Missed Opportunities for Private- and Public-Sector Stakeholders to Achieve the Institute of Medicine Report Recommendations for Food Marketing to American Children and Adolescents

December 1, 2005 – January 31, 2011

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IOM Report Background and Process

- FY 2004: Congress requested CDC to conduct evidence review on food marketing to children
- July 2004: CDC asked IOM to conduct 18-month study on nature, extent and influence of marketing on diets and health of American children and adolescents
- 16-member IOM committee with broad expertise
- 18 external peer reviewers
- Dec 2005: public release of consensus report 10 recommendations for diverse stakeholders
Diverse Marketing Strategies

Many venues

- Schools, grocery stores, malls, theaters, sporting events

Many media vehicles

- Print (magazines), broadcast (TV, DVDs) and digital (Internet, videogames, advergames, mobile phones)

Many techniques

- Branded spokescharacters, co-branding, cross-promotions, celebrity endorsement, toys and premiums, product placement

Move toward integrated marketing communication (IMC)

- Companies that combine advertising, public relations, sales promotion, direct marketing, point-of-purchase and sponsorship of brands, products and lifestyles across all media and communication platforms to provide clarity, consistency and maximum impact to reach consumers
IOM Evidence Review Findings

Marketing influence on dietary precursors

- Strong evidence that television advertising influences food and beverage preferences and purchase requests of children ages 2–11 years

Marketing influence on diets

- Strong evidence that television advertising influences short-term consumption of children ages 2–11 years

Marketing influence on diet-related health

- Food and beverage advertising on television associated with body fatness of children and adolescents
- Strong evidence associated with adiposity in children ages 2–11 years and adolescents ages 12–18 years
IOM Report Conclusions

- Along with many factors, food and beverage marketing influences the diets and health of children and adolescents.
- Food and beverage marketing practices to children and adolescents are out of balance with a healthful diet and contribute to an environment that puts their health at risk.
- Food and beverage companies, restaurants, and marketers have underutilized their potential to devote creativity and resources to promote food, beverages, and meals that support a healthful diet for children and adolescents.
IOM Report Conclusions

- Achieving a healthful diet for children and adolescents will require sustained, multisectoral, and integrated efforts that include industry leadership and initiative.
- Public policy programs and incentives currently do not have support or authority to address many of the current and emerging marketing practices that influence the diets of children and adolescents.
Study Purpose

• Evaluate stakeholders’ progress to achieve IOM report recommendations over five years (Dec 2005 – Jan 2011)

• Private-sector stakeholders (recs 1-5)
  – Food, beverage and restaurant companies
  – Industry trade associations
  – Entertainment companies and the media

• Public-sector stakeholders (recs 6-10)
  – Government
  – Educational leaders and schools
Stakeholders Accountable for Creating Healthy Food and Eating Environments for Children and Adolescents
Methods

• IOM LEAD (Locate, Evaluate, Assemble to inform Decisions) principles used to establish evidence selection approach, criteria and search strategy

• Five qualitative research criteria
  – Data relevance, research design quality, professional judgment, contextual analysis and credibility by data verification

• Data and investigator triangulation
  – Validate evidence selection and interpretation of results
Methods - Locate Evidence

Literature review conducted from diverse sources
Dec 1, 2005 - Jan 31, 2011

- **Electronic databases** (i.e., MEDLINE, Science Direct, LexisNexis, Library of Congress, Business Source Premier and Mergent)
- **U.S. federal government agency websites** (i.e., DHHS, CDC, Dept of Education, FCC, FDA, FTC, NIH, USDA, and the Office of the White House Press Secretary)
- **Industry websites** (i.e., companies and trade associations)
- **Studies and reports** (i.e., industry, government, nonprofit organization, foundations and academic institutions)
- **Other** (i.e., legislative databases, media stories, press and news releases)
Methods  - *Evaluate & Assemble Evidence*

- **Industry Progress**
  - Selected and categorized 118 data sources into evidence tables
    - N=48 published articles or reports
    - N=70 media stories, press or news releases

