Food industry self-regulation after 10 years: Progress and opportunities to improve food advertising to children

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In response to concerns about unhealthy food and beverage marketing to children, the Council of Better Business Bureaus launched the Children’s Food and Beverage Advertising Initiative (CFBAI) self-regulatory program in 2007. Today, 18 participating companies have pledged to advertise only healthier dietary choices in child-directed advertising. This report assesses companies' compliance with their pledges, the impact of industry voluntary improvements on children’s total exposure to TV and internet food advertising, and limitations in industry voluntary pledges after 10 years of self-regulation.

The research

Rudd Center researchers used syndicated market research data to measure the extent of food, beverage, and restaurant advertising and children’s exposure to this advertising on TV and the internet. The report examines advertising by CFBAI companies, as well as non-participating companies. When data were available, researchers compared 2016 results to 2007 and examined three child age groups: preschoolers (ages 2-5), children (ages 6-11), and young teens (ages 12-14). An assessment of the nutritional quality of products that CFBAI companies have indicated may be in child-directed advertising is also included.

Key findings

In total, children viewed fewer food-related ads on TV in 2016 than in 2007.

- Food-related ads viewed on all types of TV programming declined by 4 percent for preschoolers, 11 percent for children, and 14 percent for young teens.
- On children’s TV programming, preschoolers, children, and young teens viewed approximately 45 percent fewer food ads in 2016 than in 2007.
- Reduced time spent watching TV from 2013 to 2017 for all age groups also contributed to reductions in TV food ads viewed.
- However, the number of food-related ads that children and young teens saw per hour spent watching TV increased, due to an increase in ads shown per hour on other (not children’s) TV programs.

CFBAI participating companies have largely complied with their pledges to only advertise products that met CFBAI category-specific uniform nutrition criteria in child-directed media. They should also be commended for reducing advertising directed to children on TV and the internet from 2007 to 2016:

- Ads from CFBAI participating companies viewed on children’s TV declined by approximately 50 percent for preschoolers, children, and young teens from 2007 to 2016.

In 2016, children (ages 2-14) continued to view on average 10 to 11 food-related TV ads per day or approximately 4,000 ads for the year.
- Ads from CFBAI participating companies viewed on other types of TV programming also declined, but at lower rates (by 4 percent for preschoolers, 18 percent for children, and 31 percent for young teens).
- Since 2009, popular CFBAI company websites for products with child-directed advertising have been discontinued, including four sites that averaged more than 60,000 child visitors monthly (Millsberry.com, McWorld.com, AppleJacks.com, and Postopia.com).

However, several limitations in CFBAI self-regulatory pledges allow participating companies to continue to advertise unhealthy products to children.

**CFBAI category-specific uniform nutrition criteria categorize nutritionally poor products as healthier choices that can be advertised in child-directed media.**

As of January 2017, the 11 CFBAI companies with child-directed advertising listed 319 products that met CFBAI nutrition criteria and that companies also indicated may be advertised in child-directed media.

- This list included one vegetable and no fruit except fast food meal side items.
- The majority of these products did not meet Smart Snacks standards for foods that can be sold to children in schools due to excessive sugar, fat, and/or sodium content, and most did not contain any fruit, vegetables, or whole grains.
  - Almost 90 percent of yogurt products and 60 percent of breakfast cereals met Smart Snacks standards
  - However, just one-third of meals and entrees and less than 20 percent of products in other CFBAI categories met the standards. This category included Betty Crocker fruit snacks, Popsicles, and Goldfish crackers.
- The same brands also offered 386 products that were not included on lists of products that may be in child-directed advertising. Therefore, CFBAI companies could advertise brands directly to children even when the majority of products offered by that brand do not meet CFBAI nutrition criteria, provided that the ads only show listed products that meet their criteria.

**CFBAI definitions of child-directed media allow companies to advertise products that do not meet CFBAI nutrition criteria in many forms of media that appeal to children.**

In most cases, CFBAI definitions of child-directed advertising do not cover marketing with content that is especially appealing to children.
• In 2016, children viewed on average 3 TV ads per day for brands that CFBAI companies pledged they would not advertise in child-directed media – more than one-half of all ads viewed from CFBAI companies – but these ads did not appear on children’s TV programming so companies technically complied with their pledges.

• Children continued to visit CFBAI company websites for products that could not be featured in child-directed advertising. More children (ages 2-12) visited McDonalds.com per month in 2016 than any other CFBAI company website (including HappyMeal.com), while 30 percent of visitors to CocaColaStore.com were children.

