



The Junk Food Trap

Marketing unhealthy food to children in Asia Pacific



About Consumers International (CI)

Consumers International (CI) is the only independent global campaigning voice for consumers. With over 220 member organisations in 115 countries, we are building a powerful international consumer movement to help protect and empower consumers everywhere.

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For more information, visit: www.junkfoodgeneration.org

The Junk Food Trap **Marketing unhealthy food to children in Asia Pacific**

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Credits

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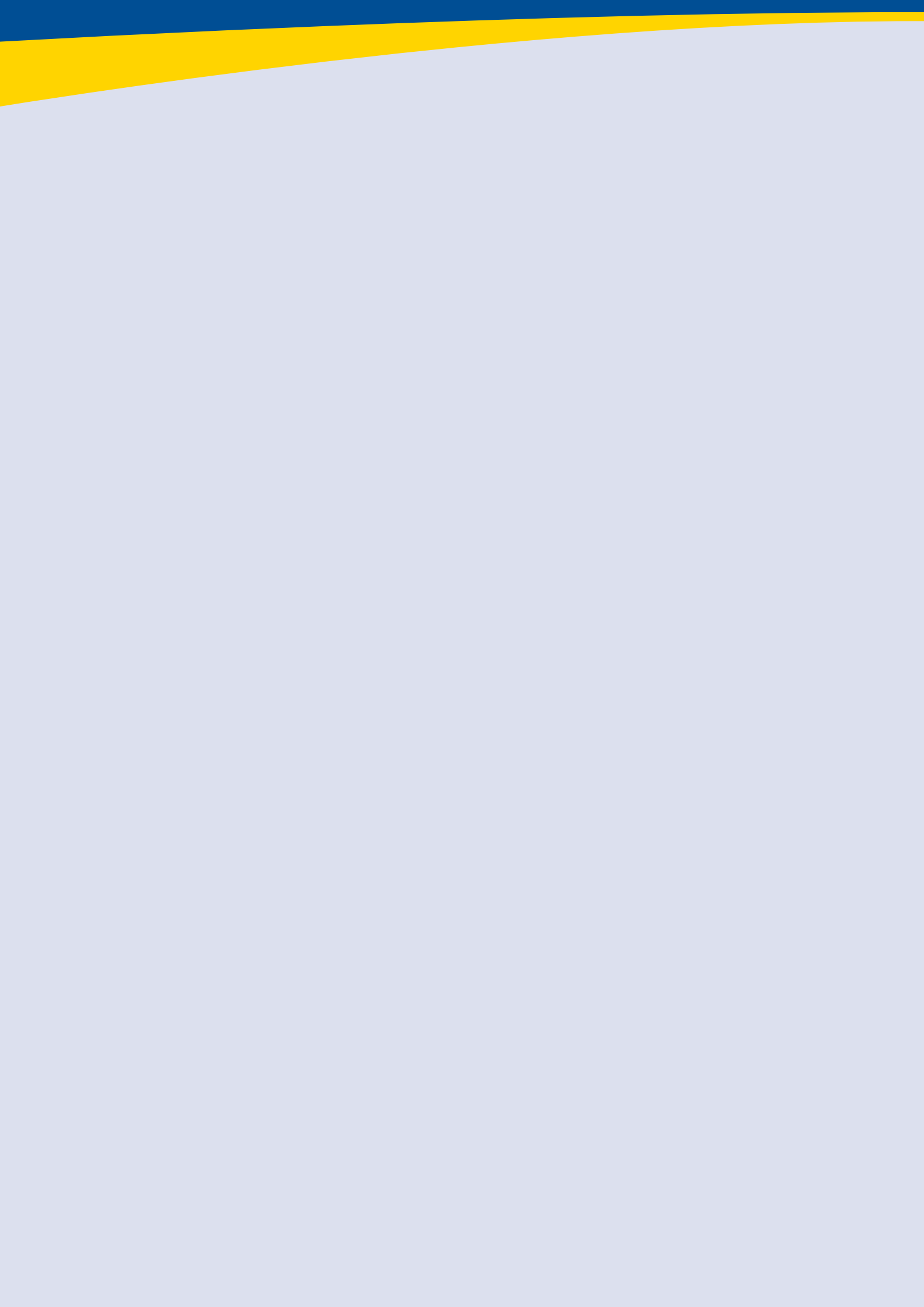
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Contents

Executive summary	7
Call for action	9
Introduction - The food trap	10
Evidence for action	13
Key findings from this research	13
What we have discovered	14
Coca-Cola	14
Kellogg's	16
KFC (Yum brands)	17
McDonald's	19
Nestlé	21
PepsiCo	23
Overview of government policies	25
Fiji	25
Hong Kong	25
India	25
Indonesia	26
Malaysia	26
Nepal	27
Philippines	27
Thailand	27
Conclusions and recommendations	28
Appendix: About the report	30
Our research	30
Research methodology	30
Endnotes	32





Executive summary

The World Health Organization (WHO) estimates that 2.3 billion people, almost one third of the global population, will be overweight by 2015. While every continent has to face up to the health consequences and economic repercussions of this preventable catastrophe, Asia is arguably facing the greatest challenge.

Overweight and obesity rates are rising faster in South East Asia than anywhere else in the world. With a predicted 27.5% rise in overweight children in the region between 2005 and 2010¹, every contributing factor needs to be urgently addressed. This report comes at a highly significant time.

While personal responsibility for maintaining a healthy and active lifestyle is important, governments and the consumer industries must also be held to account for the significant role they need to play. None more so than in their duty to young people.

As other eminent studies have shown, an overweight or obese child is far more susceptible to be obese and suffer from related health issues later in life. Action now can prevent immense costs in the future - for individuals and society as a whole.

However, as this study will demonstrate, the pervasive marketing of unhealthy food to children by the world's leading food and soft drink manufacturers threatens to undermine efforts to tackle obesity. From highly sophisticated Internet promotions, to the direct appeal of celebrity and cartoon character endorsements; global brands are influencing the food preferences of pre-teen and teenage consumers and undermining any positive messages that young people are receiving about healthy lifestyles.

As detailed in this report, the scale and reach of this marketing effort is astonishing. In Malaysia, for instance,

KFC's Chicky Club (a promotion tool for the fast food chain's kids meal) is now the biggest kids club in the country.

Equally, the levels of unhealthy ingredients in popular products in the region should not be underestimated. According to the standard used in this report, sugar levels are considered to be high if there is 15g per 100g, yet in some countries we found Kellogg's Frostie's that contained over 40g per 100g. Nestlé's MILO Energy Bar contains over 25g of saturated fat per 100g, yet anything over 5g is considered to be a high level.

This report shows that, to date, the response from governments and companies in this region falls far short of what many believe is needed. Malaysia and Thailand were found to have the strongest regulation in the region, however there are still plenty of worrying examples of marketing to be found in these countries. Other countries have even further to go, with a complete absence of on-package nutritional information in India, to near non-existent laws in Nepal.

This problem, and the fight against it, is a global one. Consumers International (CI), our national member organisations and our allies in the health sector have been leading the call for a global ban on the marketing of unhealthy food to children through the WHO. While some global food and soft drink companies have made limited national, regional and international 'pledges' to curtail their marketing, many are half-hearted, inconsistent efforts to deflect the real commitments needed globally, across the entire sector.

It is time for governments and industry to accept the argument that a global standard for the regulation of food marketing to children would give companies clarity and consistency, as well as the best possible incentive to develop healthy products for children.

We believe that the substantial body of evidence compiled for this report shows the need for a global framework for restricting the marketing of unhealthy food and drink to children and ensuring the promotion of healthier choices. Only then can the positive actions

starting to be made by companies and governments in the rich world be developed and implemented in other regions that are just as susceptible to the mounting threat of obesity.





Call for action

In March 2008, CI and the International Obesity Taskforce (IOTF) launched *Recommendations for an International Code on Marketing of Foods and Non-Alcoholic Beverages to Children*².

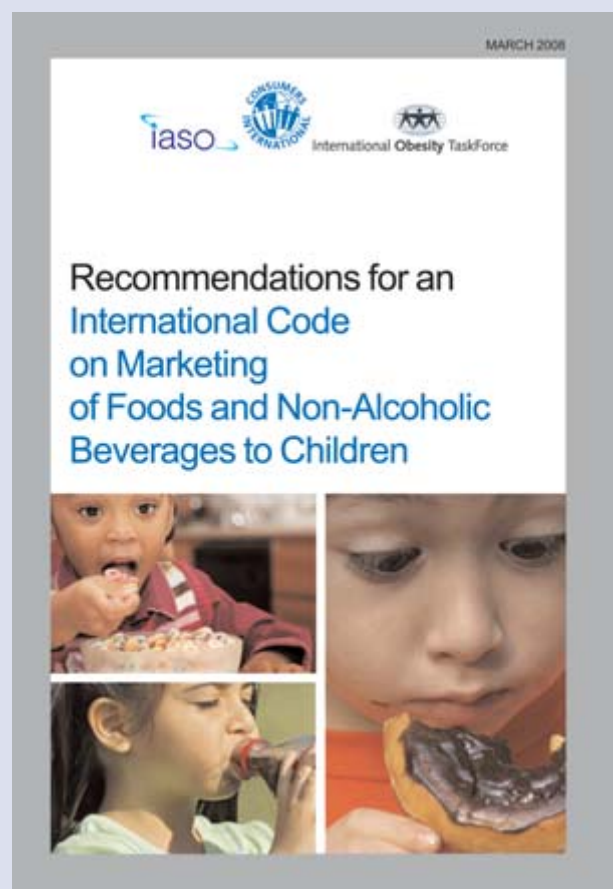
There is a wide disparity between countries in their approach to the marketing of food to children. Some have limited restrictions on advertising unhealthy food to children, whilst others have no statutory protection on any form of advertising at all. The food and drink industries' own codes also vary in terms of the countries covered, the definition of a child and the types of marketing included.