- **Government, Educational Leaders & School Progress**
  - Selected and categorized 80 data sources into evidence tables
    - N=50 published articles or reports
    - N=10 enacted legislation
    - N=20 media stories, press or news releases
Methods - *Evaluate & Assemble Evidence*

- Investigators independently reviewed the evidence for the major recommendation and sub-recommendations before assigning one of four evaluation categories
  - *No progress*
  - *Limited progress*
  - *Some progress*
  - *Extensive progress*
Methods - *Use Evidence to Inform Decisions*

- Investigators identified potential opportunities and actions that private- and public-sector stakeholders could take to advance progress toward the IOM food marketing report recommendations.
# Results for Stakeholders and Sectors

**December 1, 2005 to January 31, 2011**

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<th>#</th>
<th>Stakeholders and Sectors</th>
<th>Progress</th>
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<td>Food &amp; Beverage Companies</td>
<td>Some</td>
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<td>2</td>
<td>Restaurants</td>
<td>Limited</td>
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<td>3</td>
<td>Industry Trade Associations</td>
<td>Limited</td>
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<td>4</td>
<td>Marketing Practice Standards</td>
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<td>Media &amp; Entertainment Companies</td>
<td>Limited</td>
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<td>6</td>
<td>Parents, Caregivers &amp; Families</td>
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<td>Schools</td>
<td>Some</td>
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<td>8</td>
<td>Government</td>
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<td>10</td>
<td>HHS Secretary Monitor &amp; Report on All Actions</td>
<td>None</td>
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Food and Beverage Companies
Evaluation Results

Food and beverage companies’ reports and some evaluations suggest some progress achieved to:

- Reformulate and expand healthier products
- Reduce TV advertising for sweet snacks and SSBs
- Develop FOP labeling for consumers to identify healthier products in grocery stores and retail outlets
- Initiate partnerships to promote a healthful diet and healthy lifestyles
Food and Beverage Companies

Evaluation Results

- Product reformulations incremental to meet healthy guidelines
- Company pledges failed to protect children < 12 years from all marketing practices and do not protect adolescents 12-17 years
- Companies used misleading advertising and health claims; received FDA warning in 2009; Nestle subsidiary & Kellogg’s investigated by FTC and CARU for misleading health claims
- Non-participating CFBAI companies more likely to market unhealthy products
- Multiple FOP labeling systems confuse consumers hindering easy selection of healthy products in grocery stores and retail outlets
- Smart Choices FOP labeling investigated by FDA and aborted
- Few public-private partnerships evaluated for effectiveness
Food and Beverage Companies

Opportunities and Actions to Advance Progress

• Expand healthier food and beverage products
  – Dietary Guidelines for Americans 2010
  – Forthcoming Federal Interagency Working Group (IWG) on Marketing to Children nutrition standards

• Strengthen industry self-regulatory programs
  – All companies should join CFBAI and expand pledges beyond “child-directed advertising” for under 12 years to all marketing
  – Pledges should cover marketing to adolescents

• Improve product labeling and use truthful and non-misleading health claims
  – Support FDA in developing and widely promoting universal FOP labeling or nutrient-profiling system to help consumers identify healthiest products

• Encourage partnerships (HWCF) and support evaluations
Restaurant Companies

Evaluation Results

• Limited progress achieved to expand and promote healthier meals and provide nutrition information at point-of-choice and consumption

• Two studies (2008-2009) showed < 10% of children’s restaurant meals meet DGA criteria (i.e., 480 calories/meal based on 1300 calories/day for 4-8 year old and 733 calories/meal for adolescents)

• Rudd study (2010) showed only 12 out of 3,039 meals at 12 QSR chains met nutrition criteria for preschoolers; only 15 meals met criteria for older children; most meals purchased by adolescents provided 800-1100 calories/meal

• Meals sold to young people exceeded DGA recommendations for fat, sodium and added sugars and rarely offered healthy side dishes as default choices
Restaurant Companies
Evaluation Results

• QSR TV ads increased from 28% in 2002 to 40% in 2008 especially targeting African-Americans and adolescents

• Only 24% of 42 restaurants surveyed had clear food marketing policies to children and have complied with FTC’s recommendation to standardize nutrition criteria for marketing to children

