

Codes Review Panel  
ASA Secretariat  
PO Box 10675  
Wellington

7 October 2016

**Submission to the Advertising Standards Authority by the Children and Media Research Group, University of Otago, Dunedin**

**Review of the Code for Advertising to Children and the Children's Code for Advertising Food**

**1. Introduction**

- (i) The Children and Media Research Group appreciates the opportunity to provide this submission on the Review of the Code for Advertising to Children and the Children's Code for Advertising Food (the Codes). We agree to this submission being made public.
- (ii) We would like to present an oral submission if the opportunity is provided. Please contact: Dr Leah Watkins, leah.watkins@otago.ac.nz
- (iii) The Children and Media Research Group is made up of researchers within the Department of Marketing at the University of Otago. We also work closely with other researchers across the University as part of the Children, Wellbeing and Media Group, and with colleagues at The Health Promotion and Policy Research Unit (HePPRU) (University of Otago, Wellington), and other researchers and universities outside of New Zealand.
- (iv) Our group has a particular interest in children's well-being in relation to the rapidly changing marketing communication environment.
- (v) According to the United Nations Convention on the Rights of the Child (UNCRC), children have the right to health and to live in an environment that supports that right, (1). Children have the right for their best interests to be the primary concern in all matters that impact them (1). They must also be protected from information, including that conveyed by marketing, harmful to their health and well-being.
- (vi) The current Codes require strengthening to ensure New Zealand children's rights are protected. Decisions made about marketing to children must be weighted in favour of their health and well-being, over commercial interests. This premise should underpin the new Codes.

- (vii) The advertising industry has an obligation to ensure that children's rights are respected and protected, and that any breaches of their rights are remedied (2). The document *Children's Rights and Business Principles* (2) provides guidance for industry in interpreting and applying children's rights to their business activities. We **recommend** that the Review Panel consult this document when amending or developing new Codes.
- (viii) To align with the Review Panel's intentions, this submission takes an evidence-based approach to requests for change or amendments to the Codes.

## 2. Background

- (i) Commercial messages are increasingly being directed at children through multiple new mediums and in many of children's educational and play spaces. There is growing evidence of the negative impact cumulative exposure to marketing messages embedded in media, education and other cultural forms may have on children's well-being and their socialisation as citizens and consumers. The United Nations General Assembly Report on Cultural Rights 69<sup>th</sup> Session (2014) addresses the concerns that commercial advertising and marketing practices have a detrimental effect on the well-being of children, and impinge on their educational and cultural rights. The Report recommends that all forms of advertising to children under the age of 12 years be prohibited. We **recommend** that the Review Panel consult this document when amending or developing the new Codes.
- (ii) Our knowledge of children's inherent limitations in understanding advertising and their unique susceptibility to commercial persuasion has been well established in prior academic work. Cognitive research consistently demonstrates that children cannot effectively recognize the persuasive intent of advertising or apply the critical evaluation required to comprehend commercial messages (3-5). Studies have found that early adolescents are still in the process of developing knowledge about marketing tactics such as message bias (6). Children who lack this understanding and a healthy scepticism towards persuasive messages are more likely to accept the information conveyed in them as truthful and accurate, and are more susceptible to being influenced by it than older viewers (7,8).
- (iii) Advertising has been shown to not only prompt children's immediate desires and inform their brand preferences but also to shape and influence their broader consumption values, including materialism (9-11). Advertising has also been shown to influence children's learning of other values, beliefs and attitudes (12), including social stereotypes, self-image beliefs (13), and antisocial behaviour and aggression (14). Television advertising has also been shown to have a direct influence on family life and contributes to parent-child conflict (15).

- (iv) Given the appeal of new forms of technology and communication to children and the integration of marketing messages in public and cultural spaces, it is important to re-consider children's vulnerabilities. The current voluntary codes of practice are increasingly ineffective in the integrated media environment that children inhabit.
- (v) Pre-schoolers are particularly vulnerable and are increasingly targeted directly by advertising messages. We **recommend** the Code acknowledges and allows for age specific limitations on advertising frequency, content and tactics.
- (vi) Food and beverage marketing has been identified as "a significant independent determinant of children's food behaviours and health status" (17). This situation is supported by evidence from a number of sources (16-20), most recently WHO's *Report of the Commission on Ending Childhood Obesity*:

