



Stop Targeting Kids!

Three action areas for a childhood
free from junk food marketing



Contents

| | | |
|--|---|--|
| Irish Heart Foundation action timeline | 4 | Government must take responsibility for protecting children from junk food marketing |
| The need for action | 6 | |
| How does the junk food industry target children? | 8 | |

Three Action Areas for a Childhood Free from Junk Food Marketing:

Action 1

Take it down! Protect children from digital marketing of unhealthy food

12

Action 2

Extend the watershed

13

Action 3

Remove the junk food wallpaper in children's lives

14

| | |
|--|----|
| Six principles for effective regulation..... | 16 |
| Key provisions | 18 |
| The way forward | 19 |

The Irish Heart Foundation has led the fight against marketing of junk food to children in Ireland:

2016

In 2016, we launched the ground-breaking research “Who’s Feeding the Kids Online?”, highlighting the extent to which junk brands target children through digital media



2017

In 2017, we launched the Stop Targeting Kids campaign calling on the Government to regulate both online and broadcast media



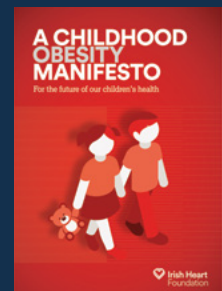
2018

In 2018, we challenged the introduction of the Department of Health’s Non-Broadcast Media Advertising and Marketing of Food and Non-Alcoholic Beverages, including Sponsorship and Retail Product Placement: Voluntary Codes of Practice

We lobbied for the introduction of a Sugar and Sweetened Drinks Tax, which was introduced in May 2018

2019

In 2019, we produced a Childhood Obesity Manifesto in conjunction with leading obesity experts, parents and young people, which makes a total of 58 recommendations under 12 separate headings



2020

In 2020, we secured a commitment in the Programme for Government for a Public Health (Obesity) Bill, to include restrictions on the marketing of unhealthy foods to children.

2021

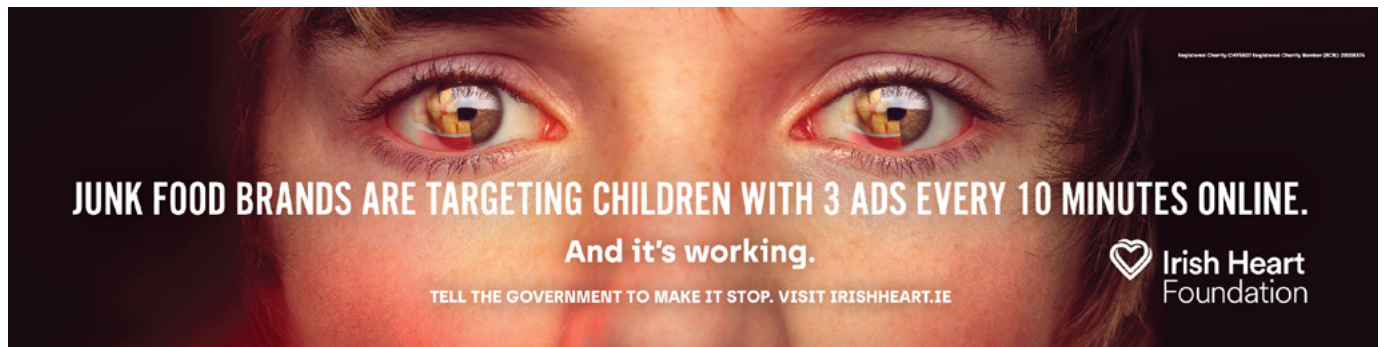
Began extensive lobbying to include a ban on junk food marketing to children across all digital platforms in the Online Safety and Media Regulation Bill

2022

In 2022 we launched a hard hitting digital and billboard ad campaign calling out the saturation levels of junk food marketing targeting children underpinned by research with 1,000 parents and children

Stop Targeting Kids campaign

The Stop Targeting Kids campaign aims to build public and political support for Government action to protect children's health through strict controls, particularly on digital marketing.



There is clear evidence that;

- ✓ junk food marketing to children is rampant
- ✓ that it's fuelling our obesity
- ✓ that children's health is being damaged often permanently as a result
- ✓ and that the State is failing in its duty of care to protect them.



Levels of childhood obesity remain worryingly high in Ireland and Safefood research estimates

85,688

or 1 in 20 children on the island of Ireland will die prematurely due to overweight and obesity.