CI is campaigning for a WHO Code, which will address this problem by agreeing on international standards to be implemented by national governments and food companies.

The CI/IOTF Code targets the marketing of energy dense, nutrient poor foods that are high in fat, sugar and salt to children up to 16 years old. Its demands include:

- A ban on radio or TV adverts promoting unhealthy food between 06.00 and 21.00.
- No marketing of unhealthy food to children using new media (such as websites, social networking sites and text messaging).
- No promotion of unhealthy food in schools.
- No inclusion of free gifts, toys or collectible items, which appeal to children to promote unhealthy foods.
- No use of celebrities, cartoon characters, competitions or free gifts to market unhealthy food.

You can download a copy of the Code and sign up in support at www.junkfoodgeneration.org.



Consumers International and the International Obesity Task Force released their recommendations for an international code in March 2008



INTRODUCTION

The food trap



The obesity pandemic

Overweight and obesity in children is not a phenomena confined to developed nations such as the US, UK and Australia. The numbers of overweight and obese adults and children are rising quickly in Asia Pacific and many of these developing countries are ill equipped to deal with the burden of diet-related diseases.

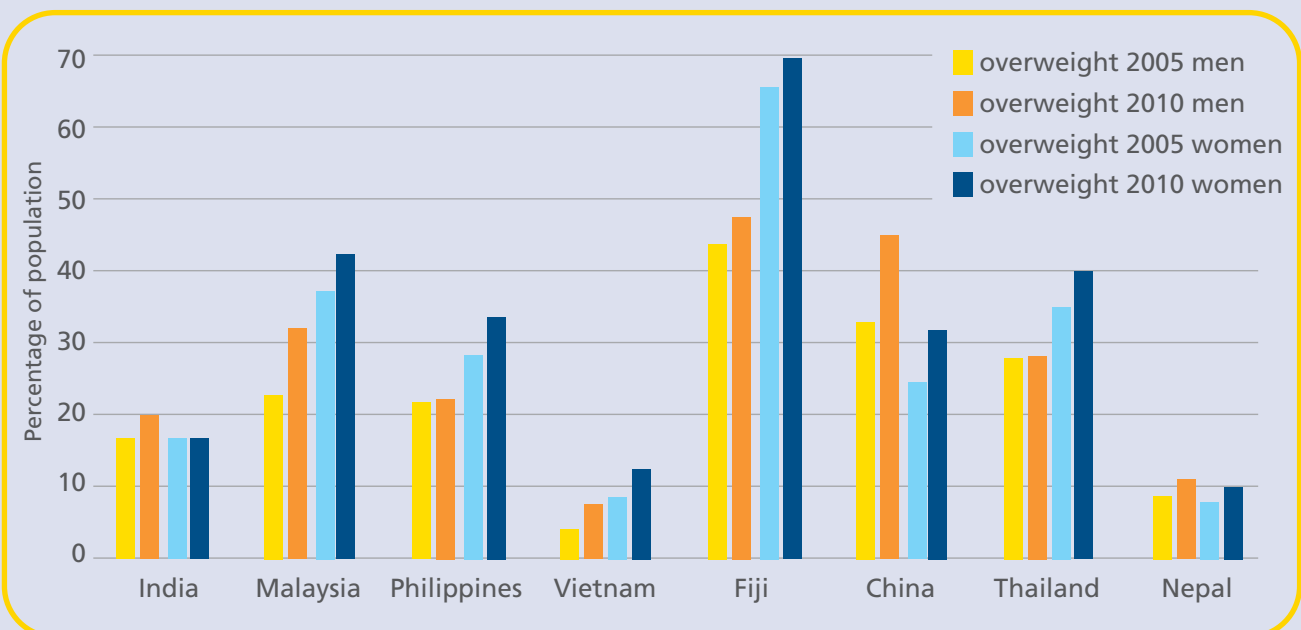
For some time, the primary problem for low and middle-income countries has been one of under-nutrition and the struggle for people to eat regular and nutritious meals. Obesity was thought of as an issue only for rich countries. Now developing countries, especially those with rising incomes and a growing middle class in urban areas, are facing the “double burden” of disease. Under-nutrition remains a challenge, but it exists alongside growing obesity levels.

According to the WHO, heart disease and stroke are already the world’s number one cause of death and it is projected that deaths from diabetes will increase by more than 50% in the next 10 years³. The WHO has estimated that noncommunicable diseases cause around 60% of deaths a year and the majority of these deaths occur in low and middle-income countries⁴.

Unhealthy diets are one of the major risk factors for developing these diseases. Each year at least 2.6 million people die as a result of being overweight or obese.

If a child is obese, he or she is much more likely to suffer disability, illness and premature death as an adult. Experts estimate that 1 in 10 school age children are clinically overweight or obese, which is a total of 155 million around the world. A further 22 million children under 5 years old are overweight⁵.

Overweight in Asia 2005 and 2010



Source: Figures from the WHO Global InfoBase

In Asia Pacific, childhood overweight and obesity rates are rising faster than anywhere else in the world. In South East Asia, between 2005 and 2010 overweight and obesity levels for the school-aged population is expected to rise by 27.5%. In Western Pacific the figure is 23.5%⁶.

The WHO has estimated that noncommunicable diseases cause around 60% of deaths a year and the majority of these deaths occur in low and middle-income countries

The role of food marketing

Many factors contribute to the risk of developing obesity. One that has been identified is the way that unhealthy food or products that are energy dense and nutrient poor are marketed to children.

In 2006, the WHO's Technical Meeting on Marketing of Food and Non-Alcoholic Beverages to Children concluded that exposure to the promotion of energy dense, nutrient poor foods and beverages can adversely affect children's eating habits. They advised that robust science and research shows that there is extensive food and beverage promotion to children; children are aware of, appreciative of, and engage with this promotion. They also found that the marketing is overwhelmingly for energy-dense, micronutrient-poor foods, which undermines recommendations for a healthy diet.

Overall the WHO concluded that advertising has an adverse effect on children's understanding of food knowledge, attitude, purchase behaviour and consumption.

Multinational companies have been able to exploit the lack of controls and regulations on marketing and advertising in developing countries and have been using a range of techniques to promote foods, which are high in fat, sugar and salt to children. The CI/IOTF Code defines 'children' as younger than 16 years old.

Professor Gerard Hastings in his review of the evidence⁷ for the WHO concluded that children in developing countries may be more vulnerable to advertising of unhealthy food because:

- They are less familiar with advertising in general.
- They are a key entry point for companies as they are more responsive than their parents.
- They may associate Western multinational company brands with a desirable modern lifestyle.

The Global Strategy on Diet, Physical Activity and Health, which was agreed at the World Health Assembly (WHA) in May 2004⁸, recognises that in order to create an environment that enables a healthier diet and more physical activity, a number of factors must be tackled simultaneously. One of the issues identified is food marketing, which includes advertising, sponsorship and promotion. Since the adoption of the Global Strategy, the evidence for action on food marketing to children has strengthened further.

Multinational companies have been able to exploit the lack of controls and regulations on marketing and advertising in developing countries



Fast food in Fiji

When is a product 'high in fat, sugar or salt'?

We are seeking only to restrict the promotion of 'unhealthy' food to children. This means products that are high in fat, sugar or salt. As a benchmark we used the UK's Food Standards Agency's criteria for its traffic labelling scheme to define what is 'high'.

Many of the products included in this report contain very high levels of fat, sugar and salt. For example, Fanta made by Coca-Cola contains 15.2g of sugar per 100ml – that's 10.2 teaspoons of sugar.

Junk Food Generation, a CI report published in 2004, established through a multi-country survey of parents and children⁹ that the marketing of unhealthy food to children in Asia was widespread. The report highlighted the concern of consumer organisations in the region that there are insufficient regulations in place to protect young and vulnerable consumers from the effects of advertising.

This report considers the current state of marketing of unhealthy food and drink to children in the region.

UK Food Standards Agency Criteria (per 100g/100ml) (Published January 2007)

	Low	Medium	High
Fat (per 100g)	3g and below	Between 3g and 20g	Over 20g
Fat (per 100ml)	1.5g and below	Between 1.5g and 10g	Over 10g
Saturates (per 100g)	1.5g and below	Between 1.5g and 5g	Over 5g
Saturates (per 100ml)	0.75g and below	Between 0.75g and 2.5g	Over 2.5g
Total sugars (per 100g)	5g and below	Between 5g and 15g	Over 15g
Total sugars (per 100ml)	2.5g and below	Between 2.5g and 7.5g	Over 7.5g
Salt (per 100g or 100ml)	0.3g and below	Between 0.3g and 1.5g	Over 1.5g



Evidence for action

Key findings from this research

Our evidence-based research, carried out with CI member organisations in Asia Pacific, looked at marketing by the following multinational food and drink companies between April and June 2008:

- Coca-Cola
- Kellogg's
- KFC
- McDonald's
- Nestlé, and
- PepsiCo.

