

12 July 2022

Children and Young People's Code Review

Submission Form

The ASA is seeking your feedback on all aspects of the Children and Young People's Advertising Code. Please use the following form to provide the ASA Codes Committee with your comments. The template is divided into seven sections. You do not have to provide feedback on every section. For ease of use, you are welcome to ignore any section in this form that you are not providing feedback on. If you need more room for any answer there are blank pages at the end of this form, or you can attach further comments on a separate document along with the email. Please email your completed form to asa@asa.co.nz or you can also print it out and post it to us if easier.

Section 1 – Submitter details	Page 2
Section 2 – Age definitions	Page 3
Section 3 – Definition of targeting children and young people	Page 4
Section 4 – Expected average audience	Page 5
Section 5 – Brand advertising	Page 6
Section 6 – Sponsorship advertising	Page 7
Section 7 – Other aspects of the Code	Page 8

Section 1 – Submitter details

Name:

Organisation (if applicable):

Contact Details:

Permission to publish submission: Yes

 No

Section 2 – Age definitions

The current Code defines 'Children' as people who are under the age of 14 years. 'Young People' are defined as people who are at least 14 years but under 18 years.

What should the age of a child be for the purposes of applying the ASA's Children and Young People's Advertising Code?

Please provide evidence or a rationale to support your recommendation.

If you have recommended the age of a child to be raised above 14 years, please comment on how 'Young People' (14 - <18 years) should be addressed in a revised Code.

Please provide any additional comments you have in relation to the age of a child that are relevant to this Code review.

The Committee would appreciate any advertisement examples that support your recommendation.

Section 3 – Definition of targeting children and young people

The current Code provides the following definition of targeting advertising to children and young people.

“Targeting” is determined by the context of the advertisement and the relationship between the following three criteria:

- 1. Nature and intended purpose of the product or service being promoted is principally or generally appealing to children or young people.*
- 2. Presentation of the advertisement content (e.g. theme, images, colours, wording, music and language used) is appealing to children or young people.*
- 3. Expected average audience at the time or place the advertisement appears includes a significant proportion of children or young people.*

Please provide your comments on this definition and how it is applied when determining whether an advertisement is targeting children and young people.

Please provide alternative suggestions for how targeting advertising to children and young people could be defined.

The Committee would appreciate any advertisement examples that support your comments or suggestions.

Section 4 – Expected average audience at the time or place the advertisement appears includes a significant proportion of children or young people.

The timing and placement of advertisements is one of three criteria used to determine the extent to which an advertisement is deemed to be targeting children and young people. The current Code provides the following guidance (in Rule 1 (i)) for advertisers to assist with assessing what a ‘significant proportion of children or young people’ is.

Measures to determine if children are likely to be a ‘significant proportion’ of the expected average audience may include one or a combination of the following;

- *Where accurate data exists, 25% or more of the expected audience will be children.*
- *Child viewing time zones.*
- *Content with significant appeal to children such as programmes, artists, playlists, video, movies, and magazines.*
- *Locations where children gather (e.g. schools, school grounds, pre-school centres, playgrounds, family and child clinics and paediatric services and during any children’s sporting and cultural events).*

Please provide your comments on this guidance and how it is applied to assessing the appropriate timing and placement of advertisements.

Please provide alternative suggestions for this guidance and provide any evidence or available tools to support your suggestions.

The Committee would appreciate any advertisement examples that support your comments or suggestions.

Section 5 – Brand advertising

The current Code provides Principles, Rules and Guidelines to support responsible when targeting children and young people. Some of the rules are specific to ads for products and services and do not extend to an organisation’s brand ads.

Should the updated Code include rules and guidelines to support the responsible advertising of any brand ad when the ad is targeted to children and young people?

If you answered yes to the above question, please provide evidence to support your recommendation.

Please provide your suggestions for new rules or guidelines to support your recommendation.

The Committee would appreciate any advertisement examples that support your recommendation or suggestions.

Section 6 – Sponsorship advertising

The ASA does not have jurisdiction over commercial sponsorship agreements between organisations and advertisers. However, advertisements that refer to or feature an occasional food or beverage product sponsorship agreement are covered by the Code.

The current Code provides a specific Principle, and Rules and Guidelines, to support responsible sponsorship advertising of occasional food or beverage products when not permitted (Rule 1 (i)).

Please note, the Code expressly states that sponsorship advertising of occasional food or beverage products targeting children is not permitted (Rule 1 (i)).

Please provide your comments on these sponsorship principle, rules and guidelines.

Please provide any recommended changes or additions to the principle, rules and guidelines.

Please provide information to support your recommendations.

The Committee would appreciate any advertisement examples that support your comments or recommendations.

Section 7 – Other aspects of the Code

Please provide your comments on any other aspect of the Code that has not been addressed elsewhere in this form.

Please name the Principle, Rule or Guideline you are commenting on.
Comments
The Committee would appreciate any advertisement examples that support your comments or recommendations.

Please name the Principle, Rule or Guideline you are commenting on.
Comments
The Committee would appreciate any advertisement examples that support your comments or recommendations.

Please name the Principle, Rule or Guideline you are commenting on.
Comments



The Committee would appreciate any advertisement examples that support your comments or recommendations.

Please include any other general comments you wish to make about the current Code here (if you wish to elaborate further and there is not enough room, please use the additional pages at the end of this form).



