



STAKEHOLDER VIEWS ON POLICY OPTIONS FOR MARKETING FOOD AND BEVERAGES TO CHILDREN

Findings from the PolMark project in Sweden
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Assessment of POLicy Options for MARKeting Food and Beverages to Children - POLMARK

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Web

<http://www.ki.se>

<http://www.polmarkproject.net/>

<http://ec.europa.eu/eahc/projects/database.html>

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Overview of PolMark project in Europe

General objectives

PolMark (POLicies on MARKeting of foods and beverages to children) aims to improve the understanding of influences on children's dietary choices and contribute to improving the nutritional status of children in Europe in order to counteract the challenge of obesity and non-communicable disease.

Strategic relevance and contribution to the public health programme

The 2006 World Health Organization's European Regional Ministerial conference Counteracting Obesity identified the marketing of foods and beverages to children as a public health issue requiring regulation¹. The European Commission's 2007 White Paper Strategy on Overweight and Obesity also recognised this issue and urged industry to take voluntary action; this position was set to be reviewed in 2010². The PolMark project is designed to provide resources to assist policy-makers in these strategic objectives.

Methods and means

The project consists of three work packages contributing to the objectives.

- An updated 'state of the art' review of current controls and regulations on marketing to children in all EU member states (last undertaken by the WHO in 2005–6).
- Interviews with over 100 key stakeholders concerned with children's health and with food and beverage production and promotion (at least 10 stakeholders in each of 11 member states) to assess the stakeholders' views and the likely opportunities and barriers that exist in developing policies in this area.
- Development of health impact assessment (HIA) techniques using quantified impact estimates, and their assessment as a tool available to policy-makers.

Expected outcomes

The project's outcomes will advance the understanding of current policies and policy options on marketing controls in relation to food and beverages for children, and expand the methodology available for Health Impact Assessment.

Partners

The International Association for the Study of Obesity – **United Kingdom** (Coordinator)

European Consumers' Organisation – **Belgium**

Research and Education Institute of Child Health – **Cyprus**

University of Masarykova – Masarykova Univerzita – **Czech Republic**

Suhr's University College – **Denmark**

University of Alicante – **Spain**

Institut de Recherche pour le Développement – **France**

Irish Heart Foundation Ltd – **Ireland**

Association of Polish Consumers – **Poland**

National Institute of Public Health – **Slovenia**

Stockholm County Council and the Karolinska Institutet – **Sweden**

¹ WHO (2006). *European Charter on counteracting obesity*. EUR/06/5062700/8 Adopted at the WHO European Ministerial Conference on Counteracting Obesity, Istanbul, Turkey, 15–17 November 2006. WHO Regional Office for Europe, Copenhagen. See <http://www.euro.who.int/document/e89567.pdf>.

² European Commission (2007) White Paper *A Strategy for Europe on Nutrition, Overweight and Obesity related health issues*. See http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/nutrition_wp_en.pdf.

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Table of Contents

Background	6
Obesity development.....	6
Regulations on marketing to children	6
Results of the PolMark study.....	7
The effect of marketing on purchasing and consumption	8
Regulation versus voluntary action	9
Influence on government policy.....	10
The Swedish debate.....	11

Background

Obesity development

Sweden has experienced a rapid increase in childhood obesity³ although the prevalence may not be as high in Sweden as in other parts of Europe⁴. No nationwide representative Swedish database on childhood obesity exists, but data from routine school health examinations indicate that childhood obesity trends may be levelling off among 10–11 years olds across Sweden and may possibly be reversing in girls^{5,6,7}. However, in low income areas, childhood obesity is still increasing⁸.

Sweden is one of the few European countries with no national action plan or national campaigns for healthy dietary habits and physical activity. There has however been wide media attention given to overweight and the need for healthy food habits and physical activity. This attention has resulted in a common awareness of the problem and been the reason for the implementation of many preventive activities in child health care, pre-schools, schools, and sport clubs. Sweden also has a long tradition of free school meals, school health care, national nutrition recommendations, food based dietary guidelines and free child health care, all of which facilitate actions to prevent obesity.