We found:

- The six companies featured in this report offered a number of globally recognised food products to children below 16 years old that are unhealthy based on the UK Food Standards Agency criteria for what is high in fat, sugar and/or salt.
- These same multinational companies are heavily marketing their unhealthy food products to children below 16 years old.

The techniques that these six multinational companies used to market their products to children include some of the following:

- sponsorship of children's sporting activities in schools
- television advertising
- interactive websites
- sports-themed contests and competitions
- discounts and money-off vouchers for other products
- use of cartoon characters
- on-pack games and promotions

- movie tie-ins
- children's clubs
- free toys
- children's meals
- celebrity endorsements
- children's parties
- posters
- language teaching
- sponsorship of children's TV programmes.

Particularly concerning techniques highlighted in our research include:

- **Sports-themed competitions and sponsorship in schools** – Companies are deliberately associating their brands and unhealthy products with sports activities, both in terms of sponsoring sports-themed competitions where sports-related prizes can be won and in sponsoring schools' sports events. This can give contradictory messages to children about what constitutes healthy lifestyles. 'Energy' products add to this confusion, such as MILO, which is marketed as providing energy plus vitamins and minerals and yet is high in fat and sugar.
- **Marketing in schools** – Examples were found where multinational companies are marketing their products to children in schools, either through promotional gimmicks that offered students the chance to win gadgets such as mobile phones or through organised games and activities with the special participation of company mascots. These examples involved direct promotion to children of unhealthy products, which are high in fat, sugar and/or salt.

- **Interactive websites** – There is evidence to show increasing use of the Internet by multinational companies in Asia Pacific to promote unhealthy products. (This is of particular concern because it is an area where parents often find it difficult to regulate what their children are viewing). These websites are often related to online children’s clubs. Increased consumption is encouraged, for example, through promotions or placing codes on packaging that can be used to collect free gifts.
- **Cartoons and celebrities** – Companies are using a range of tried and tested traditional marketing techniques like cartoon characters (both brand owned and licensed) and celebrities to appeal to children. In Asia Pacific companies use national celebrities and cartoon characters, as well as global stars or characters. Children in poorer countries may be more vulnerable to appeals from those characters that suggest a Western lifestyle.

The need for an international code

The evidence contained in this report shows that companies across the region are using marketing techniques to promote unhealthy food to children. However, there is little consistency in terms of the information they provide to consumers with companies providing basic nutritional advice in some countries, but not in others.

Companies are also attracting attention for making new commitments in the US and the EU, whilst not even responding to enquiries from consumer organisations in the Asia Pacific region.

National governments, aware of the growth of obesity-related diseases are, in some countries, beginning to take action. However, to date, the responses are inadequate. CI believes that the WHO has a responsibility to show leadership in this area and produce policies that can be easily and swiftly implemented by national governments, as well as providing a benchmark for responsible food industry practice.

What we have discovered

The six multinational companies, their policies and marketing techniques promoting unhealthy foods to kids

Coca-Cola

Information gathered in Fiji, Hong Kong, India, Indonesia, Malaysia, Nepal, Philippines and Thailand

What's in the products?

Classic Coca-Cola is high in sugar (between 10g and 11g per 100 ml bottle which is equivalent to almost 9 teaspoons of sugar). Fanta is even higher in sugar (between 11.7g and 15.2g per 100ml bottle.)

These results focus on classic Coca-Cola and Fanta, which are globally recognised brands.

Policy on marketing to children and tackling obesity/nutrition

CI members in Fiji, Hong Kong, Nepal, Philippines and Thailand did not receive responses to requests for information on policies relating to marketing to children and obesity from Coca-Cola.

Global

In May 2008, the International Council of Beverages Associations announced a set of *Guidelines on Marketing to Children*, which Coca-Cola (as a member) have signed up to and endorsed. This means that with the exception of water, fruit juices and dairy-based drinks, Coca-Cola will not advertise its beverages where children under 12 years old make up over 50% of the audience in media including TV, radio, print or digital media or cinema (including product placement). These are global guidelines and cover all countries where Coca-Cola is marketed. Other marketing practices involving children under 12, such as the use of licensed characters, sponsorship and communications in schools will be reviewed by the end of 2009.

Thailand

Although this announcement was not provided directly to the CI member in Thailand, in May 2008, Coca-Cola, Kellogg’s, Nestlé and PepsiCo were among a group of companies to announce a “Thai pledge”¹⁰. Under this act of self-regulation, these companies will stop advertisements of food and beverages to children under 12 years old by the end of 2008. They would also stop commercial activities in schools unless invited for the purpose of disseminating educational information, which leaves them a window of opportunity to continue marketing their products. The pledge was not well publicised in the local press.

India

Coca-Cola in India informed CERC (Consumer Education and Research Society) that the company “markets its products responsibly and does not market soft drinks to children under the age of 12.” They added that for more than 50 years they have had a policy not to advertise “sparkling” soft drinks on TV programmes that target children under 12. At the same time, they indicated in their response that they respect classrooms as a “commercial-free zone” and their support to schools is limited to activities that promote physical activity, academic achievement and education about balanced nutrition and healthy habits.

In terms of obesity, Coca-Cola pointed out that “No food or beverage is responsible for obesity. Obesity is a complex problem that has no easy answers and we all need to work together to find workable solutions to this complex problem.” As part of their role in addressing obesity they listed the following as their concrete actions:

- Providing variety in the broad portfolio of our beverage products.
- Supporting healthy and active lifestyles for all people, especially our young people through youth development and education programmes.
- Respecting the rights of parents, teachers and school officials to make choices for children.
- Working with representatives of government, NGOs and the public health community to ensure that the discussion about obesity remains grounded in fact and scientific evidence.
- Continuing to work together with all stakeholders.

Malaysia

F&N Coca-Cola in Malaysia responded to FOMCA, the CI member in Malaysia, saying that in general Coca-Cola does not specifically aim products at children although they recognise that children do consume their products under parental supervision. F&N stands for Fraser & Neave, the last names of the business partners that established the company, which holds the Coca-Cola bottling franchise for Singapore and Malaysia.

With regards to obesity, F&N Coca-Cola “believes in offering choices and we provide a wide variety of beverages (including many low calorie and no-calorie options) as well as portion sizes to meet consumers needs for fun, refreshment, nutrition and hydration for all lifestyles”.

In terms of marketing to children, F&N Coca-Cola provides nutritional information on packaging and respects school policies on beverages. It has an Active Lifestyle programme with which they work through 100Plus, an isotonic drink, with the Ministry of Education to promote sport in schools.

Marketing tactics we discovered

Sponsorship of children’s sports activities in schools

Coca-Cola has been the main sponsor of the Coke Games in Fiji for the last 25 years. This is an athletics competition for 120 secondary schools in Fiji. There is, we say, widespread branding of the event using the high sugar ‘classic’ Coca-Cola brand. This can give children contradictory messages about what constitutes a healthy lifestyle.

Television advertising

Coca-Cola regularly advertises on mainstream television media channels in Hong Kong. During the monitoring period, Coca-Cola adverts were found for 2008 Olympics-related food product promotions at times children are watching TV, such as Sunday early afternoons.

Coca-Cola uses celebrities, such as the Bollywood actor Hrithik Roshan, in TV advertising in India and Nepal. Hrithik Roshan is a young male star who is very popular with teenagers. In the commercial shown in Nepal, Hrithik was featured saying “Party starts and ends with Coke!” Coke promotions and advertisements in Nepal are mostly developed in India.

In Thailand, Coca-Cola uses cartoon characters in TV advertising that appeals to children. In the latest commercial for Fanta, a young female cartoon character was shown as a cool and able musician because she drinks Fanta. In contrast, young male cartoon characters struggled to play music in spite of trying so hard; apparently because they were not drinking Fanta.



Fanta TV advert in Thailand

Interactive websites

Coca-Cola has an interactive website, www.iCoke.hk, with a membership programme, Internet games, a blog, a chat room and forums. Advertising information and product logos are embedded in the website.



Web shot of Coca-Cola Hong Kong website

Sports-themed competitions

In Malaysia, Coca-Cola and Sprite brands were promoting a lucky draw offering a grand prize of two tickets to watch the EURO 2008 final in Europe and other prizes including a 32-inch LCD TV, sports bags and football shirts. Children aged 12 years old and above were eligible to enter the competition.

Discounts and money off vouchers for other products

In Indonesia, Coca-Cola has been running a promotion where if you buy a 1.5 litre bottle of high sugar Fanta you will receive a voucher offering a discount at Gramedia Bookstore. Gramedia is a newly-refurbished bookstore claiming to be the largest bookstore in South East Asia and showcases a wide collection of children's books.



Fanta voucher in Indonesia

Posters

Coca-Cola uses this poster advertisement for Fanta in Thailand. The poster features a teenager on a skateboard so that it would appeal to children under 16 years old.



Poster of Fanta advert in Indonesia

Kellogg's

Information gathered in Hong Kong, India, and Thailand

What's in the products?

Many Kellogg's cereals marketed to children are very high in sugar, including Coco Pops (38.7g per 100g) and Frosties (sugar levels varied between 28.3g and 41.7g per 100g).

In India, the amount of sugar contained in packets of Fruit Loops, Choco Toffee and Frosties is not listed on the packaging.

Policy on marketing to children and tackling obesity/nutrition

Responses to requests for information on policies relating to marketing to children and obesity and nutrition were not received from Kellogg's by CI members in India or Thailand.

