HOW UNHEALTHY FOOD IS MARKETED TO CHILDREN THROUGH DIGITAL MEDIA

POLICY BRIEF

SUMMARY

Australians experience high rates of overweight and obesity with 63.4% of Australian adults and 27.4% of children aged 5-17 overweight or obese.[1] Overweight and obesity are leading risk factors for chronic disease including cardiovascular disease, type 2 diabetes and some cancers. Interventions to change children's diets by increasing the proportion of healthy foods and reducing consumption of energy-dense, nutrient-poor foods must be prioritised by Australian governments in line with evidence-based recommendations from peak health agencies such as the World Health Organization (WHO).

The exposure of children to advertising for unhealthy foods is well-known to have an impact on their food preferences and diets. In recent decades, there has been a radical shift in the type of digital media[1] to which children are exposed. There has been a corresponding evolution in digital marketing[2] techniques being used by the food and beverage industry to reach children.

This policy brief provides an overview of:

1. Trends in digital marketing to children of food and beverages in Australia;

2. The impact of digital marketing on children's brand attitudes, food preferences and diets;

3. Policy options to reduce children's exposure to digital marketing and improve their diets and health.

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[1] Digitised content that can be transmitted over the internet or computer networks.

[2] The umbrella term used for the marketing of products and services using digital technologies, mainly on the internet, but also including mobile phones and any other digital medium.

USE OF DIGITAL MEDIA BY CHILDREN

Children access a wide range of digital media, often on mobile devices, with little or no supervision. Further the nature of digital media is continually evolving.

On a typical weekday, Australian children spend an average of two hours online outside of school hours, and of these 25% are online for more than four hours.[2]

Accordingly, the use of apps among children is also high – a 2013 study revealed that the use of apps by children aged 4–14 had doubled to 69% in the preceding 18 months, with children using an average of seven apps in the month leading up to the study.[3] While children continue to use gaming apps, increasingly children favour social media sites and apps, video viewing sites and websites.

In terms of internet activity, multiple studies report that children access platforms that offer a wide range of content for all ages, not just child-specific content.[4] Sites popular with children include Facebook, Instagram, Snapchat and YouTube.

YouTube was the most popular social media network with 8 to 11-year-olds, according to a 2013 report into young Australians' experience of social media. It showed that half of 8–9 year olds (53%) and seven in ten 10–11 year olds (69%) had used YouTube, and 60 per cent of 10–11 year olds had used it in the last four weeks. Facebook was popular with children, despite its policy of restricting access to those aged over 13 years – one in six 8–9 year olds (16%) and one in three 10–11 year olds (31%) had used it.[5] Global trends in internet and social media practices

indicate that children's use is likely to have increased since the study.

Children are using multiple internet-enabled devices; up to three for a 10 to 11 year old. These range from computers and laptops to mobile phones and tablets. Mobile phone 'ownership' increases significantly with age. The report found that 11 per cent of eight to nine year olds have their own mobile phone, increasing to 67 per cent of 12 to 13 year olds.[6] As a result, much online activity by children occurs without adult supervision.

USE OF DIGITAL MEDIA BY ADVERTISERS

Manufacturers and marketers are embracing digital marketing for its ability to amplify traditional advertising, increase the target audience and achieve greater attention, recall, brand awareness and intent to purchase.[7] Digital marketing is relatively inexpensive, indeed social media posts on a company's own page cost nothing, with the option to pay a relatively small fee to reach more people. This allows unhealthy food companies to place their advertisements on multiple media platforms that seek out children as they navigate the digital world. The relatively low cost and high impact is reflected in the increasing number of businesses that choose to advertise online. In 2016, 61% of large Australian businesses paid to advertise on social media, up from 36% in 2011.[8]

Digital marketing techniques have become sophisticated and distinct from traditional forms of marketing, such as television and print media. It holds particular advantages for advertisers because it can be:

1. Targeted
2. Interactive
3. Used for peer-to-peer marketing
4. Unidentified as advertising
5. Unsupervised.

Targeted

Online marketing may be tailored to the content that the viewer is watching on a site (contextual advertising) or to the characteristics and preferences of the user (behavioural advertising).[9] A network of

digital platforms collect extensive personal information from ever increasing volumes of data generated by internet users, to facilitate the delivery of behavioural advertising, which may specify audiences with precision. These methods are so pervasive that researchers have concluded that it is impossible to avoid online tracking.[10] There is very little effective regulation to protect children from this practice.

The individual profiles that are created from a person's digital footprint are so specific that they have been used by unhealthy food advertisers to target advertisements specifically, for instance to a person's ice cream flavour preference based on their purchase history.[11] Geo-location data has allowed fast food marketers to deliver advertisements in real time based on a person's location.[12] This is particularly potent when one considers the well documented emotional volatility and lack of impulse control in children and adolescents.

