



**Hungry Jack's submission
to the Australian Senate Community Affairs Committee
regarding the Inquiry into Protecting Children from
Junk Food Advertising (Broadcasting Amendment) Bill 2008**

Submission made by:
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A handwritten signature in black ink, appearing to read "Jim Wilson".

Jim Wilson
National Marketing Director, Hungry Jacks

In response to the Australian Senate Community Affairs Committee Inquiry into Protecting Children from Junk Food Advertising (Broadcasting Amendment) Bill 2008, Hungry Jack's would like to make the following submission.

Hungry Jack's also supports the views expressed in the comprehensive submission made by the Australian Association of National Advertisers (AANA).

Childhood obesity is a highly complex issue and there is a vast array of causative factors of obesity in children. A total of 32 factors are listed in the 2006 Harker research report, of which Advertising to children is cited as only one possible cause, and more than 30 non-advertising contributors to obesity have been identified by the Foundation for Advertising Research hosted by Queensland's University of the Sunshine Coast, as cited in the AANA submission. Additional contributing factors that have a direct correlation with advertising must be taken into consideration, including the increased amount of television viewing by children and reduced physical activity. Advertising cannot be singled out as a major contributor of childhood obesity, without demonstrating a distinct correlation between the two.

While fast food advertising bans have been introduced in the United Kingdom, Sweden, Belgium, Denmark, Italy, Greece, Ireland and Quebec, there is no compelling evidence to suggest the ad bans in these countries have had a positive impact in reducing obesity among children, and therefore fails to demonstrate a direct relationship between "junk" food advertising and childhood obesity.

The call for submissions into the Inquiry states there has been a 'dramatic increase in childhood obesity', however the 2007 CSIRO Australian National Children's Nutritional and Physical Activity Survey shows in fact the number has not increased over the last decade, instead remaining fairly constant. Therefore although it is stated in the that "junk" food advertising shown during children's television has increased by 7%, this has not been correlated in a growth of children's obesity levels, and therefore in addition to the points already discussed, does not support a direct substantiated impact on obesity.

It is also worth noting, Hungry Jack's primary target audience is not children, but adults aged 18-39 years with a strong emphasis on the 18-25 year age bracket, and its media spend is allocated accordingly. As such, a fraction of our advertising is targeted specifically at

children, although we strongly defend our right to promote our brand and its products in a responsible manner to a broad range of consumers.

The view exists that the impact of advertising affecting children's food choice is marginal. This is supported by the independent review of research commissioned by the Australian Communications and Media Authority (ACMA) to assess whether a ban would have an impact on childhood obesity. It was noted that product advertising to children may result in an increase of requests made to parents, however also indicated the relationship between television viewing (as distinct from television advertising specifically) and obesity in children. The research did not clearly demonstrate a causal relationship between any of the factors and obesity.

Parents play a key role in educating their children to appreciate what they can and cannot have. It makes more sense to teach children what messages mean rather than trying to shield them from such messages. In contrast, banning certain types of advertising is unlikely to have any real impact on children's behaviour, development or diet.

It is the parent who maintains purchasing power and decision making regarding what their children eat. As it currently stands, parents are able to complain through the Advertising Standards Board (ASB) about advertising they feel is inappropriate for children to watch. Recent online consumer feedback shows that across a cross section of consumers, people prefer to maintain the ability for self-assessment and choice.

At present, advertising to children is self-regulated and Hungry Jack's remains committed to abiding by the AANA voluntary code of conduct. It remains of paramount interest for advertisers to promote consumer confidence and respect for the self-regulatory system, which maintains industry-wide backing. Through the ASB representing a cross-section of the community, complaints in any form including those regarding concern for children, and for health and safety, are considered seriously. In adhering to prevailing community standards the board makes determinations under appropriate sections of the Advertiser Code of Ethics, as prescribed by the AANA.

There are several benefits of self-regulation. In addition to the presence of the code of ethics which Hungry Jack's abides by, self-regulation ensures codes are adaptable, and in the case where a code needs revision it can be done so quickly. Complaints are also heard and addressed in a timely manner. Self-regulation has the support of the industry with a

determination to make it work, it is responsive in order to ensure and maintain responsible operation and credibility. It is of self-interest to have codes and a complaints system that genuinely protects consumers and reflects community standards, as viewership is dependant on the consumer's trust for the medium, as well as for the brand. Broadcasters are sensitive to this fact and advertisers act accordingly.

'Fast Foods' tend to be at the focus of criticisms about today's diet. Not only does this ignore the fact that these foods are not unhealthy, but it also ignores the fact that these foods form only a small part of people's diets. The overall impact of the Quick Service Restaurant (QSR) industry on Australia's obesity levels is questionable given that our customers, on average, consume only two of their 90 meals each month at Hungry Jack's.

The use of the term 'junk food' is also emotive and inaccurate, and while it's use by the media is a sensational misrepresentation, the use of the term by the government further perpetuates the myth in a one-sided portrayal. Hungry Jack's prides itself on using the freshest quality ingredients, many of which are typically found at local supermarkets. Hungry Jack's takes special care in selecting the finest ingredients, as well as using the best cooking methods. This includes taking beef from the finest cuts with no additives or chemicals. Fries are cut from quality potatoes and cooked using palm shortening, free from trans-fats. Hungry Jack's also makes available nutritional information for all of its standard menu items.

Hungry Jack's food can form part of a healthy balanced diet when consumed in moderation in combination with an active lifestyle. The concerns remain with those who combine a poor overall diet with a sedentary lifestyle.

The complexity of childhood obesity and the many contributing factors, some of which have been suggested above indicate there is limited evidence to support an advertising ban, however Hungry Jack's believe that our commitment to responsible advertising and our support for education, combined with existing regulations, is the most effective way to give children the protection they need.