The need for action

Every child has the right to grow up free from the undue influence of advertising for products likely to be detrimental to their health and wellbeing. But, for the first time in history, we are raising a generation of children that are expected to live shorter lives than their parents.

Food marketing changes what children **want** and **do**:



The impacts of this pervasive marketing are significant, influencing young people's behaviours, sowing the seeds of life-long "brand loyalty," and ensuring that product logos are distributed across a wide spectrum of social networks and entertainment venues.

Advertising is not just about getting you to purchase something; much advertising is to make a product appear 'cool' or associate it with a particular emotion.



What we are experiencing now are childhoods where children learn their brands before they know their ABCs.

They are falling prey to endless marketing exposure, to unhealthy food, prompts and cues.

Children's food behaviours are influenced by broader environments and actors such as the food industry and Government policies, which are beyond their own, or indeed their parents', control. Unhealthy food and drink marketing has now become a wallpaper in children's lives; an insidious background and environment that children are faced with where they live, where they go to school, where they play and when they travel. This is why we need to take concrete actions to protect them.

We know that self-regulation is failing to protect children from junk food marketing and advertising, so we are calling for on the Government to publish the Public Health (Obesity) Bill promised in the Programme for Government, with the following provisions included:



An online ban on the marketing of unhealthy food and beverage products



National regulations providing for no fry zones for all new fast food outlets sited within one kilometre of schools and youth facilities



A 9pm broadcast watershed and removal of loopholes that mean four year-olds see over 1,000 junk food ads a year on TV



The restriction of adverts for unhealthy food and beverage products from being displayed within 200 metres of school playgrounds and early years services



A ban on unhealthy food and beverage advertising on state owned transport, buildings and other public infrastructure such as bus stops.

How does the junk food industry target children?

Junk food companies have become increasingly sophisticated in the way they target children with unhealthy food marketing.

Some of the tactics include:



On TV

- Paying for advertising during TV shows that are popular with children or when children watch TV most – “prime time” shows
- Paying for their products to be used in popular shows



Online

- Designing branded games and apps for young children
- Paying influencers popular with children to promote unhealthy products on social media
- Designing their own content on social media that children can engage with and share with friends
- Running ad campaigns on social media that appear when children are online



Designing marketing that directly targets children

- Putting cartoons on unhealthy food packaging
- Giving away free toys with unhealthy meals
- Running competitions with prizes that children want
- Sponsoring children's sport, to associate their unhealthy food with healthy activities



Placing advertising where children are guaranteed to see it

- Wraparounds on public transport
- Billboards, posters and on bus shelters near schools
- Unhealthy food and drink advertising at sporting events, including GAA and soccer

Government must take responsibility for protecting children from junk food marketing

Only the State can effectively protect children's health through national policies, safeguarding them from a proliferation of cheap and intensely marketed energy dense food that is blighting their lives.

To date, efforts to seek solutions and to promote concerted Government action have been complicated by a multinational processed food industry that ruthlessly uses its economic power and political influence to resist any measures that threaten its profits. Corporate influence and presence have been deeply entrenched in public health and nutrition policy in Ireland, with industry sitting on working groups developing public health policy, often wielding their power to curb provisions in these policies that are most egregious to them, diluting the effectiveness of these policies.

However, the public expects Government to take action to prioritise children's health above the profits of the junk food industry.

Currently, aside from broadcasting restrictions introduced in 2013, there are no statutory regulations that protect children from unhealthy food marketing. Instead, the processed food and advertising

industries have been allowed to design their own codes for how they market unhealthy food to children. Even the 2013 Broadcasting Authority of Ireland (BAI) regulations which banned junk food advertising during children's programming (up to 6pm when children make up 50% of the audience) are insufficient as they only apply to a minority of programmes that children watch.

In the case of online marketing of foods and beverages, the Government has relied on limited self-regulatory regimes developed and run by the food, beverage, and advertising industries, with little or no regulatory oversight. Unsurprisingly, voluntary codes make no attempt to stop the unhealthy food marketing that children see. If we want to significantly improve children's prospects for a healthy life, Government must regulate advertising and marketing, and be much more proactive than they have been in the past.

It is the responsibility of Government to step in and impose higher standards on these companies to protect all children.

