

Guidelines for Responsible Food Marketing to Children

*Industry should develop and strictly adhere to marketing and advertising
guidelines that minimize the risk of obesity in children and youth.*

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**Center for Science in the Public Interest
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CSPI and Its Nutrition Policy Project

The Center for Science in the Public Interest (CSPI) is a nonprofit organization based in Washington, D.C. Since 1971, CSPI has been working to improve the public's health through its work on nutrition, food safety, and alcohol issues. CSPI is supported primarily by the 850,000 subscribers to its *Nutrition Action Healthletter* and philanthropic foundations.

CSPI's Nutrition Policy Project is working with concerned citizens, health professionals, government officials, and other nonprofit organizations to strengthen national, state, and local policies and programs to promote healthy eating and physical activity. Our goal is to help reduce the illnesses, disabilities, and deaths caused by such diet- and inactivity-related diseases and conditions as heart disease, cancer, high blood pressure, diabetes, and obesity. For more information on our current projects and other policies to promote healthy eating and physical activity, visit www.cspinet.org/nutritionpolicy.

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The *Guidelines for Responsible Food Marketing to Children* are available on line (free of charge) at www.cspinet.org/marketingguidelines.pdf.

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Guidelines for Responsible Food Marketing to Children

These *Guidelines for Responsible Food Marketing to Children* are for food manufacturers, restaurants, supermarkets, television and radio stations, movie studios, magazines, public relations and advertising agencies, schools, toy and video game manufacturers, organizers of sporting or children's events, and others who manufacture, sell, market, advertise, or otherwise promote food to children. The *Guidelines* provide criteria for marketing food to children in a manner that does not undermine children's diets or harm their health.¹ We hope the *Guidelines* will be helpful to parents, school officials, legislators, community and health organizations, and others who are seeking to improve children's diets.

Obesity and unhealthy eating habits are common in children

Over the last 20 years, the rates of obesity have doubled in children and tripled in teens. Even for children at a healthy weight, few (only 2%) eat a nutritious diet as defined by the U.S. Department of Agriculture. Currently, children's diets are too high in calories, saturated and trans fat, refined sugars, and salt, and too low in fruits, vegetables, whole grains, and calcium. This increases their risk of heart disease, cancer, diabetes, osteoporosis, and other serious and costly diseases.

Many children experience adverse health effects from poor dietary habits while still young. One-quarter of children between the ages 5 and 10 years old have high blood pressure, elevated blood cholesterol levels, or other early warning sign for heart disease. Type 2 diabetes can no longer be called "adult onset" diabetes because of rising rates in children.

Although children's food choices are affected by many factors, food marketing plays a key role. Studies show that food marketing attracts children's attention, influences their food choices, and prompts them to request that their parents purchase products.

Companies should support parents' efforts to foster healthy eating habits in children

Parents bear the primary responsibility for feeding their children. However, getting children to eat a healthful diet would be much easier for parents if they did not have to contend with billions of dollars' worth of sophisticated marketing for low-nutrition foods.

Children receive about 58 messages from television advertising each day (about half are for food), along with many additional marketing messages from websites, schools, and in retail stores. Given how often companies communicate with children about food, those

¹ For more information and rationale for the *Guidelines* see *Pestering Parents: How Food Companies Market Obesity to Children* by the Center for Science in the Public Interest (CSPI) at www.cspinet.org/pesteringparents.

who manufacture, sell, and promote food to children have an enormous effect on parents' ability to feed their children a healthful diet.

Parental authority is undermined by wide discrepancies between what parents tell their children is healthful to eat and what marketing promotes as desirable to eat. In addition, while many parents have limited proficiency in nutrition, companies have extensive expertise in persuasive techniques. Companies also have resources to influence children's food choices that parents do not have, such as cartoon characters, contests, celebrities, and toy give-aways.

Children of all ages should be protected from the marketing of foods that can harm their health

The *Guidelines for Responsible Food Marketing to Children* apply to children of all ages (less than 18 years of age). Society provides special protections for children, including measures to protect their health, such as requiring use of car safety seats or prohibiting them from buying cigarettes or alcoholic beverages. However, even in the absence of legislative or regulatory requirements, marketers should act responsibly and not urge children to eat foods that could harm their health.

