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Committee Secretary
Community Affairs Committee
Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600
Australia
Friday, October 24, 2008

Dear Committee,

Healthy Kids SCA thanks the Community Affairs Committee for the opportunity to make a submission to the amendments to the *Broadcasting Services Act 1992* and the *Schools Assistance (Learning Together- Achievement Through Choice and Opportunity) Act 2004*

Please find following our submission.

Regards,

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Jo Gardner
General Manager

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Community Affairs Committee
Department of the Senate
Parliament House
Canberra ACT 2600
Australia

Re: Protecting Children from Junk Food Advertising (Broadcasting Amendment) Bill 2008

Healthy Kids SCA (formerly the New South Wales School Canteen Association) is a not-for-profit, non-government, health promotion organisation based in Sydney. The Association works according to the principles and values articulated in the Ottawa Charter for Health Promotion and the guiding principles for Health Promoting Schools. The aim of the organisation is to promote the provision of healthy foods to children and influence food choices within families and school communities and encourage the celebration of food and eating together as a means of preventing diet related diseases in children at school and laying the foundation for a healthy future. The goals of Healthy Kids SCA encompass the entire health promoting school community. It is the primary source of advice and information on healthy food choices for 3,000 schools in NSW.

We support this bill however ask that restrictions encompass times when children are actually watching television. We believe that the interests of children should be protected by implementing a ban on advertising high fat, salt and sugar foods and beverages during peak children's viewing times. We support changes to the Schools Assistance Act which provide consistency of messages with the Broadcasting Act changes.

It is widely acknowledged that young children are less able than adults to critically judge and evaluate claims made in advertisements. Policies are needed to protect children and while we acknowledge that childhood obesity is a multifaceted problem, restrictions in advertising should be seen as a significant strategy which reflects other key government messages.

The fact that advertisements for high fat, salt and sugar foods and beverages are much more prevalent in children's viewing times than advertisements for core foods (1) is not consistent with government guidelines for healthy eating. This increased exposure to foods from the non-core food groups skews ideas about what types of foods make up a normal diet. A recent study in Melbourne on the impact of food advertisements on the knowledge, attitudes and intentions of year 5 and 6 children suggested that if nutritious foods were more effectively promoted and junk food advertising limited it would help to reinforce healthy eating and could empower those with poor diets to recognize their eating behaviour as unhealthy and seek to change it (2).

There is a growing body of evidence that supports the recommendation that there should be a restriction on children's exposure to advertisements that encourage the consumption of energy-dense foods (3,4,5). Australia should be heeding the advice from the 2006 World Health Organisation Forum on marketing of food and alcoholic beverages to children which also found *"a strong scientific rationale is available through the robust science and research that links commercial promotion of foods and beverages to poor diets in children,"* and which recommended *"national actions to substantially reduce the volume and impact of commercial promotion of energy-dense, micronutrient-poor food and beverages to children"*(6).

Healthy Kids SCA

There are at present tools which are being used in Australia which could be adapted as a tool to identify high fat, sugar and salt foods. The Food Standards Australia New Zealand Nutrient Profiling Model (7) could be adapted to be used. Alternatively our organisation, Healthy Kids SCA, has been using a nutrient criteria (8) based on 56 food categories and which has been used successfully for 4 years to determine healthier options for foods and drinks in school canteens. This criteria considers both positive and negative nutrient characteristics. As well, the NSW Healthy School Canteen Strategy has a nutrient criteria (9) which has been used in school canteens in NSW for the last 4 years to determine high fat, salt and sugar foods and beverages to exclude from sale. This model has been adopted in Queensland, Victoria and South Australia as the basis for their school canteen strategies. At present a criteria is being developed as part of the Department of Health and Aging funded National Healthy School Canteens Project. Such models if used would provide consistency around food messages to children.

In summary

Recently, another expert panel has made recommendations supporting action be taken. The National Preventative Health Taskforce suggests one of the ways Government can achieve change in overweight and obesity is “to curb inappropriate advertising and promotion, including banning advertising of energy dense, nutrient poor foods during children’s viewing hours” (10).

We support the bill to protect children from the possible harmful effects of television by prohibiting the advertising of unhealthy food and beverages during the times when children are watching television and restrict advertising in schools.

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