits or vegetables compared with 2% in adverts³¹.

A content analysis of 92 hours of children's TV in the UK in 1998 found that of all food adverts 30% were for cereals, 30% were for sweets and snacks, 34% were for other food and 6% were for fast food³². A further study monitored 38 hours of children's TV in 2001 revealing the way this contains more food advertising than adult TV – 48% for Saturday morning viewing, 58% for children's hour as against 21% for post 9pm adverts. Unhealthy products were promoted in 95-99% of the adverts³³.

Market research data for 2003 estimated that children see an average of 28 TV adverts per day in the UK, five of which are for all food, soft drinks and chain restaurants. 43% of all food, soft drink and chain restaurant adverts are seen in children's air-time. Younger children (4-9 year olds) see more adverts for all food, soft drinks and fast food (54%)³⁴.

Creative strategies

A study carried out in **Germany** showed how food products are linked with aspects of children's culture e.g. movies and their characters, and suggests that this strategy has a stronger influence than traditional marketing methods³⁵. In Germany food products are promoted by using fantasy as a creative strategy in advertising to children³⁶.

Common creative strategies in TV advertising in **Greece** include the use of children's heroes and offering gifts with product purchases³⁷.

Research in **Italy** found factors affecting children's food choice included sweetness, familiarity (how often it is suggested), and hedonistic values (the attractiveness suggested by adverts, family members and celebrities). Hedonistic values are suggested by the use of positive contexts, social rewards and celebrities, thus influencing children's food choices and eating habits³⁸. Research using content analysis of 12,765 adverts across eight TV networks revealed the main creative strategies and techniques: the use of mothers as the main protagonists in adverts, cartoon and fantasy use, celebrity endorsement, the use of 'free gifts' tied to products, and the use of health claims³⁹.

A survey conducted in **Spain** in 2004 found that the main strategies used in advertising to children are: giving presents with the product (66%), using celebrities (50%), and associating the use of the product to unreal properties such as being the best sportsman (41%)⁴⁰.

A content analysis of 2500 adverts in 216 hours of children's TV in **The Netherlands** in 2002 found the top five creative strategies used in advertising candy and snacks – pleasant taste (89%), humour (86%), newness (31%), fun (17%) and action-adventure (14%). The top five creative strategies used in all adverts to teenagers were categorised – having the best (23%), fun (21%), seizing opportunities (21%), being modern (18%), being 'cool' (18%). An analysis of the creative strategies of all adverts found specific child-related appeals (play, fun, action-adventure, humour) in toy and candy adverts⁴¹.

A **UK** survey of 223 11-18 year olds in 2000 showed that young people could repeat almost verbatim the voice-overs in food adverts⁴². A further study involving the content analysis of 92 hours of children's TV demonstrated how food adverts are significantly more likely to use cartoons, use humour, feature a story, and be mood altering/fun in nature. Child-orientated adverts across all products are more likely to contain themes of magic or fantasy⁴³.

4.2.4. Schools-based marketing

A survey of elementary schools (6-13 years old) in **Finland** was conducted by the Finnish Consumers Association to assess the extent of food marketing in schools. The school canteen plays an important role in school nutrition education provision and commercial food promotion has grown in this sector. Regular events in canteens are themed Health Weeks. The most popular are Heart Weeks (20%) sponsored by Unilever, Vegetable Weeks (15%) sponsored by the Finnish Horticultural Products Society and Bread Weeks (14% sponsored by Finnish Bread). Other companies such as Knorr and Nestle sponsor weeks with an international theme. Materials produced for the weeks bear company logos and refer to specified brands names, and marketing is embedded in the educational information. The main aim of commercial involvement is to sell products, but caterers see the weeks as providing variety and good recipes, and appear not to recognise the commercial intent⁴⁴.

In **France** there are between 6000 and 8000 food and drinks vending machines in secondary schools. Eighty percent of them are in schools for 15-18 year olds and 20% in schools for 10-15 year olds⁴⁵.

School has also grown as a promotional channel for advertisers in **Germany**. Since the relaxation of states school laws, in a climate of decreasing school funds, new strategies have included token collection promotions linking food products from companies such as Kellogg's and Bahlsen to the purchase of school sports equipment, or to savings for school trips⁴⁶.

Commercial sponsorship in schools in **Ireland** has similarly increased to try to generate income⁴⁷.

In the **UK**, a government audit report has noted, with concern, schemes involving pupils in collecting tokens from biscuit and crisp packets which schools then exchange for educational equipment. The contradiction is highlighted between this type of commercial activity, which may encourage children to purchase unhealthier foods, and other initiatives to promote a balanced diet⁴⁸. A project which demonstrated how healthier drinks vending machines can be introduced into UK schools⁴⁹, suggested how the growth of high sugar carbonated drinks was contributing to rising levels of obesity. Vending machines in schools are seen as a growing market for drinks companies where a medium-sized school can make a profit of between £10,000 and £15,000 per annum.

In **Italy**, however, school vending machines are a relatively new introduction which have encountered some cultural difficulties⁵⁰.

4.2.5. Other media

As noted in Section 3 new opportunities for food marketing to children across Europe have arisen in recent years with the advent of 'new' media – Internet, text messaging and email – a trend noted in **Estonia**⁵¹.

In **Ireland** commentators have noted that interactive 'fun-orientated' Internet games and competitions engage children's attention and enable food companies to 'brand-stretch' across channels⁵².

The Hellenic Heart Foundation in **Greece** conducted exploratory research in Athens cinemas⁵³. During all children's movies there were adverts for unhealthier foods beforehand and also during some intermissions. The cinemas sold many unhealthier foods including chips, chocolate, popcorn and ice cream. Internet promotion strategies for unhealthier foods to Greek children⁵⁴ include online games ("advergames"), which include food company websites. One food company website example has a number of "advergames" referring to 17 of their products.

In **Norway** it was found that these multi-media approaches via the internet lead children to difficulties in distinguishing between advertisements, information and entertainment⁵⁵.

An exploratory review of food promotion via the Internet in the **UK** has highlighted the growth in on-line marketing for children's foods. Creative strategies include using cartoon-style music quizzes, competitions, games, animations, educational content and links to other sites. Sites with some educational content can exploit the use of the Internet in schools, and companies' collection of marketing data is aided by competitions which encourage children to register on-line. Another advantage to advertisers of this form of marketing is the reported "addictive" nature of the Internet⁵⁶.

4.2.6. Summary

Comparable information on the type and amount of food marketing to children proved particularly difficult to gather. Very little is publicly accessible and such statistics as are available are expensive to purchase from market research companies. Often data relating specifically to children are not produced, so most national coordinators were unable to report this information. However, from the information available it is clear that food advertisements during children's TV overwhelmingly promote 'unhealthy' foods, with very little promotion of fruit and vegetables and other 'healthy' foods.

The extent of unhealthy food marketing to children varies from country to country. For example this project found that estimates of the percentage of TV advertisements for food aimed at children that were for unhealthy foods ranged from 49% in Italy to nearly 100% in Denmark and the UK.

For some countries the project coordinators were able to find information on spending on food advertising in general. In the UK £743 million was spent on food and drinks advertising in 2003, and some data show that the total amount spent on food marketing is increasing. In Germany, total food advertising represents 87% of television advertising spending. In The Netherlands advertising spending by the food industry as a whole grew by 128% between 1994 and 2003. In Greece, specific figures regarding budgets for children were found showing that the total budget for children's food marketing increased by 38% between 2002 and 2003, from €1.3 million to €1.8 million. In Sweden in 2003, the cost of TV advertising for high-energy products such as chocolate, breakfast cereals (predominantly sweet cereals), ice-cream, soft drinks, confectionery and fast food amounted to SEK 25 million for advertising from 07.00-08.00 and SEK 213 million for advertising from 17.00-20.00. These are the main hours when children are assumed to watch television.

Creative strategies used by food advertisers when targeting children include close links with children's culture, such as references to movies and their characters, and using child-related appeals to play, fun, action-adventure, humour and magic or fantasy. Many advertisements make use of cartoon or celebrity characters.

Recent UK statistics suggest that spending on advertising in the food sector may be increasing, though the proportion spent on TV advertisements may be declining. Nonetheless, the vast majority of food promotion is through television, with food promotion through radio, magazines and cinemas taking a low and possibly declining proportion of advertising spending in the countries which reported data.

Schools, on the other hand, represent a growing marketing channel for food advertisers in European countries. Strategies include sponsoring events, linking food product purchasing to the provision of educational or sporting equipment often involving token collection schemes, and selling unhealthy food and drink products in vending machines. In Ireland, for example, food companies sponsor a wide range of sporting activities and competitions in schools, as well as providing branded educational materials about particular products.

The Internet is also a new and growing medium for food advertisers, although very little data on Internet advertising spending is reported. Creative strategies include cartoon-style games and competitions, links to food company websites, and educational content which appeals to schools. The addictive quality of web-surfing is an advantage to advertisers.

Although the general picture is clear and builds on earlier research (see Section 3), the evidence on the type and amount of food advertising to children could be strengthened, both within and between countries. A recent UK review makes a similar recommendation, adding

that a consistent approach is needed, since existing studies are hard to compare because of differing focuses and methods.⁵⁷

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4.3. Regulation of food marketing to children

4.3.1. Introduction

There are a number of alternative approaches to regulating food marketing to children and this section sets these out as reported by the national co-ordinators. Therefore this section updates the report carried out by Dr Corinna Hawkes for the World Health Organisation and cited extensively in Section 2.3 of this report.

Firstly countries differ widely in their interpretation of the age at which they consider the need for special protection for children ends, at least as regards protecting them from advertising and marketing:

- <12 years – **The Netherlands, Norway and Sweden**
- <14 years – **Greece and Slovenia**
- <15 years – the **UK**, for statutory rules on broadcast adverts
- <16 years – the UK, for voluntary rules on non-broadcast adverts
- <18 years – the **Czech Republic, Denmark, Hungary, Ireland, and Portugal**
- <21 years – **Estonia**

Some codes do not specify an age at which the rules apply, but refer only to “minors”, “small children”, “teenagers” or “young people”.

Secondly countries differ widely in the ways in which they regulate advertising and marketing. However even though many advertisers approach marketing in an integrated way, developing complementary strategies in a variety of media, most countries seem to regard each medium as separate, regulating them in different and sometimes inconsistent ways. This section therefore categorises the regulation of advertising into broadcast and non-broadcast media, then paid-for Internet and company websites.

4.3.2. Broadcast advertising

In all 20 countries there is one or more statutory codes on broadcast advertising – i.e. on TV and radio - referring specifically to children. However, only six countries have codes with specific rules on food marketing (**Denmark**¹, **Finland**², **Germany**³, **Ireland**⁴, **Spain**⁵ and the **UK**⁶), and only four of these include particular references to children and food marketing.