Global

In June 2007, Kellogg's announced changes to its Worldwide Marketing Guidelines. This now means foods that do not meet its own Nutrient Criteria will not be advertised on TV, radio or third party websites where 50% or more of the audience are children under 12 years old. It will also not use third party licensed characters, product placements or schools settings to advertise these products to children under 12 years old. It also states that no products are marketed to children under 6 years old.

Hong Kong

Kellogg's provided a lengthy response covering obesity, nutrition and the marketing of food to children to the Hong Kong Consumer Council. This reiterated information contained in the global announcement in June 2007 described above.

Marketing tactics we discovered

Use of cartoon characters

Kellogg's repeatedly use their own brand cartoon characters such as Tony the Tiger and Coco the Monkey to market their high sugar products to children. This was a common feature in all the CI member countries that provided examples of marketing to children by Kellogg's.

In Thailand, Kellogg's use both own brand and licensed cartoon characters, such as Garfield to promote breakfast cereals.



Kellogg's TV advertisement in Thailand

TV advertising

Kellogg's TV commercial ads in India use animation and also show parents and children together at various stages either consuming the product or benefiting from the breakfast cereals. In Hong Kong and Thailand, Kellogg's TV advertising also features cartoon characters such as "Monkey Coco" in mini-story adventures, such as looking for treasure.

The still below comes from a Kellogg's TV commercial for Coco Pops shown in Thailand which was shown three times during the "Toon Disney" TV programme on Saturday, 8 March 2008 between 06.30 and 08.10. The advert features cartoon characters accompanied by a song describing how the cereal turns the milk into chocolate. The ad ends with an announcement that children can now get two Garfield magnets in boxes of Coco Pops and Frosties.



Coco Pops TV advert in Thailand

On-pack games and promotions

As well as featuring brand characters, Kellogg's packaging in India features games on the back of packets for children to play with. It featured for instance Tony the Tiger and "Be a Tiger" cut out collectibles. A packet of Kellogg's Choco Toffee had the animated picture of an Indian God "Krishna" on it and offered an animated CD of the same along with that pack.



Kellogg's Frosties pack promotion in Thailand

Movie tie-ins

Kellogg's Hong Kong and India offered a fun pack with a free toy, such as a glow-in-the-dark adventure spoon to coincide with the release of the film "Indiana Jones and the Kingdom of the Crystal Skull" in May 2008.



Kellogg's movie tie-in in Hong Kong

KFC (Yum brands)

Information gathered in Malaysia and Philippines

What's in the products?

The Chicky Meal for children consists of one piece of fried chicken (11g of fat), a regular Whipped Potato (0.2g salt), one small iced MILO chocolate drink (22.5g of sugar). The Buddy Meal is basically a Chicky Meal for two, which consists of two pieces of fried chicken, one regular Fun Fries (7g of fat) and two small iced MILOs.

There is a special meal for teenagers, the X Meal, which consists of one piece of fried chicken, one Zinger Burger (37g of fat) and a regular carbonated drink, such as Pepsi.

In the Philippines fast food products from KFC do not feature nutritional information and the request for this information was not granted.



KFC kids menu promotion in Malaysia

Policy on marketing to children and tackling obesity/nutrition

Malaysia

KFC Holdings Malaysia “believe(s) that healthy eating is a lifestyle choice and that any food properly consumed in moderation can be a part of a balanced diet. We do not and never have advocated uncontrolled consumption of food. We have also taken steps to help our customers make educated choices when it comes to choosing their meals, including helping them become aware about the importance of a balanced diet and good nutrition.”

As for policies on marketing of food to children, KFC states that, “we comply (with) all the guidelines set by the Ministry of Health in collaboration with the Association of Accredited Advertising Agents Malaysia pertaining to advertisements for children”. Approved in June 2007, the guidelines ban the sponsorship by fast food industries of children’s TV programmes and fast food advertisements during children’s TV programmes.

With respect to nutritional labelling, KFC has developed nutritional content fact sheets of their products as required by the recent national fast food regulations.

Responses to requests for information on policies relating to marketing to children and obesity and nutrition were not received from KFC for the CI member in the Philippines.

Marketing tactics we discovered

Children’s clubs

The Chicky Club created by KFC is the largest kids’ club in Malaysia (acknowledged by the Malaysian Book of Records). Chicky Club members are entitled to special offers from KFC, such as meal discounts, special collectible toys/merchandise, and birthday event celebrations. Members also have access to a variety of discounts at KFC’s marketing partners, which include toy stores, children’s apparel, theme parks, music classes, and cinemas. Membership of the club is open to children up to 12 years old.



KFC Chicky Club promotion in Malaysia



KFC Chicky Club kids meal and giveaways in Malaysia

Children’s meal with free toys and movie tie-ins

In Malaysia, each of KFC’s Chicky Meals comes with a toy with the type and design of the toys varying in accordance to KFC’s current marketing tie-ins with movies, cartoon characters, or popular toy figures. The X-Meal for teens often comes with collectible merchandise, such as key chains.

In the Philippines KFC has used film tie-ins such as Superman, Spiderman, and Scooby Doo to market its meals. These film icons appear on packaging, tumblers, or as toys.

KFC also offers toys such as Wall Smasher, Floor Racer, Image Spinner, and Beam Bender; and innovative products such as Colonel Sanders Figurine and Cartoon Network CDs.



Chicky Club ‘Speed Racer’ movie giveaways in Malaysia

Interactive websites

KFC’s website in Malaysia www.kfc.com.my has a colourful section exclusively for children. Featuring the main character Chicky and his friends (Chippy, Adora, Slyde, Wanda, and Ace), the website offers a variety of online activities. Visitors to the website can play online games and view updates on KFC’s latest offers and programmes for kids.



Chicky Club online game from Malaysia

In school marketing

KFC in Malaysia also has a programme called “Chicky goes to School”, whereby children and teachers are encouraged to invite Chicky and his friends over to their schools to organise games and activities. KFC also organises the Chicky Carnival, a theme-based annual event featuring contests, musical shows, games, and rides.

TV advertising

In the Philippines, KFC’s TV commercials focus heavily on family images of people eating together to advertise KFC meals including the Bucket Meal, Fully Loaded Meal and the Kid’s Meal. Meanwhile, teenagers in the adverts endorse Funshots and Snackables.



KFC Chicky goes to school online promotion in Malaysia



McDonald's Happy Meal in Malaysia



McDonald's Happy Meal menu from Hong Kong

McDonald's

Information gathered in Fiji, Hong Kong, India, Malaysia, Philippines and Thailand

What's in the products?

The McDonald's Happy Meal for children has a variety of combinations, which vary from country to country. However, in most countries, this consists of a burger, fries and a soft drink.

In Hong Kong, a Happy Meal can combine Sausage McMuffin (19g of fat), Hash Browns (9g of fat) and a small soft drink, such as Coke. The information on saturated fat is not available in Hong Kong. In Malaysia, Happy Meals come with a small portion of fries (10.3g of fat and 0.3g of salt).

It was not clear from the information provided whether the measurements were per 100g or per portion.

In some countries, such as the Philippines, no nutritional information was provided in the restaurant or on request.

Policy on marketing to children and tackling obesity/nutrition

CI members in Fiji, Philippines, and India did not receive responses to requests for information on policies relating to marketing to children from McDonald's.

Malaysia

McDonald's is “committed to being part of the solution by reinforcing the importance of energy balance – the food you eat and the activity you do. McDonald's Balance, Active Lifestyles programme is built on three strategic pillars – increasing menu choice, promoting physical activity and continuing to provide accessible nutrition information.”

On nutrition they “offer a wide variety of high quality freshly prepared food choices, a varied menu and range of serving sizes to provide items that fit into a balanced diet. We also offer a range of meal combinations that fall within recommended guidelines for calories, fat and other nutrients.”

McDonald's have indicated in their response to FOMCA that starting June 2008 product packaging will feature nutritional information. FOMCA reported that McDonald's is now providing nutritional information on their paper-tray mats to cover fat, sugar and salt, and booklets listing the nutritional information of all their

products, are also available in their outlets. McDonald's Malaysia also shared that they have not advertised on TV to children since July 2007.

Hong Kong

McDonald's has adopted the following principles to:

- Communicate to children balanced food choices that fit within a child's nutritional needs.
- Use licensed characters and properties to encourage activity and balanced food choices for children to make food, such as fruit and vegetables, fun to eat.
- Promote to children positive messages that support their well-being, body, mind and spirit.
- Provide the nutritional information of food to help parents and families make informed food choices.

More specific information from McDonald's includes changes to the Happy Meal menus, such as adding the following items to the menu, including Qoo White Grape Juice Drink, Qoo Soya Milk, Hi-Calcium Mango Fruit Yogurt and Hi-Calcium Low fat Milk.

Leaflets containing product nutritional information are available at McDonald's stores. The information is also printed on the company's tray mat and posted on the company website. However, some of this information such as the tray mat is only available after the purchase has been made.

Marketing tactics we discovered

Children's meal with free toy

In all countries that provided information on McDonald's, the "Happy Meal" menu offers food aimed specifically at children and a free collectible toy. It includes less healthy options. There is usually a number of different toys to collect within a set range which lasts for a certain period of time before changing to a different range. During the research period, Happy Meals included Power Puff Girls, Naruto and Angel Blue collectible toys. Created by Japanese designer Narumiya, the Angel Blue line of clothes features cartoon-like characters in pastel colours that are popular with young girls and teenagers. Naruto is a Japanese manga series with an anime adaptation. The main character, Naruto Uzumaki, is a hyperactive, unpredictable, adolescent ninja who constantly searches for recognition and aspires to become a Hokage, the ninja in his village that is acknowledged as the leader and the strongest of all.

