

Redefining “Child-Directed Advertising” to Reduce Unhealthy Television Food Advertising

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Background: Food and beverage companies have pledged to reduce unhealthy marketing to children through the Children’s Food and Beverage Advertising Initiative (CFBAI). However, public health experts question the initiative’s effectiveness because pledges apply to only some types of marketing. For instance, the CFBAI covers only TV advertising that is “child-directed,” defined as advertising during programs for which children make up 35% or more of the viewing audience.

Purpose: To quantify the proportion of food and beverage TV advertisements (ads) viewed by children that is covered by current CFBAI pledges and examine the potential impact of broader definitions of child-directed advertising.

Methods: Nielsen data were used to quantify percentages of children (aged 2–11 years) in the audience (i.e., child-audience share), as well as absolute numbers of child viewers, for all national TV programs in 2009. Nielsen advertising data provided the number of food and beverage ads viewed by preschoolers (aged 2–5 years); older children (aged 6–11 years); and adults (aged 18–49 years) during programs with various child-audience compositions. Data were collected in 2010 and analyzed in 2011.

Results: Just 45%–48% of food ads viewed by children met current CFBAI definitions of child-directed advertising. Expanding this definition to include advertising during programs with a child-audience share of 20% or higher and/or 100,000 or more child viewers would cover 70%–71% of food advertising seen by children but just one third of ads seen by adults.

Conclusions: Children viewed an estimated 35% fewer food ads during TV programs with a high child-audience share ($\geq 50\%$) in 2009 compared with 2004. However, ensuring that nutrition standards apply to the majority of food ads viewed by children requires broader definitions of child-directed advertising.

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Introduction

Food and beverage advertising contributes to childhood obesity.^{1–3} It affects children’s requests and preferences for advertised products and likely contributes to less-healthy diets,^{1,2} including through increased consumption of frequently advertised product categories, such as fast food and sugary drinks.^{1,4,5} TV and other forms of food marketing to children primarily promote products high in sugar, sodium, or saturated fat.^{1,2,6–9}

In the U.S., food companies spent \$1.6 billion in marketing targeted to children and adolescents, with 46% of expenditures devoted to TV advertising.¹⁰ In response to calls for reduced marketing of calorie-dense, nutrient-poor foods to children, the Council of Better Business Bureaus introduced the Children’s Food and Beverage Advertising Initiative (CFBAI) in 2006.¹¹ As of mid-2012, in the U.S., 16 food companies participate in this self-regulatory program to “shift the mix of advertising messaging directed to children under 12 to encourage healthier dietary choices and healthy lifestyles.”¹²

The CFBAI was an important first step in reducing unhealthy food marketing to children.⁹ In response to criticism of the program, the CFBAI has continued to enhance minimum requirements for participating companies. For example, in 2010, core principles were expanded to include advertising in child-directed video and computer games, cell

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phone marketing, and word-of-mouth advertising and to require that 100% of child-directed advertising promote healthier dietary choices.¹¹ Similarly, in 2011, the CFBAI announced category-specific uniform nutrition criteria to be implemented by the end of 2013.¹³ This move addressed critiques that self-defined “healthier dietary choices” allowed participating companies to advertise many of their own unhealthy products.^{6,14,15}

Need for Further Measures

Despite these improvements, public health experts urge companies to do more.^{9,15,16} For example, although new uniform nutrition standards are more restrictive than current company-defined criteria, they are not as stringent as standards proposed by a working group of U.S. government experts, which were widely supported by the public health community.^{15,17} Similarly, the CFBAI does not apply to the \$195 million spent annually by food companies on youth-targeted product packaging and in-store promotions^{8,10} and many forms of marketing in schools.¹⁸ Finally, as the CFBAI is voluntary, not all food companies that advertise to children participate, and approximately 40% of food ads that children see on TV are placed by nonparticipating companies.⁶

Another limitation of the CFBAI is that it does not include a mechanism for independently evaluating program effectiveness,¹⁹ and differing criteria for evaluating outcomes have led to apparently contradictory findings in recent ad hoc evaluations. The CFBAI reports excellent compliance with company pledges.¹¹ The Grocery Manufacturers Association reports that the average number of food commercials on children’s TV declined by 50% from 2004 to 2010, and there was “a dramatic increase in ads featuring healthier product choices.”²⁰

Yet evaluations by public health researchers have found limited change. One study reports that children viewed just 4% fewer food ads on TV in 2010 compared with 2004.²¹ Another found that children viewed 7% fewer TV food ads in 2009 than in 2003 and that 86% of ads seen by children in 2009 promoted products high in saturated fat, sugar, and/or sodium, a small improvement versus 94% in 2003.⁶ A content analysis of food advertising during 2009 children’s TV concluded that 73% of commercials featured nutritionally poor products, slightly down from 84% in 2005.¹⁴