*There is unequivocal evidence that the marketing of unhealthy foods and sugar-sweetened beverages is related to childhood obesity. Despite the increasing number of voluntary efforts by industry, exposure to the marketing of unhealthy foods remains a major issue demanding change that will protect all children equally. Any attempt to tackle childhood obesity should therefore, include a reduction in exposure of children to, and the power of, marketing (16).*

**(vii) Response to questions in submission document**

*1. What are the strengths and weaknesses of the two current Children's Codes?*

- (i) The current Codes are based on some provisions within UNCRC, stating that children's protection and best interests are a concern. This could be seen as a strength. However, research demonstrates that the ASA's use of UNCRC is selective and used to serve the interests of industry (21). Children's rights are indivisible, and as such, should be applied in their entirety (1). Furthermore, UNCRC defines a child as any person under the age of 18 (1). However, the current Codes only include children up to the age of 14; children aged 15-17 are provided an "extended duty of care" within the adult-focussed Code for Advertising Food (22). We **recommend** that the Code's definition of a child is any person under the age of 18, as defined by the Convention.
- (ii) The self-regulatory nature of the Codes, including the complaints system, is problematic. The Codes are industry-developed, voluntary, and lack independent monitoring and evaluation. This presents a conflict of interest between the rights of children as the primary consideration in developing and monitoring the Code and the concern of industry to consider the interests of share-holders. Thus, rather than serving the best interests of children, and their health and well-being, the Codes primarily prescribe criteria in favour of industry's commercial interests. Research demonstrates that self-regulation is ineffective, in particular in reducing the amount of unhealthy food

and beverage marketing, and inconsistent with health goals (21,23). We **recommend** mandatory regulation and independent monitoring and evaluation of advertising to children.

- (iii) Although the current Codes encompass a range of marketing activities and media platforms, the list is not exhaustive. Furthermore, the Codes do not make allowances for the rapidly emerging forms of media and marketing platforms (24). Furthermore, although there are specific situations and settings that are of significance to children, including home, school and sports clubs, children are exposed to marketing in a variety of everyday settings and locations. The Codes do not encompass all of the various forms of marketing to which children are exposed on a day-to-day basis (25).

2. *What are the strengths and weaknesses of the current complaints process?*

- (i) The current complaints process relies on members of the public lodging complaints about advertisements they believe have breached the Codes. Research in countries with similar systems as New Zealand shows that the process is difficult to use. It also requires complainants to have a high level of resources in terms of time, knowledge and skill (26-28). Parents are also often unaware of the system or do not complain because they perceive it to be futile due to its low success rate (26-28).
- (ii) As mentioned previously, the complaints process is industry-led and as such is subject to a conflict of interest between the commercial goals of industry and the health and well-being of children.
- (iii) The current complaints system is neither timely nor effective. By the time a complaint is lodged and reviewed, and sanctions (if any) imposed, the impact and potential harm of the advertisement has occurred. We **recommend** that immediately a complaint is lodged, the advertisement or marketing communication in question is removed and only re-aired or made public once it has been reviewed.
- (iv) We **recommend** that the complaints process be more transparent and monitored by an independent panel consisting of health and children's rights experts, and children's representatives.
- (v) We **recommend** the implementation of a complaints process that is accessible to and easily used by the public, including children.
- (vi) We **recommend** that the complaints process is regularly promoted to the public, as occurs for breaches of the Broadcasting Standards.

3. *What changes, if any, are necessary to protect the rights of children and their health / well-being?*

- (i) Children's best interests must be the primary consideration of all individuals, groups and organisations in all matters that concern children (1). As previously stated, organisations have an obligation to respect and protect children's rights, and to remedy any violations of them. This premise should form the basis of any amendments to the current Code, or development of new Codes and guidelines.
  - (ii) This means that decisions made about food and beverage marketing to children must be weighted in favour of children's health and well-being. Only healthy food should be marketed. To ensure this occurs, we support HePPRU's **recommendation** that all food and beverage marketing is evaluated by an independent panel consisting of nutrition, health and children's rights experts before being aired or made public. A nutrient profiling system that is specifically designed for the regulation of food and beverage marketing should be used to evaluate the nutrient status of foods and beverages that food producers and advertisers wish to promote.
  - (iii) We **recommend** that the health and children's rights sectors have majority input into the development of the Codes, including the complaints process.
  - (iv) The recommendations in this submission are made with the best interests of children as a primary concern. Implementing the recommendations would protect the rights of children, and their health and well-being.
4. *Please comment on any concerns you have with different media formats in relation to advertising to children (for example, magazines, television, social media, websites).*
- (i) WHO defines food and beverage marketing as

