

# Letter to the Editor

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## In response to ‘Unhealthy food advertising directed to children on New Zealand television: extent, nature, impact and policy implications’ by Vandevijvere *et al.*

Madam

On 26 May 2017, *Public Health Nutrition* published an article online entitled ‘Unhealthy food advertising directed to children on New Zealand television: extent, nature, impact and policy implications’ by Stefanie Vandevijvere, Alanna Soupen and Boyd Swinburn<sup>(1)</sup>. We acknowledge the value of robust academic research in promoting debate on issues of public interest. The present letter aims to address concerns with the quality of the research and the published article.

The ASA Children and Young People’s Advertising Code is referred to in the article. The article states that ‘television and radio advertisements for both food and non-food products have to be screened by the CAB before being aired’<sup>(1)</sup>. In fact, the CAB (Commercial Approvals Bureau) process does not apply to radio advertising.

The article states that ‘the screening process for airing food advertisements during designated children’s programming times ... is governed by two codes of practice developed by the ASA’<sup>(1)</sup>. In fact, the process to specifically restrict the types of food advertisements permitted in designated children’s programmes times at the time of the Vandevijvere *et al.* study is the Children’s Food rating, part of the CAB policy called ‘Getting it right for children’.

The two ASA (Advertising Standards Authority) codes on advertising to children in place at the time the advertisements in the article were assessed state that: ‘All advertisements in all forms of media that influence children whether contained in children’s media or otherwise shall adhere to the principles and guidelines set out in this code.’

The article quotes the new draft ASA code and an audience restriction of 25 % in terms of targeting children. The article refers to the draft code and the new code in different places, which creates confusion<sup>(1)</sup>. As the authors are aware, prior to the date of the final revised article being accepted on 18 March, the ASA had released the final version of the new code (1 March 2017) which clearly outlines a definition of targeting children, and guidance on placement, including a 25 % restriction where audience can be measured. This definition states:

“‘Targeting’ is determined by the context of the advertisement and the relationship between the following three criteria;

- Nature and intended purpose of the product or service being promoted is principally or generally appealing to children or young people.

- Presentation of the advertisement content (e.g. theme, images, colours, wording, music and language used) is appealing to children or young people.
- Expected average audience at the time or place the advertisement appears includes a significant proportion of children or young people.’

It is disappointing that this is not accurately reflected in the article<sup>(1)</sup>, which purports to ‘comprehensively assess the extent, nature and impact of unhealthy food advertising targeted to children on New Zealand television’.

The article<sup>(1)</sup> also refers to a limitation in the research regarding other channels with children’s programming and specifically mentions FOUR, as a channel with free-to-air children’s programmes. In May 2016, Mediaworks announced FOUR would close in July 2016.

In the ASA’s view, the following are significant limitations in the research<sup>(1)</sup>:

- The lack of distinction between advertisements targeting adults and those targeting children regardless of the viewing time.
- The assumption that the use of a discount means the advertisement was targeting children, regardless of the products being advertised (including supermarket price and product advertisements).
- The classification of advertisements as unhealthy if just one of the products featured met that criteria under the WHO-Europe nutrient profiling system.
- Multiple references that unhealthy food advertisements ‘specifically targeted children’ despite the limitations in the assessment of the data listed above.
- Lack of distinction between the restrictive advertising environment for food advertising during children’s programming where children are likely to be viewing unsupervised and during peak viewing times with parental or guardian supervision as part of family viewing time.

The Children and Young People’s Advertising Code was introduced on 1 March 2017 and will take effect on 3 July 2017 for new advertising and 2 October 2017 for existing material. It introduces a clear restriction on targeting children under 14 years with occasional food and beverage advertising. The ASA has run briefings to ensure industry is aware of the requirements of the new code and there has been a high level of engagement.

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#### Reference

1. Vandevijvere S, Soupen A & Swinburn B (2017) Unhealthy food advertising directed to children on New Zealand television: extent, nature, impact and policy implications. *Public Health Nutr* (Epublication ahead of print version).