One reason for contrasting reports of program effectiveness is that CFBAI definitions of “healthier dietary choices” do not match public health experts’ definition of nutritious products that should be promoted to children. This difference has been widely discussed in the literature.^{6,14,15} The present study addresses another reason for these apparently contradictory findings. Even if companies implemented ideal nutrition standards according

to public health experts, these standards would have little impact if the definition of child-directed advertising covered by the initiative was so narrow that it applied to only a small proportion of food ads viewed by children. Yet published studies have not analyzed the proportion of TV food ads viewed by children now covered by CFBAI pledges following program implementation.

Defining Child-Directed Food Advertising

Under CFBAI guidelines, food advertising by participating companies during child-directed TV programs is “child-directed advertising” and subject to nutrition criteria.¹¹ The CFBAI defines child-directed TV programming by the percentage of the audience composed of children aged <12 years (referred to as “child-audience share”), with the majority of companies using a minimum child-audience share of 35%.²² Similarly, the Federal Trade Commission (FTC) has defined children’s programming as programs with a minimum child-audience share of 30%, approximately double the percentage of children aged 2–11 years in the U.S. population.¹⁰ Therefore, the FTC argues that this definition is “likely to ensure capturing most programming . . . targeted to children . . . , while not also including substantial amounts of adult fare that happen to have some young people in the audience.”¹⁵

However, children also view a substantial number of food and beverage ads on other TV programming. In a 2004 analysis by FTC researchers (prior to CFBAI implementation), 50% of food ads seen by children appeared during programs with a child-audience share of 50% or more²³; 13% were viewed during programs with a child-audience share of 20%–50%. In addition, 9.5% of ads viewed occurred during programs with a child-audience share of less than 20%, but with a large number of children in the audience (defined by the report’s authors as more than 1% of all children in the U.S.).²³ As a result, food companies can circumvent their CFBAI pledges by shifting child-directed advertising to family programming that is viewed widely by children aged <12 years (e.g., *American Idol*).^{24,25}

The purpose of this study is to quantify the opportunity to reduce unhealthy TV food advertising to children by broadening the definition of child-directed advertising. The following analysis documents how much of the food advertising that children viewed in 2009 appeared during TV programming covered by CFBAI pledges, in total and by product category. It also examines the number of food ads children viewed during programming with various child-audience shares and absolute numbers of child viewers, as well as the potential effect of broader definitions on ads viewed by adults. Implications for the effectiveness of alternative policies to reduce children’s exposure to unhealthy food marketing are discussed.

Table 1. Number of national telecasts and food and beverage ads viewed by preschoolers, older children, and adults in 2009 during programs with various child audiences

Child audience aged 2–11 years (%)	Telecasts		Preschoolers (aged 2–5 years)		Children (aged 6–11 years)		Adults (aged 18–49 years)	
	Number	% of total	Ads viewed	% of total	Ads viewed	% of total	Ads viewed	% of total
All programs	881,942	100	3801	100	4435	100	5618	100
≥50	39,532	4	1634	43	1726	39	230	4
≥35 ^a	56,492	6	1839	48	2014	45	288	5
≥20	67,128	8	1999	53	2308	52	421	7
≥20, or ≥500,000 <i>n</i>	68,686	8	2122	56	2470	56	716	13
≥20, or ≥100,000 <i>n</i>	96,733	11	2646	70	3146	71	1898	34

Note: Analysis uses Nielsen data from January 1 to December 31, 2009.

^aThe definition for “child-directed” currently used by most Children’s Food and Beverage Advertising Initiative participating companies¹²

Methods

Two Nielsen databases provided data for this analysis: Market-Breaks²⁶ provided program audience numbers, and Ad*Views²⁷ quantified food ads viewed during programs with various child-audience compositions. Researchers collected data in 2010, which were analyzed in 2011. The number of viewers by age group was obtained for TV programs that aired in 2009 (January 1–December 31). Data were available for all programs on network, cable, and syndicated TV, but excluded spot market (i.e., local) programming. Researchers first selected programs with an average audience consisting of 20% or more children, calculated by dividing the number of children (aged 2–11 years) by the total audience. Programs viewed by 100,000 or more children were also selected. Average numbers of viewers per telecast (i.e., each time the program aired) were used.