Much of the legislation is based on the EU’s Television Without Frontiers Directive which states that TV advertising must not:

- cause moral or physical detriment to minors,
- exhort minors to buy a product by exploiting their inexperience or credulity,
- encourage minors to persuade parents or others to purchase goods, or
- exploit the special trust minors place in parents, teachers and others.

National legislation in 12 countries was reported as including these provisions.

In **Sweden**⁷ and **Norway**⁸, TV advertising to children under the age of 12 is forbidden, and both countries further specify that children’s characters cannot appear in adverts. **Finland**⁹,

Iceland¹⁰ and **Ireland**¹¹ also ban the use of cartoon characters, since these are likely to appeal to children, and **Spain**¹² prohibits the use of celebrities to influence consumption. The distinction between adverts and programmes must be clear to children, according to the rules reported in **Finland**¹³, **Germany**¹⁴, **Greece**¹⁵ and **Slovenia**¹⁶, with **Slovenia**¹⁷ and **Estonia**¹⁸ both also specifying that adverts must not imply any advantage will result from purchasing the product. **Slovenia**¹⁹ and **Portugal**²⁰ both specify that adverts must not encourage unhealthy behaviour.

This theme is expanded upon in **UK**²¹ self-regulatory rules on broadcasting, which state that adverts must not;

- encourage or condone excessive consumption of any food,
- discourage or disparage good dietary practice, or
- encourage or condone practices that damage oral health.

The Radio Authority in the **UK**²² also specifies that adverts must not discourage selection of foods such as fruit and vegetables, which currently accepted scientific opinion recommends should form a greater part of the average diet.

In **Italy**, a self-regulatory code promoted by the Ministry of Communications²³ and supported by an Act of the Italian Parliament²⁴, prescribes three different levels of protection for children depending on time of day. This code also states that adverts aimed at children should:

- not encourage children to pester parents,
- not undermine the role of parents
- not suggest that an advantage will be gained by purchasing the product
- be clearly distinguishable from ordinary programming

Some national governments have particular rules about the timing of adverts in an effort to protect children. The TV Without Frontiers Directive, for example, states that there should be no advertising in children's programmes that last for less than 30 minutes. **Iceland** prohibits adverts during children's programmes of any length²⁵, and the rules in the **UK** do not permit adverts during programmes broadcast to schools²⁶. **Finland** bans sponsorship of children's programmes²⁷, and **Spain** does not allow, between 6am and 10pm, any advert able to prejudice minors' physical, mental or ethical development²⁸.

On 1 January 2005, **Ireland** introduced a new statutory code²⁹ specifically for children, with extensive rules on broadcast food marketing. It specifies that adverts must;

- not use celebrities or sports stars to promote food or drink, unless this is part of a public health or education campaign,
- not encourage unhealthy eating or drinking habits,
- not encourage immoderate consumption or excessive eating,
- include an oral health warning for confectionery products, and
- include a warning for fast food about the need for a balanced diet and moderate consumption.

These statutory rules are not dissimilar to the voluntary code on TV confectionery adverts aimed at children under 12, funded by the industry, that has been in operation in **The Netherlands** for some years³⁰. It too states that that adverts must:

- not stimulate excessive consumption,
- not encourage consumption after tooth brushing or before sleeping, to protect oral health,
- include a specified toothbrush figure.

The code also adds that adverts must not;

- link consumption of confectionery with health, or
- suggest that confectionery can replace a meal.

In order to reinforce the statutory regulation, the **Spanish** Government reached an agreement with the TV channels in December 2004 to restrict advertising aimed to children on a voluntary basis, particularly during the hours of 8 to 9 am and 5 to 8 pm (Monday to Friday) and 9 to 12 am on weekends and holidays³¹.

In addition, in February 2005, the Spanish Ministry of Health and Consumer Affairs has begun to implement a new strategy to fight against childhood obesity (NAOS Strategy) with a self regulating code to regulate the marketing of food and drink aimed at children under twelve³².

In fact 14 countries reported one or more voluntary codes on broadcast advertising referring specifically to children. However, only five – **Belgium**³³, **France**³⁴, **Italy**³⁵ and **The Netherlands**³⁶ and **Spain** – refer specifically to food marketing and Children. (**Ireland's** voluntary code³⁷ does not refer specifically to children but its statutory code on food marketing now does.)

In general, voluntary codes on broadcast advertising tend to lack specific rules, relying instead on subjective appeals. **Slovenia's** code³⁸, for example, states that “media should be aware of their moral and ethical responsibility concerning advertising to vulnerable groups, like minors”. Often, the codes do no more than simply repeat the provisions in national legislation, for example, on prohibiting exploitation of children’s natural sense of credulity, or not exhorting children to pester their parents. Two of 12 countries reported that the voluntary code was operated without industry funding: **Denmark**³⁹, and **Slovenia**⁴⁰.

4.3.3. Non-broadcast advertising

Non-broadcast advertising regulations cover media such as posters and billboards, adverts printed in newspapers and magazines, and adverts shown in cinemas. A few countries’ codes cover both broadcast and non-broadcast advertising, for example, **Estonia's** Advertising Act⁴¹ and **Iceland's** Competition law⁴², both of which are statutory. In **Greece** the Code of Advertising and Marketing⁴³ and in **Spain** the Code of Advertising Practice⁴⁴ also cover both broadcast and non-broadcast advertising, but are voluntary.

Fourteen countries reported having statutory codes covering non-broadcast media, most of which refer specifically to children. However, only five have codes with particular rules on food marketing – **Denmark**⁴⁵, **Germany**⁴⁶, **Greece**⁴⁷, **Slovenia**⁴⁸ and **Spain**⁴⁹ – and these do not have special provisions for food marketing to children. Six countries reported having no statutory codes – only voluntary codes – on non-broadcast advertising; **Austria**, **Belgium**, **Ireland**, **Italy**, **The Netherlands** and the **UK**.

Belgium reported having neither statutory nor voluntary codes covering non-broadcast advertising. However, 13 countries did report having voluntary codes, almost all of which refer to children, with three of these – **The Netherlands**⁵⁰, **Slovenia**⁵¹ and the **UK**⁵² – including provisions on food marketing and children. **Slovenia's** statement on Junk Food Marketing to Children is a challenge to the media, from the Ministry of Health and the National Institute of Public Health, to promote healthy food⁵³. Some codes aim to protect children from marketing in schools, for example, both **Finland**⁵⁴ and **The Netherlands**⁵⁵

prohibit adverts on teaching materials, with the Netherlands further specifying that promotions must not encourage students to buy the sponsors' products.

In the **UK**⁵⁶ there is an industry-funded Advertising Standards Authority to administer the voluntary code on non-broadcast advertising. It states that:

- adverts should not exploit children's credulity, loyalty, vulnerability or lack of experience,
- children should not feel inferior or unpopular for not buying the product,
- adverts should not encourage children to eat or drink at or near bedtime, and
- adverts should not encourage children to replace main meals with confectionery or snack foods.

4.3.4. Paid-for Internet advertising

Even though this form of advertising is relatively new, eight countries report having statutory codes, of which six refer to children. Three countries – **Denmark**⁵⁷, **Germany**⁵⁸ and **Greece**⁵⁹ – have codes referring specifically to food marketing, but none reported having codes covering food marketing to children. Furthermore the codes only apply to banners and 'pop-up' advertising and not the content of websites.

Germany also has a statutory code⁶⁰ which regulates electronic media as well as nearly all other media. The code is relevant for children and adolescents and covers all areas. However, particular reference to food marketing is not included. According to this code advertising must not:

- cause physical or mental harm to children
- appeal directly to buy advertised products
- exploit inexperience and personal confidence
- show children in dangerous situations.

Voluntary codes were reported in 12 countries, with nine referring to children, but only one referring to food marketing – **The Netherlands**⁶¹ – which also includes food marketing to children. Four countries have neither a statutory nor voluntary code covering paid-for Internet advertising; **Belgium, Hungary, Iceland** and **Portugal**.

In contrast, a small number of countries reported initiatives specific to this new medium, including the following:

- **Finland's** Consumer Ombudsman prohibits commercial links from children's websites, the appearance of children's characters in adverts, and requests to children to order on-line⁶².
- The Internet Service Providers Association of **Ireland** has produced a code of ethics and practice⁶³.
- A self-regulatory code for **Italian** Internet providers has been promoted by the Italian government⁶⁴.
- The Nordic Consumer Ombudsman in **Norway**⁶⁵ has ruled that Internet marketing to children must not use games and must be recognisable as marketing.
- In **Spain**⁶⁶ there is an Ethical Code of Electronic Commerce and Interactive Advertising.
- In **Sweden**⁶⁷ the Parliament has passed a law prohibiting sending adverts by email to those under 16 years old.

However, it is worth noting that most of the codes reported, whether statutory or voluntary, cover a range of media and so have not been designed specifically to cover the unique features of this new communication method.

4.3.5. Company websites

Company websites are even less well-regulated than paid-for Internet advertising. Ten countries reported that they had neither a statutory or voluntary code covering any aspect of the information on company websites. However, five reported statutory codes that specify children, and two (**Denmark**⁶⁸ and **Norway**⁶⁹) have codes covering food marketing. No country reported having a statutory code covering food marketing to children, though **The Netherlands**⁷⁰ has a voluntary code that includes both food marketing and children. Five countries have more general voluntary codes.

4.3.6. Attempts to integrate the regulation of food marketing to children

As mentioned earlier most countries seem to regard each promotional medium as separate and regulate them in very different ways. However there is a growing demand for a more co-ordinated approach to the regulation of food marketing to children from public interest organisations and in some cases government and industry have responded.

In **Belgium** the Federation of Belgian Food Industry and the Union of Belgian Advertisers are currently proposing a voluntary code⁷¹ which recommends that children are protected from all misleading information about food, that the role of parents and educators is not undermined by food advertising etc. In **Denmark**⁷², **Italy**⁷³ and **The Netherlands**⁷⁴ the equivalent bodies have already published similar sets of principles for good practice in marketing and advertising of foods particularly in relation to children, based on the ICC Framework and/or the CIAA's recommendations for responsible food and beverage advertising.

4.3.7. Summary

The regulation of food marketing to children across Europe is characterised by inconsistency, both within and between countries. Approaches to protecting children vary from the very tough (e.g. the ban on TV advertisements targeting children under 12 in Norway and Sweden) to the non-existent (e.g. the absence of controls on company websites in most countries). While the majority of countries recognise the need to protect children from advertising and marketing in general, only six countries have specific rules on food marketing (Denmark, Finland, Germany, Ireland, Spain and the UK). Furthermore, broadcast advertising – particularly TV – tends to be more heavily regulated than non-broadcast advertising. Although the Internet is very popular with children, paid-for Internet advertising is not well regulated.

There are also many more ethically-based guidelines and far fewer specific restrictions on the timing, content and form of marketing campaigns targeted at children. The Slovenian code on broadcast advertising, for example, is not atypical in stating: "Media should be aware of their moral and ethical responsibility concerning advertising to vulnerable groups, like minors", but within Slovenia there are frequent discussions about the dangers of food marketing to children.