Loopholes that allow unhealthy food and beverage marketing and advertising to children:



It's OK to have child friendly cartoon characters on high sugar, unhealthy food products



It's OK to show children lots of ads for fast food and soft drinks during family TV shows and live sport, as adults watch too¹



It's OK to design ads for games and apps for young children to build awareness of their unhealthy brands

The Irish public doesn't agree...



Nearly

3 out of 4 people

want a ban on the marketing and promotion of unhealthy food and drink to children².



¹ The BAI Children's Commercial Communications Code states that "commercial communications for HFSS food products and/or services shall not be permitted in children's programmes" i.e those with an audience profile of which over 50% are under 18 years of age. Consequently, these restrictions currently only apply to a minority of programmes that children watch, with children viewing many programmes not classed as children's TV or covered by the BAI regulation for example evening family TV.

² IPSOS MRBI IHF Childhood Obesity Research October 2019



Three action areas for a childhood free from junk food marketing

The need and support for urgent
Government action is clear.

These three actions will protect
children in Ireland from unhealthy food
and beverage marketing.



Action 1

Take it down! Protect children from digital marketing of unhealthy food

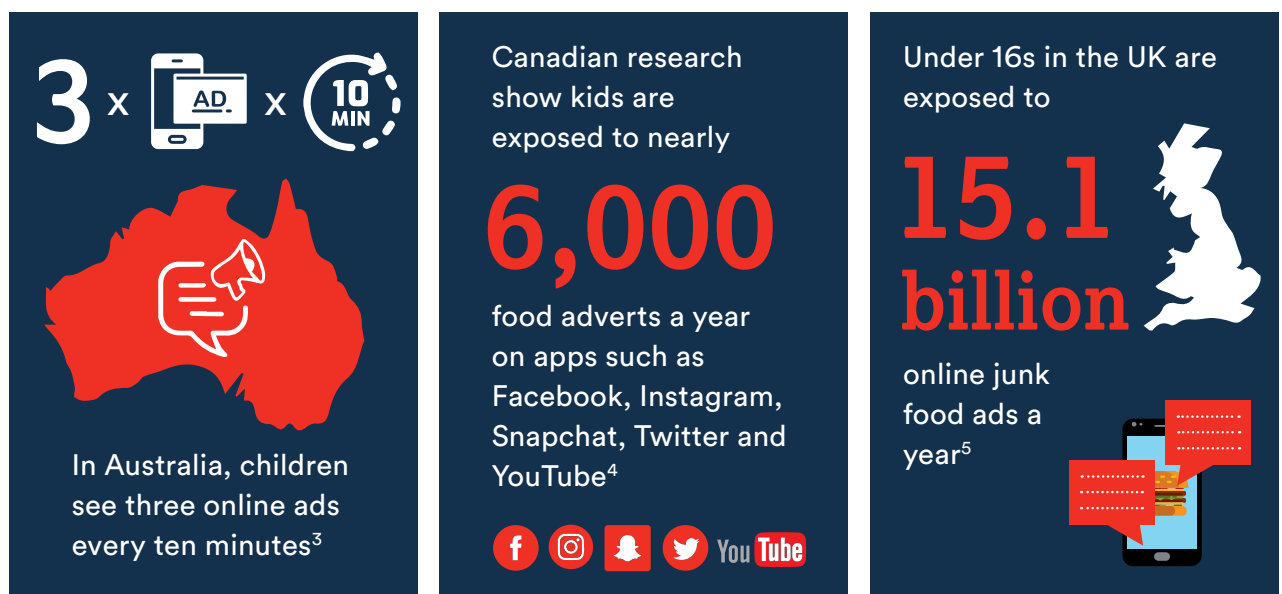
Children should be able to use digital media without being exposed to unhealthy food marketing. Digital media is an important part of children's lives; they use it for education, to access information, to communicate with friends and family and for leisure time.

Most digital marketing takes place completely under the radar of parents, policymakers, and health professionals. Unlike television, for example, where ads can be monitored and analysed, "native advertising", "influencer marketing", machine learning, and many other techniques enable brand promotion and marketing to be woven seamlessly into young peoples' digital ecologies and everyday experiences.

Children should be protected from unhealthy food marketing whenever they use digital media of any kind. To ensure children are effectively protected online, unhealthy food must not be advertised on digital media. In the UK, the Government recently announced ground-breaking new laws to crack down on the extensive and powerful online methods so that from the end of 2022, paid-for online advertising for unhealthy food and beverages foods will no longer be permitted.

