

Marketing Foods to Children: Are We Asking the Right Questions?

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Abstract

The childhood obesity epidemic has prompted a range of regulatory initiatives that seek to reduce the impact of food marketing on children. Policy recommendations by government and public health organizations have suggested regulating the promotion of high-sugar, -fat, and/or -salt foods to children, while the food industry has created voluntary nutrition guidelines to channel child-targeted marketing toward only “better-for-you” products. This article argues that the overarching focus on nutrient profile of foods (nutritionism) is wrong-headed: The slippage in terms from “better-for-you” foods to “healthy dietary choices” is problematic and also makes it difficult for children to identify the healthy choice. Nutritionism further works to sidestep important questions pertaining to the ethics of food marketing, not to mention the way that marketing foods as fun and entertainment works to encourage over-eating in children.

Introduction

Increasing rates of overweight and obesity in children have prompted a range of regulatory initiatives that seek to reduce the impact of food marketing on children. Policy recommendations by government and public health organizations (at both the national and international level) have suggested regulating the promotion of high-sugar, -fat, and/or -salt foods to children,¹⁻³ although the issue of mandatory versus self-regulatory efforts on the part of the food industry continues to be debated. And while a global consensus exists on the need to discourage the marketing of foods that contribute to an unhealthy diet,⁴ there is equally the sense that such initiatives are, in some ways, falling short. For instance, the United Nations’ recent “Political Declaration” on preventing noncommunicable disease⁴ was critiqued for not providing a “solid commitment to regulations” that would protect children from the marketing of high-fat, -sugar and -salt foods.⁵

In the United States and Canada (with the exception of Quebec), the starting point for policy when it comes to marketing foods to children is industry self-regulation. Programs such as the Children’s Food and Beverage Advertising Initiative, launched in 2006 (United States) and 2007 (Canada), for example, saw participating members of the food industry create their own criteria for what should be advertised to children. Each country’s Initiative is similar, but not identical, leading to variance in

the products advertised. (Note that the U.S. pledge uses the acronym CFBAI, whereas the Canadian pledge uses CAI.) In July, 2011, the U.S. CFBAI released an updated set of criteria for its participating companies, detailing new, uniform guidelines for food companies who market to children under the age of 12.* Last July also marked the end point of a public consultation initiated by the U.S. government on “voluntary principles to guide industry self-regulatory efforts to improve the nutritional profile of foods marketed to children.”⁶ (Outlined by the Interagency Working Group (IWG), such “voluntary principles” were highly contested by the food industry, which reportedly spent \$37 million to oppose the recommendations.⁷ As a result, the final recommendations for voluntary nutrition standards may be completely derailed. In March, 2012, the chairman of the Federal Trade Commission announced that although both childhood obesity and food marketing to children are priorities, the IWG proposal is “not a priority.”⁸)

While such initiatives as the CFBAI and CAI are important, this overarching focus on the nutrient profile of processed foods targeted at children sidesteps some critical questions that need to be addressed in the policy discussion. Simply put: Are we asking the right questions when it comes to marketing foods to children? More

*Advertising Standards Canada is currently reviewing the U.S. CFBAI criteria changes to determine their applicability to the Canadian initiative.

specifically, what does a punctilious focus on the nutrient profile of foods marketed to children miss in the context of childhood obesity? This article argues that three issues—nutritionism, ethics and the implications of symbolic marketing—need more attention in the discussion of food marketing to children.