Non-traditional forms of advertising targeted at children such as marketing in schools, sponsorship, Internet-based techniques and sales promotions are less regulated than television advertising to children. Belgium, Hungary, Iceland, and Portugal, for instance, have no voluntary or statutory codes covering advertising on the Internet.

One other way in which the regulation of marketing to children varies between countries is the way that children are defined. The definition of a 'child' ranges from less than 12 years of age in The Netherlands, Norway and Sweden to less than 21 years of age in Estonia.

Regulation of marketing techniques therefore lacks a comprehensive approach anywhere in Europe. Companies devise their marketing strategies as an integrated and sophisticated mix of media, while countries tend to regulate each medium separately and with greater or lesser stringency. In addition, the regulations, in whatever form, apply to each advertisement in isolation and to the advertising techniques (such as using cartoons, or harnessing 'pester power'). The effect on children's diets of food marketing as a whole has not yet been considered in any of the regulatory approaches, even the most recent. Thus, apart from the TV advertising bans in Norway and Sweden, there have been no attempts to control the type of food which is advertised, or the frequency or volume of advertising of particular types of food.

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- ²⁴ Italian Parliament (03/05/2004) Act No. 112 *Rules of principles for the reform of the national radio and TV system and of RAI-Radiotelevisione italiana S.p.a., and delegation to the Government to issue a code for radio and TV regulation.*
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4.4. Attitudes towards food marketing to children

4.4.1. Introduction

As food marketing to children has become an increasingly high profile and controversial issue, the project examined the views of those who are involved – governments, food and media industries, and those concerned with children's health, including consumer and medical groups. Differences in the recommendations of the different groups in response to the debate around food marketing to children are explored including differences between countries, although in three countries no attitudinal data was found.

4.4.2. Government

In **Denmark** the National Action Plan against Obesity, produced by the Danish government's National Board of Health¹, describes the obesity problem and outlines a number of recommendations, including stricter rules for TV advertising that targets children.

In **Finland** the Government's regulatory code 'Minors, Marketing and Purchase'², defines the ways in which advertisers are constrained. The Minister of Education³ and the Minister of Health⁴ have drawn attention to anxieties about vending machines in schools.

In **Germany** the Government's recent policy document 'Eine neue Ernährungsbewegung für Deutschland. Regierungserklärung der Bundesministerin für Verbraucherschutz, Ernährung und Landwirtschaft'⁵ calls for more stringent rules for nutrition and health related statements, particularly for foods high in fat, sugar or salt, and emphasises everyone's responsibility for diet and health, including the food industry. Another government report outlines expert opinion which suggests that marketing strategies can play a key role in successful disease prevention measures, arguing for the adoption of such strategies for social marketing⁶. An external expert, reported in a government hearing, suggested that the regulation of food promotion would have little effect on consumer's diets, but noted the importance of advertising statements being truthful and based on up to date scientific knowledge⁷.

In 2001 the Ministry of Education in **Greece** produced a list of foods deemed 'healthy' which were acceptable in school contexts⁸. However, the lack of an agreed definition of what constitutes 'healthy' or 'unhealthy' foods in Greece, has led to some enforcement difficulties. Nonetheless, since the introduction of this regulation an immediate end to the marketing of a large number of 'unhealthy' foods in Greek schools was reported.

A discussion between two government departments in **The Netherlands** highlights some issues which are often raised in the debate about protecting children from food marketing on TV. At the end of 2002, one government member⁹ proposed an experiment to assess the impact of a commercial-free section on youth TV. A response from another government member¹⁰ claimed that such a move would be ineffective and unjustified. She argued that it would increase the commercials during adult programming (also watched by children), that the income available for children's TV would be reduced, and that industry self-regulation would be a more effective route for government to encourage.

The Ministry of Children and Family Affairs in **Norway** has issued a policy document¹¹ proposing that all marketing should be forbidden in cinemas where the recommended viewing age for the film is under seven.

In **Sweden**, where there is currently a ban on TV advertising to children under 12, the Swedish Consumer minister has recently announced that she would advocate a total ban on all advertising to children because of the obesity problem. The Government therefore continues to defend its position on marketing to children, and to take the lead on this issue in the international community.

A recent government Action Plan¹² to promote healthy eating and increased physical activity in Sweden, has highlighted how food marketing has contributed to increasing food consumption. The Plan indicates that the Government:

- will work at EU level to encourage a ban on TV food advertising aimed at children;
- recognises and will act on the need for adequate monitoring of marketing trends;
- will set up a collaborative group for responsible marketing;
- will allow consumer groups to apply for Consumer Agency funding to monitor and publicise developments in marketing to children of 'unhealthy' foods.

The publishing company De Agostini Svenska AB had challenged the law in 1998 by arguing that the ban on advertising to children in Sweden discriminated against foreign companies and created unacceptable trade barriers within the EU¹³. The Swedish Consumer Agency reported that the Swedish Market Court and Consumer Ombudsman dismissed this claim, explaining that the ban did not apply to TV broadcasts from outside Sweden, and that it was right that the Swedish Marketing Act should seek to ban all unfair or misleading advertisements. The Consumer Ombudsman was seeking to ban all advertising to children including that on channels from abroad.

The Swedish Consumer Agency has a long-standing interest in advertising to children and commissioned reports about the international position in 1994¹⁴ and 2001¹⁵. More recently, the Agency has called on the EU and the USA to re-examine their existing regulations to take into account a recent Trans-Atlantic Consumer Dialogue resolution. This advocates restricting food marketing to children and the employment of social marketing, in order to promote healthy eating as part of wider public health goals¹⁶.

In the **UK** there have been a number of official reports offering advice to government on the issue of food advertising to children, of which these are only two examples:

- the Chief Medical Officer's Annual Report for 2002 outlined a number of suggestions, including that industry should take a more responsible approach in marketing 'unhealthy' foods, that healthier foods should be promoted, and that school food promotion should be regulated¹⁷.
- the House of Commons Health Committee report on obesity¹⁸ recommended voluntary withdrawal of advertising of unhealthy foods to children, improved nutrition information, school nutrition policies, and government guidance to schools about sponsorship.

The UK government agency, the Food Standards Agency (FSA) published an Action Plan of Food Promotion to Children in 2004, which recognised that the solutions in relation to the promotion of food to children should involve many stakeholders in a raft of measures – parents, children and young people, government, regulators, schools and industry. Recommended actions included the FSA publishing nutritional criteria and advice on signposting to enable the food industry to promote healthier foods, and best practice on nutrition and food health claims. It called for schools to promote healthier vending and school meals; for government to acknowledge the influence of TV advertising of unhealthy foods on children's diets and act on it, for government not to endorse promotions for unhealthy food and for it to support mandatory EU nutrition labelling and support prohibition of nutrition or health claims on unhealthy foods. It also made other recommendations for the

role of broadcasters, the Advertising Standards Authority, food manufacturers, celebrities and event sponsors¹⁹.

In response to the FSA's call for action the UK regulator of the UK communications industry (Ofcom) commissioned research into the role of television advertising in the context of the wider public debate about childhood obesity, and commented that a total ban on TV advertising to children would be neither proportionate nor, in isolation, effective²⁰.

Another attempt by the UK government to encourage commercial bodies to act responsibly in relation to the promotion of food to children was demonstrated in a speech by the minister from the Department of Culture Media and Sport. She called for a review of advertising codes on food promotion to children, and challenged the advertising industry to engage in social marketing to support healthier food choices²¹.

A government white paper on public health published in November 2004 sets out a series of commitments to take action in relation to all forms of food advertising and promotion to children. The white paper outlines proposals to work with the food industry, advertisers, consumer groups and other stakeholders to strengthen controls on broadcast and non-broadcast media²². Subsequent to the publication of this white paper the Government has published a delivery plan which sets out how the advertising of food to children will be restricted^{23,24}.

4.4.3. Food and media industries

Among the food and media industries, views range from outright denial of the links between food marketing and children's food consumption patterns, though to acknowledgement of some responsibility. The food and media industries generally regard the current regulatory environment as adequate. Any further restrictions on food marketing to children are vigorously opposed.

The **Danish** Food and Drink Federation– which has published a set of general guidelines for good practice in food marketing and advertising - believes that the industry can provide useful information to help consumers eat healthy diets. It is opposed to a ban on food advertising to children on the grounds of lack of scientific evidence for the effectiveness of such action²⁵.

There has been a similar response from the advertising and food industries in **Germany**. The Bundesverband der Deutschen Süßwarenindustrie (BDSI)²⁶ does not consider that poor nutrition is the sole cause of children's obesity, and believing that increasing levels of physical activity is the main solution. They consider that research conducted in the Province of Quebec in Canada shows that a ban on children's TV food advertising would be ineffective. The German marketing industry umbrella organisation Zentralverband der deutschen Werbewirtschaft (ZAW) has issued two statements; the first²⁷ asserts that current German regulations and voluntary codes adequately protect children, that children soon develop competence in understanding advertising, and that there is no evidence of food marketing causing obesity; the second²⁸ points out that socio-economic, physical inactivity and genetic factors are the main causes of obesity, and reacts strongly against any blame attributed to the advertising industry.

In **Italy** the federation of food producers, Federalimentare, claims to support national programmes to promote healthy lifestyles and physical activity in line with World Health Organisation recommendations²⁹. Federalimentare worked with the Institute for Advertising Self-regulation (IAP) to produce a recent voluntary code in Italy. The IAP stresses how

government intervention and regulation are unnecessary on the grounds of respect for freedom of advertising creativity³⁰, but recognises it is a defensive position in the obesity debate³¹.

Taking a similar position, IPM Kidwise, a media organisation in **The Netherlands**, believes it is better to help children understand marketing than to ban it, whilst recognising that government and industry have a role in providing some forms of protection³². Examples of such protection in the Netherlands include a food industry code and provision of consumer information. The Netherlands commercial trade body (VAI) representing the food industry has produced a similar voluntary code³³ to those in Denmark and Italy. Other representatives of the food industry in the Netherlands support self regulation. The bakery and confectionary industries say that banning food marketing will not reduce overweight since they believe it is the responsibility of the whole of society³⁴; the Foundation of Dutch soft drinks considers it is behaving responsibly, for example, by developing 'light' drinks and its own marketing code³⁵; Unilever believes it is behaving responsibly by accepting the VAI code³⁶; and Haribo argues that their marketing does not increase confectionary consumption in the Netherlands but facilitates choice, and suggests that obesity is a result of a lack of physical activity³⁷.

In recognising the need for the food industry to act responsibly, a media organisation in **Slovenia** has suggested that companies which produce foods likely to contribute to an unhealthy diet when excessively consumed, should financially support healthy eating literature³⁸.

