

Recommendations for Responsible Food Marketing to Children

Issue Brief, January 2015

Introduction

Children in the United States grow up surrounded by food and beverage marketing, which primarily promotes products with excessive levels of added sugar, salt, and fat, and inadequate amounts of fruits, vegetables, and whole grains. Food and beverage companies and marketers use an array of marketing strategies to target children and adolescents. Companies have expanded beyond traditional television and media advertisements to reach youth through websites, social media, and mobile devices. Youth also encounter child-focused products, packaging, and marketing in the places they frequent, as well as promotions and incentives, which influence their food preferences and choices for specific products and company brands.



Copyright Veer. Used with permission from the Robert Wood Johnson Foundation.

A body of compelling evidence shows that the marketing of high-calorie and nutrition-poor foods to children and adolescents increases their risk of unhealthy weight gain and contributes to poor diet-related health outcomes. As a result, the widespread marketing of unhealthy foods and beverages to children and youth is a major public health concern.

Key Recommendations for Responsible Food Marketing to Children

The following *Recommendations for Responsible Food Marketing to Children* were developed by a national panel of experts convened by *Healthy Eating Research*, a national program of the Robert Wood Johnson Foundation, to provide a comprehensive set of model definitions for food marketing practices directed to children. These recommendations are intended to provide guidance to a broad range of stakeholders, including food and beverage manufacturers, retailers, restaurant companies, media and entertainment companies, industry trade associations, advertisers, marketers, government agencies, regulators and other policymakers, advocates, and researchers. The members of the expert panel are listed on page 4, followed by a table on page 5 that compares industry's current self-regulatory efforts with the panel's recommendations.

The child audience is defined as birth to 14 years of age.

Research demonstrates that current food marketing practices present a significant public health threat for children and youth by influencing their food and beverage preferences, purchase requests, choices, diet quality, and health. Most companies participating in the Children's Food and Beverage Advertising Initiative (CFBAI) define the child audience as youths ages 2 to 11. However, children ages 12 to 14 are substantially influenced by unhealthy food marketing due to their greater independence, their higher levels of media consumption, and evidence showing that this age group is disproportionately targeted by companies with unhealthy food and beverage marketing. In addition, newer forms of digital and interactive food marketing practices are often difficult, even for older children, to recognize and resist.

This issue brief is based on the full report of the expert recommendations, which includes citations, available at: <http://healthyeatingresearch.org/?p=3108>.



Media and venues are considered child-directed if children constitute 25 percent or more of the audience or if an assessment of the marketing strategies, techniques, characteristics, and venue suggests that children are the target demographic for the advertising or marketing message.

The existing industry definitions of child-directed programming for most companies that participate in self-regulatory programs is that children comprise 35 percent or more of the audience share. This high threshold does not adequately cover the food and beverage advertisements directed at children. A broader definition of child audience share will capture the majority of child-directed programming with limited impact on restricting the marketing messages aimed at adults.

Any marketing that is especially appealing to kids is child-directed.

Marketing or advertising that utilizes strategies or techniques—or contains qualitative characteristics that are particularly appealing to children—regardless of media platform or venue, should be considered child-directed based upon its net impression. The food and beverage products that are promoted through that marketing should meet nutrition criteria.

Brands marketed to children contain only products that meet nutrition criteria.

Many advertisements and other marketing aimed at children focus primarily on promoting a corporate or family brand. These marketing efforts show brief images of specific products that meet nutrition criteria, but place greater emphasis on larger brand-related messages and images. This is particularly problematic when most products offered within the corporate or family brand do not meet nutrition criteria, and are not appropriate to market to children. Such tactics are not addressed (or are inadequately addressed) by most company marketing policies, allowing companies to market wide portfolios of unhealthy food and beverage products to children. Closing this loophole is critical to reduce the amount of unhealthy food marketing directed to children.

The definitions presented in this brief cover the broad range of marketing approaches commonly used, as well as the characteristics that define which marketing practices should be considered as directed to children. While the panel focused on defining food marketing practices and not on developing nutrition criteria, it is critical to have strong nutrition standards and criteria for foods and beverages marketed to children. General references to nutrition criteria within this document do not imply endorsement of any existing criteria and are made with the assumption that responsible food marketing to children can only be achieved when all child-directed marketing practices are addressed and the foods and beverages marketed meet strong nutrition criteria.

Rationale for Developing Recommendations for Responsible Food Marketing to Children

Nearly one-third of American children and adolescents ages 2 to 19 are overweight or obese. In addition, rates of childhood obesity have increased disproportionately among African-American, Latino, Native American, and low-income children. Many of the foods and beverages most heavily marketed to children contribute to a poor diet, excessive calorie intake, and unhealthy weight gain. Research also shows that food and beverage marketers are increasingly targeting African-American and Latino children.

In 2006, the Institute of Medicine (IOM) of the National Academies concluded that food marketing is a risk factor for an unhealthy diet that contributes to childhood obesity. The IOM recommended that the food, beverage, restaurant, and entertainment industries work with government, scientific, public health, and consumer groups to establish and enforce high standards for the marketing of foods, beverages, and meals to children and youth.