Researchers contend that the capacity to collect data and the understanding of the vulnerabilities of children has driven the design of digital media, noting that Facebook's marketing, data collection and targeting operations are attuned to the key aspects of adolescent development.[13]

Marketers are currently developing emotion analysis methods or neuromarketing to identify vulnerable moments though motion sensors in games consoles and in sentiment analysis of social media comments and level of viewer attention.[14] Analysis of this type of data promises to allow marketers to modify their advertising campaigns and potentially to target moments of peak vulnerability. As a WHO report notes, the evidence of the effectiveness of neural marketing is unclear but its development and testing is a real-time experiment[15] that includes children as subjects.

Measures to protect privacy are very limited. Legislation in the United States prohibits the collection of personally identifiable data if a child is under 13 years of age, without parental consent.[16] As many companies operate internationally, this appears to have become the de facto cut off for privacy protection and potentially the reason why many sites exclude users who are younger than 13. This does not protect children for whom parents provide consent or who are pretending that they meet the

age requirements of sites, particularly social media sites.

Parents and children may give consent to the collection of data without realising the implications. Privacy policies are often so complex and legalistic that they have been characterised as deceptive[17] and accordingly provide minimal practical protection as users of all ages overlook them in their enthusiasm for digital engagement.

Interactive

Digital marketing is interactive involving children in a two-way interaction with the brand via social media, branded communication, competitions or games. Unhealthy food and beverage marketers who are keen to reach children seek to engage them in entertaining experiences and encourage them to share these experiences with their friends.

A particularly sophisticated and enticing example is the Unilever Paddle Pop website (http://www.paddlepop.com.au/), which features the Paddle Pop Lion in an array of videos and games. This website leads children onto a succession of mediums; a mobile app, an Instagram account and a YouTube account with additional shareable videos.

Uses peer-to-peer marketing

Digital marketing engages children in powerful peer-to-peer viral marketing, involving "sharing" with friends. Peer-to-peer marketing exploits one of the primary motivators of pre-teens and teenagers, the need to define their identity. This vulnerability has been exploited in the social media model of sharing. This process allows an individual to identify with a product and then like and share.

Research has found that social media users are engaging with digital marketing from unhealthy food brands on a daily basis. This enables marketers to capitalise on the users' social networks and magnify the reach and personal relevance of their marketing messages.[18]

Apps like snapchat are another medium used by fast food chains to engage children and teenagers with their product. McDonald's, for instance, has produced a Snapchat lens which converts the image of a person's face into a hamburger, complete with McDonald's branding.The person shares the image with friends, so the child essentially does the advertising for the fast food chain.

Unidentified advertising

A feature of digital marketing is the blending of advertising with unpaid content to create a variety of stealth marketing techniques. This is particularly concerning as children are vulnerable consumers and are likely to have reduced capacity to understand the commercial and persuasive intent behind advertising messages.[19]

The immersive and embedded nature of commercial messages in advergames means they may not be recognisable to children, particularly as these activities are often not punctuated by breaks or cues to interrupt a child's participation, or to alert a child to the persuasive intent.[20] In the same way, advertisers may craft Instagram or Facebook advertisements that appear as posts, which make them difficult to identify as advertising.

Vlogging is another form of unidentified marketing which appeals to children. Around a third of children who use YouTube in the UK watch vlogs/blogs. Girls are much more interested in these than boys and viewing is highest for older children, peaking at half of 11–12 year olds.[21] This word of mouth advertising is very powerful as children view Vloggers as authentic, trusting their recommendations.[22]

Unsupervised: parents can't control or critique

The nature of children's use of digital media allows marketers to achieve repetitive and sustained engagement of children, some of whom may use social media or play a game for as long as they like, whenever they like[23], often without supervision.

Surveys show that while parents would like to monitor their children's viewing, their involvement in monitoring or limiting what their children view declines as their child gets older.[24]

As a result, parents are largely unaware of unhealthy food advertising to children in digital media[25] and tend to assume that marketing of unhealthy food online isn't a problem and that their children would ignore any unhealthy food marketing they see.[26]

IMPACTS ON CHILDREN

Systematic reviews of the evidence have concluded that food promotion influences the types of food children prefer, demand and consume, and is likely to contribute to poor diets, negative health outcomes,

weight gain and obesity in children.[27] This underpins the core recommendation of the WHO Commission on Ending Childhood Obesity to reduce children's exposure to such marketing.[28]

A study in the Netherlands demonstrated that playing food-based advergames, increased a child's food intake in a similar way to food commercials.[29]

An Australian study looked at the marketing of six food brands across multiple digital media platforms and identified a number of relationship and brand tactics. It found that the use of sophisticated integrated branding strategies in immersive online media allows marketers to generate young consumer brand engagement at an interactive, direct and social level that is more powerful than traditional media.[30]

As adolescents are likely to have access to money, they are an attractive target for marketers. In the past it was assumed that adolescents had the cognitive capacity to recognise advertisements and their persuasive intent, however previous analysis didn't consider the unique emotional, implicit and social impact of digital marketing. Adolescents are susceptible because of neurological and hormonal changes which cause them to be more subject to peer influence, including risky decision making.[31] This means it's more important than ever to consider the vulnerability of teenagers as digital marketing continues to grow.

