

This submission outlines evidence addressing the effectiveness of marketing restrictions of unhealthy foods to children in Ireland, young children's recognition of food brands in Ireland, and parents' perceptions of the issue. The Broadcasting Authority of Ireland (BAI) and the Department of Health have made progress with regulation of broadcast media and the new Voluntary Code for digital media. However, gaps in definitions ensure that children continue to be exposed to extensive marketing practices for unhealthy foods, hampering implementation of the WHO 2010 Set of Recommendations on restricting marketing of high fat salt and sugar food and drinks to children in Ireland. A forthcoming WHO-Regional Office for Europe report (May 2018) identifies progress and limitations across the WHO European Region including in Ireland in implementing the 2010 Set of Recommendations. It will note that "there is a compelling case for a causal relationship between HFSS food marketing exposure and obesity in children" and that child health and rights perspectives mandate that this is addressed. It therefore identifies points of focus to achieve the goals of the Set of Recommendations.

1. Broadcast media – an 'advertised diet' high in unhealthy food for children in Ireland

Despite regulatory compliance with the relevant provisions of the BAI Children's Commercial Communications Code, children's exposure to advertising for food and non-alcoholic beverages high in saturated fats, salt or sugar (henceforth, 'unhealthy foods') on television in Ireland remains high. This is due to how the parameters of regulation were set.

An analysis of advertising on television in the Republic of Ireland (Tatlow-Golden et al, 2016) identified food ads at times of the day and on channels *viewed most* by children aged 4-6 years (based on panel data). The study found that **although advertising was regulation-compliant, half (55.2%) of food ads at times viewed most by young children were for unhealthy items** that, according to the nutrient profiling system used in Ireland to regulate marketing to children, are not recommended for marketing to children. This is because much of the television children actually view is not considered children's programming as it constitutes general entertainment, sport, family programmes, etc. **On some channels, ads for unhealthy items were shown up to 6 times an hour and overall the study estimated children's annual exposure at over 1000 unhealthy food/drink ads a year.** Thus, the 'advertised diet' of very young children normalises consumption of items that should be occasional treats rather than the predominant feature of the diet.

A further weakness of the BAI Code is the **nutrient profile model** it adopted. The Ireland nutrient profile model almost exactly mirrors the UK Department of Health model (with exceptions for cheese); Scarborough and colleagues carried out a comparison of 8 international models and found the UK model to be the *least* restrictive in identifying unhealthy foods not for marketing to children. When Tatlow-Golden et al (2016) analysed the same dataset of food ads, employing the WHO-European Region nutrient profile model, it was found that the proportion **of items not recommended to be marketed to children rose to nearly three-quarters (71.9%).**

Therefore, definitions of children's programming, and the nutrient profiling approach used, mean that the impact of the food marketing restrictions in the BAI Children's Commercial Communications Code on children is weak.

Recommendations

- 1. Regulation of television should be reviewed. It should be targeted at those times and channels with the greatest child audiences, as children view other programming extensively*

2. *The nutrient profile system identifying foods not to be marketed to children should be tightened. This also applies to the new Voluntary Code of Practice for non-broadcast media*

Non-broadcast media and other marketing

Regarding digital media, the Department of Health Non-Broadcast Media Advertising and Marketing of Food and Non-Alcoholic Beverages Code of Practice (2017) represents a step forward compared to countries that have yet to address digital media. However, multiple features of this Code of Practice are a disappointment. First, it is **voluntary**, and evidence indicates that such codes are less effective (WHO, 2016; WHO, 2018, forthcoming). Second, the code has adopted the **same weak nutrient profile model** as employed in the broadcast code and again will therefore ensure a lax definition of items marketed to children. Third, **applying restrictions to 'children's media'** will ensure that the same weakness that affects the broadcast code will affect the non-broadcast code as described above. Fourth, although provision 7.2.3 of the Voluntary Code ('Marketing Communications for HFSS food by means of social media shall not target children under the age of 15') may have potential to affect marketing based on profiling of children in social media, it is unclear how this will be interpreted. The definition of 'target' is unclear. This provision is so open as to allow marketers and social media platforms to target advertising based on *proxy* variables (such as music preferences, etc) that are effective in identifying children and thus to continue to profile them effectively. Finally, the **monitoring and evaluation mechanism(s) remain to be defined** and are currently ultimately in the gift of the Minister. Without strong provisions many aspects of the code particularly pertaining to digital media may prove to be largely meaningless.

