Comment on: Getting serious about protecting New Zealand children against unhealthy food marketing

Katherine Rich

Dear Editor,

This Viewpoint suggests that an evaluation of the “degree of exposure of New Zealand children to unhealthy food marketing” is required. We welcome such an evaluation, but suggest the Viewpoint is seriously outdated. The current situation, which has been extant for five years and is set to continue into the future, is as follows.

Advertising in all media (print, radio, television, cinema, and websites) in New Zealand is subject to oversight by the Advertising Standards Authority (ASA). This is the agency that provides industry self-regulation of advertising for New Zealand. It is unique in world terms in that its membership comprehensively includes all major New Zealand advertising, media and broadcaster organisations. The ASA develops codes of practice and maintains compliance with the codes through voluntary commitments and a public complaints process.

In 2010, the ASA published the Children’s Code for Advertising Food 2010 as a companion to the Code for Advertising Food and the Code for Advertising to Children. There is an explicit recognition in the Children’s Code for Advertising Food of the need to protect children, of the need to support the food and nutrition policies of Government and the Ministry of Health Food and Nutrition Guidelines and the need to protect the health and wellbeing of children.

A selection of requirements in the codes reflects the measures applied: advertisements should not undermine the role of parents in educating children to have a balanced diet and be healthy individuals; advertisements for treat food, snacks or fast food should not encourage children to consume them in excess; the quantity of the food depicted in the advertisement should not exceed serving sizes that would be appropriate for consumption by a person or persons of the age depicted; benefits of foods for a nutritious diet should not be exaggerated and should not imply that a single food should replace a healthy diet, nor undermine the importance of consuming a variety of food; children should not be urged in advertisements to ask their parents, guardians or caregivers to buy particular products for them; and advertisements soliciting responses incurring a charge should state, “Children ask your parents first” or similar words.

In this context, all major publishers and broadcasters require advertisements to show evidence of assessment for compliance with the Codes and will publish only in line with the Codes.

In order to assess compliance, the ASA invites complaints from the public (consumers, competitors, representative organisations etc), assesses the complaints and publishes its determinations. ASA decisions are available in a searchable database on the ASA website. There have been 9 complaints about advertising food to children in the past 5 years, representing around 0.2% of complaints received over that period (there are around fifty complaints a year received by the ASA relating to food and beverages...
of around 700–800 complaints annually). The grounds for complaint about advertising food to children covered sexism (boys only), nutrition related, disturbing to children, timing of advertisement and trade name. None were upheld.

Television watching in New Zealand for children aged 5–14 years is decreasing, evidenced by reporting by the Ministry of Health. The Ministry reports that while nearly half of children aged 5–14 years (53 percent) usually watched two or more hours of television a day in 2011/12, this was down from 57 percent in 2006/07. The measures applied by Free-to-Air Television broadcasters’ in their policies and voluntary rules include no advertising in specific preschool television programming times and limited advertising in school-age children’s television programming times. The times variously cover 0600–0950 and 1400–1700. This, and several developments in the past two decades, render research such as by Wilson, 1999 as of historical interest only. Work by the same authors and others in 2014 show that 67% of selected packaged food manufacturers and soft drink manufacturers in New Zealand had a publicly available policy related to marketing to children on their company website.

It is of particular interest that the recently adopted Health Star Rating system (HSR), which has been developed and endorsed by joint Australian and New Zealand Governments, rates over 30 different breakfast cereals from Kellogg’s, Sanitarium and Hubbard’s with 4.5 stars (out of 5 stars), a number that increases to 70 different cereals rating 4 stars or more. As well, a number of products from a range of fast food outlets rank with 4 or more stars.

What is disappointing is that voluntary agreements, such as those signed by major soft drinks companies not to sell into schools, are being circumvented by ‘third parties’ and the schools themselves for continuing to accept soft drinks for sale. Support from Government for healthy eating programmes in schools, and greater promotion of the Heart Foundation’s Fuelled4Life programme, would be welcomed by industry.

Overall, this Viewpoint creates the false impression that self-regulation has failed. In our view, self-regulation is very effective and increasingly so in terms of driving measures, such as limited food advertising to children, reformulating foods and conveying the healthfulness of foods to consumers.

Yours sincerely,

Katherine Rich

---

**Competing interests:** Nil

**Author information:**
Katherine Rich, Executive, New Zealand Food & Grocery Council

**Corresponding author:**
Katherine Rich, Executive, New Zealand Food & Grocery Council
katherine.rich@fgc.org.nz

**URL:**
REFERENCES:


