



**THINKING CRITICALLY ABOUT
UNHEALTHY FOOD AND DRINK
MARKETING AND THE WELLBEING OF
CHILDREN AND YOUNG PEOPLE**



Analysing unhealthy food and drink advertising to children and young people

Purpose and background

This activity introduces students to the New Zealand Advertising Standards Authority (ASA) Children and Young People's Advertising Code to use as the basis for deciding what is (un)ethical and (in)appropriate about the way unhealthy food and beverages are advertised and marketed. The code is under the New Zealand ASA.

Students will identify the rights of children and young people as consumers and use this information to evaluate the advertising of unhealthy food and beverage products.

Key competencies: Thinking, participating and contributing
Suggested time: 45-60 mins.

Learning intention

Students will identify the rights of children and young people as consumers and use this information to evaluate the advertising of unhealthy food and beverage products.

Resources

Print or electronic copies of the template provided on resource pages following. Note that the template includes a selection of the more relevant clauses from the code. Teachers may decide other rules from the code are more applicable to the advertising the students are analysing and replace the selection in the template. The complete Children and Young People's Advertising Code can be viewed online or downloaded as a pdf. The size (6 pages all in tables) and language make it accessible for students with minimal teacher support.

PRESENTATION

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Teaching and learning process

1. Explain to the students that New Zealand has an official organisation called the Advertising Standards Authority. A powerpoint has been provided. Part of the work of the ASA includes monitoring the advertising of products to children and young people. The ASA defines children as all persons below the age of 14 years and young people as all persons who are at least 14 years but under 18 years.

2. The task is to put some of the rules of the Children and Young People's Advertising Code to the test, using the unhealthy food or beverage advertisement selected.

3. Supply each group with the provided template of the ASA rules. There are specific questions provided to guide the analysis.

4. [Optional] If necessary to support student learning, briefly model how to use the template, using the Coca Cola ad example provided.

Encourage each group to contribute a summary of their discussion to the class. Ask: What recurring ideas or themes were apparent from each group's feedback?

Student learning journal entry / artefacts that provide evidence of learning

Students file a copy of their group's template of the evaluation of their selected advertisement in their learning journal.

Teacher knowledge and support resources

Only the rules most likely to apply to unhealthy food and drinks have been included in this resource. Other rules may also be relevant which could add to or replace the rules on this list – use the link above to access the full set of rules in the Children and Young People’s Advertising Code. It is not expected that students will develop lawyer-like understandings of these rules, but they should at least gain understanding about ways some unhealthy food and beverage ads may come close to or actually breach the Children and Young People’s Advertising Code.

This task is leading toward students being able to answer future critical thinking questions such as:

- Who is being advantaged?
- Who is being disadvantaged?
- Who is not being heard or served?
- What are the inequalities in this situation? Teachers could ask some of these questions as part of this activity.

Teacher reflection on and evaluation of the activity

- How well did students engage with this activity?
- Were they interested in finding out about regulations that relate directly to them?
- What was your evidence for this?
- What other conversations did this activity initiate (e.g. general healthy eating or about topics other than unhealthy food and drinks)?
- Where else in the learning programme could these rules be reused in a different learning context?



Resource Page

Use the Children and Young People’s Advertising Code to evaluate the appropriateness of an unhealthy food or beverage advertisement

Format of ad eg print ad, billboard, video (commercial)	SUBJECT
Brief description of the ad – imagery, catch phrases, music, etc	
Food or beverage being advertised	
Is it an occasional food or beverage?*	
Do you think this advertisement targets children or young people DIRECTLY or INDIRECTLY, or not at all? Give a reason for your answer	

*Occasional Food and Beverage products are those food and beverage products which are high in fat, salt or sugar and classified under the Food and Beverage Classification System (FBCS) as being intended for occasional consumption.If a particular product is not classified under the FBCS but is comparable or equivalent to a product which is classified, then it shall be deemed to have the same classification. If a particular product is not classified under the FBCS and is not comparable or equivalent to a product which is classified, then it shall be deemed to be an “Occasional food and beverage product” if it has less than 3.5 stars under the Health Star Rating System.