Regulations on marketing to children

General marketing regulations: Marketing Act, (SFS 2008:486) and the rulings of the Swedish Market Court. In Sweden there is a national ban on Radio and TV advertising targeted at children under the age of 12 (SFS 1996:884). The ban includes advertising before, after and during children's programmes. People associated with children's radio or television programmes are not allowed to take part in advertising targeted at children under the age of 12. According to European legislation, the ban only covers broadcasters under Swedish jurisdiction.

In December 2009, the Audiovisual Media Services Directive 2007/65/EC will replace the present EC directive. Some additions include rules on product placement and time limits for advertisements. The directive contains no specific ban on advertisements targeting children; however, states some restrictions. It is still possible to have stricter national legislation

The statutory regulations are complemented by self-regulatory guidelines/codes such as ICC Consolidated Code of Advertising and Market Communication Practice and, specifically for food, CIAA Principles of Food and Beverage Product Advertising, ICC framework for responsible food and beverage communications and guidelines of the Swedish food and retail sector. A newly formed Marketing Ombudsman handles complaints on unethical marketing, or marketing that in other ways is incompatible with good marketing practices.

³Mårild, et al. Prevalence trends of obesity and overweight among 10-year-old children in western Sweden and relationship with parental body mass index. *Acta Paediatrica* 2004;93:1588–1595.

⁴Lobstein T, Frelut ML. Prevalence of overweight among children in Europe. *Obes Rev* 2003;4(4):195–200

⁵Sundblom E, Petzold M, Rasmussen F, Callmer E, Lisner L. Childhood overweight and obesity prevalences levelling off in Stockholm but socioeconomic differences persist. *Int J Obesity* 2008, Oct; 32(10):1525–30.

⁶Sjöberg A, Lissner L, Albertsson-Wikland K, Mårild S. Recent anthropometric trends among Swedish school children: evidence for decreasing prevalence of overweight in girls. *Acta Paediatrica*, 2008;97:118–23

⁷Lager ACJ, Fossum B, Rörvall G, Bremberg SG. Children's overweight and obesity: Local and national monitoring using electronic health records. *Scandinavian J Public Health*, 2009; 37:201–5

⁸Årsrapport barnhälsovården 2007. Stockholm: Stockholms läns landsting; 2008

According to European law “country-of-origin” principle, Sweden is not permitted to ban advertising broadcast from other countries, thus Swedish children are exposed to advertising from abroad. The majority of the advertisements have come from two Swedish language channels based in the UK. These channels have recently and voluntarily stopped advertising foods to children and with the new UK Ofcom ruling banning the marketing of HFSS foods (foods high in fat, sugar and/or salt) to children Sweden will probably have relatively little marketing of foods to children on TV.

The public health policy from 2003, identifies intense marketing of sweet and fatty foods as contributing to the obesity development among children⁹. In a later public health policy, marketing is identified as one of the topics to be discussed within the government’s forum for dialogue with representatives from the food industry, retailers, consumer organisations and media¹⁰. In June 2009 the forum, through meetings with the food industry, agreed on a set of statements for promoting healthy eating habits to the general public, especially among children¹¹.

The food industry has decided to contribute to a responsible and balanced marketing, especially when targeting children. This could be done through the companies’ internal policies, as well as the compliance of the industries members to the ICC framework for responsible food and beverage marketing communication¹².

In a proposal 2005 for an action plan for healthy dietary habits and increased physical activity, the marketing of energy-dense foods to children was subject to several proposed measures¹³. The proposal, containing a total of 79 measures, did not however lead to a national action plan, nor to any actions on marketing.

There have been many debates in the media about the marketing of HFSS foods to children. Significant contributors to the debate have been the two largest consumer organisations who regularly perform surveys on the extent and nature of food marketing to children. Their results are described later in this report.

