

Opening statement:

Thank you for this opportunity to talk to you about the safety of children online.

Since 1992, Ireland has developed strategies to counter the shift in weight of the entire population. Over these past 30 years there has been five programmes for government with obesity as a key challenge, four obesity taskforces, four national frameworks, two ten-year national action plans, 13 reports on recommendations and progress, four national surveys, five sets of national guidelines, three policies and four healthy eating strategies. In the same window of time, obesity and overweight has increased from 22.9% in 1990 to 29.73% in 2016.¹

The reason for this is a *category* mistake. In that first decade, we tended to think that foods which are high in saturated fats, salt and sugar (so-called 'HFSS' or ultra-processed foods) were ok. They were definitely not harmless, but we could control our intake of them by relying on two easy and popular policy mechanisms: make people aware of nutrition, and give parents control.

In the second decade, evidence mounted about their harm. We started to see correlations between the intake of this food and physical harm in children: diabetes, certain cancers, heart disease and depression. We turned to lifestyle management, and we appealed to families to take responsibility and take exercise.

Then, more recently, the actual neuro-biological mechanism of obesity started to be understood outside of the expertise of niche medical researchers. We started to understand that obesity and overweight were a response to changes in the food environment that affected some individuals worse than others, because of their underlying genetic factors. If the human body is a gun loaded to gain weight, the food environment is the trigger which will cascade a runaway neuro-psychological response beyond willpower, discipline, intelligence, or personal choice.

In this next phase of our understanding, we need to change the pace of knowledge translation and change the paradigm. I am before you today to advise that *this food is a neurological and physical threat to children*, we need to use regulation to stop its exposure to children online.

I know your immediate thoughts: *Is this not a ruinously excessive action that will have a significant impact on employment? Why on earth can't we rely on parental responsibility? Surely this smacks of a regressive, paternalist proposal that suffocates our liberty and narrows down choice, two of the most important markers of democracy? You cannot surely expect us to think that junk food is on a par with the horrific and violent threats of child sexual abuse or bullying?*

Please let me address each briefly:

¹ Oxford University 2021 Global Obesity Prevalence <https://ourworldindata.org/obesity> Ireland 1990: 22.50% 2016: 29.73% Absolute change: +7.23; Relative change pp +32%

Employment: Producers of this food invoke the threat of job losses or production relocation as a way to delay policy interventions or dilute them into voluntary codes or individual lifestyle promotional messages². International research on the economic impact of sugars taxes on employment or company relocation demonstrates there is no evidence of this.^{3,4} Further, the threat of revenue loss needs to be constantly balanced against the economic cost of obesity, with recent estimates of €4.6 billion over the lifetime of the current population of Ireland.⁵

Parental responsibility: The family has also long been used as an arena where real intervention should happen. In fact, this has been a key framing mechanism that food lobbyists shift the locus of control, by appealing that families should be allowed to make ‘responsible’ choices. In all other ways, parents have never been more responsible than we are today: sociologists refer to the phenomena of intensive parenting and helicopter parenting. So why aren’t parents stopping the consumption of this food? The volume of it has increased exponentially, and the levels of exposure children have it are growing. Asking parents to be responsible is like asking them to swim better in a flood.

Choice and liberty: That we should have choice and liberty is a seductive argument. The ‘nanny state’ debate is powerful because it takes valid concerns about autonomy and personal values to defend logically-incoherent rhetoric that is designed to obscure meaningful discussion and obstruct paths (whatever one’s political leanings) to a fairer, healthier society⁶. The reality is that parents would like this⁷. Civil society would like this.

² Campbell N, Mialon M, Reilly K, Browne S, Finucane FM. How are frames generated? Insights from the industry lobby against the sugar tax in Ireland. *Soc Sci Med* 2020;**264**:113215 doi: 10.1016/j.socscimed.2020.113215.

³ In short, consumption of sugary drinks has reduced, as people have switched to low sugar alternatives, so industry profits have not been adversely affected: Pell D, Mytton O, Penney TL, et al. Changes in soft drinks purchased by British households associated with the UK soft drinks industry levy: controlled interrupted time series analysis. *Bmj* 2021;**372**:n254 doi: 10.1136/bmj.n254

⁴ Claudy M, Doyle G, Marriott L, Campbell N, O’Malley G. Are Sugar-Sweetened Beverage Taxes Effective? Reviewing the Evidence Through a Marketing Systems Lens. *Journal of Public Policy & Marketing*. December 2020. doi:[10.1177/0743915620965153](https://doi.org/10.1177/0743915620965153)

⁵ Safefood Ireland 2018: Costs of Childhood Obesity on the Island of Ireland <https://www.safefood.net/research-reports/estimated-costs-childhood-obesity>
Direct costs: healthcare expenditure; indirect costs are absenteeism, premature mortality.

⁶ Coggan (2018) The Nanny State Debate: A Place Where Words Don’t Do Justice’ British Institute of Public Health <https://www.fph.org.uk/media/1972/fph-nannystatedebate-report-final.pdf>

⁷ Tatlow-Golden (2018) ‘Who’s Feeding the Kids Online? Digital Food Marketing and Children in Ireland’ Irish Heart Foundation https://irishheart.ie/wp-content/uploads/2016/12/web__whos_feeding_the_kids_online_report_2016.compressed.pdf

A stronger regulatory environment would actually be a relief to the lobbyists, marketers and advertisers working in the junk food industry: it would clarify their roles and remit and relieve them of the strain of finding ways to circumvent these vague obligations in order to maximise shareholder value. Removing such food advertising online is not a closing down of choice. It creates innovation and it makes room for genuinely new choice.

Level of harm: There is no question: bullying and child sex abuse pose direct threats to individual children that outscale the threat of the presence of this food online. However, the former affects a small number of individual children. The latter affects all of the nation's children, such that one in four children are obese or overweight. When you have something happening to an entire population, experts will tell you that you need what's called 'population-level interventions' for change⁸. Simply put, there is a continuum of interventions: some change the whole social environment, some change group behaviours, and some change individual's physiology. Environmental changes means changing the supply and communication of this food, and it is both the most difficult and the most effective.

Changes in the media landscape in recent years means that one third of internet users are children, and they are online for approximately 15 hours per week.⁹ We are in a legislative paradox: we have regulations to restrict advertising HSSF to children on television. They are based on sound evidence. Why do they not apply to online? Is it because the presence of such foods online is somehow not as effective? Of course not. The aim of digital HFSS food marketing to create engaging, emotional, entertaining and educational experiences. It is more immersive, interactive, and targeted than broadcast messages.

I conclude by proposing a pilot – a moratorium on unhealthy food communication online – and regarded it as one of the few natural experiments that has ever been done. We could get support financial and otherwise, from our partners in the EU, and use Ireland as a living laboratory for such a study. If there is no commensurate reduction in the same period a sunset clause would reverse the moratorium. This would offer a real opportunity to reframe harmful content online, provide a valuable experiment for policymakers internationally, and experiment with new paradigms to reverse obesity and overweight for children in Ireland.

⁸ Swinburn et al. 2011

⁹ Boyland 2020