Children's clubs

In Malaysia, McDonald's mascot, Ronald McDonald has a children's club called the "Ronald McDonald Kids' Club". By joining the club, members are eligible for discounts and privileges from McDonald's and their partners, which range from theme parks to kids' gym memberships. Members can also participate in fun activities and events organised by McDonald's plus a free quarterly newsletter called "Red Shoe News". In its latest promotion for the Kung Fu Panda movie, McDonald's is offering its club members a chance to redeem two free movie tickets by completing a redemption form complete with a Happy Meal receipt.



McDonald's "Kung Fu Panda" movie tie-ins in Malaysia

Celebrity endorsements

McDonald's have used popular celebrities in the Philippines, like Sharon Cuneta and her daughters plus world-boxing champion Manny Pacquiao and his two sons to endorse some of their products. Also Kris Aquino, presenter of the popular TV show "Deal or No Deal", did a commercial spoof of the show called "meal or no meal". All these celebrities are well known and idolised as role models for children.

Another McDonald's celebrity endorsement features a popular young actress Angel Locsin, who endorsed McDonald's summer ice cream treats in the "Summer Colours of Love" promotion. She is particularly popular with children after starring in a number of super hero roles such as *Darna* (Wonderwoman) and *Mulawin* (Winged Humanoids).

TV advertising

In Hong Kong, McDonald's advertise their Happy Meals on mainstream television channels during weekday afternoons (after school hours) and weekend mornings and afternoons. Usually the advertisements are about children playing with the Happy Meal toys, particularly the Naruto and Angel Blue collectibles.

McDonald's was also found to advertise its products on children's channels in India and Thailand.

Sports-themed competitions

In conjunction with the 2008 Beijing Olympics, McDonald's is currently running the "McDonald's Champion Kids Challenge" for children below the age of 14 in many parts of Asia, such as in Thailand and in Malaysia. Contestants compete in the challenge and three winners will be selected to represent their country at the 2008 Olympic Games in Beijing, China.

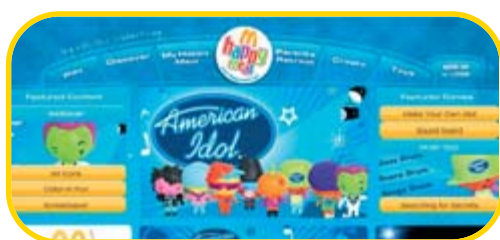


McDonald's Champion Kids Challenge in Thailand

Interactive websites

McDonald's has interactive websites in the countries covered by this research. Malaysia's website has a link to the Happy Meal website at www.happymeal.com which is highly interactive, providing children with various kinds of activities, information, and updates on their latest news. Children can play online games, mind puzzles, and also get sport tips. There are also colourful guides that teach children to create origami artworks, build 3D cars, design badges and even mix music.

McDonald's website in India features a fun zone link, <http://www.McDonaldsindia.com/funzone/>, which allows children to play games and download wallpapers and screen savers.



McDonald's 'American Idol' tie-in from Malaysia

Sponsorship of children's sporting activities in schools

McDonald's Malaysia has a programme for young children called "Fitness Fun" with Ronald McDonald, which is aimed to encourage young Malaysian children to live a healthy and balanced lifestyle. Ronald McDonald is the central character in the programme, teaching children about good nutrition and fitness. The "Fitness Fun" show is performed free for lower primary schools and kindergarten premises. Those intending to have Ronald visiting them at their schools have to make reservations with McDonald's on a first-come first-served basis.



McDonald's "Fitness Fun" promotion in Malaysia

Nestlé

Information gathered in Fiji, Hong Kong, India, Malaysia, Philippines and Thailand

What's in the products?

Many of Nestlé's breakfast cereals that are aimed at children are high in sugar, including Koko Krunch (37.9g of sugar per 100g) and Honey Stars (37.4g of sugar per 100g).

Nestlé also produce the MILO range, aimed at children, which includes the MILO Energy Bar, which is high in saturated fat and in sugar (25.3g saturated fat per 100g and 50.4g sugar per 100g). The MILO chocolate drink contains 22.5g of sugar per 100g.

Policy on marketing to children and tackling obesity/nutrition

Nestlé was comprehensive in its replies to all CI members with the exception of Fiji. A summary of all responses is provided below.

Global

Nestlé says it does not advertise or market directly to children under 6 years old. Advertising for children from 6 to 12 is to be restricted to products with a nutritional profile, which helps children achieve a healthy balanced diet including clear limits for such ingredients as sugar, salt and fat.

In July 2007, Nestlé adopted global principles on marketing to children under 12 years old, which mean:

- Food products advertising to children must be appropriate for the specific age range portrayed in the advertisement.
- Advertising should not mislead about potential benefits from the use of the product.
- Communication must not undermine the authority of parents.
- Advertising directed to children should not create a sense of urgency.
- Advertising should not portray or encourage behaviour intended to shock or create anxiety in children including use of violence or sexual innuendo.
- Fantasy, including animation should not create difficulty in distinguishing between the real and the imaginary.
- Products developed from or associated with programme content primarily directed to children should not be advertised during or adjacent to that programme.
- Programme personalities, live or animated should not be used to sell products, premiums or services adjacent to programmes primarily directed to children in which the same personality or character appears. In the same way, a character or personality associated with the editorial content of a print publication should not be used to sell products, premiums or services in the same publication.
- Sampling and promotional activities in schools and at events will be done only with the prior agreement and consent of the school administration and event organisers. It should also comply with applicable legislation or regulations and should be accompanied by some kind of educational nutritional messages.

Marketing tactics we discovered

Use of cartoons characters

In all countries, Nestlé markets many of its products to children. MILO, Koko Krunch and Honey Stars use

cartoon characters such as brand-owned characters “Koko” and “Captain Stars” or licensed characters like “Batman Dark Night Figures” on their packaging and in their advertising.



Nestlé's Koko Krunch character in the Philippines

Interactive websites and online children's clubs

In Hong Kong, Nestlé has an online kids club where children can register to become members and play exclusive online games, join exclusive activities and enjoy product discounts.



Web shot of Nestlé kids website in Hong Kong

In Malaysia, Nestlé's MILO website, www.milo.com.my, is a portal providing access to product promotions, contests and activities such as the Art Zone, recipes and online games.

The Nestlé website for Koko Krunch, www.kokokrunch.com, is also a colourful and interactive website where visitors can view adverts for products and learn about new promotions. In the Philippines, the website of Koko Krunch (<http://www.kokokrunch.com/ph/index.html>) has links to their TV ads and a preview of their newest product, the Koko Krunch Duo. Jigsaw-puzzle posters, signed postcards, flipbooks, and door hangers are available and ready to be printed. There are also downloadable screensavers and wallpapers. The website also has a game that requires kids to sign up. Prizes can be exchanged with goodies.



Nestlé Koko Krunch website in the Philippines

Free gifts and toys

In Malaysia, Nestlé ran a promotion that offered a free Koko Krunch cereal bowl in three designs to include “Koko”, the brand-owned cartoon character, with every purchase of a standard pack of cereal.

In the Philippines, Nestlé gives away free toy items in the form of different body parts with every purchase of its large Koko Krunch packs. According to Nestlé, it is a way of educating children. Also, with its tie-up with Lego Knight Kingdom, Koko Krunch gives free Lego toys that are designed and patterned from the medieval period. A recent Koko Krunch promotion also offers various collectibles featuring all-time favorite children’s characters, most recently from the films Star Wars, Finding Nemo, Spiderman, and Narnia.



Nestlé Koko Krunch movie tie-in in the Philippines

Sports promotions and competitions

In Malaysia, Nestlé recently organised the Koko Krunch Junior Taekwondo Championship in 2008 in association with their “Grow with Sports” tagline and theme. They have also organised a “hidup bola” football competition for children under 16 years old, offering the grand prize of a five-day trip to Manchester United in the UK, including watching a game and seeing players at their training ground.

Language teaching

In Malaysia, Nestlé and the New Straits Times organised the “Koko Smart Start Camp” for young children, which aims to teach children about nutrition, as well as teaching them English. The event took place in a primary school hall and Koko Krunch boxes, certificates, workbooks and t-shirts were presented to the children.

TV advertising

In the Philippines, Nestlé’s TV advertisements for MILO feature children doing sports (MILO Champions League) and carry celebrity endorsements. The ads claim that MILO provides children with the energy they need plus vitamins and minerals.

In schools marketing

In the Philippines, in order to appeal to schoolchildren, Nestlé conducted a promotional gimmick called “sCOOL Scratch-Cards Promos” that offered students the chance to win various gadgets, such as mobile phones, gameboys, discmans, and Nestlé branded items, such as Koko Krunch. These promotions were launched by the company in hundreds of schools nationwide.

Indirect advertising in children’s TV programmes

In Thailand, Nestlé MILO sponsors a game show for children, which features branding and product images in the actual programme.

PepsiCo

Information gathered in Fiji, India, Malaysia, Philippines and Thailand

What’s in the products?

Although PepsiCo owns a huge range of both drink and food brands, due to the disparity across the region we have focused only on classic Pepsi and Lays, which are globally recognised brands. Classic Pepsi Cola is high in sugar (11g per 100ml) and Lays crisps are high in fat (34g per 100g).