Results of the PolMark study

Industry representatives (food producers, marketing agencies, retailers) as well as non-industry (consumer organisations, researchers in the field, public health officials, professional organisations, and government agencies) were interviewed on their opinions on the impact of marketing foods to children and to assess the strength and effectiveness of the current regulations and codes of practice. Fourteen people in total were interviewed.

⁹ Den nya folkhälsopolitiken, Nationella mål för folkhälsan, 2003.

<http://www2.fhi.se/upload/PDF/2004/rapporter/dennyafhpolitiken0401.pdf>.

¹⁰ En förnyad folkhälsopolitik. Regeringens proposition, 2007/08:110.

<http://www.regeringen.se/content/1/c6/10/09/78/2ee01484.pdf>.

¹¹ Gemensamt uttalande av regeringen och livsmedelsbranschen om arbetet för bra matvanor. Pressmeddelande 24 juni 2009. Socialdepartementet och Jordbruksdepartementet. <http://www.regeringen.se/sb/d/11998/a/128869>.

¹² ICC riktlinjer för ansvarsfull reklam för mat och dryck. [Framework for responsible food and beverage communications] 2004 ICC Commission on Marketing and Advertising.

¹³ Background material to the action plan for healthy dietary habits and increased physical activity. National Institute of Public Health, 2005. Online at:

http://www.slv.se/upload/nfa/documents/food_nutrition/Theactionplanforhealthdietaryhabitsandincreasephysicalactivity.pdf.

All the interviewed stakeholders could identify countries with more advertising and promotion to children on TV or other media, than Sweden and no one could think of any other countries with less advertising. The general perception seemed to be that Swedish children are not exposed to an overwhelming amount of food marketing in comparison with other European countries or USA.

There is a distinct difference in the positions taken by industry and non-industry representatives in regards to the question of whether food advertising to children is adequately controlled. Industry representatives feel that existing regulations are adequate, whereas non-industry representatives feel that the regulations are not. In one of the questions the interviewees were asked to compare the regulations on food advertising in Sweden to those in other European countries; “are we more controlled, about average or less controlled?” More interviewees felt that the Swedish regulations are more restrictive, than did those who believed it was about average in a European context. All non-industry representatives saw statutory regulation as the best option for introducing controls on marketing, whereas all industry representatives preferred industry wide self-regulation and voluntary action.

The effect of marketing on purchasing and consumption

The majority of the interviewees were of the opinion that TV advertising increases children’s overall purchase *and* consumption of the advertised food. Only representatives for advertising agencies, food industry and the retailers were of the opinion that TV advertising merely switches children’s brand choices and does not affect their total purchase of the food. All of the interviewees believed there was a link between the marketing of HFSS foods and children’s overweight.

The interviewees were asked to rank the relative effectiveness of different marketing communications in terms of likely impact on children purchases or pestering their parents to make a purchase (table 1). The types of marketing communications considered having the most impact were free puzzles with a pack of cereal promoted with Shrek, cartoon-imaged sweets at check-outs in supermarkets, Internet site with games, and TV advertising.

Table 1. Estimate of the relative effectiveness of different types of media in terms of likely impact on children 10–12 years old regarding their own purchases or pestering their parents to make a purchase.

Scale 0–10; 0 = no impact, 10 = very high impact

Free puzzle with a pack of sweetened cereal, promoted on pack with Shrek	3
Display cartoon-imaged sweets at all checkouts of a supermarket used regularly	7,3
TV ads for fast food store shown 2 x daily for a week, between 6pm and 9pm	6,9
Internet site with games and prizes e.g. 15 minutes involvement	6,8
Phone text message for fast food offer, sent to child’s phone on Saturday morning	6,6
Product placement of soft drink brand in a children’s cinema movie	5,6
Fast food brand logo on every 10 th page of a school exercise book	5,6
School football shirts with fast food branding used for one season	4,3

Industry representatives viewed the effects of the different types of media marketing, in general, as having less impact, compared with non-industry representatives.

