

13 April 2016

Codes Review Panel
ASA Secretariat
P O Box 10675
Wellington

By email: asa@asa.co.nz

Dear Panel

Review of Children's Advertising Codes

Introduction

Progressive Enterprises Limited (**Progressive**) is one of the largest retailers in New Zealand. We operate more than 180 supermarkets throughout the country under the Countdown brand. In addition, we are the franchisor for 60 SuperValue and FreshChoice stores, have 4 distribution centres and a number of food processing facilities. In total, we have more than 18,000 employees. Each year we contribute over \$600 million in wages to the New Zealand economy.

We are a major advertiser in New Zealand across a variety of platforms, including television, digital and through our mailer. Progressive has not been the subject of any complaints under either the Code for Advertising to Children or the Children's Code for Advertising Food (the **Children's Advertising Codes**).

Childhood nutrition is an important societal issue, and as a supermarket we recognise that we have a role to play. We have committed to roll out the Health Star Rating on all our private label products; we have introduced free fruit for kids in all our Countdown supermarkets; and we have a programme of reformulation underway for our private label products.

Self-regulation

We strongly support self-regulation of the advertising industry, and we believe that the rules established by the industry have been serving the public well to date. Self-regulation of industry is most appropriately used to guide 'how' goods and services should be responsibly advertised. It is the role to the Government to determine 'what' products and services can and cannot be advertised.

The review

In our view, the Children's Advertising Codes have operated effectively to date. ANZA's submission, at paragraphs 3.2 and 3.3, further makes this point. However, in the context of the announcement of the Government's Childhood Obesity Plan, we believe it is timely that there is a review of the Children's Advertising Codes to ensure that they remain fit for purpose.

The consideration of any changes should be based on two fundamental principles:

- Evidence. In our submission changes should only be made on the basis of the best available evidence
- Simplicity. The Codes should be easy to interpret and use by advertisers and the public.

In pursuit of the principle of simplicity, we support the Children's Advertising Codes being combined into a single document.

ANZA's submission

Progressive generally supports the submission made by ANZA. However, we have not yet formed a view about the definition of 'child' (section 11 of the ANZA submission).

Next steps

Progressive would welcome the opportunity to be involved in the next steps of the review.

We are keen to participate in the process constructively and to provide insights from the perspective of a major retailer.

Yours sincerely,



Bridget Lamont

**GM Marketing
Countdown
Progressive Enterprises Limited**