Researchers then matched the selected program names to the programs in Ad*Views to obtain gross ratings points (GRPs) for number of food and beverage ads viewed. GRPs are the standard measure used by the advertising industry to quantify TV ads viewed by a specific population (e.g., children) during a specific time period (e.g., 2009) and have been used in previous research on exposure to TV food advertising.^{6,23} GRPs represent the total number of ads viewed by all individuals in a specific demographic group, divided by the total number of individuals in the demographic group multiplied by 100. Therefore, GRPs provide a per capita measure that enables a direct comparison among populations. GRPs divided by 100 provide the average number of ads viewed by individuals in each age group.

Gross ratings points were obtained for preschoolers (aged 2–5 years); children (aged 6–11 years); and adults (aged 18–49 years) for selected programs, as well as total GRPs across all TV programs. Researchers also obtained GRPs by product category and brand. All products and/or brands were assigned to one of the food categories advertised most often to children according to the FTC.⁶ Fast-food and other restaurants were included as separate categories. Products in other categories and those that could not be classified by category (e.g., ads for a company’s total product line) were identified as “other.” To assess the potential impact of broader definitions of child-directed advertising, the number of food ads

viewed during programming with a child-audience share of ≥35% (thus qualifying as child-directed according to the CFBAI) was compared with ads viewed during programming with lower child-audience shares and minimum numbers of child viewers.

Results

In 2009, on average, preschoolers in the U.S. viewed 3801 food and beverage ads on national TV; 4435 were viewed by children aged 6–11 years, and adults viewed 5618. Advertising on national TV represented 93.5% of all food ads seen by children and 84.9% of those seen by adults. Table 1 presents the number of telecasts with various child-audience compositions and food ads viewed during these programs.

According to the CFBAI criteria, 48% of food ads viewed by preschoolers and 45% of ads viewed by children aged 6–11 years were child-directed; child-directed programs represented just 6% of telecasts and 5% of food ads viewed by adults. Expanding the definition to include programs with a minimum child-audience share of 20% incorporated 52%–53% of food ads viewed by children, 8% of telecasts, and 7% of food ads viewed by adults. The broadest definition of child-directed advertising examined—a ≥20% child-audience share and/or ≥100,000 children in the audience—represented 70%–71% of all food ads viewed by children, but just 11% of all telecasts and approximately one third of food ads viewed by adults.

Examination of individual programs that would qualify under broader definitions of child-directed advertising provides additional understanding of these differences. Programs with a ≥20% child-audience that did not qualify as child-directed according to the CFBAI included children’s holiday specials, such as *Shrek the Halls* (2.8 million children, 29% of the audience) and *A*

Table 2. Food ads viewed by children aged 2–11 years in 2009 for various product categories during TV programs

Food category	All programs Ads viewed	Child-audience share					
		≥35% ^a		≥20%		≥20% or ≥100,000 n	
		Ads viewed	% of total	Ads viewed	% of total	Ads viewed	% of total
Fast-food restaurants	1018	408	40	465	46	685	67
Other restaurants	460	237	51	252	55	335	73
Breakfast cereals	702	560	80	584	83	626	89
Prepared foods and meals	354	157	44	180	51	239	67
Snack foods	327	181	55	199	61	243	74
Candy	281	100	36	129	46	188	67
Dairy products	253	153	61	163	65	193	76
Fruit juice and noncarbonated beverages	240	71	30	90	37	142	59
Baked goods	69	3	4	12	17	32	46
Carbonated beverages	51	1	2	5	11	24	47
Frozen and chilled desserts	18	6	34	7	42	11	63
All others	406	82	20	113	28	211	52

Note: Analysis uses Nielsen data from January 1 to December 31, 2009.

^aThe definition of “child-directed” currently used by most Children’s Food and Beverage Advertising Initiative participating companies¹²

Charlie Brown Christmas (2.9 million, 24%). Also included were “tween” programs, including *Hannah Montana* (400,000 children per telecast, 26% of the audience); and *That’s So Raven* (380,000, 25%).

Programs with ≥500,000 children in the audience (but a lower child-audience share) included special event programming (e.g., *SuperBowl* and *Macy’s Thanksgiving Day Parade*) and regular programs with large general audiences (e.g., *American Idol* and *Wipeout*). Programs viewed by ≥100,000 children included special sporting events (e.g., American Football Conference [AFC] and National Football League [NFL] postseason games); family-oriented specials (e.g., *The Sound of Music* movie); and popular family programs (e.g., *Rosa de Guadalupe*, *Modern Family*). According to Nielsen, a child audience of 500,000 represents 1.2% of all children in households with TVs in the U.S.; a child audience of 100,000 represents 0.2% of child TV viewers.