To reduce unhealthy food marketing, the IOM recommended that two key aspects of food marketing to children must be addressed: the extent of children's exposure to food marketing and the nutritional quality of the food and beverage products that are promoted through a diverse range of marketing practices. Up to this point, much work has centered on establishing standards for the nutritional quality of the food and beverage products advertised to children. However, less attention has been focused on defining what constitutes advertising and marketing practices that target children.

Current efforts to improve food marketing practices aimed at children are inadequate. Many children remain vulnerable to the influence of food marketing practices and are not protected from exposure to unhealthy products either by current industry self-regulatory efforts or government regulatory agencies. Existing definitions of marketing to children do not comprehensively address the wide range of digital and interactive media, venues, techniques, and marketing characteristics employed by businesses to market and advertise food and beverage products directly to children. For example, definitions for marketing in schools do not extend to middle or high schools where the prevalence of unhealthy food and beverage marketing is high and occurring beyond the protection of parents. In addition, existing definitions of child-directed marketing contain loopholes, which exclude child- and youth-targeted product packaging, in-store promotions, and toy premiums.

Many companies that market foods and beverages to children do not participate in industry self-regulatory programs, such as through the Better Business Bureau's Children's Food and Beverage Advertising Initiative and the National Restaurant Association's Kids LiveWell Program. Therefore, many companies continue to market foods and beverages of nutritional concern to children, including candy, sugar-sweetened beverages, desserts, salty snacks, and fast-food meals.

Conclusion

The marketing of unhealthy foods and beverages to children is a major public health concern and a risk factor for an unhealthy diet that contributes to childhood obesity and other chronic diseases. Children are uniquely vulnerable to the wide array of marketing practices and tactics that surround them and need stronger protections from unhealthy child-directed food marketing than are currently in place. The *Recommendations for Responsible Food Marketing to Children* provide an evidence-based and more comprehensive framework to define food marketing directed to children. These recommendations, when paired with strong nutrition criteria, will assist stakeholders as they work to create healthy food environments that contribute to building a Culture of Health for all children.

Acknowledgements

The expert panel for developing *Recommendations for Responsible Food Marketing to Children* was convened by Mary Story, PhD, RD, and supported by *Healthy Eating Research*, a national program of the Robert Wood Johnson Foundation. The project was planned, organized, and facilitated by co-chairs Tracy Fox, MPH, RD, and Arianne Corbett, RD. *Healthy Eating Research* thanks the expert advisory panel members for their contributions in the development of the *Recommendations for Responsible Food Marketing to Children*.

Mary Story, PhD, RD (Convener)

Professor of Global Health and Community and Family Medicine
Duke University
Director, Healthy Eating Research

Tracy Fox, MPH, RD (Co-Chair)

Food, Nutrition, and Policy Consultants, LLC

Arianne Corbett, RD (Co-Chair)

Leading Health, LLC

Sabrina Adler, JD

Senior Staff Attorney
ChangeLab Solutions

David V.B. Britt

Retired CEO
Sesame Workshop

William H. Dietz, MD, PhD

Director, Redstone Global Center for Prevention and Wellness
Milken Institute School of Public Health
George Washington University

Lori Dorfman, DrPH

Director
Berkeley Media Studies Group

Eileen Espejo

Director, Media and Health Policy
Children Now

Jennifer L. Harris, PhD, MBA

Director of Marketing Initiatives
Rudd Center for Food Policy & Obesity
University of Connecticut

Vivica Kraak, PhD, RD

Assistant Professor of Food and Nutrition Policy
Virginia Tech

Dale Kunkel, PhD

Emeritus Professor of Communication
University of Arizona

Melissa Maitin-Shepard, MPP

Senior Analyst, Policy Analysis and Legislative Support
American Cancer Society Cancer Action Network

Donald Shifrin, MD

Past Chair, Committee on Communications,
American Academy of Pediatrics
Clinical Professor, University of Washington
School of Medicine

Lisa A. Sutherland, PhD

President, LA Sutherland group

Ellen Wartella, PhD

Al-Thani Professor of Communication
School of Communication
Northwestern University