Nutrient Profiling and Nutritionism

The current policy focus on marketing “healthier-for-you” products to children exemplifies what Scrinis identifies as the ideology of nutritionism. Nutritionism is the reductionist paradigm by which our culture evaluates food, based solely in terms of nutrient composition. It presumes that “a calorie is a calorie, a vitamin a vitamin, and a protein a protein regardless of the particular food it comes packaged in.”⁹ Scrinis laments that nutritionism has been “co-opted by the food industry” to become “a powerful means of marketing their products.”⁹ Problematically, nutritionism pushes aside our focus on the health benefits of diets based on whole foods—particularly fruits, vegetables, and grains.⁸

This is certainly the case with child-targeted foods, because the promotion of only “healthier-for-you” products—which in Canada under the CAI includes Kool-Aid, Fruit Gushers, and Dunkaroos Chocolatey Chip cookies, as well as Lucky Charms, Froot Loops®, and Reese Puffs cereals—certainly is not about promoting minimally processed foods to children. Mozaffarian and Ludwig’s critique of nutrient-based metrics certainly applies here, as they affirm that “the nutrient-based approach may foster dietary practices that defy common sense.”¹⁰ Although some people might applaud the CAI’s nutrient profiling model for prompting some positive reformulations in, and modifications to, the range of food products its members advertise to children, again, important questions arise from focusing solely on nutritionism. First, should chocolate chip cookies and Froot Loops stand alongside fruits and vegetables as healthy choices? Indeed, *The Canadian Children’s Food and Beverage Advertising Initiative: 2010 Compliance Report*¹¹ uses the terms “better-for-you” and “healthy dietary choices” interchangeably, even though the terms are not synonymous. (Certainly the original intent of public health officials who pushed for such guidelines was not for “junk foods” or “treats” to undergo minor reformulations so that they might be promoted as healthy to children.) Moreover, Dunkaroos Chocolatey Chip cookies are not necessarily better than competing

cookie varieties.* Yet the (perhaps-too-obvious) point is cookies should not be classified as a “healthy dietary choice.” Neither should cereals marketed as breakfast candy (complete with mini marshmallows) or cereals based on popular chocolate bars (Reese Puffs). But this is precisely what nutritionism, which redirects focus on a food’s component parts instead of approaching the food as a whole, makes possible. Simply put, when some cookies (but not others) or breakfast candy become promoted as “healthy”—presumably to be categorized alongside whole, unprocessed fruits and vegetables—it sends mixed messages to children about how they are supposed to evaluate foods in terms of health.

In this spirit, consider the report *Curbing Childhood Obesity: A Federal, Provincial and Territorial Framework for Action to Promote Healthy Weights*¹ released by Canada’s Ministers of Health in 2010. Observing that a “complex and interacting system of factors contributes to increasing rates of overweight,” the report underscores the importance of making the healthy choice “an available and easily recognizable option.”¹ It is unclear how the CAI ‘compliant’ products described above make the healthy choice easily recognizable for children.

To compound this, the CAI criteria allow companies to parse out particular products from within brand lines. Kraft Canada, for example, advertises Kool-Aid *Jammers* as a “better-for-you” product, but regular Kool-Aid does not meet the criteria. This is problematic. Advertising works to raise awareness of brands; there is absolutely no reason why children should be expected to specify (either personally or in purchase requests to their parents) the “better-for-you” selection of Kool-Aid *Jammers* over Kool-Aid. There is little meaningful difference between the two. Most importantly, it remains unclear how the choice between variants of Kool-Aid (or cookies, etc.) creates a healthier rapport with food.

Calories and Ethics

The current policy focus on nutrient profiling also misses a key point in the whole advertising-to-children debate: The ethical (not calorific) question of marketing to children. Since 1980, the province of Quebec has banned all commercial advertising to children under the age of 12—a ban challenged by Irwin Toy** and which went to the Supreme Court of Canada in 1989.¹² In reviewing the evidence, Canada’s Supreme Court concluded that “television advertising directed at young children is *per se* manipulative” because it “aims to promote products by convincing those who will always believe....”¹² A recent commentary advocating for regulating food advertising to children in the United States