In India, the sugar content of Pepsi Cola is not listed on the packaging.

Policy on marketing to children and tackling obesity/nutrition

CI members in Malaysia and in the Philippines did not receive responses from PepsiCo to requests for information on their policies on marketing of food to children and tackling obesity. PepsiCo have also signed the International Council of Beverages Associations Guidelines on Marketing to Children (see page 14).

India

A comprehensive response was received by CERC in India and a summary is listed below.

“PepsiCo has been responsible in providing consumers relevant information in making correct and informative choices; and PepsiCo India food and juice drink portfolio already contains nutritional information toward helping the consumer make those correct choices.

PepsiCo India understands the importance of being a responsible marketer to children. With the exception of Cheetos PepsiCo India does not advertise products to children under 12 years. However, advertisement to children is done only when the products fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. Under our policy, “advertising to children under 12 years” means advertising to media audiences with a minimum of 50% of children under 12 years. This self-regulation is voluntary and in place.”

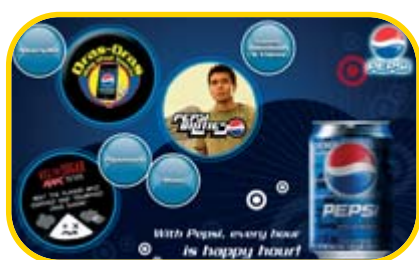
In May 2008, the International Council of Beverages Associations announced a set of Guidelines on Marketing to Children, which PepsiCo as a member have signed up to and endorsed. This means that with the exception of water, fruit juices and dairy-based drinks, PepsiCo will not advertise its beverages where children under 12 years old make up over 50% of the audience in media including TV, radio, print or digital media or cinema (including product placement).

Other marketing practices involving children under 12, such as the use of licensed characters, sponsorship and communications in schools will be reviewed in 2009.

Marketing tactics we discovered

Interactive websites

In the Philippines, PepsiCo uses interactive websites to target teenagers from 13 years old and over. PepsiCo’s interactive website (<http://www.pepsiworld.com.ph>) features its current promotions and music celebrities



PepsiCo website in the Philippines

(such as the American group The Black Eyed Peas and local stars such as female singer Yeng Constantino), and offers games, videos and downloads (wallpaper and photos), and links to Pepsi websites in other countries.



PepsiCo's Lays crisps on-pack promotion with a sport celebrity in India

Celebrity endorsements

In India both classic Pepsi Cola and Lays are advertised on TV using celebrities. Bollywood actors Shahrukh Khan and John Abraham have advertised Pepsi, along with the Indian Cricket team. They are considered role models for children and Shahrukh Khan is currently anchoring a highly popular TV quiz show aimed at children in the fifth grade.

Saif Ali Khan, another Bollywood actor, advertises Lays on TV. These celebrities are popular with children. In addition, young stars such as Deepika Padukone and Ranbir Kapoor starred in Pepsi ads showing the image of a young new India called 'Youngistan'.

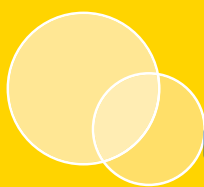
The packet of Lays below carries the message “Chala Change Ka Chakkar (Change your life)”. Sportsman Mahinder Singh Dhoni (Indian Cricket Team Captain) is shown and a chance to exchange one’s life with him and/or other film stars, for one day, has been promoted as a prize. Cricket stars are very popular with children in India.

PepsiCo-owned Lays crisps with sport celebrity tie-in from India

In Asia, PepsiCo also uses famous footballers popular with children. In Malaysia, Pepsi is promoted with an online initiative where teenagers from 13 years old upwards can log in and match their profile to a footballer.



PepsiCo website with sport idols in Malaysia



Overview of government policies

All governments in the countries covered in this report have some programmes on labelling, nutrition and obesity. In this section, information is provided on government action in the specific area of marketing of food to children.

Fiji

The Food Safety Act of 2003, which is yet to be enforced, contains general regulations on advertising. There are no specific regulations on the marketing of food to children, although the powers are contained within the Act to enable this to happen.

Under Food Safety Act (Fiji) 2003:

“An advertisement or promotion is deemed to be false, misleading or deceptive, if the advertisement or promotion–

- incites the public to excessive or irresponsible consumption of a particular food;
- contains exaggerated or substantiated claims;
- expresses partial truths or ambiguous claims which may lead to misinterpretation or confusion;
- refers to investigations or reports by false or non-existent authorities or research centres;
- suggests that the consumption or use of the product improves social prestige or personal status;
- claims that the food complies with the specific conditions desired by consumers when it does not;
- uses, in whole or in part, a copy of or the result of any analysis made for the purposes of this Act without the written approval of the board.

The board may, by regulations, impose controls on the advertising and promotion of food so as to maintain and improve conditions for informed consumer decisions concerning food.”

Hong Kong

In Hong Kong, the Government operates broad codes of practice on advertising standards for television and sound broadcasting, which have some general provisions on advertising aimed at children.

For example, the code stipulates that no product or service may be advertised and no method of advertising may be used which might result in harm to children physically, mentally or morally, and no method of advertising may be employed which takes advantage of natural credulity and sense of loyalty of children¹¹. Nevertheless, there is no particular provision in the codes on advertising of food targeting children.

India

The Advertising Standards Council of India (ASCI) is a self-regulatory body set up in 1985 on the initiative of the advertisers themselves. It has a code for self-regulation in advertising that sets down the do's and don'ts for the industry. The objective of this set up was to ensure truthfulness and honesty in advertising and also to enhance people's confidence.

In December 2007, the Advertising Standard Council of India (ASCI) has laid down certain guidelines with regard to food marketing to children:

“Self - Regulation Guidelines on Advertising of Foods & Beverages directed at Children under 13 years of age.

Children's choice of diet (food and beverages) and level of physical activity, can impact their general health and well-being. It can have a positive influence by encouraging a healthy, well balanced diet, sound eating habits and appropriate physical activity. Caution and care therefore should be observed in advertising of Foods & Beverages especially ones containing relatively high fat, sugar and salt.

- Advertisements should not mislead consumers to believe that consumption of product advertised will result directly in personal changes in intelligence, physical ability or exceptional recognition. Such claims if made in advertisements should be supported with adequate scientific substantiation. All nutritional and health benefit claims in Foods & Beverage advertisements are required to be substantiated scientifically.
- Unless a food product has been nutritionally designed as a meal replacement, it should not be portrayed as such.
- Messages in advertising to children will portray accurately the products, in a way that is in keeping with their ability to understand.
- Advertisements should not show over consumption of Foods & Beverages. It should reflect moderation in consumption and portion sizes appropriate to occasion or situation. Advertising of promotional offers on Food & Beverage products should also not show excessive consumption
- Advertisements should not undermine the role of parental care and guidance in ensuring proper food • Visual presentation of foods and beverages in advertisements should not mislead the consumers of the material characteristics of the products advertised.”

Indonesia

Food advertisements directed at children are regulated through several articles in the Government Regulation No 69, 1999 on Food Label and Advertisement that regulates them. Article 47 (2) states that advertisements are not allowed to use children under the age of 5 for any form of advertisement, unless the food product is specifically for children under 5 years old.

In addition advertisements on processed foods containing ingredients that are high in something that can endanger or disturb the growth of and or development of children is not allowed to be publicised in any media that is specifically directed towards children. In elaboration the Regulation states that this rule is meant to prevent larger distribution of certain processed food that contains high amounts of monosodium glutamate, sugar, fat or carbohydrate that can endanger or disturb children's growth or development.

Aside from that, Article 50 states advertisements are prohibited to contain information or statements saying that food product contain the best source of energy and can instantly give strength. However, YLKI (Yayasan Lembaga Konsumen Indonesia) are aware of cases where this has not been enforced.

Malaysia

With regards to legislation on advertising in general, Part III, Section 17 of the Food Act 1983 stipulates that food advertisements in general shall not deceive and mislead consumers and violate the provisions under the Food Regulations 1985.

The Ministry of Health has recently initiated a move to restrict TV advertising of fast food to children. In June 2007 it was agreed to introduce the following restrictions:

- Any form of TV broadcast fast food ads (whether direct/indirect) are banned from being aired during children TV programmes.
- Fast food industries are banned from sponsoring any children programmes on TV
- Fast food ads cannot portray inaccurate or confusing information relating to the nutritional value of the product.
- Fast food ads cannot encourage over consumption of foods.
- Fast food ads cannot portray its product as a replacement for a balanced diet.
- Fast food ads cannot refute or challenge the Malaysian Dietary Guidelines developed by the Ministry of Health

Following the decision, guidelines were developed by the Food Safety and Quality Division, and all fast food companies were given six months to comply with the regulations which came into force on 1 January 2008.

“Fast foods” are defined as foods that are prepared in large quantities in a standardised method, are quickly served, and frequently advertise their products and services through the electronic and printed media.

“Children's programmes” are defined as programmes targeting children age 4-9 years old, divided into animated and non-animated.

The Ministry of Health has declared that non-complying companies and violators will be penalised through administrative measures and have their names publicly announced. TV stations can also be held responsible in case of violations for they are deemed the final gatekeeper before airing. TV broadcasters will identify and provide the health department quarterly with a list of children's programmes, which are barred for fast food ads. For programmes with rating points less than four (4 TVR, meaning 4% of the total of children from age 4-9

are watching the programme at one time), one can still advertise as they are viewed as unpopular programmes, which have little/insignificant impact.