All, except for one, of the interviewees agreed with the statement that about 25 minutes of TV advertising per week increases the intake of snacks by about one snack per week. The interviewees were asked to estimate the effect of advertising in different settings on extra consumption of certain food items. The marketing communications believed to result in the consumption of most extra items were TV ads for fast foods, and free puzzles in cereal promoted with Shrek, followed by display of cartoon-imaged sweets at supermarket check-outs and phone text messages for fast foods (table 2).

Table 2. Estimated consumption of the number of extra items consumed per day or per week, as a result of advertising in different settings.

	Extra items per day x 7 = per week
TV ads for fast food store shown 2 x daily for a week, between 6pm and 9pm	2,0 drinks/w
Free puzzle with a pack of sweetened cereal, promoted on pack with Shrek ³	1,5 portions/w
Display cartoon-imaged sweets at all checkouts of a supermarket used regularly	1,3 items/w
Phone text message for fast food offer, sent to child's phone on Saturday morning	1,3 f-food items/w
Internet site with games and prizes e.g. 15 minutes involvement	1,2 snacks/w
Product placement of soft drink brand in a children's cinema movie	1,2 drinks/w
Fast food brand logo on every 10th page of a school exercise book	1,0 items/w
School football shirts with fast food branding used for one season	0,8 f-food items/w

The vast majority of the interviewees were in favour of restrictions on TV advertising of HFSS foods to children. Restrictions should apply to all programs watched by large numbers of children and broadcast before 9 pm. One industry representative felt that as long as the products are legal they should be allowed to be marketed, provided it is done in a responsible way. The age limit preferred for marketing restrictions varied considerably; 12 as well as 16 and 18 years were suggested. Representatives for advertisers and advertising agencies chose not to answer the question about the age limit for marketing restrictions giving the reason that children mature at different rates and age is difficult to apply to regulations. The interviewees clearly expressed that marketing of foods to children on the Internet is an area that is not adequately controlled.

Regulation versus voluntary action

The interviewees were asked how they thought different marketing activities for foods and beverages to children should be regulated and monitored. The alternatives given were voluntary industry action, industry code of practice for self-regulation, and statutory regulation. Industry representatives in general were opposed to statutory regulation but supported the TV ban on marketing to children. Representatives for both the advertisers and the advertising agencies expressed concern that the Swedish ban does not conform with the EU Audiovisual Media Services Directive.

Industry representatives said that industry voluntary action would be effective in controlling marketing of foods to children. They felt that voluntary action in combination with industry wide

self-regulation are the models for the future. Their view was that it is faster for industry to self-regulate than for the government to pass new laws. One representative said that everything is not suitable for industry wide self-regulation, such as putting soft drinks by the check-outs in grocery stores. This type of marketing should be subject to voluntary action from the grocery chains. Statutory regulation would in these cases be too rigid and there would always be loop holes.

Both industry and non-industry representatives look at the introduction of a Marketing Ombudsman as a way to make sure that industry takes its responsibility: “We have had good experience with the Swedish Food Sector’s Code of Practice, which has had good effect with its monitoring and reporting procedures”.

Some non-industry representatives said that self-regulation has not shown to be effective since “Voluntary systems based on single case reporting is not adequate”. “The Consumer Agency can not follow up individual cases, and they take too long”; “An ad campaign can be reported and then it takes a month before it is taken off the market. By then children have already been exposed”. “The advertisers would always be one step ahead in finding other marketing channels, and there is no way to impose sanctions”. “Regulation is necessary and it would have to be on EU level in order to work”.

Other non-industry representatives think that a self-regulatory system where the whole industry adheres to the ICC code could be effective: “Reporting procedures can be effective, it works as a deterrent for the companies, but it has to be done regularly”. “The new Marketing Ombudsman in Sweden will make it easier for citizens to report companies”.

Influence on government policy

The interviewees when asked to judge the influence on the government’s policies on the issue of marketing to children, indicated that the ministry of health/government food agency, media and broadcasting companies, and journalist for major newspaper were the institutions with the most influence (Table 3).

