



ADVERTISING FEDERATION OF AUSTRALIA

Submission No. 35

(Inq into Obesity)

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**ADVERTISING FEDERATION OF AUSTRALIA
(AFA)**

**SUBMISSION TO THE
HOUSE OF REPRESENTATIVES STANDING COMMITTEE ON
HEALTH AND AGEING**

INQUIRY INTO OBESITY IN AUSTRALIA

May 2008

Background

The Advertising Federation of Australia (AFA) is pleased to present this submission to the Committee of Health and Ageing on the inquiry into obesity in Australia.

Formed in 1975, the AFA is the peak body representing companies in advertising and marketing communications. Members include multinational advertising agencies and small and medium independent businesses providing creative and strategic communications services to Australian and multinational businesses. Our members, of whom there are 187 Australia-wide, are responsible for producing around 80% of the commercial communications, developed on behalf of clients, and placed on television and other media in Australia.

A key role of the AFA is to maintain and promote professional standards in advertising, to encourage responsible advertising and support effective self-regulation. To this end, the AFA manages an accreditation program for agencies that requires them to commit to a structured program of professional development for staff and compliance with advertising laws and codes. The AFA Accreditation program is the first of its kind in the world.

In the context of the obesity debate, the AFA and its membership recognises that we have a responsibility to produce marketing communication messages that are compliant with all regulations governing the advertising of food and beverages through the Australian Association of National Advertisers (AANA) Code of Ethics, the Food and Children's Code, Commercial Television Industry Codes of Practise, Commercial Radio Australia's Codes of Practise and Guidelines, and the Outdoor Advertising Association of Australia's Code of Ethics.

The AFA also has a member of its National Board on the Management Committee of the self-regulatory advertising body, the Advertising Standards Bureau and is deeply committed to the principle of best practise industry self-regulation.

Terms of Reference of the Inquiry:

"The Committee will inquire into and report on the increasing prevalence of obesity in the Australian population, focusing on future implications for Australia's Health system.

The Committee will recommend what governments, industry, individuals and the broader community can do to prevent and manage the obesity epidemic in children, youth and adults.”

Scope of the AFA Response:

The AFA in 2006 co-funded an Australian version of a report entitled “Advertising’s Role in Diet and Exercise in New Zealand and Australia: Developing a Research Agenda.”

That report was commissioned by the Foundation for Advertising Research (FAR) and the University of the Sunshine Coast was requested to conduct a major review of the research, literature and evidence relating to obesity, diet, exercise and advertising with particular emphasis on Australia and New Zealand.

The AFA encourages the Inquiry to review in detail the findings of the FAR Report because it is the most comprehensive Australian study of its kind and has a direct bearing on issues before the Inquiry.

This brief submission will outline the areas of the report we believe throw light on the issue of obesity and we will outline some of the pitfalls other jurisdictions have fallen into with respect to non-evidence based interventions in obesity policy settings.

We would draw attention to the submission of FAR to this Inquiry which, in greater detail, outlines aspects of its report that the Inquiry should heed.

In recent times there has been more heat than light with respect to discussion about obesity and its causes and solutions. We would encourage the Inquiry to take wherever possible an evidence based approach and this can only be done with adequate research – research not only focussed on causes, but also research before interventions.

We would not encourage potentially damaging intervention without a sound research base for determining the known outcomes.

An AFA Perspective on Obesity:

The evidence is irrefutable that obesity is a growing problem, especially within certain groups of the population, and as a society we must all bear the responsibility to find ways to reverse this trend.

Around the world governments, health professionals and families are struggling to understand and prevent people getting fatter. However, obesity is a complex issue and there are no easy answers or magic solutions.

- There is often a lack of understanding about the physical damage that can be done by being over-weight.
- Cultural backgrounds often play a major role in determining eating habits and even attitudes to obesity
- People’s lives have changed dramatically over the past 50 years and while the evidence shows that we are eating less (calories consumed) the population is getting fatter.

- Lack of exercise is as much a part of the problem as eating too much food.
- International experience has taught us that focussing on food consumption alone is a grave mistake.
- Genetic predisposition within certain groups can increase the prevalence of obesity.
- Food needs to taste good otherwise people will not eat it. Food composition is a major issue and industry can and is playing an extremely constructive role in creating foods that are lower in salt, fat and sugar, but still taste good.
- Food is a staff of life and the issue of obesity cannot and must not be compared with issues around tobacco or alcohol.

The AFA believes it is important to balance interventions to reduce obesity, with the rights of consumers to consume legal products.

The AFA also believes that there is no such thing as bad food – only bad diets.

In other words moderation is the key to reaching that balance and achieving healthy outcomes.

FAR Report Findings:

(Reproduced with permission, from the FAR submission to this Inquiry – page numbers refer to the substantive FAR report attached with the FAR submission)

Causes of Obesity:

4. The basic cause of obesity is simple. It is the imbalance of 'energy in' and 'energy out'. (p63) The balance is quite delicate but if 'energy in' in the form of food is greater than 'energy out' in the form of exercise then there is inevitable weight gain.

However the underlying reasons, which in the opinion of various researchers are causes or drivers of this imbalance, are many and varied. The table (p66/67) lists 32 different reasons under the headings Energy In – Consumption, Energy Out – Exercise, Family Issues, Genetics and Technological Changes. It will be noticed from the table that there is relatively little research on the issues of Energy Out – Exercise and Genetics.

Among the 32 reasons are the decrease in the relative cost of food, increase in the relative cost of physical activity, fast food advertising, giving up smoking, formula fed babies, watching television, parental obesity and mothers working.