In the **UK**, the Food and Drink Federation (FDF) recently published a food and health manifesto setting out a consensus position on "how the food industry can contribute to the food and health debate." The manifesto refers to working with broadcasting regulator, Ofcom, and the government to tighten self-regulatory codes on advertising to children³⁹. The British Retail Consortium (BRC) response to the Food Standards Agency Action Plan⁴⁰ is that policy makers should provide clear, consistent messages in healthy lifestyle campaigns to consumers. They support the current regulatory framework (a mix of statutory and voluntary codes)⁴¹. However, one supermarket chain – the Co-op – supports a ban on advertising foods high in fat, sugar or salt during children's TV⁴² and has a self-imposed commitment to this⁴³. Responses from British advertisers have consistently opposed any proposed ban. The Food Advertising Unit⁴⁴ and the Incorporated Society of British Advertisers⁴⁵ believe regulation to be sufficiently strict already, arguing that advertising is a minor influence on food choice, and that TV programming would suffer if a ban were imposed.

Norway and Sweden TV ban – how does the food industry respond?

Commercial and media interests in countries where food marketing to children on TV and radio is banned, continue to argue against the regulation.

Sweden

- The President of the Swedish International Chamber of Commerce believes that the advertising industry should be opposing the ban, and that they should be able to make responsible adverts which won't harm children⁴⁶
- The Swedish public TV and Radio broadcaster SVT mentions the debate within the EU, where a new consumer Directive threatens the advertising ban. Sweden has 8 years to explain why advertising to children is unacceptable⁴⁷.

Norway

- A Norwegian advertising organisation argues against the ban, stating that parents are responsible for their children's diets, not the advertising industry⁴⁸
- The Norwegian organisation for local TV argues that it is not economically viable to restrict advertising 10 minutes before or after children's programmes and wants this restriction removed⁴⁹
- The grocery manufacturers of Norway argue against the advertising ban and advocate that providing information to consumers would be more effective⁵⁰
- The Norwegian organisation for commercial organisations opposes the advertising ban⁵¹

4.4.4. Health organisations

The views of health and medical organisations contrast sharply with those of the food and media industries.

A university hospital in **Belgium**⁵², for example, describes school sweet drink vending machines as morally unacceptable, given their contribution to national obesity.

The Finnish Heart Association⁵³ similarly has demanded the removal of soft drinks and sweets vending machines, claiming that this form of marketing partly contributes to overweight and obesity in **Finland**.

The Danish Nutrition Council makes brief mention of restricting unhealthy food advertising to children as part of an obesity prevention strategy in **Denmark**⁵⁴.

The **Irish** Heart Foundation believes it is no longer credible to blame the individual for the rise in obesity in Ireland, and argues that societal factors such as advertising, accessibility and availability of foods are the causes which need addressing⁵⁵.

An **Italian** health institute has recommended strengthening nutrition and media education in Italian schools so that children can resist advertising messages⁵⁶.

In **The Netherlands** the Netherlands Heart Foundation believes that evidence links obesity and food advertising to children, and the Dutch Obesity Association notes that children are not able to understand commercials, so both support a ban. The nutrition centre 'Voedingscentrum' calls for advertising to be restricted, but suggests that a better option is to make the food industry pay 1% of their commercial expenses on healthy eating information⁵⁷.

The **Spanish** Society of Community Nutrition outlines the three main areas of focus on the causes of obesity – home, school and the environment, with the Society calling for advertising restrictions. However, the Spanish Society of Paediatrics argues that it is parents' responsibility to teach their children about a balanced diet and why they should avoid unhealthy food⁵⁸.

Two articles from the National Institute of Public Health in **Sweden** indicate that the Swedish ban on advertising to children under 12 allows them to focus on a wider range of policy options. In a raft of suggested measures they call for an examination of food taxes, more ways to establish good eating habits among children from an early age, adequate nutrition labelling and a ban on the promotion of unhealthy foods at checkouts and other points of sale⁵⁹. They also call for stricter regulation of food marketing to children at EU and

international level and have drawn up an Action Plan for good eating and physical activity habits in Sweden⁶⁰.

The National Heart Forum, an alliance working to prevent coronary heart disease in the **UK**, has brought out a position paper⁶¹ on food marketing to children. Recommendations included:

- A government approved nutrition profiling scheme to enable banding of foods into high, medium and low categories for fat, sugar and salt content;
- Compulsory nutrition labelling on all food products;
- Clear nutritional information on food products at points of sale;
- Statutory regulation of food promotion in schools;
- Strengthened school curriculum requirements for nutrition education;
- Media literacy education linked to nutrition education;
- A ban on marketing of foods high in fat, sugar or salt to children before 9pm.

In a general statement of priorities⁶², the UK Public Health Association cites the UK as a world leader in 'health-degrading production and consumption', arguing firmly against the food and drink industries promoting unhealthy consumption, often directly aimed at children. The UK National Obesity Forum reports the activities of the All Party Parliamentary Group on Obesity⁶³ which recommends regulation or banning of unhealthy food advertising to children and inappropriate commercial school sponsorship, whilst supporting provision of parental information and improved nutrition content of food. The Community Practitioners and Health Visitors Association in the UK supports an outright ban on food marketing to children of foods high in fat, sugar or salt⁶⁴.

4.4.5. Consumer organisations and consumers

Consumer organisations

The views of consumer groups, and those of other citizen organisations in the following section, are very similar to those of health and medical associations.

The **Finnish** Consumers Association is particularly concerned about the marketing of foods to children in schools. It suggests that the nutritional quality of foods offered should be the top priority, with the dining environment being conducive to food enjoyment. The Association does not raise children's TV advertising as a main concern in Finland as the quantity is not large, and notes that children watch adult programmes⁶⁵.

The Federation of **German** Consumer Organisations (VZBV) is concerned about health claims. The VZBV would support EU rules for food marketing to children, and supports the current EU proposals on nutrition and health related claims statements in advertising. In particular, it supports the suggested ban on health claims on foods with a poor nutrition profile, and recommends that the German government adopts this measure⁶⁶. The organisation is also keen that only those products with scientifically proven health benefits should be allowed to carry health images⁶⁷. In response to the growth of food marketing in German schools, the Association suggests that this should be banned, and calls for the government to recommend to schools that they should reject commercial sponsorship of schools despite limited budgets⁶⁸. A German consumer advice centre calls for a ban on TV advertising to children under-12, tightening of regulation in schools and the Internet, and the provision of more effective nutrition education programmes throughout children's schooling⁶⁹.

The Consumers Institute in **Greece** (KEPKA) notes that there is a relationship between obesity and food marketing to children, and that Greek parents disapprove of such marketing⁷⁰. KEPKA also highlights research demonstrating that some school canteens continue to sell foods (such as biscuits, cakes, pizza and chips), even though they are not permitted under existing regulations⁷¹.

A call for EU-wide regulations on advertising to children, which encompasses food, has been made by Adiconsum, an **Italian** consumers' association. In a position paper it called for regulation of not only TV, but also other promotional channels such as schools, the Internet and radio⁷². Adiconsum advocates national restrictions on mass marketing of foods high in fat, sugar or salt to children, the elimination of these foods from school vending machines, and the provision of more accurate nutritional information for consumers⁷³. The consumer organisation Altroconsumo has highlighted research demonstrating the way TV networks flout existing advertising codes by broadcasting food adverts to children which break the limits on the number of adverts and slots allowed. Altroconsumo advocates banning all adverts between the hours of 16.00 and 19.00 and also supports a total ban on any advertising explicitly directed to children⁷⁴.

In **The Netherlands**, the Consumentenbond supports the recommendations in the European Consumers Organisation report 'Children and Advertising', which include EU advertising regulation to protect children, more information and education campaigns, and the commissioning of further research⁷⁵. For schools, Consumentenbond published a leaflet to inform teachers and parents on how to alert children to the persuasive messages in advertising⁷⁶.

The Consumer Ombudsman in **Norway** calls for restrictions on food advertising to children, rules to restrict the location of unhealthy food in stores, taxes on unhealthy foods, and improved nutritional information⁷⁷.

Facua, the **Spanish** consumers' association, denounces food advertising to children in Spain for the use of untruthful claims and calls on the Health Ministry to bring in appropriate regulation⁷⁸.

A factsheet⁷⁹ published by the **Swedish** consumers' association in 2001 demanded

- An EU ban on TV commercials to children;
- More funding for raising public awareness about the consequences of advertising to children;
- Media literacy education in schools.

In a press release in 2003, the Association called upon companies to follow the example of Coca Cola, which claims to have agreed not to advertise to children under twelve⁸⁰. The Swedish Consumer Coalition also supports a total ban on marketing foods high in fat, sugar or salt⁸¹.

The Konsumentföreningen Stockholm (Stockholm's co-operative consumer association) has established a Parents Jury of 500 parents. A survey of the Jury on the issue of marketing of food to children showed that 55% of respondents thought there should be no marketing at all to children, 41% thought it was acceptable if it were for healthy products and 95% disapproved of adverts for sweets or sugared cereals in comics. A very high number of respondents (95%) advocated banning commercials targeting children from any TV network source (i.e. programmes originating in other countries but broadcast to Sweden)⁸².

Recommendations from the **UK** Consumers Association for better food labelling include the removal of cartoons and other images aimed at children from foods high in fat, sugar or salt

and a ban on the advertising of foods that are high in fat, sugar or salt to children⁸³. The Food Commission has been co-ordinating The Parents Jury, an online campaign to improve the nutritional quality of children's foods which encourages parents to campaign against the promotion of unhealthy foods to children in the UK⁸⁴.

Various consumer organisations in the UK support the Sustain Children's Food Bill campaign. The Sustain campaign calls for legislation to protect children from all commercial activities which promote unhealthy foods, regardless of the method or media. The campaign is supported by over 100 national organisations, almost 250 Members of Parliament, and by a growing number of local groups and individuals⁸⁵.

Consumers

The **Swedish** Consumers' Association conducted an opinion poll of consumer attitudes to the Swedish ban on advertising to under-12s. Almost half of the respondents supported an extension of the ban and almost as many supported the existing arrangements⁸⁶.

The UK Food Standards Agency has also commissioned an opinion poll amongst consumers in the **UK**⁸⁷. The survey showed that 85% of people supported stricter controls on fast food promotion to children. Opinions were also canvassed by the FSA following the publication of its Action Plan on Food Promotion to Children⁸⁸, and there was widespread public support for imposing a number of the restrictions outlined. Student focus groups also gave support to the plan, particularly that school meals should be healthy and that fizzy drink vending should be banned.

4.4.6. Others

Parents organisations and parents

A Catholic family association in **France** says schools should provide media literacy education to protect children from the effects of advertising⁸⁹.

In **Norway**, a school parents' organisation wants to reduce commercial advertising to children and does not want it in Norwegian schools⁹⁰.

Opinion polls have been used to gauge parental attitudes for a number of years and in several countries.

An Internet poll in **The Netherlands** showed that 31% of parents were not aware of school commercial influences, with 27% stating they were 'really worried'⁹¹.

