Guidelines for Responsible Food Marketing to Children  
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While a number of other countries have banned television advertising aimed at children and marketing in schools, the last serious attempt by the Federal Trade Commission to protect children from junk-food advertising was a quarter-century ago. Currently, advertising aimed at kids is largely left to the industry’s own self-regulatory body, the Children’s Advertising Review Unit (CARU), a division of the Council of Better Business Bureaus. CARU is funded by regulated companies and seeks to “preserve their freedom” to advertise to kids.

Considering the current political environment, government is unlikely to require companies to change the way they market foods to children. Some companies, like Kraft and Nickelodeon, are beginning to take steps to change their marketing practices to children. Soft-drink manufacturers don’t advertise during television aimed at young children (though they do aggressively market their brands in schools). These voluntary actions are encouraging, but generally modest. A look at the current market place shows that there is still much to be done to reduce junk-food marketing aimed at children. Today, the Center for Science in the Public Interest (CSPI) is calling on food marketers to not wait for government regulation and to do much more to protect children’s nutrition and health.

Companies should support parents’ efforts to foster health eating habits in children. Clearly, parents bear the primary responsibility for feeding their children a healthy diet. As parents, we try to set a good example, ensure that healthy foods are available, and limit our kids’ consumption of unhealthy foods. But, parents are fighting a losing battle against food marketers.

Food marketers have considerably greater skills and resources for influencing children’s food choices than parents. Even if a parent talked to their child every day about good nutrition that would pale in comparison to the several dozen seductive messages about food that kids get from television advertising each day. Plus, children get many additional marketing messages from websites, product placements in movies, in schools, and in retail stores.

Companies attract kids with everything from cartoon characters and contests to celebrities and toy give-aways. If only I could get Shrek to come to dinner to encourage my daughter to eat her zucchini! Also, parental authority is undermined by the wide discrepancies between what we tell our children is healthful to eat versus what marketing promotes as desirable to eat.

Age of children. CSPI’s new Guidelines for Responsible Food Marketing to Children apply to children under the age of 18. Children often lack the skills and maturity to comprehend the complexities of good nutrition or to appreciate the long-term consequences of their food choices. Furthermore, young children don’t understand the persuasive intent of advertising and are easily misled. Older children, who still don’t have a fully developed
understanding of advertising and the consequences of unhealthful diets, have considerable spending money and opportunities to make food choices and purchases when their parents are not there to guide them.

**Nutrition guidelines.** Uniquely, CSPI’s *Guidelines for Responsible Food Marketing to Children* address not only how food is marketed, but also which foods are marketed to kids. In contrast, the industry’s self-regulatory guidelines through the Children’s Advertising Review Unit (CARU) address which marketing techniques are appropriate to use. The Federal Trade Commission’s occasional actions against ads are based on whether they violate laws against unfair or deceptive advertising.

Those approaches fail to address the fact 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 real problem is that the product is unhealthful and undermines children’s health.

CSPI is urging companies not to market soda, caffeinated drinks, sports drinks, and sugary juice drinks or other foods that are largely devoid of nutrients, fruits, vegetables or whole grains; that are high in saturated or trans fat, added sugars, or salt; or that are served in large portion sizes.

CSPI’s marketing guidelines set nutrition criteria that allow for the marketing of some products and brands that may not be nutritionally ideal. However, all the allowed foods would provide some positive nutritional benefit and could help children to limit their intake of calories, saturated and trans fat, salt, and refined sugars. The nutrition criteria also should provide an incentive for companies to develop foods that are nutritionally better than those that are currently marketed to children and then, market and increase demand for them.

**Marketing techniques.** The *Guidelines for Responsible Food Marketing to Children* also provides guidance regarding marketing techniques that should not be used to market unhealthful foods. The *Guidelines* urge companies to support parents’ efforts to feed their children a healthy diet and not encourage children to nag their parents to buy junk foods. Companies are encouraged to introduce new products and reformulate existing products to help children eat healthfully.

We encourage food companies and television stations not to advertise nutritionally poor choices during TV shows for which more than a quarter of the audience is children under 18. Unfortunately, a high percentage of ads on shows watched by children promote junk foods. For instance, a commercial on Nickelodeon for Mrs. Butterworth’s Little Dunkers elevates syrup from a condiment to the center of the meal and reduces the waffles to a mere delivery device for high-fructose corn syrup.

Movie studios, television producers and stations, and publishers should not use product or brand placements for low-nutrition foods in media aimed at children – like the stealth ad for Burger King in Warner Bros. Studios’ Scooby-Doo 2.

The *Guidelines for Responsible Food Marketing to Children* urges companies not to use toys, games, contests, club memberships, and other premiums and incentives to promote
nutrition-poor foods, meals, and brands. That would mean no SpongeBob toys with most Burger King Kids Meals.

Companies should limit marketing tie-ins with movies or television shows, cartoon characters, or celebrities to foods that meet nutrition criteria. That would prevent Shark Tale characters on the boxes of Pillsbury Dunkables Waffle Sticks, Blue’s Clues on packages of Kraft Macaroni & Cheese, Shrek on Hostess Twinkies, and Lemony Snicket’s Series of Unfortunate Events linked to Procter & Gamble’s non-carbonated soft drink, Sunny Delight.

Responsible marketing also means not building junk-food products, logos, or spokes-characters into web-based “advergames” like on Dairy Queen’s thedqlab.com, Mars’ US.MMs.com, Hostess’ Twinkies.com, General Mills’ Millsberry.com, or Kraft’s NabiscoWorld.com, CandyStand.com, and Postopia.com. Instead of just passively watching a 30-second ad, websites provide ads that children can actively play for hours.

Companies should not exploit children’s natural tendency to play by turning nutritionally poor foods into toys, such as fruit gummy shapes like cartoon characters or Kool-Aid Magic Twists drink mix that turns to a surprise color. Food-based toys like Hershey’s Smore Maker provide new opportunities for children to eat the company’s product by making eating junk food a part of play.

CSPI’s Guidelines call on companies to support healthy eating in schools by not marketing, selling, or giving away low-nutrition foods or brands anywhere on school campuses, including by entering into exclusive soft drink contracts with schools; on the Channel One television station; by placing logos, spokes-characters, or other product marketing on vending machines, in books and curricula, and on scoreboards, buses, or other school property; by sponsoring educational incentive programs that provide food as a reward for academic achievement, such as Pizza Hut’s Book It! program; or incentive programs that provide schools with money or school supplies when families buy a company’s products, such as Campbell’s Labels for Education program. If they followed CSPI’s Guidelines, Chuck E. Cheese restaurants and Krispy Kreme could no longer offer pizza or doughnuts for school fundraisers.

CSPI’s Guidelines for Responsible Food Marketing to Children does not call on companies to stop marketing food to children. However, adhering to the Guidelines would require most food manufacturers, restaurants, television stations, magazines, movie studios, and advertising agencies to change their current practices – especially the products that they promote or advertise.

For far too long, food manufacturers, chain restaurants, and TV networks, have been profiting by pushing obesity- and disease-causing junk foods to kids. It’s time for them to clean up their act.

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