Our ask:

An online ban for the marketing of unhealthy food and beverages products



³ Kelly B, Bosward R, Freeman B. Australian children's exposure to, and engagement with, web-based marketing of food and drink brands: cross-sectional observational study. *J Med Internet Res* 2021;23:e28144.doi:10.2196/28144pmid:http://www.ncbi.nlm.nih.gov/pubmed/34255675

⁴ <http://www.ctvnews.ca/health/canadian-kids-see-thousands-of-ads-for-unhealthy-foods-on-social-media-study-1.4154607>

⁵ Department of Health and Social Care and Department of Culture Media and Sport (2020). Open. Consultation: Evidence Note

Action 2

Extend the watershed

The BAI Children's Commercial Communications Code will only consider an advert for a non-compliant product as a breach of the rules if it happens during children's programmes, which is where there is an audience profile of which over 50% are under 18 years of age. In practice, this fails to protect children from enormous exposure to advertising of HFSS products during "prime time" TV shows.

Research shows that four and five year olds in Ireland were still seeing more than 1,000 ads for unhealthy food and beverages on TV a year after the broadcast regulations were introduced. Children should be able to watch their favourite TV programmes and listen to the radio without exposure to unhealthy food marketing.

Legislation has been passed in the UK enforcing a 9pm watershed for unhealthy food advertising on television. The Irish Government should also recognise that such a time-based restriction is essential to protect children from ubiquitous junk food marketing during family viewing time

Our ask:

A 9pm broadcast watershed to stop the broadcast of unhealthy food and beverage advertising when children watch TV the most.



6 Obesity Health Alliance (2017). A Watershed Moment: Why it's Prime Time to Protect Children from Junk Food Adverts. Available from: <http://obesityhealthalliance.org.uk/wp-content/uploads/2017/11/A-Watershed-Moment-report.pdf>

7 Thomas, C., Hooper, L., Rosenberg, G. Thomas, F. and Vohra, J. (2018). Under Pressure: New evidence on young people's broadcast marketing exposure in the UK. March 2018. Cancer Research UK. [Online]. Available from: https://www.cancerresearchuk.org/sites/default/files/under_pressure.pdf

Action 3

Remove the junk food wallpaper in children's lives



Whilst children are bombarded by unhealthy food and beverage marketing on their screens, ads for these products are also common in their offline lives too. Children's exposure to powerful marketing techniques goes far beyond just those used on television or online; from billboards and ads on public transport to cartoon characters on packaging and toys in meals, marketing of these unhealthy products is pervasive.

To ensure children can go about their daily lives without being targeted with unhealthy food marketing, popular marketing practices used in the offline world need to be tackled:

- Marketing that uses any feature or technique that is likely to appeal to children (including images, activities, characters and prizes).
- Cartoon or licensed media characters are incredibly common on the packaging of unhealthy food products and can be a strong influence on children asking their parents to purchase a particular product. Similarly, many food companies or restaurant chains offer toys as a 'reward' for the purchase of their product or design children's games to promote unhealthy food brands. Children must not be targeted in this way.
- Marketing in places where children go as part of their normal lives and where children are guaranteed to see it.

Children should be able to travel to school, participate in sporting activities, go to public places and attend public events without being exposed to unhealthy food marketing. We must ensure public spaces and events are free from unhealthy food marketing. Public spaces and public events include:

- all Government owned, managed and funded facilities, assets and events
- public transport vehicles and infrastructure, including bus stops
- public outdoor locations
- education, healthcare, sporting and recreation facilities
- cultural institutions, for example libraries, museums and galleries
- sporting, cultural and music events, including sponsorship

Our asks:

- Remove confectionery and other unhealthy products from **end of aisles and checkouts**
- Introduce **national regulations** providing for “**no fry-zones**” for all new fast-food outlets within one kilometre of all schools and youth facilities
- **Restrict adverts** for unhealthy food and beverage products from being displayed within **200 metres** of school playgrounds and early years services

71%



of the public agree the Government should stop unhealthy food marketing including:

- ads within websites, games or mobile apps that appeal to children
- using characters or cartoons popular with children
- using celebrity endorsements
- toys being sold alongside unhealthy food



68%

of the Irish public support the introduction of “No Fry Zones” near schools



64%

of the Irish public support a ban on unhealthy food and drink brand sponsorship of sports teams, events and stadiums



Six principles for effective regulation

Self-regulation or alternatively co-regulation is widely promoted by industry as an alternative to statutory regulation. It is also often the Government's first policy choice.