In **Ireland**, a parents' organisation poll demonstrated that 90% of parents believed children were being misled by TV advertising and 75% believed adverts encouraged children to eat unhealthy foods⁹². The Advertising Education Forum (funded by industry) conducted a poll in Ireland which showed that parents rated parents, school, friends, other family and children's TV as top influencers on children⁹³. A survey of mothers in Ireland found that 75% would like to see limitations on the advertising of fast foods and snacks to children, and that 66% are very concerned about the availability of vending machines and fast food in schools⁹⁴.

In **Norway**, a media institution poll reported 67% of parents not liking marketing to children⁹⁵.

A media commissioned poll in the **UK** showed that only 16% of mothers and 30% of fathers thought that schools should be allowed to vend crisps, sweets and fizzy drinks⁹⁶.

Children's Organisations and children

Save the Children Fund in **Iceland**⁹⁷ supports the tightening of regulations for advertising to children. Save the Children in **Norway**⁹⁸ supports the ban on advertising to children on TV, and wants international regulations to ban all advertising to children.

Children in one **Swedish** survey were not aware of the ban on advertising to children under 12, mainly because they watch satellite TV coming from other countries⁹⁹.

In a poll of 10-12 year olds in **The Netherlands** by the Netherlands Heart Foundation¹⁰⁰, children were asked about the intentions of advertisers, with most (28%) believing that they are wanting to sell products, 26% thinking they promote products, and 11% believing they are giving product information.

Teachers' organisations and teachers

Following the recent relaxation of the laws forbidding sponsorship in schools in some states in **Germany**, a German teachers' organisation has objected. Instead its members advocated a centralised pool of industry support which could then be evenly distributed between schools¹⁰¹.

In the **UK** the General Secretary of the Secondary Heads Association commented on the Cadbury's chocolate promotion in schools, saying 'Many heads will not circulate this material because they recognise the contradiction between educating children about healthy eating and promoting Cadbury's chocolates'¹⁰². The National Union of Teachers cautions against the use of commercially sponsored materials which would undermine healthy eating messages in schools¹⁰³. The Scottish Secondary Teacher's Association congress stated that they were alarmed at the increase in advertising within Scottish schools and called upon the Scottish Executive to draw up a code of practice on advertising in schools in order to protect children¹⁰⁴.

A poll of primary school principals in **Ireland** showed that 59% did not support company sponsorship, and 92% did not approve of product promotion in schools¹⁰⁵.

4.4.7. Summary

The attitudes of governments are shaped by many bodies that recommend a variety of courses of action on the issue of food marketing to children. Health, consumer and other citizen groups advocate protecting children from food marketing in the interests of public health. The food and advertising industries defend their right to promote their products, resist proposed restrictions, and lobby governments about the possible harmful effects of such restrictions on trade and commerce. Governments' responses to these conflicting pressures have varied from tough regulations – as in Sweden, for example – to a more 'laissez-faire' approach in the majority of countries.

In some countries, such as Germany, Spain and the UK, governments are trying to persuade the food and advertising industry voluntarily to restrict their activities, for example by 'responsible' self-regulation and by challenging them to introduce social marketing

techniques to promote healthier food. Governments in other countries are focusing on restricting food marketing in schools, for example Finland, where the influence of marketing in schools is perceived as a key area of concern, and Greece, where a lack of agreed definitions for 'healthy' and 'unhealthy' foods is inhibiting efforts to remove unhealthy food products from schools.

Where countries have already banned food marketing to children on TV, governments are being called on to take action in other areas, e.g. advocating bans on cinema advertising in Norway, and calling for an international ban on TV advertising to children in Sweden.

The attitudes of the food and media industries reflect, of course, their commercial aims. They oppose plans to ban food marketing to children, argue for its removal where a ban is in place, and oppose tightening of existing restrictions. Industry arguments that are commonly made in a number of countries include the following:

- There is a lack of scientific evidence for food marketing to children causing obesity;
- Many societal factors are responsible for obesity – it is not reasonable to blame the food or media industry;
- Industry self-regulation is more effective than statutory restrictions;
- There is a lack of scientific evidence for the effectiveness of banning food marketing to children on TV;
- Helping children to understand advertising is better than banning it;
- 'Healthier' food ranges are expanding.

Health and consumer organisations are happy to acknowledge that obesity has many causes. The Danish Nutrition Council, for example, mentions restricting unhealthy food advertising to children as only one element of a broader obesity prevention strategy. However, food marketing to children, though not the only factor, is seen as important, and health and consumer organisations are predominantly in favour of either banning or further restricting the marketing to children of foods high in fat, sugar or salt. Parents, teachers, and other groups concerned with child welfare endorse these calls for bans or restrictions, including in schools. Indeed some regard this as a moral as well as a health issue, with a university hospital in Belgium, for instance, describing sweet drink vending machines in schools as morally unacceptable.

Other measures suggested by public interest groups include:

- regulating school food promotion, including unhealthy food in vending machines;
- providing more effective nutrition education throughout the school curriculum;
- providing media literacy education linked to nutrition education;
- regulating food promotion via other media, e.g. the Internet;
- restricting promotions at point of sale;
- taxing unhealthy foods;
- providing appropriate nutrition labelling;
- developing a standardised nutrient profiling scheme;
- offering effective nutrition information to parents;
- introducing tougher EU-wide and global food marketing regulations; and
- undertaking further research and monitoring.

Interestingly, there are some broadly common themes shared by commercial interests and those concerned with public health, e.g. the importance of education. However, there are no signs of a convergence of views on what should be done about marketing 'unhealthy' food to children.

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4.5. Counterbalancing measures

4.5.1. Introduction

This final section of the report summarises measures that may be broadly interpreted as balancing out the effects of “unhealthy” food marketing in some way. Counterbalancing measures are hard to define, since very few programmes or projects are introduced specifically for this reason and more often, the initiatives aim to improve children’s health and, more recently, tackle obesity. Counterbalancing measures have been categorised as fruit and vegetable promotion, general educational measures focusing on food and health, media literacy programmes, and physical activity programmes.

The media literacy programmes are of particular interest since they attempt to provide children with the knowledge and skills to interpret critically the messages in advertising. Physical activity programmes are only dealt with briefly.

In the section on counterbalancing measures introduced by industry and by other organisations there are also special sub-sections on voluntary codes of practice. These are similar to the self-regulatory codes in relation to marketing to children reported on in Section 4.3 but are either wider in remit – concerned not only with marketing, but with industry’s involvement in education including media literacy, etc, – or produced by individual companies as statements of their commitment to improving children’s diets.

The programmes and projects that are described in this section were ongoing at the end of 2004 but may have ceased operation since.

4.5.2. Government

Most governments have published dietary recommendations for children particularly recommended daily intakes of particular nutrients and many governments also have guidelines or standards aimed at improving food in schools – particularly the nutritional quality of school lunches. These dietary recommendations, guidelines and standards form the basis to their initiatives to promote healthier eating amongst children.

Some governments are now initiating major campaigns against overweight and obesity. In particular the **German** government have formed a broad-based platform, with representatives from a variety of stakeholders, to develop a common strategy¹. Another initiative involves the co-operation of various partners from science, industry and the media in Germany². Both initiatives involve strengthening existing networks and activities, and developing new ones, focusing on the promotion of healthy eating and increased physical activity.

In **Spain**, the Ministry of Health and Consumer Affairs published its Strategy for Nutrition, Physical Activity and Prevention of Obesity (NAOS), in February 2005. This strategy aims to improve diets and to encourage physical activity, focusing on the prevention of obesity in childhood. A range of stakeholders have and will be involved³.

Fruit and vegetable promotion

Most national co-ordinators reported that the Government in their country has set up, and is running, a programme to increase fruit and vegetable consumption amongst children, generally in collaboration with other organisations.

In **Austria** children aged between 6 and 10 are encouraged to eat five portions of fruit and vegetables per day⁴.

The **Danish** scheme '6 om Dagen', has been jointly run since 1996 by government agencies, consumer and public health organisations and commercial trade bodies. It aims to increase the daily intake of fruit and vegetables amongst children to 400g (600g for adults). One current project promotes fruit and vegetables in schools (for children aged 6-17 years) by advertising and supplying the produce⁵.

In **Finland**, consumer and health organisations have worked together with government since 2000 to promote the 'Health from Vegetables' campaign, to meet the Finnish recommendation of half a kilo per person per day. In 2004 all Finnish 7th grade schoolchildren could obtain a free cookery book from the campaign; about 100 events were held in primary schools each year; educational materials were produced which gave information about nutrition and physical activity and a cartoon competition was held to challenge children to create their ways of promoting vegetables, etc⁶.

Similarly, the **German** collaboration to promote fruit and vegetables involves government, academic institutions, health and commercial bodies and food companies. School children aged 8-11 years are encouraged to get to know and enjoy fruits and vegetables using all their senses. Educational materials for school children of all ages have also been produced⁷.

The 5 a day scheme in **Iceland** is aimed⁸ at the general population from 2 years upwards⁸.

The **Irish** Fruit and Vegetable Board of the Department of Agriculture has run the Food Dude Healthy Eating pilot programme from 2002 in primary schools⁹.

In **The Netherlands** they raise children's awareness about fruit and vegetables, provide fruit and vegetables in school, and also offer information, games and recipes for children on the scheme's website¹⁰. A government agency in The Netherlands is funding an intervention study (2002-2006) to assess the effect on children's eating habits of increased fruit and vegetable consumption in primary schools¹¹.

In **Norway**, the Norwegian government and the Fruit and Vegetables Marketing Board run a national subsidised subscription scheme for primary and secondary pupils to receive fruit or vegetables school every day¹².

A government scheme runs in **Slovenia**, aiming to increase consumption of fruit and vegetables in the general population¹³.

A TV publicity campaign was launched in 2004 by the Ministry of Agriculture, Food and Fisheries to promote fruit and vegetables in **Spain** as part of their '5 a day' campaign. This publicity campaign was explicitly designed to counteract the marketing of unhealthy foods¹⁴.

The Minister of Agriculture, Food and Consumer Affairs, and the Minister of Public Health in **Sweden**, wrote to the European Commission in April 2004, suggesting that the best way of

encouraging consumption of fruit and vegetables is by addressing the circumstances (e.g. in the Common Agricultural Policy)¹⁵.

In the **UK** the 5 A Day Programme was started in 2000. It involves a range of action including providing free fruit to 4-6 year olds in state schools, local educational initiatives to promote fruit and vegetable consumption, and a national communications programme which will involve TV advertising¹⁶.

General education measures focusing on food and health

Projects

Governments in some countries are running educational projects of varying types. All projects aim to improve children's health either by providing education about healthy diets alone, or in combination with physical education.

The LOGO regional health promotion teams in Flanders, **Belgium** have worked in schools on projects such as promoting drinking water instead of soft drinks¹⁷.