Table 2 presents average numbers of food ads viewed by children (aged 2–11 years) by product category. Figure 1 presents percentages of ads viewed by children and adults on programming with a ≥20% child-audience share for the most-advertised food categories. These numbers highlight wide variations in advertising for various food categories. The percentage of ads viewed by children that were child-directed according to the CFBAI ranged from 2% to 4% of ads for carbonated beverages

and baked goods, to 80% for breakfast cereals. In other heavily advertised categories, including fast food, other restaurants, prepared foods and meals, and snack foods, 40%–55% of ads viewed by children met the CFBAI definition of child-directed advertising.

Broadening the definition to include programs with a ≥20% child-audience share increased the percentage of ads covered for some of the least-healthy categories, including carbonated beverages (11% of ads viewed by children); baked goods (17%); and candy (46%). With the exception of breakfast cereals, ≤10% of ads seen by adults appeared during these programs. Further broadening the definition to include programming with ≥100,000 children in the audience would cover at least two thirds of ads viewed by children for eight of the 11 food categories. Baked goods and carbonated beverages were least likely to advertise during these programs (46%–47% of these ads seen by children).

Discussion

Approximately half of food and beverage ads viewed by children are not subject to CFBAI guidelines because they appear during programming with a child-audience share of less than 35%. Even if companies implemented strict nutrition standards for child-directed advertising, preschoolers and children would still see 5.4 and 6.6 ads

every day that were not required to meet these standards. Of note, advertising during clearly youth-oriented fare, such as “tween” programming and holiday children’s specials, is not child-directed according to the CFBAI. The broadest definition of child-directed advertising examined would capture 70%–71% of food ads viewed by children, while affecting just 11% of telecasts and one third of food ads viewed by adults. Companies would continue to have substantial opportunity to advertise their products to adults. Thus, the present analysis documents the need for a broader definition of child-directed advertising so that these nutrition standards apply to more of their advertising.

Although these results cannot be compared directly to the 2004 FTC analysis²³ of advertising viewed by children because of differing methods, some comparisons are possible. For example, it appears that food advertising during programming with a very high child-audience share ($\geq 50\%$) has declined. In 2004, on average, children (aged 2–11 years) viewed approximately 2800 food ads during these programs,²³ compared with 1600 and 1700 ads viewed by preschoolers and older children, respectively, in 2009. Accounting for food ads viewed during local programming in 2009 (which were included in the 2004 analysis, but not this one), children viewed approximately 35% fewer food and beverage ads during programming with a child-audience share of $\geq 50\%$. However, advertising during child-directed programming may have increased for some product categories, including fast food (645 ads viewed in 2009 vs 436 in 2004) and prepared entrees (157 vs 113).

Food advertising viewed by children during other programming also appears to have increased. In 2004, children viewed approximately 2000 ads for foods and beverages during programming with a child-audience share $< 20\%$.²³ In 2009, children viewed more than 2300 ads for these products during similar programming. As adults viewed 29% more food advertising in 2010 versus 2004,²¹ it appears that increased adult-targeted advertising also has affected ads viewed by children.

As in previous analyses by FTC researchers,²³ the current study examined options for redefining child-directed advertising based on the proportion and num-

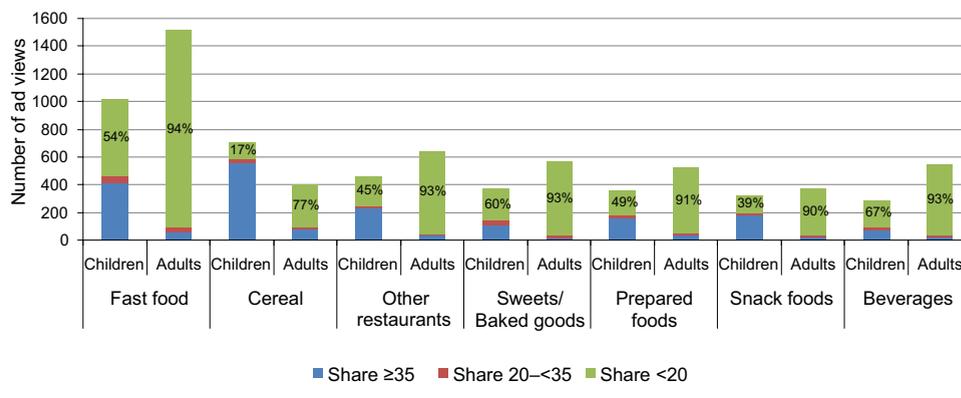


Figure 1. Child^a (aged 2–11 years) and adult exposure to food ads that appeared on programs with various child-audience shares

Note: Illustrates the percentage of advertising for specific food categories that were viewed by children and adults during programming with a child audience $< 20\%$; for example, 54% of fast-food ads viewed by children appeared during programming viewed by relatively few children compared with 94% of food ads viewed by adults. Analysis uses Nielsen data from January 1 to December 31, 2009.

ber of children in the audience of the TV programs on which they aired. However, future research could evaluate alternative definitions. For example, the U.K. Office of Communications evaluated the potential impact of implementing nutrition standards for food advertising that occurred during times of the day when children watch.²⁸ It concluded that restricting advertising for products high in fat, sugar, and sodium before 9PM would cover 85% of such ads viewed by children.