*any form of commercial communication or message that is designed to, or has the effect of, increasing the recognition, appeal and/or consumption of particular products and services. It comprises anything that acts to advertise or otherwise promote a product or service (29).*

Marketing techniques include:

*Advertising, sponsorship, product placement, sales promotions, cross-promotions using celebrities, brand mascots or characters popular with children, web sites, packaging, food labelling and point-of-purchase displays, e-mails and text messages, philanthropic activities tied to branding opportunities, and communication through "viral marketing", and by word-of-mouth (30).*

- (ii) Television is still a significant media form used by New Zealand children (31). Although time restrictions are in place for advertising on free-to-air channels (31), the time limits are inconsistent across the channels and do not correspond with the times

that the majority of children watch television. We **recommend** the Codes include guidelines on restricting the times of advertising to children.

- (iii) Electronic media is playing an increasing role in New Zealand children's lives (31) and provides a largely unregulated platform for marketing messages, including social media sites, websites, advergames and product placement in games and other electronic sources (24). Additionally there is evidence in the literature that children have more difficulty recognising advertising, marketing and brand messages within digital media than through traditional media (32). Therefore, it is likely that children are increasingly exposed, and unprotected against, such marketing (24). We **recommend** the current code be updated to address all platforms.
  - (iv) It is **recommended** that the issue of privacy, and the collection of children's data for marketing purposes on websites and social networking sites is addressed by the Codes.
  - (v) Product packaging is a key marketing medium (17,18,20,33,34) not captured by the current Codes. Marketing techniques on packaging aimed at children include the use of cartoon and film characters, sports celebrities, promotions and premiums, and health and nutrition claims (40).
  - (vi) We **recommend** that the Codes encompass all media formats and that provision is made to incorporate new formats within the Codes as and when they become publically-available.
5. *If the content of advertisements is a concern, can you please give examples and / or supporting evidence? A product name and description would be helpful so we can source the advertisements.*
6. *If the placement of advertisements is a concern, can you please give examples and /or supporting evidence? For broadcast media it would be helpful to have the time/date/channel or programme, for other media, a link / publication title / outdoor location would be appreciated.*
7. *The Children's Codes currently define a child as under the age of 14. Do you support or oppose this definition? Why?*
- (i) We **support** extending the Code to include persons aged less than 18 years.
  - (ii) Doing so would ensure the Code is in keeping with (i) UNCROC (3); (ii) the WHO *Report of the Commission on Ending Childhood Obesity*(1); (iii) the national obesity plan; and (iv) *New Zealand's Food and Nutrition Guidelines for Healthy Children and Young People* (Aged 2-18 Years) (35).

- (iii) As previously mentioned, even though children over the age of 8 may be able to discern the persuasive intent of the marketing, they do not necessarily act on this knowledge (24,41). Moreover, young children are still impacted by marketing aimed at older children and young adults (30), for example, energy and sports drinks.
8. *Is there a role for a nutrient profiling system such as the health star rating system in the Children's Code? If yes, in what way and which system would you suggest?*
- (i) We **support** the use of a nutrient profiling system in the Code to usefully inform consumers about healthier food and beverage choices (36,37) and encourage food manufacturers to reformulate products (37). Front-of-pack traffic light labelling systems have been shown to be the most effective interpretive labelling systems for consumers (38).
9. *Do you support or oppose a specific guideline on sponsorship? Why?*
- (i) We **support** a specific guideline on sponsorship.
  - (ii) Sponsorship is a key marketing strategy used by companies to increase awareness, and generate brand loyalty and sales of products (39). Sport is a key activity that receives food and beverage sponsorship, however, there is a conflict of interest between the healthy nature of sport and the generation of income for sporting organisations and food companies from sponsorship (40). Furthermore, community organisations, such as local sports clubs, are particularly vulnerable to unhealthy food sponsorship given the perceived need for them to find funding sources.
  - (iii) Research demonstrates that sports sponsorship influences children's food preferences, choices, purchasing and consumption (17,41,42). Sponsorship-related marketing communications in sport include, but are not limited to, Player of the Day vouchers, merchandise, sponsorship of equipment and uniforms displaying brand or company logos, funding for sports workshops and programmes, and hoardings and posters (39,43,44). We **recommend** that sponsorship-related marketing communications are included in the Code.
10. *Do you support or oppose the introduction of independent monitoring and evaluation of the code? How would this work?*
- (i) We strongly **recommend** the introduction of independent monitoring and evaluation of the Code.
  - (ii) Such action is recommended by WHO to protect children and improve health outcomes(1)
  - (iii) Such action should be undertaken by members of the health sector, children's representatives and children's rights advocates.