• Thirty percent of banner ads placed by CFBAI companies on kids’ third-party websites (e.g., Roblox.com, ABCYA.com) in 2016 were for products that companies indicated would not be in child-directed advertising. However, just one-half of kids’ websites (defined as sites composed primarily of content appealing to children) qualified as child-directed according to the CFBAI.

**CFBAI company improvements in advertising to children under age 12 have had limited benefit for young teens (ages 12 to 14), who primarily view advertising in media that does not meet CFBAI definitions for child-directed.**

CFBAI company pledges only cover advertising to children up to age 11.

• In 2016, young teens viewed 39 percent fewer ads than children viewed for child-directed brands, but 30 percent more ads for brands that companies pledged to not advertise in child-directed media.

• TV advertising for one candy brand (M&Ms), three sugary drinks (Gatorade, Mountain Dew, and Pepsi), and two snack foods (Doritos and Cheetos) appeared to directly target 12- to 14-year-olds in 2016 as evidenced by the greatest disparities between ads viewed by this age group compared to children under 12.

Furthermore, a small number of non-participating companies have increased their advertising to children – on children’s TV and other TV programming – which has largely offset reduced advertising by CFBAI companies.

**Twenty-four non-participating companies advertised brands that ranked in the top-50 for the most TV advertising viewed by children.**

• These companies were responsible for approximately 30 percent of all food-related TV ads viewed by preschoolers, children, and young teens in 2016, averaging 2 to 3 ads per day.

• Preschoolers and children saw more than 600 TV ads in 2016 for 12 non-participating fast food restaurants, an increase of 95 percent and 61 percent, respectively, from 2007 to 2016.

• More than 100,000 children visited websites for two non-participating companies – PizzaHut.com and Dominos.com – per month in 2016.

**Seven non-participating companies directly targeted advertising to children, including on children’s TV programming.**

• Chuck E. Cheese’s and Topps candy brands were responsible for almost three-quarters of advertising by non-participating companies on children’s TV in 2016, totaling more than 200 ads viewed by preschoolers and children.

• ChuckECheeses.com was visited by more children than any other website in our analysis, averaging 139,000 child visitors per month in 2016.
Recommendations

These analyses identify numerous opportunities for food and media companies, child health advocates and policymakers to take meaningful action to ensure that unhealthy food marketing does not continue to put children’s health at risk.

CFBAI companies should address limitations of their pledges that allow them to continue to advertise nutritionally poor food and drinks to children:

- Revise CFBAI category-specific uniform nutrition criteria to align with the 2015 Dietary Guidelines for Americans. At a minimum, they should correspond with Smart Snacks standards.
- Only advertise brands in child-directed media when all products offered by the brand meet nutrition standards for advertised products.
- Implement Healthy Eating Research (HER) recommendations to protect children up to age 14 and revise definitions of child-directed advertising to incorporate all marketing that appeals to children.

Non-participating companies should discontinue advertising their unhealthy products – including candy, fast food and pizza – during children’s TV programming and other child-directed media, and reduce children’s exposure to their advertising in all media.

- In particular, the small number of companies with the most unhealthy food advertising to children should join the CFBAI or establish their own company policies.

Media companies should take action to improve food advertising during children’s programming on their networks:

- Children’s TV networks and third-party websites should follow the lead of The Walt Disney Company and set nutrition standards for all advertising placed by food, beverage, and restaurant companies on children’s programming.
- Media companies should provide incentives, such as lower advertising rates, for advertising that promotes nutritious products, such as fruit, vegetables, and whole grains, to children.

Child health advocates can help inform the public about the most harmful food marketing practices and mobilize grassroots actions to demand improvements, including:

- Engage in campaigns to help raise awareness of current food marketing practices and encourage food and media companies to correct their most harmful practices.
- Continue to put pressure on current industry self-regulatory programs to implement recommended actions to reduce children’s exposure to unhealthy food marketing.

Policymakers also have options to improve food marketing to children:

- Federal regulatory agencies – including the Federal Communications Commission and the Federal Trade Commission – should resist industry efforts to eliminate existing protections for advertising on children’s broadcast media and expand these protections to newer forms of media, including digital media.
- Local and state level officials can propose and enact policies to address child-directed marketing in their communities, such as bills to strengthen restrictions on unhealthy food marketing in schools and require nutrition standards for restaurant kids’ meals.

The Rudd Center for Food Policy & Obesity at the University of Connecticut is a multi-disciplinary research center dedicated to promoting solutions to childhood obesity, poor diet, and weight bias through research and policy. For the full report visit [http://www.uconnruddcenter.org/facts2017](http://www.uconnruddcenter.org/facts2017).

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