Answer the following questions to guide making a complaint:

Summary of the ASA Children and Young People’s Advertising Code	What I think this principle or rule would mean in relation to advertising unhealthy food and beverages	Does your chosen ad comply with the principle or rule - totally, somewhat or not at all?
Principle 1: Ads must not contain anything that is likely to result in children or young people’s physical, mental or moral harm and must observe a high standard of social responsibility.		
Rule 1 (e) Advertising must not provide an unrealistic sense of body image or promote an unhealthy lifestyle.		
Rule 1 (h) Popular characters and celebrities must not be used irresponsibly in ads for occasional foods.		
Rule 1 (i) Ads (including sponsorship ads) for occasional food or beverages must not target children.Targeting is determined by: -the product’s appeal to children or young people.		

<p>-the presentation of the ad content (theme, images, colours, wording, music and language used)</p> <p>- average audience at the time or place the advertisement appears.</p>		
<p>Rule 1(j) A special duty of care must be applied to occasional food and beverage product advertising to young people.</p>		
<p>Rule 1(k) Ads must show appropriate food portion size for age and for one eating occasion</p>		
<p>Rule 1 (l) Ads must not encourage acting promptly to purchase or buy excessive amounts for irresponsible consumption.</p>		
<p>Principle 2: Ads must not mislead or deceive children or young people, abuse their trust or exploit their lack of knowledge.</p>		

Rule 2 (f) Ads must not mislead as to the potential physical, social or mental health benefits from consumption.		
Principle 3: A special duty of care must be exercised for Occasional Food and Beverage Product sponsorship advertising targeted to young people.		
Rule 3 (a) Sponsorship ads must not show an occasional food or beverage product, or such product's packaging, or depict the consumption of an occasional food or beverage product.		

Overall summary:

Do you think children or young people are ‘advantaged’ or ‘disadvantaged’ by advertising like this? Give a reason for your response that relates to ideas about wellbeing. What might be the consequences for wellbeing if a child or young person (uncritically) believes the messages in unhealthy food and drink advertising?

Resource Page

Coca Cola advertisement example

Out of home bus shelter ad

Complaint 17/454



Resource Page

Coca Cola Advertisement example. Complaint 17/454

Format of ad eg print ad, billboard, video (commercial)	SUBJECT
Out of Home- Bus shelter ad	
Brief description of the ad – imagery, catch phrases, music, etc	
The Coca-Cola advertisement appeared on a bus stop on Kepa Road close to the intersection with Kohimarama Road in Auckland. The majority of the advertisement featured a vintage style Santa Claus riding in a car holding two glass bottles of Coca-Cola, one labelled No Sugar, doing a peace sign with his other hand and stating: “IT FEELS GOOD TO GIVE”. The bottom of the advertisement included the Youthline and Coca-Cola logos and said: “Join us in giving to Youthline. TXT ‘YL’ to 5144 to give \$3”.	
Food or beverage being advertised	
Coca Cola Classic and Coke No Sugar	
Is it an occasional food or beverage?*	
Complainant noted: All beverages other than milk and water are classified as occasional under the Ministry of Health Food and Beverage Classification System used by the ASA. Advertiser response: Coca-Cola Classic falls into the definition of an Occasional Food under the Food and Beverage Classification System. Coca-Cola No Sugar does not meet this definition.” The Advertiser said “Coca-Cola No Sugar falls under the definition of a Sometimes Beverage and should be excluded. Decision noted: included the ‘occasional beverage’ product, Coca-Cola Classic. A full-sugar or ‘Classic’ Coke fell in to the occasional category.	
Do you think this advertisement targets children or young people DIRECTLY or INDIRECTLY, or not at all? Give a reason for your answer	
Santa Claus is probably one of the best loved characters by children of all ages as the bringer of gifts and joy to family Christmas time. In the poster he is holding out two bottles of coke in a very inviting manner that we contend will appeal to children and young people. The position of the bus shelter in relation to a primary and secondary school. Because of the position of the bus shelter there are large numbers of children and young people passing the poster advertisement several times a day.	