Table 3. Rating of different organisations’ strength to influence government

	Scale 0-10, 0 = no influence, 10 = full influence
Ministry of Health/Government Food Agency	7,1
Media and broadcasting companies	6,9
Journalist for major paper	6,6
National consumer association	6,1
Association for food companies	6,0
Association for supermarkets	5,8
Ministry of Finance/Treasury	4,9
Public health researchers	4,9
Association for advertising agencies	4,6
Teachers union	4,4
Parent and child organisation	3,3
National church body	2,2

When asked to judge the public trust in the above organisations; public health researchers, ministry of health/government food agency and national consumer association were ranked as the ones that were most trusted. The least trusted were the association for food companies, association for advertising agencies and the association for supermarkets.

The Swedish debate

Marketing to children on the Internet has been the subject of considerable debate in media, with consumer organisations providing data for the discussions. *Swedish Consumers* in a survey for the Nordic Council found that of 80 percent of 277 print screens from 93 examined websites contained commercials for different kinds of food stuffs and almost half of these were for HFFS foods, mostly candy and sweet desserts¹⁴. The report made special mentioning of the difficulties children have in separating ads from the games and interacting activities, and the subsequent need to clearly identify what is advertising on the Internet. In a follow-up study two years later the websites, to a higher extent, were equipped with an advertising sign, allowing children to easier identify what is advertising. Businesses had also started providing links to websites with information on health and nutrition. According to the report children are still too young to understand the concept of hidden commercial motives¹⁵.

Stockholm Co-operative Consumer Society in a study of children and brand building found many examples on the Internet of how national and international food companies target Swedish children with the help of brand building, co-branding, product placement, “buzz” marketing and viral marketing¹⁶.

A recent survey by the *Stockholm Co-operative Consumer Society’s* Parent Jury found that:

- 28 percent of children who use the Internet use web addresses that link to games, puzzles or corporate brands that they find on packages of toys or foods
- 67 percent of parents find it unacceptable that children are encouraged to download and spread promotional material containing corporate brands
- 74 percent of the Parent Jury find it unacceptable that there are no rules regulating marketing to children on the Internet.

The Nordic Consumer Ombudsman in a statement on commerce and marketing on the Internet has taken the position that marketing to children on the Internet should neither take the form of games nor be integrated in games¹⁷. Games should not be interrupted by advertisements. The statement gives several examples of what should be considered when marketing is aimed at children.

¹⁴ Nordiska ministerrådet, Söt reklam, feta ungar, Nord 2007:002, <http://www.norden.org/pub/velfaerd/konsument/sk/N2007002.pdf>.

¹⁵ Nordiska ministerrådet, Prinsessmuffins och chokladägg, Nord 2008:003, <http://www.sverigeskonsumenter.se/files/PRINSESSMUFFINS.pdf>.

¹⁶ Konsumentföreningen Stockholm, Barnen och varumärkesbyggarna, Februari/juni 2009. http://www.newsdesk.se/pressroom/konsumentforeningen_stockholm/tag/webbmarknadsfoering.

¹⁷ De nordiska konsumentombudsmännens ståndpunkt om handel och marknadsföring på Internet. http://www.konsumentverket.se/Documents/internetit/nordisk_standpunkt_ehandel_2002.pdf.

The Swedish consumer organisations are important actors in pushing for stronger protection of children's interests. The Swedish Consumers propose the following requirements for advertising towards children¹⁸:

- A complete ban on TV-commercials aimed towards children across the European Union.
- Businesses must take a greater responsibility in encouraging children to develop healthy eating habits.
- Internet websites with communities for young consumers should be made to introduce particular health policies.
- Promotions should always be easily separable from editorial information.
- Better monitoring to make sure that the applicable rules and regulations are complied with.
- Further surveys must be conducted in order to monitor the development.

¹⁸ Nordiska ministerrådet, Prinsessmuffins och chokladägg, Nord 2008:003, <http://www.sverigeskonsumenter.se/files/PRINSESSMUFFINS.pdf>.

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