In **Denmark** the government runs an educational programme called 'Body is Needed' about food and exercise for 9-10 year olds which offers four TV programmes and teaching materials, aiming to raise children's awareness about food and exercise¹⁸. A 'Healthy Sign' programme¹⁹ is operating in Danish schools similar to the UK Government's National Healthy School Standard (see below).

Examples of educational projects in The Netherlands

- 'The healthy eating club' sets up five meetings for 7/8 year olds to be taught about basic food principles, good and bad calories, and exercise²⁰.
- A nutrition store which is a fake supermarket is designed to stimulate health and nutrition education. The theme boxes contain educational material for 4-12 year old children²¹.
- 'Junior Hartdag' is a special day to educate 10-12 year old children about food and exercise²².
- A neighbourhood focused project works with children from birth to 10 trying to increase knowledge and change attitudes about health²³.

A number of initiatives have been run by the Ministry of Agriculture, Fish and Food in **Spain** (from 2003 onwards) in both school and non-school settings, including workshops, competitions and races to promote fish as a healthy choice for children²⁴.

A programme to develop positive attitudes among children to food and lifelong healthy eating is in place in **Sweden**, where the National Food Administration has launched a sensory training method in primary schools²⁵.

In the **UK**, the 2003 Food in Schools Programme has run a number of small-scale projects looking at healthier breakfast clubs, tuck shops (selling break-time snacks), vending machines, lunch boxes, cookery clubs, growing clubs, water provision and dining room environments²⁶. The UK government has also had a National Healthy School Standard since

1999, which includes nutrition standards (among other things) and enables 'healthy schools' to be accredited and recognised²⁷.

Teaching materials

In **The Netherlands** government agencies run a number of projects. One includes the development of a number of packs which can be used in schools, e.g. multi-themed packs for primary school teachers and children's care centres about food and exercise²⁸; a lesson package with notes and a game promoting balanced diets and exercise to primary school children²⁹; a teaching kit to organise a fruit and vegetable project involving parents³⁰; 'Kokus', a learning, doing and looking book about food with recipes and tasks for 8-12 year olds³¹; and teachers notes with student booklets, including a food quiz and a practical guide to organise breakfast in class³².

Information

Other educational materials include leaflets, websites and CD ROMs. A government/university project in **Germany** to offer assistance in consumer education, including nutrition, offers a webpage for primary and secondary teachers³³.

In 2003 the Department of Health and Children in **Ireland** produced voluntary guidelines called 'Food and Nutrition Guidelines for Primary Schools' – a resource for people working with primary schools to encourage healthy eating.³⁴

A campaign promoted by the Ministry of Health addressing childhood obesity in **Italy** developed TV and press adverts aimed at mothers, and was backed up by a government website offering principles for healthy diets³⁵.

Since 1998 the Directorate for Health and Social Affairs in **Norway** has provided free healthy cookbooks for all 14 year old children³⁶.

The National Food Administration in **Sweden** publishes leaflets about food and nutrition for Child Welfare Centres to distribute to parents³⁷.

The Personal, Social and Health Education curriculum in the **UK** is supported by a number of websites for children to use in schools³⁸. The Food Standards Agency has also produced a CD ROM offering teaching activities, games and quizzes designed to interest and motivate young people towards healthier eating³⁹.

Curriculum measures

Within the **Estonian** 'Man and Health Care' curriculum there are mandated elements referring to healthy eating and physical activity⁴⁰.

A revision of the **Finnish** National Board of Education framework this year has seen the introduction of Health Education as an independent subject for the first time⁴¹, building on existing curricular requirements for Home Economics.

In **Hungary** there is a similar curriculum addressing health and environmental education⁴².

Home economics and lifeskills curricula provide the vehicle for teaching about healthy eating and nutrition in **Iceland**⁴³.

In **Ireland** the Social Personal and Health Education curriculum addresses media literacy⁴⁴.

Slovenian educators seek to provide dietary information to children at all educational stages⁴⁵.

Other programmes

A few countries mentioned specific prevention programmes to help tackle childhood obesity, for example in **France** and **The Netherlands**. Although focusing on a particular condition, these programmes seem to contain the same elements around healthy eating and physical exercise as many more general programmes.

Media literacy programmes

In **Finland**, the Media, Consumer and Entrepreneurship Education curriculum aims to provide 7-19 year olds with a critical understanding of the purpose of the media. Any commercial materials used by the schools should be studied in class and the motivation behind the materials is examined⁴⁶.

Similarly in **Iceland**, the Life skills and Information & Computer Technology curriculum promotes critical thinking about the mass media and safe “surfing” on the Internet⁴⁷.

One of the functions of Ofcom, the **UK** communications regulator, as set out in the Communications Act, 2003, is to promote media literacy. It sees parents as key stakeholders who may need to become more media literate so that they can better protect their children⁴⁸.

Physical activity programmes

A number of national co-ordinators provided information on governments' physical activity programmes as part of their reporting on counterbalancing measures. While promoting physical activity is, of course, a very important public health measure and is sometimes combined with information and activities around healthy diets, government funded programmes have not been listed separately here, since this report focuses principally on food and food marketing.

4.5.3. Food industry and media industries

In most countries the food industry recognises health and nutrition as important in marketing and has responded to public concerns about food and health by developing a range of new products, which are often more expensive than their standard equivalents.

For example in **Ireland** Findus (Unilever) has relaunched its Captain Birds Eye kids range⁴⁹ with restrictions on colours, flavours, fat and salt; Kraft foods⁵⁰ are producing reduced salt ranges; and Kellogg's⁵¹ have launched a new version of its top selling children's cereal 'Frosties' with one third less sugar.

In **Italy** the Italian Association of Confectionery Producers in co-operation with a team of nutritionists conducted a study which demonstrated that Italian 'merendine' (industrial cakes), which only provide 6-7% of children's daily energy intake, have suffered unfair criticism and should not be labelled as 'unhealthy'⁵².

In **Sweden**, Procordia⁵³ has reduced the amount of sugar in several of their products and the fat content in a popular snack, Risifrutti, in direct response to the obesity debate; two dairy companies – Arla⁵⁴ and Valio⁵⁵ – have introduced yoghurts with less sugar. Many other examples could be cited here.

Fruit and vegetable promotion

Food companies and trade bodies often collaborate with governments and others to promote fruit and vegetables.

In **Austria** the supermarket chain, Spar, encourages people to eat five portions of fruit and vegetables per day⁵⁶.

Rynkeby Foods, **Denmark's** largest fruit juices producer, promotes recipes for fruit drinks⁵⁷.

In **France** a campaign run by two fruit and vegetable organisations Aprifel and Interfel, aims to encourage the population including children to eat 10 portions of fruit and vegetables per day, with 5 portions being the minimum requirement⁵⁸.

Fyffes have produced small fruit packets for children in **Ireland**⁵⁹.

In **Italy** the National Union of Fruit and Vegetable producers' initiative 'Eat the colours of life' encourages people, especially children, to eat 5 portions of fruit and vegetables a day⁶⁰.

BAMA, a **Norwegian** food company⁶¹, runs campaigns to increase fruit and vegetable consumption in the whole population.

The supermarket Grupo Eroski in **Spain** has produced a 287 page guide about fruit and vegetables, a calendar and website to give practical nutritional information⁶².

In **Sweden**, a fruit and vegetable company KA Lundblad together with the supermarket chain Vivo is placing fruit stands by the cashiers instead of the more usual confectionary⁶³.

In the **UK** four major supermarket chains – Tesco⁶⁴, Asda⁶⁵, Sainsburys⁶⁶ and Waitrose⁶⁷ have launched fruit or vegetable packs for children, often marketed with cartoon characters. Some now also promote healthy eating messages to children via interactive websites including games, quizzes and healthy eating recipes. One of these, Waitrose, has also produced teaching materials – Fruit First and Vital Vegetables – including lesson plans for primary aged children. Another supermarket chain Tesco and Cancer Research UK have combined to promote the 5 a day message at points of sale in stores.

McDonalds⁶⁸ has been mentioned by several countries (**Finland, Ireland, Norway, Sweden, UK**) as having introduced fruit and salad options to its menus, including as part of children's Happy Meals, and is also now offering 5 a day leaflets to parents.

General educational measures focusing on food and health

As noted in Section 4.2 marketing in schools is increasingly used as an integrated part of food company marketing strategies. Some measures reported, and therefore listed here as "educational", could be regarded simply as "marketing" (as reported on in Section 4.2.4) or possibly a mixture of the two.

Teaching materials

The **Danish** Dairy Board and Danish Pig Sector produce materials about food and health for use in primary and secondary schools⁶⁹.

The milk marketing company Valio in **Finland**, has produced a resource box with information about healthy and safe snacks for teachers to use with the 1st grade children⁷⁰. Food companies in Finland work with non-government organisations to support health theme weeks in school canteens e.g. Unilever sponsors Heart Week. Other companies involved include Knorr, Nestle and Pimenta (See Section 4.2.4 for further details).

Kellogg's has worked with a university in **Germany** to produce teaching materials for use in primary schools and for parents, explaining a balanced diet using the American food pyramid model, and emphasising that the largest proportion of foods in the diet should be fruits, vegetables and cereals⁷¹. Nestle, with university collaboration, has produced folder for secondary school teachers about good nutrition, including lesson plans, a cookbook for pupils and a web-based quiz and CD ROM⁷². Nutrition education materials aimed at 3-6 year olds are produced by Danone⁷³.

Nestle in **Hungary** has worked with the Association of Hungarian Dieticians to produce 'Nutrikid children and the secrets of eating' which is delivered to 11-12 year olds in school⁷⁴.

The **Icelandic** Milk Marketing and Distribution company produces a programme promoting healthy eating habits and exercise in primary school children⁷⁵.

The National Dairy Council in **Ireland** has developed a toolkit for primary teachers about healthy eating for use in the curriculum⁷⁶.

A project by the **Norwegian** dairy distributor Tine⁷⁷ focuses on healthy school cafeterias, and the Norwegian Fruit and Vegetable Marketing Board and other organisations run projects in kindergartens where children learn about healthy food through stories, cartoons, CD and practical tasks⁷⁸.

A sugar institute in **Spain** annually distributes free books to 22,000 8-10 year old children along with a teacher's manual with practical ideas. This is backed up by nutritionists and cooks who give practical lessons in schools⁷⁹.

The Food and Drink Federation in the **UK** has created the Foodfitness programme, part of which includes a Join the Activators CD ROM programme for 7-9 year olds, which encourages healthy eating, including 5 a Day, alongside physical activity⁸⁰.

Information

Nutritional advice and information are offered by many multinational companies on their websites – e.g. Kellogg's⁸¹, Schulstad⁸², Danisco⁸³ and Arla⁸⁴.

McDonalds' **Danish** and **German** websites supply information for secondary aged children⁸⁵.

FAGE SA, one of the leading food companies in **Greece**, produces a website with information about the dangers of obesity and the importance of a balanced diet. A 'Juniors Club' encourages children to interact with the site⁸⁶.