Nepal

Nepal has no clear policies on food marketing to children. There are, however, general regulations on advertising goods and services in the Food Act of 1966 and in the Consumer Protection Act of 1997. However, SEWA Nepal shared that these policies are not being monitored.

Under the Food Act of 1966:

“Clause 4. Food products can not be sold through misleading activities” -

No one can sell or distribute any food product by fake identity of the product or selling and distributing any low quality goods claiming it to be of higher quality.

Under the Consumer Protection Act of 1997:

“Article 10. Actions which must not be taken in respect to consumer goods or services: No one shall take or instigate others to take any of the following actions in respect to any consumer good or service” -

- To produce, sell, supply, export or import a sub-standard consumer good.
- To imitate any consumer good in such a manner as to mislead consumers.
- To sell or supply any consumer good or service by making false or misleading claim that it is another consumer good or service, or by describing a substandard consumer good or service as of a high standard.
- To engage in unfair trading practices in such a manner as to make false or misleading publicity or advertisements relating to the use, usefulness, or efficacy of any consumer good or service.
- To produce, sell or supply any consumer good or service, which is likely to harm consumers' health.
- To take such other actions as are prescribed.

Philippines

There is no specific government regulation on food marketing to children. Dr. Oliveros informed IBON that the Ministry of Health in the Philippines is “planning to engage the ADBOARD (Advertising Board of the

Philippines) as to ethical promotions not only of food products but other products as well”. Also, the health agency is “looking forward to engaging with the food manufacturing industry for the regulation of fat, salt and other important food contents in their food products.” The Government of the Philippines highlighted the difficulty of monitoring and enforcement as a barrier to introducing regulations on the marketing of food to children.

Meanwhile, the Department of Education Order No. 8, series of 2007 issued on 6 February 2007 included provisions requiring public school canteens to sell only healthy foods. The policy statement under paragraphs 4.4 and 4.5 emphasised that only nutrient-rich foods shall be sold in the school canteen and foods that do not bear the “Sangkap Pinoy” seal or did not pass the BFAD approval are prohibited. The sale of junk food, as well as carbonated drinks and sugar-based and artificially flavoured juices is prohibited.

Thailand

In September 2007, the Government of Thailand introduced measures to control TV advertising during children's programmes for children between the ages of 3 to 12 years old and other programmes with children as the main target audience:

- There must not be more than 12 minutes of advertising in the period of 1 hour (with 10 minutes of ads for the product and 2 minutes of ads promoting healthy eating habits).
- Advertisements for the same product or ads with the same content must not be broadcast for more than 4 times during the period of 1 hour. And not more than 2 times in the period of 30 minutes.
- Content of the ads must not involve sales promotion by games, contests, or giveaways such as toys.
- Ads must not contain message encouraging excessive consumption. It must not present messages, sound, photos, or pictures, which exaggerate the benefits, speed, size, colour and endurance of the products.
- Ads must contain consumption warning according to the standard set out by the Food and Drug Administration.
- Characters (cartoon/person) well known to children, or characters which have appeared in children's programmes such as presenters must not be used to present or endorse the product.



CONCLUSIONS AND RECOMMENDATIONS



Conclusions

Advertising of unhealthy food to children is prevalent in Asia Pacific and is not only an issue for developed countries. The promotion of food to children in this region uses a combination of tried and tested traditional marketing approaches, as well as a wide range of the latest highly sophisticated marketing techniques.

Absence of labelling

Some serious questions must be asked of the multinational companies featured in this report. Some of them chose not to respond to enquiries from consumer organisations in their own countries, yet they are making efforts in the US and EU by signing pledges and announcing commitments to take action. Some CI members found it difficult to obtain information, not only on advertising policies, but also on nutritional information. Providing clear information to consumers must be a priority.

Some of the products in India highlighted in this report do not disclose how much sugar is in the product – yet the same product sold in other countries does. Such information should be a standard requirement.

Pester power

One of the arguments often used by industry in opposition to regulations on advertising food to children is that it is up to parents to take responsibility for their children's eating habits. However, it is impossible for parents to be able to make a decision when information is not readily available.

This report has detailed the extent of the marketing techniques used by companies, which further reduces parents' ability as they are bombarded by 'pester power' and the demands of their children. The use of 'pester power' may be even more important in low and middle-

income countries where techniques such as competitions and free toys may have an even stronger appeal.

Confusing commitments

There is a confusing array of 'pledges' that have been signed by some food and beverage companies, the latest being the 'Thai pledge'. Where some companies had signed global pledges, they did not inform the local consumer organisation which makes it difficult to hold the companies to account for their commitments. The range of different countries they cover can make it difficult to see which pledges are truly global. The pledges themselves are also limited in scope. It is also confusing to consumers that the fast food restaurant industry seems to be absent from this attempt at self-regulation and is not a signatory to some of the pledges, such as the 'Thai pledge'.

This report has also shown a wide disparity between the responses of national governments in this region. Some have no national statutory controls on advertising; others rely on general principles while some have introduced restrictions designed to specifically address the marketing of food to children. However, the responses by these governments do not go far enough to protect children. While controls restricting the advertising of unhealthy foods to children are only one part of the answer to rising obesity rates, it is a concrete action that governments can take to ensure that food marketing to children is in line with healthy eating advice, rather than contradicting it. To fully protect children from the impact of marketing unhealthy food, governments should adopt national legislation based on the recommendations drawn up by CI and the IOTF.

The need for an international code

The evidence from this report further highlights the need for an international code on the marketing of food and beverages to children. The report reveals a whole range

of inconsistencies from companies sponsoring school sports events with their high sugar or high fat brands or providing basic nutritional advice in some countries, but not in others, to the fact that while companies are attracting attention for making new commitments in the US and the EU, many did not even respond to enquiries from consumer organisations in their countries.

National governments, aware of the scale of the issue of growing obesity-related diseases in some countries, are taking some measures. However, the responses, while moving in the right direction in the case of Malaysia and Thailand that have introduced measures on TV advertising, are inadequate. It should be the responsibility of the WHO to show leadership and produce policies that can be easily and swiftly implemented by national governments and provide a benchmark for responsible food industry practice.

The international Code prepared by CI and IOTF provides a model framework on how this can work. It would provide protection from advertising of products high in fat, sugar and/or salt for children up to 16 years old and would include:

- A ban on radio or TV adverts promoting unhealthy food between 06.00 and 21.00.
- No marketing of unhealthy food to children using new media (such as websites, social networking sites and text messaging).
- No promotion of unhealthy food in schools.
- No inclusion of free gifts, toys or collectible items, which appeal to children to promote unhealthy foods.
- No use of celebrities, cartoon characters, competitions or free gifts to market unhealthy food.

Recommendations

CI believes that all children up to the age of 16 years old should be protected from marketing of unhealthy food and drink through a global standard based on the Code prepared by CI and IOTF. In particular, the following marketing techniques should not be allowed to promote food high in fat, sugar and/or salt:

- 1. Advertising or promotion that directly appeals to children, including:**
 - The use of celebrities
 - The use of cartoon characters, including brand owned and licensed
 - The inclusion of free gifts, toys or collectible items

- The inclusion of competitions, vouchers or games
- The shape or novelty value of the food or food packaging

- 2. Advertising or promotion in places children visit frequently, which includes:**

- Nurseries, pre-school centres, schools and school grounds
- Children's clubs, centres, playgrounds and sports halls
- Family and child clinics and paediatric services

- 3. Advertising that targets parents or carers:**

- No indirect advertising to parents or other adults caring for children such as other family members, child carers, teachers, health workers. This includes suggesting that a parent or adult who purchases such a food or beverage for a child is a better, more intelligent or a more generous parent or adult than one who does not do so, or that their child when fed these products will be more intelligent and gifted.

Consumers International calls on:

The World Health Organization

- To develop an international code to restrict the marketing of food to children based on the CI/IOTF Code
- Report on and monitor compliance with the international Code

National governments

- To give their support to the development of an international code on the marketing of food to children
- To implement national legislation based on the international Code to restrict the marketing of food to children
- To implement measures on nutritional information and labelling

Multinational food and beverage companies

- To voluntarily comply with all the provisions in the CI Code
- To adopt a consistent global approach and ensure that all internal policies on advertising and nutrition are implemented to the same standard in all countries
- To use their creativity and breadth of marketing techniques to encourage children to make healthy food choices.



APPENDIX

About the report

Our research

This piece of research from CI explores the techniques used by six multinational food companies to promote unhealthy food to children and to get a snapshot of how significant this problem is in the Asia Pacific region.

Another aim was to examine the industry's response to concerns about obesity and to look at the national governments' response. The research covered emerging and developing economies in this region, namely, Fiji, Hong Kong, India, Indonesia, Malaysia, Nepal, Philippines and Thailand.

All CI members involved have produced a country report, which also looks at advertising by national or regionally based companies. Information has been synthesised from selected members to produce this regional report. The information used for this report comes from the following organizations:

- Fiji – Consumer Council of Fiji (CCF)
- Hong Kong – Hong Kong Consumer Council (HKCC)
- India – Consumers Association of India (CAI) and Consumers Education and Research Society (CERC) – this information has been combined.
- Indonesia – Yayasan Lembaga Konsumen Indonesia, (YLKI)
- Malaysia – Federation of Malaysian Consumers Association (FOMCA)
- Nepal – SEWA Nepal
- Philippines – IBON Foundation
- Thailand – Foundation For Consumers (FFC)

Research methodology

CI utilised the model used by Which?, the Consumers Association in the UK, for their reports published in November 2006 and July 2008 titled *Food Fables*¹² and *Food Fables – the second sitting*, which explored industry policies on responsible food marketing to kids. Which? is a member of CI. Below is a brief description of the process we went through to carry out the research:

1. Choosing the manufacturers to focus on

The multinationals were chosen based on their market share. As we wanted to be able to make international comparisons, the research focused on the companies that have the largest share globally that sell products in the participating countries. Local food companies were also chosen by members based on the largest market share in the country or in the region.