In the alcohol industry, U.S. manufacturers limit advertising to media with an audience composed of $< 30\%$ youth (aged ≤ 20 years), but public health experts have recommended also restricting the use of marketing practices with substantial underage appeal.^{29,30} Similarly, applying nutrition standards to food ads using marketing techniques with substantial child appeal, such as advergames and licensed characters,^{7,31} would provide another opportunity to expand the definition of child-directed advertising. Finally, incorporating somewhat older youth in the definition of “children” would also increase the proportion of food advertising covered. The CFBAI currently defines children as individuals aged < 12 years.¹¹ However, older youth are also vulnerable to the influence of food marketing, and public health experts recommend nutrition standards for food marketing aimed at adolescents as well as children.^{15,16,32,33}

Policy Options to Protect Children from Unhealthy TV Food Advertising

Public health advocates, the food and media industries, and U.S. policymakers could reduce the number of TV ads for nutritionally poor foods and beverages viewed by children through further policy actions. An important consideration is whether stronger nutrition standards

and broader definitions of child-directed advertising should be implemented through industry self-regulation, or imposed by government. Public health experts argue that government regulation or the threat of regulation is necessary for meaningful change in industry practices.^{32,34–36} Government regulation also would require companies that do not currently participate in the CFBAI to comply. In this analysis, children viewed a significant number of ads that the CFBAI would define as child-directed for nutritionally poor foods placed by nonparticipating companies, including a total of 300 ads per year for candy and other restaurants.

In the U.S., government options to regulate advertising on TV are limited primarily because of the First Amendment, which guarantees marketers' right to communicate truthful, nonmisleading commercial information, including ads, to consumers.^{37–39} In one landmark case, the Supreme Court upheld tobacco companies' right to advertise within 1000 feet of schools because prohibiting these ads would restrict their ability to advertise in "87% to 91%" of locations in urban communities.⁴⁰ However, legal scholars argue that advertising viewed primarily by young children should not be protected by the First Amendment.^{37,38,41}

The present analysis suggests that the FTC could regulate food advertising during child-directed programming under its jurisdiction over unfair and deceptive acts.³⁸ Or the U.S. Congress could legislate such restrictions³⁴ without infringing on companies' right to communicate with adults. Although any government restrictions would likely result in legal challenges by the industry, prohibiting marketing of nutrient-poor foods on TV programs with a child-audience share of 20% or higher would affect just 7% of food ads that adults now view, and therefore should withstand these challenges.

However, expanding the definition of child-directed advertising through industry self-regulation may be the most realistic short-term solution for reducing unhealthy food ads viewed by children. The recent establishment of category-specific uniform nutrition standards and expansion of CFBAI core pledges suggest that public scrutiny of food industry practices can lead to industry-sponsored improvements, and public health advocates should pressure CFBAI companies to expand the definition of child-directed advertising. At a minimum, a definition that includes programs with a child-audience share of 20% or more would close a loophole that currently allows companies to advertise anything during clearly youth-oriented programs, such as the *Hannah Montana* series or *Shrek the Halls* holiday special.

Public health advocates also should press for broader definitions that incorporate somewhat older child viewers (e.g., children aged 12–14 years); the number of chil-

dren viewing the ads; time of day the ads air; and/or child-oriented marketing techniques, to cover a greater proportion of ads viewed by children. If some food and beverage companies continue to decline participation in the CFBAI, media companies could also follow the lead of The Walt Disney Company and impose nutrition standards on advertising they will accept during children's programming.⁴² Finally, the public health community could also raise awareness among parents about the substantial amount of food advertising viewed by children during family and "tween" programming and enlist parent advocates to demand that food and media companies change their policies.

In 2010, the White House called for all responsible parties to take further action:

Key actors—from food and beverage companies, to restaurants, food retailers, trade associations, the media, government and others—all have an important role to play in creating a food marketing environment that supports, rather than undermines, the efforts of parents and other caregivers to encourage healthy eating among children and prevent obesity.⁴³

The current paper highlights the opportunity for these key actors to ensure that most food advertising seen by children does not encourage them to consume products that can damage their health.

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