But there are serious failings in permitting companies to set the rules themselves: they do not work for public health objectives; they do not reduce exposure to junk food marketing; and current complaints systems fail to hold food companies to account.

Effective regulation of harmful marketing and advertising must be statutory and must be underpinned by the following principles.



Be Government led

The Irish Government must regulate to protect children from unhealthy food marketing and policy development must be protected from the food and advertising industries' efforts to influence it.



Be informed by evidence

Government must develop regulation based on the best available evidence and advice from public health organisations and academia.



Be comprehensive and future-proofed

Effective regulation must apply to all marketing techniques and technologies now and into the future.



Stop the exposure of children to unhealthy food and beverage marketing

Regulation must stop children being exposed to unhealthy food products and brands in all areas of their lives, not only in environments that are specifically for children.



Stop using marketing that appeals to children

Regulation must prevent the use of marketing that appeals to children, including children's games and apps, cartoons on packaging, and free toys with fast-food meals.



Ensure industry follows the rules – and is properly sanctioned when they don't

Under the present complaints' mechanisms, even when the rules have been broken, the consequences are minimal. "Name and shame" or post removal are used, as opposed to significant sanctions for non-compliance, including financial penalties.

Key provisions

We are calling on the Government to end the reliance on self-regulation and finally regulate the marketing and advertising of unhealthy foods and beverages to children.

The definition of marketing must be comprehensive and future-proofed, covering any activity that promotes any product, service, organisation, or brand, including:

- ✓ all marketing on television, radio or at the cinema (including digital film, television, and radio)
- ✓ all forms of digital marketing, including on social media, video streaming or gaming platforms (e.g. influencer, brand owned, sponsored, and shared content), branded mobile applications, games and websites and programmatic or display advertising
- ✓ print advertising, including publications, billboards, and signs
- ✓ promotions and competitions, including giveaways and prizes
- ✓ sponsorship

Children must be protected from the marketing of brands that are predominantly associated with unhealthy food, even where unhealthy food is not featured. This is a key element of comprehensive regulation to protect children from unhealthy food marketing. If brand marketing is not addressed, food companies and fast-food chains will replace current unhealthy food marketing with new campaigns that promote unhealthy brands. We already know that children as young as 18 months can recognise brands, with preschool children demonstrating preferences for branded products. Failure to address this will undermine the purpose of the regulation.

The regulation should clearly define the types of food and drinks that are unhealthy. The widely recognised World Health Organisation Nutrient Profiles should be used to determine which foods should not be advertised to children.

9 Robinson TN, Borzekowski DLG, Matheson DM, Kraemer HC. Effects of Fast Food Branding on Young Children's Taste Preferences. Arch Pediatr Adolesc Med. 2007;161(8):792–797. doi:10.1001/archpedi.161.8.792. Available from: <https://jamanetwork.com/journals/jamapediatrics/fullarticle/570933>

The way forward

A Public Health (Obesity) Bill

The Irish Government must adopt comprehensive regulation to effectively protect children from unhealthy food marketing, including in all forms of media and in the online environment – starting with ensuring that television and radio are free from unhealthy food marketing when children are watching and listening, and protecting children from digital marketing of unhealthy food.

The Irish Heart Foundation was successful in securing the commitment for a Public Health (Obesity) Bill in the Programme for Government, following the submission of a Draft Bill to the Department of Health. The aim of the Bill is to improve children's current and future health through the reduction in exposure of children to marketing and advertising of HFSS food and drinks. This can only be achieved by legislation rather than ineffective and weak voluntary codes of practice. The Bill seeks to end commercial activities which promote, advertise or market unhealthy food and drink products to children.



Ireland must put our children's health above the processed food industry's profits.

The time to act is now.



**Irish Heart
Foundation**

Stop Targeting Kids



Irish Heart
Foundation

Irish Heart Foundation,
17-19 Rathmines Road Lower,
Dublin 6, D06 C780



01 668 5001
01 668 5896



info@irishheart.ie
www.irishheart.ie

Follow us on Facebook, Instagram and Twitter   

Registered Charity CHY 5507 Registered Charity Number (RCN): 20008376