2. Identifying the brands/products these manufacturers sell

We wrote, emailed and called the manufacturers to ask for the full list of the food products they primarily sell to kids. We also visited their websites and scanned supermarkets to get this information.

3. Assessing which of the products are unhealthy

Products targeted at children were evaluated based on the UK Foods Standards Agency Criteria traffic labelling scheme to see if they were high in fat sugar or salt.¹³ (See chart page 31.) Those that got high score either in sugar, fat or salt content were considered as 'unhealthy' for the purpose of the research. We looked at packaging to study the nutrition information while in cases when this was missing; we emailed, wrote, and called their manufacturers and requested the information.

When is a product 'high in fat, sugar or salt'?

As a benchmark we used the UK's Food Standards Agency's (FSA) criteria for its traffic labelling scheme to define what is 'high'.

UK Food Standards Agency Criteria (per 100g/100ml) (Published January 2007)

	Low	Medium	High
Fat (per 100g)	3g and below	Between 3g and 20g	Over 20g
Fat (per 100ml)	1.5g and below	Between 1.5g and 10g	Over 10g
Saturates (per 100g)	1.5g and below	Between 1.5g and 5g	Over 5g
Saturates (per 100ml)	0.75g and below	Between 0.75g and 2.5g	Over 2.5g
Total sugars (per 100g)	5g and below	Between 5g and 15g	Over 15g
Total sugars (per 100ml)	2.5g and below	Between 2.5g and 7.5g	Over 7.5g
Salt (per 100g or 100ml)	0.3g and below	Between 0.3g and 1.5g	Over 1.5g

4. Were the manufacturers marketing their unhealthy products to children?

Marketing of food to children has become more and more creative and sophisticated. Examples of marketing can be found by monitoring a range of media such as television, Internet, in-store or in-restaurant promotions and press. It is impossible to define all forms of marketing.

In this research, CI members in Asia Pacific were asked to collect and examine examples of marketing of unhealthy food products to children focusing on:

- TV advertisements
- product packaging, and
- innovative marketing techniques, such as interactive websites, viral marketing, film promotions, etc.

The examples of advertising were collected from April to June 2008.

Based on the CI and IOTF Recommendations for an International Code on Marketing of Foods and Non-Alcoholic Beverages to Children, marketing applies to the processes or techniques of promoting, selling, and distributing food products including all future forms of advertising. Examples of these could include the following:

- interactive websites
- film promotions

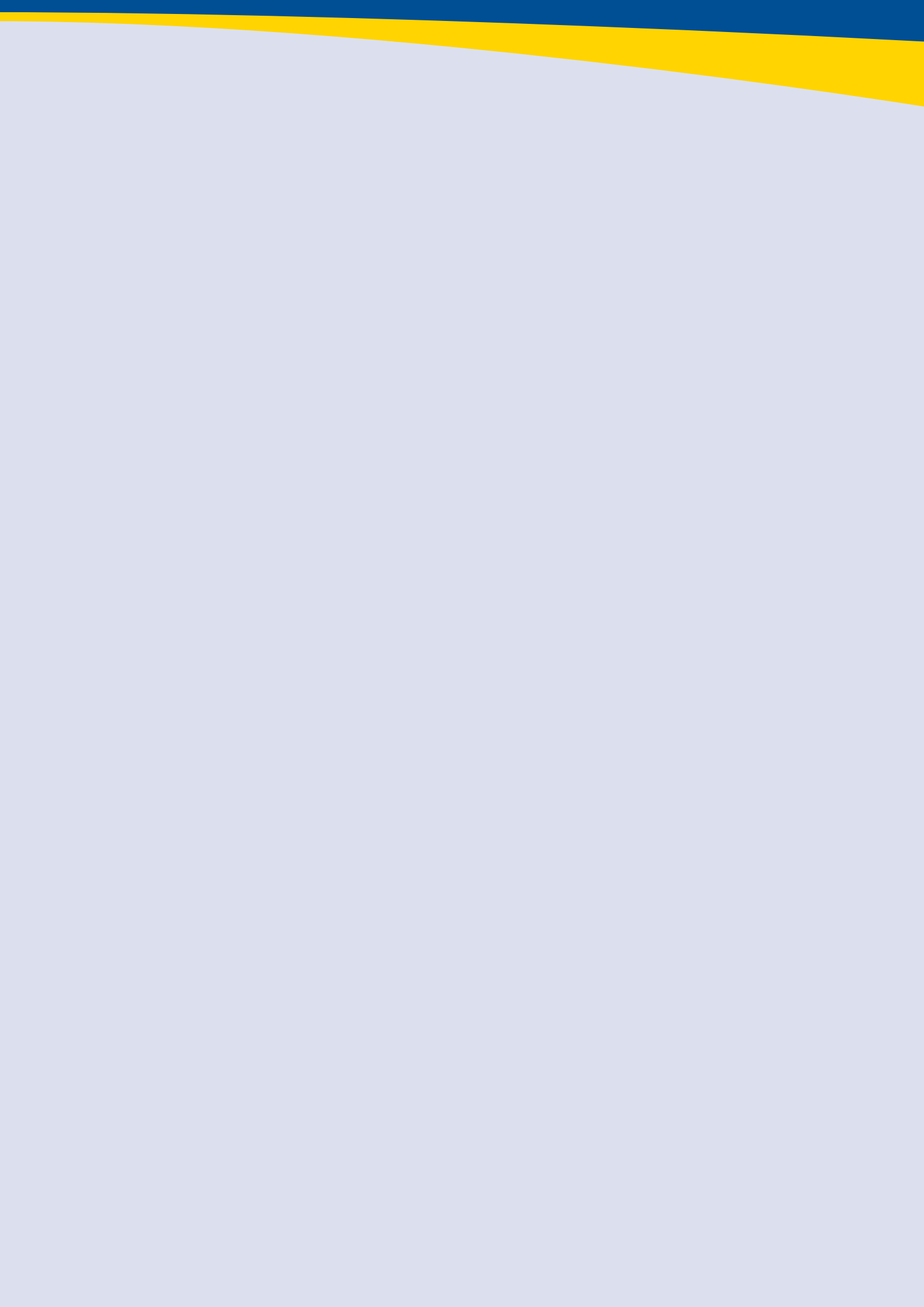
- day trips
- materials for schools
- viral marketing (eg emails, games, blogs)
- competitions
- free toys or prizes
- football or other sports promotions
- use of celebrities
- clubs to join
- use of cartoon characters
- TV adverts
- articles in children's magazines
- SMS messaging
- innovative food products (eg 'food you can play with')
- on-pack promotions, including coupon collecting
- sponsored hotel suites or other holiday promotions.

5. Establishing company policies

Companies featured in this report were asked for their policies on marketing of food to children and their action on obesity or nutrition. A number of communication modes were maximized to obtain this information.

Endnotes

- ¹ International Journal of Pediatric Obesity. 2006; 1: 11_/25 (2006)
- ² The CI and IOTF Recommendations for an *International Code on Marketing of Foods and Non-Alcoholic Beverages to Children* is available to download at www.junkfoodgeneration.org
- ³ <http://www.who.int/mediacentre/factsheets/fs317/en/index.html> Accessed 3 July 2008
- ⁴ <http://www.who.int/mediacentre/factsheets/fs317/en/index.html> Accessed 3 July 2008
- ⁵ <http://www.iotf.org/childhoodobesity.asp> Accessed 27 February 2008
- ⁶ International Journal of Pediatric Obesity. 2006; 1: 11_/25 (2006)
- ⁷ *The extent, nature and effects of food promotion to children: A review of the evidence* Professor Gerard Hastings et al, World Health Organization (WHO), July 2006
- ⁸ http://www.who.int/gb/ebwha/pdf_files/WHA57/A57_R17-en.pdf Accessed 3 July 2008
- ⁹ Countries included India, Indonesia, Malaysia, Pakistan, Philippines, South Korea. Junk Food Generation available to download at http://www.consumersinternational.org/Shared_ASP_Files/UploadedFiles/728E4ABF-3B36-4450-9A6D-D0A2A1B16F4B_JunkfoodfinalROAP.pdf
- ¹⁰ As reported in *The Nation* online on 23 May 2008
http://www.nationmultimedia.com/2008/05/23/national/national_30073761.php accessed on 3 July 2008
- ¹¹ The codes of practice are issued by the Hong Kong Broadcasting Authority and are available at its website at: www.hkba.hk.
- ¹² *Food Fables, Which?*, November 2006 is available to download at http://www.which.co.uk/files/application/pdf/0611foodfables_rep-445-111767.pdf and *Food Fables – the Second Sitting*, July 2008, is available at <http://www.which.co.uk/campaigns/kids-food/food-marketing-tricks-to-look-out-for/food-fables/index.jsp>
- ¹³ http://www.salt.gov.uk/understanding_labels.html





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Find out more about Consumers International's
campaign by visiting www.junkfoodgeneration.org