Children are uniquely vulnerable to the marketing of low-nutrition foods. Many children lack the skills and maturity to comprehend the complexities of good nutrition or to appreciate the long-term consequences of their actions. Children of different ages face diverse challenges to healthful eating and different vulnerabilities to food marketing. Young children do not understand the persuasive intent of advertising/marketing and are easily misled. Older children, who still do not have fully developed logical thinking, have considerable spending money and opportunities to make food choices and purchases in the absence of parental guidance.

Nutrition guidelines

Responsible food marketing to children must address not only *how* food is marketed, but also *which* foods are marketed to kids. Uniquely, the *Guidelines for Responsible Food Marketing to Children* set criteria for which foods are appropriate to market to children. Other guidance regarding marketing to children has focused primarily on marketing techniques. For example, industry's self-regulatory guidelines through the Children's Advertising Review Unit (CARU) of the Council of Better Business Bureaus address which approaches are appropriate to use in marketing to children. Also, the Federal Trade Commission occasionally takes action against ads deemed unfair or deceptive.

What those approaches fail to address is that most of the food marketed to children is of poor nutritional quality. Changing the way a sales pitch is couched is irrelevant if the product is unhealthy. It hardly matters whether a company markets a candy to children by placing Bart Simpson on the package, by promoting it with a contest, or by advertising it on television. What matters is that the marketing encourages children to eat a product of poor-nutritional quality that can undermine their diets.

Ideally, companies would market to children only the most healthful foods and beverages, especially those that are typically under-consumed, such as fruits, vegetables, whole grains, and low-fat dairy products.

However, nutrition criteria that would allow only marketing of those foods seem unrealistically restrictive. Instead, we recommend a compromise approach. These *Guidelines* set criteria that allow for the marketing of products that may not be nutritionally ideal but that provide some positive nutritional benefit and that could help children meet the *Dietary Guidelines for Americans* (i.e., that help them to limit their intake of calories, saturated and trans fat, sodium, and refined sugars). This approach limits the promotion of some foods that are now commonly marketed to children. However, it allows companies to market reasonable alternatives to those products and a wider range of products. It also should provide an incentive for companies to develop and increase demand for foods that are nutritionally better than those that are currently marketed to children.

Some marketing efforts do not promote individual products, but instead promote a line of products, one brand within a company, or a whole company. For example, a campaign might encourage children to go to a particular restaurant without marketing a specific menu item. A company logo or spokes-character featured on a hat or website might promote a whole line of products. **Companies should not conduct general brand marketing aimed at children for brands under which more than half of the products are of poor nutritional quality, as defined below.**

Beverages

Low-nutrition beverages (as defined below) should not be marketed to children.

Nutritious/healthful beverages	Low-nutrition beverages
water and seltzer without added caloric sweeteners	soft drinks, sports drinks, punch, ice tea, and other drinks with less than 50% real juice and that contain added caloric sweeteners
beverages that contain at least 50% juice and no added caloric sweeteners	drinks containing caffeine (except low-fat and fat-free chocolate milk, which contain trivial amounts of caffeine)
low-fat and fat-free milk, including flavored milks and calcium-fortified soy and rice beverages	

Foods

Foods marketed to children should meet all of the following criteria (nutritionally-poor choices or low-nutrition foods are those that do not meet the criteria):

Nutrient	Criteria
Fat	less than 30% of total calories, excluding nuts, seeds, and peanut or other nut butters
Saturated plus trans fat	less than 10% of calories
Added sugars	less than 25% of calories (added sugars exclude naturally occurring sugars from fruit, vegetable, and dairy ingredients)
Sodium	no more than 150 mg per serving of chips, cereals, crackers, cheeses, baked goods, French fries, and other snack items no more than 480 mg per serving for soups, pastas, meats, main dishes no more than 600 mg for meals
Portion size – individual items	no larger than the standard serving size used for Nutrition Facts labels
Portion size – meals	no more than one-third of the daily calorie requirement for the average child in the age range targeted by the marketing
Nutrient content	contains one or more of the following: 1) 10% of the DRI (naturally occurring/without fortification) of vitamins A, C, or E, calcium, magnesium, potassium, iron, or fiber, 2) half a serving of fruit or vegetable, or 3) 51% or more (by weight) whole grain ingredients

Marketing techniques

When marketing foods to children, companies should:

Product characteristics and overall messages

- Support parents' efforts to serve as the gatekeepers of sound nutrition for their children and not undermine parental authority. Marketers should not encourage children to nag their parents to buy low-nutrition foods.
- Depict and package/serve food in reasonable portion sizes and not encourage overeating directly or indirectly.
- Develop new products that help children eat healthfully, especially with regard to nutrient density, energy density, and portion size.