Recommendations

3. *End profiling of children for marketing in social media*
4. *Introduce a robust monitoring mechanism for the non-broadcast Code of Practice*
5. *Implement a statutory rather than voluntary Code for non-broadcast media*

Food packaging and brand marketing

Food packaging: the WHO (2018, forthcoming) report summarises that at least 16 different techniques designed to attract children have been defined "including bright colours, child-oriented text, kid-size/lunchbox packs, links to food company websites, promotional characters, references to play/education, references to flavour, captions that exaggerated the attributes of the food (e.g. "dangerously cheesy"), novel packaging shapes, cross-promotions, movie tie-ins, images of children, celebrities and games) ... over three quarters of products featuring one or more of these techniques were promoting unhealthy foods. Experimental studies have demonstrated that these packaging techniques can be effective in influencing children's behaviour. For example, the presence of a character on food packaging can significantly influence eating-related outcomes in children (including increasing taste and snack preferences towards the character packaged product, and the desired frequency of consumption and anticipated product requests) with effects demonstrated for unfamiliar spokescharacters, licensed characters, and brand equity characters. The size of the food portion that is depicted on cereal packaging has also been shown to influence children's serving and consumptive behaviour" (WHO, 2018, forthcoming).

It also summarises evidence on brand marketing, where brands that sell large quantities of unhealthy items evade regulation by promoting their logos alone or by promoting other items in their ranges. It raises the concern that "cross-promotion effects will continue, e.g. through common taglines, common design elements, common themes, an enable indirect promotion of top-selling products" and concludes that "limiting marketing restrictions to a narrow range of channels or techniques alone will still leave children exposed, and may result in marketing via other channels and techniques increasing" (WHO, 2018, forthcoming).

Recommendation

6. *Follow the WHO recommendations and address marketing to children in all its forms*

Children's food brand logo recognition and parents' attitudes in Ireland

In this context it is of note that already by the age of **3 to 5 years children in Ireland have high levels of recognition of food brand logos, and significantly more so for unhealthy items compared to healthy items** (Tatlow-Golden et al., 2014). Young children correctly matched logos to the food they represented at 57% accuracy at age 3 years and over 90% at 5 years, for unhealthy items. Their knowledge increased significantly between the ages of 3 and 4 years. This is earlier than their understanding of 'healthy' started to increase, between 4 and 5 years (Tatlow-Golden et al, 2013). This means that marketing is the strongest early form of food knowledge children have.

In terms of **parents' perceptions**, parents in Ireland have strong negative feelings about food marketing targeting young children (Tatlow-Golden et al., 2015) and moderate negative feelings regarding adolescents (Tatlow-Golden et al, June 2016). However parents of young children believe that other children are more likely to be affected than their own and very few engage in mediation of their children's media activities regarding marketing. **Parents of adolescents are largely unaware of marketing directed at children in social media and are almost wholly unaware of targeted marketing in social media based on profiles.** They are also almost wholly unaware of the marketing techniques employed and when shown these, use terms such as unethical, misleading to characterise them. After viewing examples of unhealthy food advertising to teens in social media three-quarters of a demographically representative sample of 33 parents in Ireland wanted more regulation of such activities (Tatlow-Golden et al, June 2016).

Recommendations

7. *Develop education on food for preschool educators and incorporate food and eating in preschool education*
8. *Educate parents, younger children and teens about effects of food marketing on them, including unconscious persuasion, profiling activities of marketers and digital media ad tech companies and media platforms, and in particular about the consequences of liking, sharing and tagging others. This needs to be specific - generic exhortations will not be effective and relying on media literacy to negate effects of food advertising has not been proven effective. However public awareness is important, in addition to the earlier recommendations*

References

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