

Letters to the Editor

Marketing of unhealthy food to young children **Brazilian David and multinational Goliath**

Madam

You recently published a comment on transnational food and drink companies' advertising and marketing to children⁽¹⁾. Brazilian consumers, especially those who prefer food to additives and/or synthetic nutrients, day after day are getting more organised to defend their right to nutritionally, socially, economically and environmentally healthy food. In the last five years several mobilising actions have been carried out through governmental and non-governmental sectors.

In 2006 the Brazilian National Health Surveillance Agency (ANVISA) launched a proposal to regulate advertising and marketing of food products with high content of sugar, saturated fat, *trans* fat and sodium, and also sugary soft drinks⁽²⁾. The proposal was first launched for public consultation. Anyone, from consumers to policy makers and industry CEOs, could send their contributions and suggestions to the proposal⁽³⁾. This started a broader discussion between consumers and the food industry in Brazil. While two years have passed since the consultation was closed to public contributions, the proposal has not yet become law.

Remaining steps include agreement of the nutrient cut-offs that will define which food products should have their advertisements regulated. This is in the context of battles with lobbyists from the food and advertisement industries, who seek to prevent or at least delay any inconvenient regulations.

Meanwhile, a study conducted by the Brazilian Institute of Consumer Defence (IDEC) and the Child and Consumer Project (Alana Institute)⁽⁴⁾ has evaluated the advertisements and the nutritional composition of eighteen products of twelve multinational food companies (Burger King, Cadbury Adams, Coca-Cola, Danone, Ferrero, Kellogg's, Kraft Foods, Mars, McDonald's, Nestlé, PepsiCo and Unilever). This shows that if ANVISA's proposal had already been implemented, all the advertisements analysed would be prohibited in Brazil.

In 2008 these companies promised not to advertise unhealthy food and drinks to children up to 12 years old. Some went further and promised, for example, not to use licensed characters or not to produce any kind of food and drink advertisement to children, irrespective of nutritional composition^(5–7).

However, nine of them (Burger King, Cadbury Adams, Coca-Cola, Danone, Ferrero, Kraft Foods, McDonald's, Nestlé and PepsiCo) do not obey even their own self-

regulation rules in Brazil⁽³⁾. The IDEC study also shows that the international, European and US pledges^(4–6) signed by these companies have not been honoured in Brazil.

Fabio S Gomes
National Cancer Institute of Brazil
Rua dos Inválidos 212, Centro
Rio de Janeiro, 20231-048, RJ – Brazil
Email: fabiog@inca.gov.br
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References

1. Cannon G (2009) Food and drink marketing to children (Out of the Box). *Public Health Nutr* **12**, 732–734.
2. Agência Nacional de Vigilância Sanitária (2006) Consulta Pública nº 71, de 10 de Novembro de 2006. [http://www4.anvisa.gov.br/base/visadoc/CP/CP\[16556-1-0\].pdf](http://www4.anvisa.gov.br/base/visadoc/CP/CP[16556-1-0].pdf) (accessed May 2009).
3. Agência Nacional de Vigilância Sanitária (2008) Propaganda de Produtos Sujeitos à Vigilância Sanitária. Detalhes da Consulta Pública n.º 71/2006 – Alimentos. http://www.anvisa.gov.br/propaganda/consulta_71_2006.htm (accessed May 2009).
4. Instituto Brasileiro de Defesa do Consumidor/Instituto Alana (2009) Projeto Criança e Consumo. Publicidade infantil: multinacionais não aplicam padrões internacionais no Brasil. <http://www.idec.org.br/emacao.asp?id=1729> (accessed May 2009).
5. Powell K, Mackay D, Rosenfeld I, Michaels P, Bulcke P, Nooyi I, Kent M & Cescau P (2008) A global commitment to action on the global strategy on diet, physical activity and health. Letter from food and beverage CEOs to Dr Margaret Chan, Director General of the World Health Organization, 13 May 2008. http://www.idec.org.br/pdf/OMS_companies_commitment_WHO.pdf (accessed May 2009).
6. EU-Pledge (2007) Food and drink companies pledge to change advertising to children. <http://www.eu-pledge.eu> (accessed May 2009).
7. Better Business Bureau (2008) Children's food and beverage advertising initiative. <http://www.bbb.org/us/WWWRoot/SitePage.aspx?site=113&id=dba51fbb-9317-4f88-9bcb-3942d7336e87> (accessed May 2009).

PepsiCo marketing policy

Madam

Christine Haigh⁽¹⁾ rightly stresses the need to protect children from irresponsible marketing practices, but she misrepresents the evidence base on tackling obesity and PepsiCo's commitments on health.

PepsiCo, along with a number of other global food companies, has made a series of clear public commitments to the WHO⁽²⁾. Progress against these, including

restrictions on marketing to children, will be validated by independent third parties and published.

In the UK, PepsiCo has not advertised regular full-sugar Pepsi through any marketing channel, to any audience (adult or child), since 2004. All of our marketing spend has been invested into supporting zero-calorie alternatives like Pepsi Max. The 'finger puppets' referred to by Christine Haigh were removed from the Pepsi Max website within a day of Sustain's query – not because they breach any of our commitments, but because we are responsive to stakeholder concerns.

Christine Haigh's underlying point, that voluntary action is meaningless and only national and international legislation can drive responsible food marketing, presents a false choice not grounded in the evidence. The most definitive study on obesity – the UK Foresight Report – states categorically that action from government will need to be matched with action from business if the pressing threats from chronic disease are to be addressed successfully⁽³⁾. We need both legislation and credible voluntary action in areas where governments are unable to act. After all, a world without voluntary corporate action, often in partnership with non-governmental organisations, would be a world without Fairtrade, the Rainforest Alliance, GAIN, the Forestry and Marine

Stewardship Council, and a host of other initiatives making a real impact.

We will continue to deliver against our public commitments, and engage with all those who seek real solutions on responsible marketing and chronic disease prevention.

Derek Yach, MBChB, MPH
Vice President, PepsiCo Global Health Policy
700 Anderson Hill Road, 1–2
Purchase, NY 10577, USA
Email: Derek.yach@pepsico.com
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References

1. Haigh C (2009) McDonald's continues to lure kids with toys (Letter to the Editor). *Public Health Nutr* **12**, 882–883.
2. Powell K, Mackay D, Rosenfeld I, Michaels P, Bulcke P, Nooyi I, Kent M & Cescau P (2008) A global commitment to action on the global strategy on diet, physical activity and health. Letter from food and beverage CEOs to Dr Margaret Chan, Director General of the World Health Organization, 13 May 2008. http://www.idec.org.br/pdf/OMS_companies_commitment_WHO.pdf (accessed May 2009).
3. Foresight (2009) Foresight – Tackling Obesities: Future Choices. <http://www.foresight.gov.uk/OurWork/ActiveProjects/Obesity/KeyInfo/Index.asp> (accessed May 2009).