*Occasional Food and Beverage products are those food and beverage products which are high in fat, salt or sugar and classified under the Food and Beverage Classification System (FBCS) as being intended for occasional consumption.If a particular product is not classified under the FBCS but is comparable or equivalent to a product which is classified, then it shall be deemed to have the same classification. If a particular product is not classified under the FBCS and is not comparable or equivalent to a product which is classified, then it shall be deemed to be an “Occasional food and beverage product” if it has less than 3.5 stars under the Health Star Rating System.

Summary of Coca Cola complaint, complaint decision and advertiser response

Breaches highlighted by complainant: In breach of principle 1 and rules 1(h) 1 (i) 1(j), principle 3 and rule 3(a)

Breaches determined by ASA complaints board: Partially upheld. Ruled in breach of principle 1, rule 1(i), principle 3 and rule 3(a).

The complaints board ruled that the ad did not breach rules 1(h) and 1(j).

Summary of complaint decision: The Complaints Board ruled the ad was a sponsorship advertisement from Coca-Cola for Youthline which targeted children and young people and included the ‘occasional beverage’ product, Coca-Cola Classic. It was therefore deemed socially irresponsible. The Complaints Board did not think that the use of Santa Claus was socially irresponsible despite it being a main feature of the ad, which they thought was somewhat mitigated by the vintage look of the ad. They were more concerned with the imagery of a Coca Cola Classic can being included. The Complaints Board was unsure whether young people were a significant proportion of the audience but due to it being a bus shelter ad and difficult to determine the exact audience they decided to err on the side of caution.			
Principle /Rule	Complaint to ASA	Advertiser/media agency response	Response from ASA
Principle 1 Advertisements targeted at children or young people must not contain anything that is likely to result in their physical, mental or moral harm and must observe a high standard of social responsibility. Rule 1(h)When licensed and proprietary characters and celebrities popular with children or young people are used in advertisements, they must be used in a responsible manner.	Complainant does not believe this is responsible advertising despite the good cause that the funds are being donated to. Santa Claus is probably one of the best loved characters by children of all ages as the bringer of gifts and joy to family Christmas time. In the poster he is holding out two bottles of coke in a very inviting manner that we contend will appeal to children and young people.	We agree that Santa Claus is a much-loved character and is often considered as the bringer of gifts and joy to families at Christmas time. Coca-Cola and the image of Santa Claus have a long history together. The purpose of using Santa in our advertisement is to appeal to families, it is not to target children or young people.	The Complaints Board ruled it was a sponsorship advertisement from Coca-Cola for Youthline which targeted children and young people. Rule 1 (h) not breached. The Complaints Board was of the view that while Santa Claus was appealing to children, the inclusion of the occasional beverage was the primary concern. The Complaints Board said the image of Santa would have strong appeal to children, albeit somewhat mitigated by the vintage nature of the image.

Summary of Coca Cola complaint, complaint decision and advertiser response

Principle /Rule	Complaint to ASA	Advertiser/media agency response	Response from ASA
<p>Rule 1(i) Advertisements (including sponsorship advertisements) for occasional food or beverage products must not target children or be placed in any media where children are likely to be a significant proportion of the expected average audience.</p> <p>Rule 3(a)Sponsorship advertisements must not show an occasional food or beverage product, or such product’s packaging, or depict the consumption of an occasional food or beverage product</p>	<p>The position of the bus shelter in relation to a primary and secondary school. The bus shelter is opposite to the local shops where many of the children walking to and from both schools stop to purchase food and drinks on their way to and from school. Many children congregate outside the dairy, fish and chip shop, bakery and pizza place that are located in the block of shops.</p> <p>The advertisement was a ‘sponsorship’ advertisement forYouthline. It went against the requirements of Rule 3(a) which restricts the inclusion of occasional food or beverage products in sponsorship advertisements.</p>	<p>There are rules to ensure that advertising of sugary/occasional food and beverage is not placed within 250m of the main entrance to a school. The bus shelter is over 500m from the front gate of Selwyn College and even further away from the main entrance of St Thomas’s School. The median age of people in the surrounding households were between 38.5 and 47.5 years.</p> <p>Principle 3 and Rule 3(a) did not apply as the advertisement does not constitute sponsorship advertising due to our relationship with Youthline being a corporate partnership and not a sponsorship relationship.</p> <p>We highlight our Corporate Brand – the Contour Bottle; which is a registered trade mark of The Coca-Cola Company and widely recognised around the world.</p>	<p>Rule 1(i) breached The Complaints Board said the advertisement was a sponsorship advertisement for Youthline Children under the age of 14 were unlikely to be a significant proportion of the audience but erred on the side of caution and took a common-sense approach due to a lack of actual data.</p> <p>Rule 3(a) breached The Complaints Board ruled it was a sponsorship advertisement rather than simply an advertisement for an occasional food and beverage product.</p>