Two **UK** supermarket chains Asda⁸⁷ and Sainsburys⁸⁸ offer schoolchildren store tours as part of their healthy eating initiatives, but many other examples could be cited here.

Other programmes

In **France** a number of food companies financed the public health initiative Fleurbaix-Laventie Ville Santé in 1992, in a study to investigate how children can educate their parents about healthy eating. Families where children had received nutritional information about healthy eating in school demonstrated improved lifestyle habits⁸⁹. Also in France the Institut Danone has developed a large programme addressing the issue of childhood obesity in the EU⁹⁰.

Media literacy programmes

The main media-literacy programme mentioned by the national co-ordinators was MediaSmart. This is a programme largely funded by corporate sponsors, including food companies, seeking to improve children's critical understanding and interpretation of advertising. It was launched in the UK in 2002.

In **Belgium** the Union of Belgian Advertisers is soon to launch a version of MediaSmart⁹¹. Like the English version (see below), food marketing is not specifically addressed in the material.

In **The Netherlands** the food industry sponsors Stichting de Kinderconsument, a children's consumer organisation, to run a media literacy programme 'Reclamerakkers' similar to MediaSmart.

In the **UK**, the MediaSmart programme provides a teaching pack and web site with a range of activities for 6-11 year old children, linked to the National Curriculum⁹².

Voluntary codes of practice

In response to the growing problem of obesity, and in particular to concerns about the marketing of "unhealthy" food to children several industry bodies and individual companies have published voluntary codes of practice.

In **Finland** Kellogg's have produced a policy document 'Children and Advertising' which notes that marketing to children should be directed to parents as well, there should be no pester-power marketing, and parents should make their children media literate⁹³.

In **France** the National Association of the Food Industries (ANIA) has made a number of commitments in relation to the prevention of obesity e.g. working with the food industry to promote nutrition information and reasonable portion sizes, and working with consumers to promote the idea of a healthy diet, particularly in relation to low-income families⁹⁴,

A policy statement on diet, physical activity and health was launched by the food and drinks industry in **Ireland**. This emphasised the need for cross-departmental work in the light of the rise in obesity⁹⁵.

The **Italian** food industry federation has issued an agreement to work towards five aims – promoting Italian food, improving self-regulation, improving nutritional information, keeping food industry producers nutritionally informed, and co-operating in obesity prevention work⁹⁶.

The **Spanish** Federation of Food and Drink Industries (FIAB), has signed an agreement with the Ministry of Health and Consumer Affairs to promote and support all the activities carried out by the latter in the framework of the NAOS Strategy for Nutrition, Physical Activity and

Prevention of Obesity. Likewise, the Spanish National Association of Automatic Distributors has signed an agreement with the Ministry to ensure that vending machines offer a healthier choice to pupils and that vending machines are not located in areas of easy access to young children.⁹⁷

In the **UK**, the Co-operative supermarket chain has a commitment not to market products to children which contain above 20g/100g of fat, 10g/100g of sugar and 1.25g/100g of salt⁹⁸. Several companies operating in the UK have policies with elements addressing food marketing to children. For example, Coca Cola says it has stopped marketing to children under 12, and is committed to removing branding from school vending machines in Scotland and Wales⁹⁹. Kraft UK does not market in schools or to pre-school children¹⁰⁰. Cadbury Schweppes says it is limiting calorie levels in its 'treat' and 'fun' products¹⁰¹.

Physical activity programmes

In contrast to the section on government activities, projects aimed at promoting physical activity amongst children have been included as counterbalancing measures in this section, since food industry sponsored physical activities have often been developed – explicitly or implicitly – as a way of distracting public attention away from “unhealthy” food marketing, often by the same companies.

School programmes and activities

Balsnack and Karl Fazer AB, in co-operation with the School Sport Union, create and support individual training and physical activity promotion for all **Estonian** school children¹⁰².

In 1996 Coca Cola developed a project, now extended to all **German** states, to promote physical exercise. New ways of practicing and new sports ideas are developed in school settings using an holistic approach¹⁰³.

The extent to which food companies have sponsored health promotion activities in **Irish** schools is summarised below¹⁰⁴. Note that the majority of sponsored activities relate to school sport or physical activity.

School Sponsorship Activities of food companies in Ireland (May 2004)	
Company	Activity
Cadbury	Sponsors of the schools Second Level Basketball Championships for the past 10 years
Cuisine de France	Sponsors of a DJ Carey hurling video, sent to approx. 350 schools
Dairygold	Sponsors of the “Cumann na mBunscoil” competition, which is run in schools in the Cork area
Fyffes	Sponsors of “Bangor Project/Food Dude” pilot healthy eating programme in schools
Irish Pride	<ol style="list-style-type: none"> 1. Placed branding in an Agri Aware video aimed at schoolchildren, teaching them the origin of flour 2. Sponsors of DJ Carey hurling video, sent to approx. 350 schools 3. Sponsors of the North Dublin Schoolboy's League in the Celtic International Cup 2003

Irish Sugar	Sponsors of Siucra Primary School Sports Day
Kellogg's	Sponsors of Schools Rugby, National Schools Activity Day
Masterfoods	Education/cooking campaign in schools, teaching the benefits of rice and pasta, for the past 17 years
Nestlé Ireland	Sponsors of the Irish Schools Athletics Programme (for the past 42 years, making it the longest running programme of its kind in Ireland)
Nestlé Cereals	Education/sampling campaign in schools – promoting the importance of breakfast for education.
RHM	Promoting a return to traditional playground games in national schools, such as dodge ball, drop the beanbag, etc.

The **Italian** food industry organisation Federalimentare along with other collaborators, runs a programme which includes encouraging schoolchildren to commit to 30 minutes physical activity a day in addition to the 2 hours per week prescribed by the curriculum. The programme runs in four Italian regions and also focuses on improving eating habits and lifestyles¹⁰⁵.

In the **UK** Weetabix produces School Sports Day packs to give to schools¹⁰⁶. Coca Cola Great Britain sponsors national School Football Association tournaments as part of their Corporate Social Responsibility Policy on Obesity.¹⁰⁷ Pepsi UK supports under-16 soccer but does not say it is part of any Corporate Social Responsibility policy¹⁰⁸. McDonalds has promoted Community Football, creating 10,000 football coaches to work with children and young people in schools¹⁰⁹.

Other physical activity programmes aimed at children

In the **Czech Republic**, multinational companies have physical activity programmes targeting all ages, such as Danone's 'Be Healthy by Moving'¹¹⁰ and McDonalds 'Measure your steps'¹¹¹. Nestle¹¹² provides financial support for pre-school playgrounds and McDonalds sponsors a football cup for all school-aged children¹¹³.

Similarly McDonald sponsors a football cup for school-aged children in **Denmark**¹¹⁴.

Support for pre-school playgrounds is given by Kalev¹¹⁵, the **Estonian** confectionary industry. Balbiino, an Estonian ice cream producer, supports youth sports, especially mini basketball and football¹¹⁶.

McDonalds in **Finland** supports football schools in every city with a McDonalds restaurant, run by the Finnish Football Association¹¹⁷.

In **Hungary**, Danone sponsors a junior football championship for 10-12 year olds¹¹⁸, and Flora supports a popular cycling event for children¹¹⁹.

McDonalds in **Ireland** run the Go Active campaign which seeks to introduce primary school children to traditional Irish sports such as hurling and camogie/Gaelic football¹²⁰.

The **Italian** chewing gum company Perfetti Van Melle Spa launched a programme 'More sport less calories' in 2004, aiming to link the brand to the idea of health and physical activity, where children collect tokens with sports shoes as prizes¹²¹.

McDonalds in **The Netherlands** is sponsoring a national physical activity programme called Flash¹²².

4.5.4. Other organisations

Various non-governmental organisations, like Governments, produce dietary guidelines aimed at children and also guidance on the promotion of healthy eating and increased physical activity, particularly in schools. For example in **France** the Institut National de Prévention et d'Éducation à la Santé published established nutritional guidelines for children in 2002¹²³. Similar guidelines 'Optimix' have been developed by the Research Institute of Child Nutrition in **Germany**¹²⁴. But many other examples could be cited here.

Fruit and vegetable promotion

Health promotion organisations in Flanders **Belgium**, together with government and a food company, have a 'Tutti frutti' fruit scheme in Flemish speaking schools, providing low cost produce and educational messages¹²⁵.

The Healthy Nutrition Forum in the **Czech Republic** run a 5 a Day scheme for all school children which aims to increase the amount of fruit and vegetables children eat¹²⁶.

The **Estonian** Society of Nutritional Science runs TV and radio advertisements and provides leaflets for schoolchildren to promote fruit and vegetables¹²⁷.

In **Iceland** a media organisation, Lazytown, promotes increased fruit and vegetable consumption in 2-8 year olds through games and play, and a similar project is run by the University of Iceland in an EU initiative for 11-13 year olds¹²⁸.

A regional Food and Nutrition Hygiene Service in Lodi, **Italy** seeks to increase fruit and vegetable consumption in primary school children's school meals using different sensory activities¹²⁹.

Since 1996, the **Spanish** Heart Foundation, the Spanish Ministry of Agriculture, Food and Fisheries and the Spanish Society of Cardiology have run the national "Healthy Breakfasts" campaign in primary schools to remind children, teachers and parents of the need for a complete and balanced breakfast¹³⁰.

The **Swedish** Cancer Foundation programme in collaboration with ICA, one of Sweden's largest supermarket chains, supports 5 a Day by providing 8 to 11 year old children with educational material and supermarket visits for information and tasting opportunities¹³¹.

The Pro Children project, operating in nine European countries, is managed in **The Netherlands** by an academic institution; the project is exploring the determinants of fruit and vegetable consumption in 10-11 year olds¹³².

In 2000 the **UK** campaign group Sustain launched a 'Grab 5!' project to promote fruit and vegetables in low income primary school groups. An holistic approach is taken, and includes Action Packs, Curriculum Packs and school food policies¹³³. The Food Dude Healthy Eating Programme has been developed by a research unit at Bangor University and uses video adventures incorporating heroes who ate fruit and vegetables, and used stickers, notebooks and pencils to reward children; it now operates in some English primary schools¹³⁴. The Stroke Association in the UK runs an educational campaign using cartoon characters to deliver the 5 a Day message¹³⁵.

General educational measures focusing on food and health

Projects

The Healthy Nutrition Forum in the **Czech Republic** works with families and offers nutrition information, particularly to mothers¹³⁶.

In **France** there are several local projects, run by a number of academic and health institutions in the various regions of France, which aim to promote a balanced diet and increased food knowledge among children of all ages^{137,138,139,140,141,142,143,144,145,146,147,148}.

A **German** consumer organisation seeks to counterbalance food promotion to children by setting up tasting tables in its advice centres, and encouraging 8-12 year old children to come and develop their critical faculties around food¹⁴⁹.