Another challenge in the protection of children and young people from unhealthy food marketing online is the lack of publicly available data detailing the nature and volume of content children see via apps, games and devices.

The personalised nature of digital marketing makes it difficult for others to observe, while the extensive, detailed data available to Google, Facebook and Instagram and food marketers, is not publicly available.

This imbalance of information is an impediment to monitoring and safeguarding the exposure of children to digital marketing.

THE LACK OF EFFECTIVE CONTROLS ON ONLINE FOOD MARKETING

Despite the consensus among peak public health agencies that children should be protected from the marketing of unhealthy products, there remains a notable lack of regulation designed to limit children's digital exposure to unhealthy food marketing. Presently, controls on marketing to children are overwhelmingly left to a system of weak industry self-regulation, overseen by the Advertising Standards Board. See the OPC's Report *Exposing the Charade*[32] (at www.opc.org.au) for more information.

Complaints about advertising on social media are unlikely to succeed because self-regulatory codes only cover advertisements that are directed primarily to children, who are younger than 12 under the Responsible Children's Marketing Initiative (RCMI) and younger than 14 under the Quick Service Initiative (QSRI).

Whether an advertisement is directed primarily to children is determined by either its content or placement. For an online advertisement to be assessed as primarily directed to children by its placement, children must represent at least 35% of the audience. It is unlikely that advertisements on Facebook, Instagram or Snapchat would be assessed as primarily directed to children because the nominal age for participation in these sites is 13 and it would be assumed that it is not possible to satisfy the 35% audience requirement. This is despite data[33] showing that a significant proportion of children under 13 are using the sites and the admission by Facebook that it is difficult to verify the age of users and that there may be many users younger than 13.[34]

The codes also fail to capture apps and games by interpreting "directed primarily at children" very narrowly. An illustration is the KFC "snack your face" app, a free, animated game, premised on a quest to help save the Popcorn Chicken characters that have been stolen from KFC. A complaint that the app breached the QSRI by marketing high-fat snacks to children was dismissed because, although the Advertising Standards Board accepted it would be *attractive* to children, it was not directed *primarily* to

them, as they would not meet the very high audience threshold of 35%.[35]

In addition, the advertising of many unhealthy products is not restricted, because pursuant to the RCMI and the QSRI, the companies define whether a product is a "healthier choice".[36] This means that although the RCMI and QSRI apply, few online activities are actually restricted because of the wide and permissive range of products that companies allow themselves to promote to children.

For example, Paddle Pop ice-creams, which contain around 21% sugar by weight, or 11g sugar per serve,[37] are considered a "healthier choice", which means the Paddle Pop website is permitted under the self-regulatory codes, forging positive brand associations through significant time periods of online play, using recognisable characters.

POLICY ACTION REQUIRED

The present self-regulatory industry codes are ineffective to control the exposure of children to digital marketing. They are particularly ill-suited to address social media marketing, online marketing, apps and advergames – allowing a large volume of unhealthy food marketing to reach children.

The existence of intricate data on the use of digital media should be considered when designing mechanisms to reduce children's exposure to marketing of unhealthy foods. The food industry has access to information about individuals, including their age, which allows the targeting of advertising. It logically follows that if required by regulation, the food industry would have the capacity to block access to the unhealthy food marketing children are seeing, according to specific parameters such as age, in a manner that it is not possible in open access media like television.

The Australian Government must act to impose legislative, regulatory or strong co-regulatory measures to reduce the volume of food marketing reaching children. Essential features of an effective, comprehensive scheme that covers digital marketing must include:

1. application across all forms of digital marketing communication directed to children;

2. a definition of directed to children to cover mixed audiences and include digital locations that are likely to be of interest to children;

3. flexible mechanisms to ensure coverage of new and emerging marketing techniques;

4. defining "unhealthy food" by reference to established nutrient profile scoring criteria;[38]

5. increase the age of protection by defining children as under 16 as a minimum;

6. mandatory participation by all food and beverage advertisers;

7. administration and enforcement by an independent agency;

8. imposition of meaningful disincentives and sanctions for breach that apply to both content creators (marketers and food industries) and the digital platforms;

9. ongoing monitoring, review and evaluation, measured against policy objectives.

About the Obesity Policy Coalition

The Obesity Policy Coalition (OPC) is a coalition between the Cancer Council Victoria, Diabetes Victoria and the Global Obesity Centre at Deakin University, a World Health Organization Collaborating Centre for Obesity. The OPC advocates for evidence-based policy and regulatory change to address overweight, obesity and unhealthy diets in Australia, particularly among children.

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[37] Values are based on Paddle Pop Choc flavour, see nutrition information for this and other products at http://www.paddlepop.co.nz/products/Streets-Paddle-Pop-Banana.aspx#!/products/Streets-Paddle-Pop-Caramel.aspx
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