- Reformulate products to improve their nutritional quality, including adding more fruits, vegetables, and whole grains, and reducing portion sizes, calories, sodium, refined sugars, and saturated and trans fats.
- Expand efforts to promote healthy eating habits consistent with the *Dietary Guidelines for Americans* and to promote healthful products, such as fruits, vegetables, whole grains, and low-fat milk. Do not portray healthful foods negatively.

Specific marketing techniques and incentives

- Should not advertise nutritionally poor choices during television shows for which more than a quarter of the audience is children.
- Should not use product or brand placements for low-nutrition foods in media aimed at children, such as movies, television shows, video games, websites, books, and textbooks.
- Only offer premiums and incentives (such as toys, trading cards, apparel, club memberships, products for points, contests, reduced-price specials, or coupons) with foods, meals, and brands that meet the nutrition criteria described above.
- Use/allow licensing agreements or cross-promotions (such as with movies, television programs, or video games) or use cartoon/fictional characters or celebrities from television, movies, music, or sports to market to children only those foods that meet the above nutrition criteria. This includes depictions on food packages, in ads, as premiums, and for in-store promotions.
- Should not put logos, brand names, spokes-characters, product names, or other marketing for low-nutrition foods/brands on baby bottles, children's apparel, books, toys, dishware, or other merchandise made specifically for children.
- Incorporate into games (such as board, Internet, or video games), toys, or books only those products and brands that meet the nutrition criteria.
- Use sponsorship of sporting, school, and other events for children only with brands and foods that meet the above nutrition criteria.
- Should not exploit children's natural tendency to play by building entertainment value into low-nutrition foods (for example, products such as mechanical lollipops, food shaped like cartoon characters, or sugary drink mixes that turn to surprise colors).

Additional guidance for schools

- Schools are a unique setting. Parents entrust their children into schools' care for a large proportion of children's waking hours. Also, schools are dedicated to children's education and are supported by tax dollars. Companies should support healthy eating in schools and not market, sell, or give away low-nutrition foods or brands anywhere on school campuses, including through:
 - logos, brand names, spokes-characters, product names, or other product marketing on/in vending machines; books, curricula, and other educational materials; school supplies; posters; textbook covers; and school property such as scoreboards, signs, athletic fields, buses, and buildings
 - educational incentive programs that provide food as a reward (for example, earning a coupon for a free pizza after reading a certain number of books)
 - incentive programs that provide schools with money or school supplies when families buy a company's food products
 - in-school television, such as Channel One
 - direct sale of low-nutrition foods
 - free samples or coupons
 - school fundraising activities
 - banner ads or wallpaper on school computers

Additional guidance for retail stores (such as grocery, toy, convenience, and video stores)

- Replace low-nutrition foods with more healthful foods or non-food items at checkout aisles or counters.
- Do not position in-store displays for low-nutrition foods or place low-nutrition products on shelves at young children's eye level.
- Cluster cookies, chips, candy, soda, and other food categories that are predominantly of poor nutritional quality in a few designated aisles of grocery stores to allow parents to skip those aisles if they choose.

Companies should not use the following approaches to market any foods (irrespective of the nutritional quality of the food being marketed)

- Should not show children engaged in other activities (like skateboarding, playing soccer, watching television, etc.) while eating.
- Should not mislead children regarding the emotional, social, or health benefits of a product or exploit children's developmental vulnerabilities and emotions to market any food, including:
 - Should not link children's self-image to the consumption of any foods/brands, use peer pressure, or arouse unrealistic expectations related to

consuming/purchasing a food (for example, implying that a child will be more physically fit, more accepted by peers, happier, or more popular if he buys a food/brand or goes to a certain restaurant).

- Should not market any food by modeling rebellion against parents or by portraying parents, teachers, or other authority figures in negative roles.
- Should not suggest that an adult who buys a child a certain product is more loving, generous, or otherwise better than an adult who does not.
- Should not use physical activity or images of healthful foods (such as fruits and vegetables) to market any low-nutrition food.