In **Hungary**, the Garbage Alliance organised a drawing event to invite children to consider what sort of school canteen would be better than one serving food high in fat, sugar or salt¹⁵⁰.

The campaign of the **Italian** consumer organisation Altroconsumo 'A dish of health' aims to provide nutritional information to children with a photographic competition, surveys, leaflets and a website¹⁵¹.

An educational organisation De Vereniging Openbaar Onderwijs in The **Netherlands** promotes healthy lunches to primary school children¹⁵².

The National Health Association in **Norway** provides a body, health and lifestyle programme 'Petter Puls' to 10-12 year old school children¹⁵³.

Attracting at least 5% of young people in **Slovenia** to engage in physical activity and eat a healthy diet, is the aim of the CINDI Slovenija programme which includes a series of events over 10 days¹⁵⁴.

Teaching materials

The Flemish Institute for Health Promotion, which has developed a food pyramid and health education model, supports educational activities in **Belgium** by providing information for schools on implementing a food policy¹⁵⁵, and by providing educational materials for class activities in primary and secondary schools about healthy diets¹⁵⁶. A Christian health insurance company in Belgium also provides teaching materials about healthy food and snacks¹⁵⁷ (for 12-18 year olds), including a CD ROM¹⁵⁸ (for 5-6 year olds).

A **German** consumer advice organisation Netzwerk Gesunde Ernährung collaborating with others, has constructed an 'Adventure box', which contains 85 different materials for teachers wanting to create healthy schools¹⁵⁹.

A nutrition manual for primary school teachers has been developed in **Greece** by Harokopio University¹⁶⁰.

The **Norwegian** National Association for Nutrition and Health produces a website programme (for 13-15 year olds) and workbooks (for 6-7 year olds) to promote healthy eating in schools¹⁶¹.

A similar programme is promoted in **Sweden** by the Swedish Heart-Lung Foundation¹⁶².

In the **UK**, both the British Heart Foundation (BHF) and the World Cancer Research Fund UK¹⁶³ are among those who produce healthy eating materials for the National Curriculum for children of all school ages. The BHF also supports some interactive websites for children¹⁶⁴.

Information

The Nutrition Information Centre in **Belgium** supplies games and a CD ROM about healthy diets appropriate for children aged 8 and over¹⁶⁵.

Advice about healthy food and snacks is available on the webpage of the **Danish** Cancer Society for 6-17 year old children¹⁶⁶.

Leaflets and other materials are given to schoolchildren during the **Estonian** Heart Association's annual Heart Week¹⁶⁷.

An interactive website full of games provides children in **Italy** with information about healthy diets and lifestyles¹⁶⁸.

In the **UK**, the British Broadcasting Corporation (BBC) provides website information on healthy lifestyles, providing links with relevant programmes, such as the 2004 series 'Fat Nation', which aimed to reduce the weight of 200 adults and children¹⁶⁹.

Other programmes

The Community of Västervik runs a project in part of **Sweden** aiming to reduce soft drink consumption in the community. Schools have collaborated by introducing water fountains and withdrawing soft drinks from cafeterias¹⁷⁰.

Media literacy projects

The **German** Federal Association of Consumer Organisations (VZBV) supports a webpage about advertising for children, aiming explicitly to counterbalance the promotion of foods high in fat, sugar or salt. This Association also acts as a watchdog for food adverts which break German law, and manages an online magazine for European young consumers, aiming to address issues around food marketing to children¹⁷¹. Similarly, a touring exhibition/CD ROM, sponsored by another German consumer organisation, encourages children to discover the tactics of the advertising industry¹⁷².

A 2003 media literacy project was initiated in **France** by the Union Féminine Civique et Sociale de Vesoul, aiming to develop critical awareness of advertising in 10-11 year old children¹⁷³.

The 'Say it with TV' project in **Italy**, also sought to alert 9-11 year old children to the importance of being critically aware when watching TV programmes and commercials¹⁷⁴. A second Italian project involved a website by the major Italian consumer organisation Altroconsumo with educational games to teach young consumers how to read a food label and how to recognise advertising techniques¹⁷⁵.

In **The Netherlands** a Dutch consumer organisation for children Stichting de Kinderconsument, works with government, business, advertising and media industries, university and social institutions to support Reclamerakkers, set up in 2004. This programme

aims to improve the media skills and awareness of children up to the age of 12, so that they understand the aims and methods of marketing. There is a website for children, parents and teachers, education pack for schools, information, newsletters and events, games, workshops and parents evenings¹⁷⁶.

A **Swedish** Consumers' Association project organised in 2001 'Children and Advertising' provides media literacy education in five schools, and also held seminars to raise awareness¹⁷⁷.

In the **UK**, a school education pack has been developed by a campaigning group – Baby Milk Action - to offer independent media education to 11-14 year olds¹⁷⁸.

Physical activity programmes

As with government-funded physical activity programmes, those run by independent organisations have not been described here since, despite their public health value, they are not directly relevant to the issue of promoting “unhealthy” food to children.

4.5.5. Summary

This section of the report summarises measures that may be broadly interpreted as balancing out the effects of ‘unhealthy’ food marketing in some way. Counterbalancing measures are hard to define, since very few programmes or projects are introduced specifically for this reason; more often the initiatives aim to improve children’s health and, more recently, tackle obesity. Counterbalancing measures have been categorised as fruit and vegetable promotion, general educational measures focusing on food and health, media literacy programmes, and physical activity programmes. The media literacy programmes are of particular interest since they attempt to provide children with the knowledge and skills to interpret critically the messages in advertising. The programmes and projects that are described in this section were ongoing at the end of 2004 but may have ceased operation since. In very few instances have the projects been evaluated.

Fruit and vegetables

Fruit and vegetable promotion schemes are reported in most countries, from Austria to Spain and from Estonia to the Czech Republic. Many of these schemes advocate the consumption of at least five portions of fruit or vegetables a day. Such ‘Five a day’ schemes are mostly government funded or occasionally jointly funded with health and public interest groups, and/or with parts of the food industry. Sometimes these groups fund separate projects.

It is very common for fruit and vegetable promotion schemes to work in schools, offering educational programmes, information and materials, tasting sessions and free or low cost fresh fruit and vegetables. Media strategies, using traditional promotional techniques on TV and radio, and working through videos and websites are also often used.

General educational projects and materials focusing on food and health

Most countries have general educational projects and materials. Government projects tend to be school based, and focus either on specific teaching programmes or take a ‘whole school’ approach to health or nutrition standards within the school environment. Education projects

run by other organisations may be set in schools, or be based on events or competitions. Food companies sometimes collaborate with health organisations in such projects. For example, in Hungary Nestlé worked with the Association of Hungarian Dieticians to produce materials for schools.

Media literacy projects

Media literacy projects have been heralded as one way of counterbalancing the effect of promoting 'unhealthy' food to children. The aim of such programmes is to raise the critical awareness and understanding of children about advertising or, more unusually, focus on new media, such as the Internet, as in Iceland. However, only two countries, the UK and The Netherlands, reported specifically constructed programmes funded by a mixture of industry, advertising and media bodies and government. Other initiatives, mentioned by a few countries, tended to be more local in nature, and run by consumer or campaign groups.

Physical activity programmes

Most countries reported a variety of measures to promote physical activity – including projects run by or sponsored by food companies. From the companies' perspective, such projects can boost their public image and deflect attention away from the impact of their marketing activities that promote 'unhealthy' food.

Although all these measures have been grouped together as 'counterbalancing', in some way, the effects of 'unhealthy' food marketing to children, in no country have they been conceived of or implemented as an integrated programme. Unsurprisingly, therefore, they do not operate as such, and there are many gaps and overlaps.

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5. Conclusions

The significant increase of obesity in children in the European Union is of major concern to all Member States. It is imperative that comprehensive strategies be put in place to combat this increase in obesity and that measures be taken as a matter of urgency.

One factor which is known to have an impact on children's consumption patterns is the marketing of unhealthy food to them, but there is a lack of agreement amongst stakeholders over what should be done.

It is clear that food manufacturers are increasingly using integrated and sophisticated marketing strategies to promote their products directly and indirectly to children. It is also clear from this report, as well as from other international reports and surveys, that globally the commercial marketing to children of food and drink is dominated by unhealthy products.

Whilst television continues to be used as a powerful tool for food marketing, and in-school marketing is increasingly exploited, many other non-traditional marketing techniques are becoming more prominent. One of the fastest growing ways to market food to children is via the Internet.

Regulation of marketing to children varies considerably, with the majority of regulatory efforts focusing on TV. Sweden and Norway have tried to protect their children from TV advertisements by prohibiting them within their borders. However, their efforts are being undermined by advertisements on cable and satellite TV broadcast from other countries, and by other forms of marketing.

Most countries have an incoherent patchwork of legal and voluntary controls on broadcast and non-broadcast advertising, and on marketing in schools. The Internet is among the least regulated, with food company websites given virtually free reign.

It is clear that national regulation of marketing of unhealthy food needs to be complemented by European and even global strategies, because marketing is international in its strategies and reach.

Comprehensive strategies to combat obesity in children need to address all the causes of obesity, including measures to encourage children to be more physically active. This report focuses on the marketing of food to children.

All the partners involved in this project have been impressed by the extent of the marketing to children of unhealthy food. They are adamant that children are a special group of the population and, therefore, need special protection against commercial communications. Given the concerns about the increase in obesity in children and the consequent increased risk of cardiovascular and other chronic diseases, which led to the development of this project, the findings presented in this report lead to the following recommendations:

- TV advertising of unhealthy food to children should be prohibited and, as this can only be done effectively at European level, the Television Without Frontiers Directive should be amended accordingly, thereby protecting the existing legislation in Norway and Sweden and extending this protection to the rest of Europe's children.

Legal bases in European treaties already exist to allow inclusion of health protection in European policies. In theory, there should be no difficulty in prohibiting the marketing of unhealthy food to children to ensure that the health of all children in Europe is adequately

protected. The experience in Norway and Sweden – where a ban on TV advertisements aimed at children has been undermined by broadcasting from outside their borders, and by marketing in other media – demonstrates why a Europe-wide approach is necessary.

- Additional measures should be introduced to protect children from all other forms of 'unhealthy' food marketing, including through schools and the Internet and through any other broadcast and non-broadcast media.

The national coordinators for this project noted that there is no commonly agreed definition for an 'unhealthy' food or even a food that is 'high in fat, sugar or salt'. Any future plans to protect children throughout Europe from the marketing of 'unhealthy' foods will need a common EU definition of an 'unhealthy' food. Therefore:

- A common EU definition of an 'unhealthy' food needs to be agreed.

In most instances the coordinators had difficulty in collecting information relevant to this report, particularly information about the type and amount of food marketing to children in their country. In many cases relevant data was buried within reports written for other purposes. Therefore, in order to inform policy making:

- Effective structures and procedures should be established to monitor the nature and extent of food marketing to children and its regulation throughout Europe.



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