11. What is your view of the sanctions imposed by the ASA when a complaint is upheld?

- (i) We view the sanctions imposed by the ASA when a complaint is upheld as weak, as the punitive measures do not provide a significant deterrent for industry nor signal the importance of the issue.
- (ii) We support HePPRU's **recommendation** that sanctions should include significant monetary losses for, and transparency in identifying, those companies and organisations that have breached the Codes.

12. Are there environments where you consider it to be inappropriate to advertise to children?

- (i) The *Report of the Commission on Ending Childhood Obesity* states that “settings where children and adolescents gather (such as schools and sports facilities or events) and the screen-based offerings they watch or participate in, should be free of marketing of unhealthy foods and sugar-sweetened beverages” (16).
- (ii) Settings where it is inappropriate to market to children include all educational facilities such as early-childhood centres, schools, after-school and holiday facilities; sporting facilities such as sports clubs and events; health organisations; public facilities such as libraries, recreation centres and areas; parks and halls, churches, bus stops and other transportation facilities.
- (iii) Research suggest that advertising to children in schools presents serious threats to children’s education and to their psychological and physical well-being and recommends that, “policymakers should prohibit advertising in schools unless the school provides compelling evidence that their intended advertising programme causes no harm to children.” (45)
- (iv) The United Nations General Assembly Report on Cultural Rights (2014) (3) states that “the prohibition of advertising should be applied in both public and private schools” (UN Report 2014 p.16). They state:

*“International human rights standards and national laws on education place a legal obligation on children to attend school. Schools therefore constitute a distinct cultural space, deserving special protection from commercial influence... School children offer a captive and credulous audience... Marketing and advertising programs are normalised and given legitimacy when embedded in the school context; the strategies deployed lead children to interact and engage with particular brands during school time. Furthermore, the sponsoring of school material and educational content reduces the freedom education institutions have for developing the most appropriate and highest quality curriculum for their students” (U.N Report 2014: Article 65)*



- (v) Normalising marketing activities in schools and differential school reliance on sponsorship initiatives are a serious threat to the autonomy and integrity of both individual children, schools and the educational system as a whole. We **recommend** that the new codes specifically address advertising in schools.

13. Do you support or oppose combining the two codes? Why?

- (i) We **oppose** combining the two Codes.
- (ii) The prevalence of diet-related disease in New Zealand children is significant and alarming. To ensure that children's diet-related health is afforded the specific attention it require, it is crucial that the Code for Advertising Food is maintained as a separate document.

**(viii) Summary of the Children and Media Groups recommendations**

1. The Children and Media Group **recommends**:

- that children's rights are the primary concern, underpinning the amendment of the Codes, including the complaints process;
- that the Review Panel consult the WHO document *Children's Rights and Business Principles* (4) and the United Nations Report (3) when amending the Code;
- that the Code's definition of a child is any person under that age of 18;
- that the Code addresses advertising in schools as a specific environment;
- that the rewriting of the Codes acknowledges the cumulative effects advertising has on children's wellbeing and limits exposure accordingly;
- that the Code acknowledges and allows for age specific limitations of advertisings frequency, content and tactics (for example to pre-school children);
- that the Codes encompass all media formats and a broad range of settings and locations;
- that the Code makes provision for mandatory regulation, and independent monitoring and evaluation, of advertising to children;
- that the Codes include guidelines on restricting the times of advertising to children;
- that the health and children's rights sectors, and children's representative have majority input into the development of the Codes, including the complaints process;
- that all food and beverage marketing is monitored and evaluated by an independent panel consisting of nutrition, health and children's rights experts before being aired or made public;
- that an easy-to-use, efficient, and transparent and independently monitored complaints system be implemented and that strong sanctions are imposed for breaches of the Codes;
- that a specific guideline on sponsorship is developed, and,
- that the two Codes remain separate.

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