COCA COLA

PRINCIPLE	WE COMPLAINED THAT	COCA COLA REPLIED	ASA RULED
<p>Principle 1, 1 (h), 1 (i), 1(j) Likely to result in physical, mental or moral harm, high standard of social responsibility</p> <p>1(h) Popular characters and celebrities to be used in a responsible manner</p> <p>1(i) Ads (incl sponsorship ads) must not target children or be placed where children are significant proportion of audience</p> <p>1(j) Special duty of care to occasional beverage advertising to young people</p> <p>Principle 3, 3(a) Sponsorship ads must not show an occasional food or beverage product</p>	<p>Both Coke and Coke No Sugar are occasional.</p> <p>Santa Claus best loved characters by children. Holding bottles of cokes to appeal to children.</p> <p>Bus shelter close to primary and secondary school- large numbers of children will view.</p> <p>Irresponsible advertising despite good cause.</p> <p>Sponsorship ad for Youthline containing occasional beverages.</p>	<p>Coke No Sugar is a sometimes beverage</p> <p>Purpose of Santa is to appeal to families, not to target children or young people</p> <p>Not placed within 250m of main entrance of a school.</p> <p>Median age of surrounding households 38.5 and 47.5</p> <p>Relationship with Youthline a corporate partnership</p>	<p>Partially upheld- In breach of 1, 1(i), 3, 3(a)</p> <p>Sponsorship ad which targeted children and young people. Full sugar Coke appeal to children, placement, recognition of Youthline.</p> <p>Primary concern occasional beverage not Santa Claus</p> <p>Placement- lack of data- err on the side of caution.</p>

Appendix

Additional information regarding the Children and Young People's Advertising Code and its interpretation.

Rule 1(h) Licensed and proprietary characters and celebrities: Licensed and proprietary characters and celebrities must be used in a responsible manner. *We believe that characters popular with children should not be used to promote unhealthy food or beverages. This is different from what the rule itself states.

Rule 1(i) For an advertisement to be classified as “targeting children or young people”, the context of the advertisement needs to be analysed, as well as the relationship between the following three criteria: Nature and intended purpose of the product or service being promoted is principally or generally appealing to children; Presentation of the advertisement content (e.g., theme, images, colors, wording, music, and language used) is appealing to children ; Expected average audience at the time or place the advertisement appears includes a significant proportion of children. In practice, the Complaints Board requires all three criteria to be met, Even where the product and presentation of a product is appealing to children or young people, the Complaints Board considers the harm can be mitigated by the placement of the advertisement.

Measures to determine if children are likely to be a ‘significant proportion’ of the expected average audience may include one or a combination of the following; Where accurate data exists, 25% or more of the expected audience will be children. Child viewing time zones. Content with significant appeal to children such as programmes, artists, playlists, video, movies, and magazines. Locations where children gather (e.g. schools, school grounds, pre-school centres, playgrounds, family and child clinics and paediatric services and during any children’s sporting and cultural events).

Rule 1(j) Targeting young people (See targeting definition above). It is unclear what 'special duty of care' means in practice. The guidelines state: advertisements must not state or imply that such products are suitable for frequent or daily consumption. Where possible, healthy or better-for-you options should be promoted.

Sponsorship advertising: Sponsorship advertising of occasional food and beverages targeting children is not permitted. A special duty of care is required for sponsorship advertising targeting young people. It is unclear what 'special duty of care' means in practice.





Contact Information

**For information or to get
involved**

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