5. Another feature is that the phenomenon is global (p57, 58, 62) and even occurs in rapidly developing countries such as China, which now claims to be the “*fat capital of the world*”, with an estimated 200 million overweight people. (p58).

2. Television Advertising and Television Watching

6. Reviews by Hastings, Zywicki and Young emphasise there is only limited evidence to support the conclusion that advertising per se is the root cause of increasing purchase of unhealthy foods. (p71) When that literature is taken into account with various critiques the evidence supports two main thrusts:

“1. That television advertising affects children’s food choice in a modest way, and

2. That most television food advertising is for unhealthy products.” (p72)

7. Sedentary activity such as television and associated food advertising is sometimes cited as a cause of obesity. Various studies lead to the conclusion that weight gain is not due to television viewing per se but a combination of:

- *“The sedentary nature of television viewing which decreases metabolic rates and is a time substitute for other healthier activity;*
- *The creation of a positive energy balance from the frequent snacking, pre-prepared meals and/or food and soft drink consumption during television viewing;*
- *Increased television viewing time offering increased possible exposure to food and soft drink product advertisements.” (p74)*

8. After reviewing the evidence the authors conclude, *“Thus the jury is still out on the question of whether sedentary behaviour, time in front of the screen, is strongly related to weight gain”. (p75) Also “Academic research and reviews reveal limited but statistically significant direct effects of television advertising on food preference, purchase requests and consumption. There is insufficient evidence to determine the relative size of the effect of television advertising on food and soft drink choice in comparison to other relevant factors.” (p81)*

With regard to the influence on children the conclusion is *“There is a quite modest body of evidence demonstrating the direct effect of food and drink promotion (in the main television advertising) on children’s preferences, knowledge and consumption. However, since this evidence explains only a small amount of the variance, it is likely that other factors can be identified which have greater effect.” (p86)*

3. Sedentary Activity

9. The nature of sedentary activity is changing with technological advances and children do not watch as much television as their parents and grandparents. Persons aged 55+ watch about twice as much television as children 5-12 (p136). Furthermore there is evidence that television watching is diminishing (p136). Children are spending time in front of various screens - television, computers, video games and cinema. However Australian research found that an association between fatness and screen time explains *“less than 1-2% of the variance in fatness and they are relatively insignificant” (p132).*

4. Eating Habits

10. Nearly half (47%) of Australians' expenditure on food outside the home is in restaurants, followed by pubs, clubs and nightclubs (19%). Takeaways have a 9% share and cafes 6%. (p114).

5. Advertising and Obesity

11. There is little or no correlation in the number of food advertisements on television and obesity rates. Australia has 12 food ads per hour and has an overweight/obesity rate of 58.4%. New Zealand has 12.8 ads per hour and an overweight/obesity rate of 56.2%. On the other hand Greece has 7 food ads per hour and the overweight/obesity rate is about the same as Australia. Reference should be made to the table on p138.

12. China has a serious and increasing problem with obesity but has traditionally low levels of advertising and restricted fast food outlets. (p63)

13. There is also evidence from Europe and United States that advertising expenditure is in decline but obesity levels are increasing. (p140)

14. With regard to a ban on advertisements in children's television viewing time the report concludes that it is *"a policy that has little merit"*. It suggests that media literacy is a better option as it empowers consumers. (p159)

6. Intervention Strategies

15. The Report recognises that obesity is a serious problem that needs appropriate intervention strategies. The authors conclude that obesity is not caused by the traditionally viewed problem of overweight individuals being 'lazy' or 'having no will power' but stems mainly from the interaction of individuals with their environment. *"The environment in this context is the circumstances in which we live and has been termed the obesogenic environment"*. (P142 Thus *"If obesity is driven by the environment, then our main focus for intervention should be environmental change, not individual will-power"*. (p142)

16. *"An environmental approach to obesity prevention takes all influences on obesity into consideration" and "focuses more on the changeable aspects of an environment rather than the changeable aspects of an individual. Environment-based interventions do not tell people how to eat or exercise, or present dire warnings for non-compliance; they simply try to make it easier for people to eat, exercise and live in healthy ways."* (p142)

17. The Report recommends eight Principles of Intervention within which various strategies can be devised. These principles, and discussion on them, are found on pages 144 – 163 and provide a useful framework for the Committee in designing intervention policies.

18. FAR submits that a Principle approach to intervention as outlined in the Report should be adopted. It would eliminate ad hoc ideas that sound appealing but have no solid evidential support, from being introduced and then failing in their objective. When this occurs it undermines the credibility of the entire policy. It is interesting to note that Gerard Hastings in his book published in 2007 entitled *"Social Marketing - Why Should the Devil Have All the Best Tunes"* included a chapter about the Eight Principles written by the authors of the Report.

The importance of measuring the likely success of Intervention Strategies before they are implemented is of critical importance.

19. We therefore submit that suggested Intervention Strategies be measured against the Eight Principles prior to adoption and implementation.

7. Evidence and Research

20. It is very difficult to design policy to combat the growing problem of obesity when there is a lack of strong evidence on which to base the policy. There is an urgent need for a research program, which produces *“stronger evidence for and against the many claims made, leading to better informed policy and action.”* (p167)

21. The various areas and topics that require to be researched are listed on pages 167 - 176. This will require a coordinated approach by Government, industry and academia. Currently research tends to be in areas of interest of the researcher and therefore ad hoc.

The AFA wishes to thank the Inquiry for the opportunity to present this submission and requests an opportunity to present an oral submission to the Committee.
The AFA would also like to thank FAR for its permission to reproduce parts of its submission.

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