

7 April 2016

Codes Review Panel
ASA Secretariat
PO Box 10675
Wellington 6143

Dear Sir/Madam

Re: Consultation on the Review of the Code for Advertising to Children and the Children's Code for Advertising Food

Pegasus Health (Charitable) Ltd is a large primary health care organisation in Canterbury with around 395,000 people enrolled in its general practice services, representing the majority of the Christchurch population. Pegasus is committed to promoting, maintaining and restoring the health of its enrolled population. The health and wellbeing of children and young people is a priority for Pegasus.

We understand that while primary health care services are an important determinant of health, health is most profoundly influenced by social and environmental factors that sit outside the health sector¹. One of these determinants is the messages that children and young people receive about food, including advertising of foods. Pegasus endorses the Royal New Zealand College of General Practitioner's position on obesity, which states that 'reducing the advertising of junk food and beverages to children' as being a highly cost-effective intervention in addressing childhood obesity².

Pegasus advocates for an environment that promotes and supports the health and wellbeing of children and young people and promotes and supports a healthy weight. Pegasus therefore welcomes the opportunity to comment on the Review of the Code for Advertising to Children and the Children's Code for Advertising Food.

In this letter, we comment on the two areas identified in the Consultation:

1) *What changes, if any, are necessary to protect the rights of children and their health/wellbeing?*

Children and young people are increasingly becoming the target of marketing strategies of energy-dense foods and beverages through a variety of advertising schemes, and strategies³. However, children are limited in their power to influence, change or question the messages being delivered. Pegasus believes children and their health and wellbeing must be protected at the expense of commercial interests.

¹ Barton, H and Grant, M. (2006) A health map for the local human habitat. *The Journal of the Royal Society for the Promotion of Health*, 126.6, 252-253. <http://www.bne.uwe.ac.uk/who/healthmap/default.asp>

² The Royal New Zealand College of General Practitioners. (2014) Policy Brief. Tackling the Growing Obesity Epidemic: a General Practice Perspective. The Royal New Zealand College of General Practitioners: Wellington.

³ Swinburn, B., Sacks, G., et al. (2008) Sydney Principles' for reducing the commercial promotion of foods and beverages to children. *Public Health Nutrition*, 11.9, 881-6.

2) Do you support or oppose the introduction of independent monitoring and evaluation of the codes?

Pegasus supports the independent monitoring of the Codes. Children are limited in their agency and most vulnerable to the effects and influences of food marketing and advertising. Despite this, industry places great emphasis on the personal responsibility of consumers.

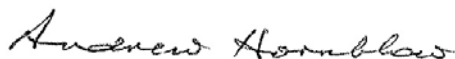
An International Obesity Taskforce report found that “self-regulatory codes, by their nature and even if fully enforced, would not substantially reduce the large volume and high impact of marketing obesogenic foods and beverages to children”⁴. Therefore, we support independent, rather than self-regulated, monitoring and evaluation of the Codes. We believe this would provide the statutory regulation needed to protect those most vulnerable — our children and young people.

We would be pleased to attend to give an additional verbal submission, if this was made available to us.


Kind regards



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Head, Department of General Practice, University of Otago, Christchurch
Chair, Pegasus Health (Charitable) Ltd



Professor Andrew Hornblow, CNZM
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⁴ Swinburn, B., Sacks, G., et al. (2008)