*General Mills markets the *Dunkaroos* brand. Its commitment indicates that cereals and snacks can be advertised to children if the products in question contain ≤ 175 calories, ≤ 2 g saturated fat, ≤ 3 g trans fat, up to 230 mg sodium and ≤ 12 g sugar. (See the 2010 CAI *Compliance Report*¹¹ Exhibit 1, p. 9). Dunkaroos Chocolatey Chip serving size is 28 g (130 calories, 12 g sugar). Chips Ahoy! chocolate chip cookie’s serving size is 31 g (150 calories, 10 g sugar) whereas Oreo’s serving size is 24g (120 calories, 9 g sugar). (Author’s compilation.)

echoes this sentiment, arguing that “a substantial body of scientific literature has determined that most children are not able to fully comprehend commercial messages. Their lack of cognitive maturity means that they tend to accept commercial claims and appeals as fair, accurate, and balanced when in fact they are not.”¹³

Under this logic, it is manipulative to market all products to children, even “better-for-you” choices. The Supreme Court’s (and others’) focus on children’s cognitive abilities, not the product itself, suggests that it is equally manipulative to market spinach to children using *SpongeBob SquarePants* as it is to market *Pop-Tarts*. Marketing to children is either ethical or it is not. It is not less manipulative to market a product that will not make children fat. Focusing on the ethical question of marketing ultimately suggests that promoting poorly nutritious foods to children constitutes a dual ethical transgression: First, due to the inherently manipulative nature of marketing to young children, and, second, due to encouraging children to eat foods that are “bad” for them.

Consuming More

Finally, a strict focus on the nutrient profile of (processed) foods fails to address some important questions around the symbolic marketing of children’s food. Children’s food is marketed to children almost solely under the banner of fun^{14–16}; child-targeted advertising and food packaging emphasize how entertaining it will be to consume the product. Yet this message—eating for fun—also encourages eating more. Eating for fun is not about portion control and certainly not about eating less, both of which are important considerations when it comes to overweight/obesity.

Considering food quantity matters because “portion distortion” is identified as a key contributor to obesity. Indeed, the USDA’s most recent dietary icon (the 2011 food plate) comes with the first-ever accompanying recommendation to “Enjoy your food, but eat less.” (Note that enjoying food and approaching food as entertainment are two very different things.) Children’s food marketing poses a problem because it seemingly sets up children to consistently overeat. For instance, a study conducted by Cornell’s Food and Brand Lab reported that preschoolers would eat twice as many carrots when they were given “catchy new names” like “X-ray Vision Carrots.” Children in the study ate about 50% more because “[w]hether it be ‘power peas’ or ‘dinosaur broccoli trees,’ giving food a fun name makes kids think it will be more fun to eat.”^{17,18} Yet, if children eat 50% more simply because of catchy names and appeals to fun, then the fact that virtually all child-oriented supermarket foods have these characteristics should give us pause. All children’s foods, from *FunBites* fruit snacks, *Funcheez* and *Fruit Gushers* to *Crush!* (yogurt) and *Bears Paws* (cookies), should therefore be considered in light of questions which are distinct from a simple focus on their nutrient profile. (Although the Cornell study focused specifically on veg-

etable consumption, it seems reasonable to suggest that an increase in consumption might similarly be observed with other “fun” food—including the high-fat, high-sugar, and/or high-sodium foods designed to be highly palatable to children. I offer this up as a consideration, because no published studies have examined this for highly processed fare.)

More broadly, however, the promotion of food as entertainment to children encourages them to develop a particular relationship with food based on eating for fun or as a type of “distraction” or “sport.”^{14,15} Certainly, food and eating should be a pleasurable experience, but this is quite different from marketing techniques that promote eating as entertainment to children or reframe food as a type of toy/plaything. Food habits and taste preferences form early on and persist over time. It is important that marketing messages do not interfere with the development of healthy food habits.

Conclusion

As such, when it comes to food marketing to children, we need to stop focusing on nutrient profiling and ignoring broader questions regarding contemporary food marketing techniques. The CFBAI/CAI framing of cookies (etc.) as a “healthy dietary choice” does not work to promote the health of our children, and sidesteps some of the implications of what it means to market foods to children in a particular way.

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