Laurie Whitsel, PhD

Director of Policy Research
American Heart Association

Margo G. Wootan, DSc

Director, Nutrition Policy
Center for Science in the Public Interest

Comparison of Industry Self-Regulation and Expert Panel Recommendations

	Self-Regulatory Practices	Expert Recommendations for Responsible Food Marketing to Children
Definition of Children	Under age 12	Birth through age 14
Definition of Child-Directed Advertising	Children constitute at least 35% of the expected audience. Companies may consider advertising on covered media to be child-directed based on an analysis of factors, including the overall impression of the advertising, the target demographic based on the company's media plan, and the audience definition for measured media.	Children constitute 25% or more of the expected audience, or Children are the target demographic, or an assessment of the marketing strategies, techniques, characteristics, and venue suggests that children are the target demographic.
Definition of Brand Advertising and Marketing	Marketing definitions apply to products only.	Marketing definitions apply to brands and products. Marketing that features a brand more prominently than a specific product should depict only those master brands, sub-brands, brand families, or individual product brands in which all products within the recognizable brand meet nutrition criteria.
Media Platforms	<p>The following media platforms are covered when at least 35% of the expected audience is children ages 2 to 11 (a few companies use a 30% threshold and one uses 25%):</p> <ul style="list-style-type: none"> Television Radio Print Third-party websites Company-owned websites <p>Or using other criteria to designate media as child-directed:</p> <ul style="list-style-type: none"> Interactive games (advergimes) Video and computer games DVD movies Mobile media via cell phones, smart phones, tablets, personal digital devices Word of mouth where incentives, samples, and other support are provided to encourage discussion or consumption of a company's branded foods or beverages <p>Marketing via social media and in movie theaters is exempt.¹</p>	<p>The following media platforms are covered when 25% or more of the measured audience are children (ages 2 to 14), children are the target demographic, or net impression of the strategies, techniques, or characteristics used are appealing to children:</p> <ul style="list-style-type: none"> Television Radio Print <p>Digital platforms including cell phones, smart phones, tablets, personal computers, game consoles, laptops, and other personal digital devices. Digital marketing and advertising includes:</p> <ul style="list-style-type: none"> Company-owned websites, third-party sites, and marketing directed to children via mobile devices, such as emails, text, and picture messaging, downloads, games, apps, and social media posts Viral or word of mouth marketing including promotional messages intended to encourage consumers to discuss or otherwise promote branded content, messages, or product samples to their friends Location-based advertising delivering ads or promotions in proximity to a person's surroundings Movies, videos delivered via movie theaters, videos, or digital downloads Videogames

¹ Any marketing on media platforms where children consist of less than 35 percent of expected audience are exempt regardless of the strategies, techniques, and qualitative characteristics used in the marketing.

	Self-Regulatory Practices	Expert Recommendations for Responsible Food Marketing to Children
Marketing Strategies, Techniques, and Qualitative Characteristics	<p>Product placement, licensed characters, celebrities, and movie tie-ins appearing in covered media (generally where at least 35% of the expected audience is children ages 2 to 11).</p> <p>Child-oriented marketing strategies such as brand mascot characters, toy premiums, sponsorship, and merchandising are exempt.</p>	<p>Any marketing utilizing strategies or techniques or with qualitative characteristics appealing to children may be considered child-directed based upon its net impression.</p> <p>Strategies and techniques include, but are not limited to, character licensing and cross-promotions, brand mascot characters, premiums, celebrity endorsements, product placement, sponsorship, cause marketing and philanthropy, and/or merchandising.</p>
Qualitative Characteristics	<p>Use of licensed characters and celebrities appearing in covered media.</p> <p>Marketing containing other animation, company-owned brand mascot characters, child-oriented products, packaging, sounds, and voices are exempt.</p>	<p>Marketing contains features appealing to children, such as anthropomorphic objects and animation, licensed or brand mascot characters, interactive games, celebrities popular with children, direct appeals to children, child-oriented packaging, products, sounds, images, and locations.</p>
Child-Oriented Settings	Not covered.	<p>Child-directed settings, activities, and events, such as out-of-school time programs, early care and education settings, community recreation facilities, entertainment events, children's museums, amusement parks, zoos, and children's sports leagues or teams.</p>
School Settings	Elementary schools only.	Preschools and elementary, middle, and high schools.
School Marketing	<p>School marketing includes direct advertising, branded curricula, materials for students such as pencils and book covers, and public service announcements with prominent brand depictions.</p> <p>Marketing featured on vending machines, menus, display racks, coolers, posters, food reward programs, materials for staff such as aprons, and fundraising programs are exempt from marketing commitments.</p>	<p>School marketing includes all food and beverage advertising and other marketing, such as the name or depiction of products, brands, logos, trademarks, or spokespersons or characters, on any property or facility owned or leased by the school district including school buildings, athletic fields, or school buses and used at any time for school-related activities, including signs, curricula, vending machine exteriors, food display racks, ads in school publications or in-school television, branded fundraisers, corporate-incentive programs and sponsorships.</p>
Retail Marketing	Point-of-sale materials, packaging, and the use of company-owned characters are exempt.	<p>On-package and in-store marketing which contain marketing strategies, techniques, and qualitative characteristics appealing to children including:</p> <p>Food and beverage packaging, labeling, package design, words and images, brand equity and licensed characters, games, incentives, premiums, and contests.</p> <p>In-store marketing including standard and seasonal advertising, displays, premiums, and promotions at the retail site.</p>

Suggested Citation

Healthy Eating Research. Issue Brief: Recommendations for Responsible Food Marketing to Children. Minneapolis, MN: Healthy Eating Research; 2015. Available at: <http://healthyeatingresearch.org/?p=3108>.