

## World Obesity comments on the WHO Policy Brief: Taking measures to implement the WHO set of recommendations to reduce the impact of the marketing of unhealthy foods and non-alcoholic beverages to children

### About World Obesity

The World Obesity Federation is a not-for-profit organisation representing professional members of the scientific, medical and research communities from over 50 regional and national obesity associations. Through our membership we create a global community of organisations dedicated to solving the problems of obesity. World Obesity is official recognized as a nongovernmental organisation by the World Health Organization. For more information visit [www.worldobesity.org](http://www.worldobesity.org)

### General comments

We welcome this briefing and the attention that the World Health Organization has given to this issue for the last decade. We encourage every possible opportunity to push this issue further forward.

We have a few points we wish to raise:

1. While the 2010 WHO Recommendations refer to 'marketing to children' much of the debate is about 'children's exposure to marketing'. This subtle difference means that children who see marketing during family TV, for example, or in neighbourhoods near schools, or on internet sites are 'exposed to marketing' while the advertisers will say this was not 'marketed to children' specifically.
2. The Recommendations also make the point that both the quantity of the exposure (e.g. number of advertisements) and the power or strength of an individual marketing message (e.g. quality, such as cartoon images, celebrity endorsement) are factors that need to be controlled. This is important when a total ban is not in place, to ensure that marketing messages do not appeal to children.
3. While much of the Briefing is accurate, there are a couple of points where some inaccuracy may have crept in, or where the text can now be updated.
  - Page 3: The text says: "a small number of private sector entities have started to take measures to implement the WHO set of recommendations on the marketing of foods and non-alcoholic beverages to children." Two things can be clarified here. The first is "small" – hundreds of food companies are involved, including the world's leading food companies. Second, though, is whether the measures they are taking are really helping to implement the WHO set of recommendation. More accurate

would be “leading global and national food companies have started to take measures to change food advertising to children.”

- Page 3: The text says “*There are several voluntary initiatives or pledges at the global, regional and country level that large companies participate in within Europe. These include codes covering the general principles of marketing to children, including two that address food and beverage marketing itself.*” The phrase ‘within Europe’ is redundant here, as the sentence notes the global pledges etc. The mention of two codes is ambiguous: there are around 25 global, regional and national pledges (all listed at: <http://www.yaleruddcenter.org/marketingpledges/search.aspx>) which specifically address food and beverage marketing, including one for the USA, one for Canada, one for Australia, one for the Europe Union, and a global policy statement from IFBA which takes the form of a brief code (see <https://www.ifballiance.org/sites/default/files/IFBA%20Global%20Policy%20on%20Advertising%20and%20Marketing%20Communications%20to%20Children%28FINAL%2011%202011%29.pdf>) .
- Page 3-4 – the bullet points which finish page 3 and start page 4 refer to the pledge characteristics in several regions, but these have changed recently or are in the process of changing. (a) Most pledges now refer to an audience threshold of 35% under 12 years. (Note that this is still rarely exceeded, so nearly all TV programmes still remain below the threshold.) (b) The nutritional criteria in the pledges are in the process of some harmonisation, although not at levels which satisfy their critics. (c) This still pertains, though the word ‘much’ could be disputed.
- Page 4 – you refer to reviews of policies on food advertising. It is confusing to talk about the “relative success” and “common features” of the three SEARO countries when plenty of other countries limit in some way TV advertising to kids, when a small number of countries actually restrict food advertising to kids, and when there is difference between whether it is self-regulation of statutory. It might be more useful to point readers to examples of recent policies, such as those at <http://www.wcrf.org/int/policy/nourishing-framework/restrict-food-marketing>
- Finally, we would welcome a more detailed discussion of marketing through digital media, including company-sponsored advergames and company-led Facebook pages. Despite their pledges and promises, these platforms are used for the promotion fatty and sugary food brands using techniques which appeal to children: see for example: <http://www.nestlecrunch.com/playground.aspx>  
<http://frootloopsbloopers.com/>



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