• Limited evidence that restaurants used competitive pricing to encourage consumption of healthy meals

• Restaurants lacked clear nutrition guidelines for offering toys with meals to children

• Restaurant sector not yet joined partnerships
Restaurant Companies

Evaluation Results

- Only 2 restaurants (i.e., Subway and Walt Disney Company) have designated healthy default choices
- Only 2 restaurants (i.e., McDonalds and Burger King) are CFBAI members
- Several leading chain restaurants (i.e., Yum! Brands and Subway) have not made formal commitments to market healthy meals to children and adolescents
Restaurant Companies

Opportunities and Actions to Advance Progress

• Join and support industry self-regulatory programs
• Establish healthy meal standards and healthy default choices
• Use competitive pricing strategically to promote healthy options
• Offer toys and incentives only with healthy products
• Promote clear menu labeling
• Encourage partnerships
• Support evaluations of collective efforts
Industry Trade Associations
Evaluation Results

- Limited progress collectively achieved to show leadership and harness industry creativity, resources and support to market a healthful diet to children and adolescents
- Some positive steps made by food and beverage (GMA and ABA), food retailers (FMI) and fresh produce (UFPA) industry sectors
- Very limited progress made by trade associations representing advertising and marketing (ANA and AAAA), restaurants (NRA), confection (NCA) and snack food (SFA) sectors
Industry Trade Associations

Evaluation Results

- No evidence that 2006 school snack food agreement, brokered by Alliance for Healthier Generation, was evaluated
- Two studies showed unhealthy products widely available to young people through food retailers, although Wal-mart announced intent to expand healthier options in Jan 2011
- Delayed industry trade actions until after Let’s Move! initiated (Feb 2010) and White House Task Force Report released (May 2010)
- NRA failed to support menu labeling until enacted into law through health care reform (March 2010)
- In 2009, GMA spent $1.6 million and NRA spent $1.4 million to oppose SSB tax
Industry Trade Associations

Evaluation Results

• ANA and AAAA defended right to advertise to children
• NCA viewed Child Nutrition Reauthorization legislation a threat due to proposed limits on candy sales in schools
• In late 2010 and early 2011, GMA and FMI jointly announced industry FOP labeling system – *Nutrition Keys* – and pledged $50 million education campaign to help American consumers select healthier choices
• GMA and FMI strategy developed without FDA input and pre-empted a forthcoming IOM report based on consumers’ understanding of FOP systems
Industry Trade Associations

Opportunities and Actions to Advance Progress

• Develop competitive framework for members to promote a healthful diet
• Provide technical assistance to members to adhere to government nutrition standards for marketing to young people
• Incentivize grocery stores & food retailers to promote healthy options
• Evaluate 2006 school snack food agreement
• Work with FDA to develop and adopt industry-wide FOP labeling
• Encourage partnerships
• Evaluate collective efforts to promote a healthful diet
Marketing Practice Standards

Industry Evaluation Results

• Industry stakeholders made some progress to work with government, scientific, public health and consumer groups to establish and enforce highest marketing standards for young people
• By 2010, 17 companies (15 food and beverage & 2 restaurant companies representing ~66% industry marketing expenditures) revised and applied standards to “child-directed advertising”
• CBBB released 3 reports (2008, 2009 and 2010) on company compliance showing highly favorable for “child-directed advertising” for < 12 years
Marketing Practice Standards
Licensed Characters

- One study observed a reduction in third-party licensed characters used to promote products to young children but an increase in other forms of cross-promotional marketing (Harris et al., 2010)
- Nearly half (49.4%) of company advertisements use licensed characters to promote unhealthy products (Kunkel et al., 2009)
- Children prefer foods with licensed characters for energy dense foods and snacks (candy) compared to healthy options (baby carrots) (Roberto et al., 2010)
- CFBAI pledges exclude brand-equity characters and licensed characters on product packaging
Marketing Practice Standards

Government Evaluation Results

- Government made some progress to evaluate pledge compliance
- A 2008 Senate hearing and FTC urged companies to adopt meaningful, uniform nutrition standards for all products and all forms of marketing (*measured* and *unmeasured* media spending)
- No company has yet fully complied with FTC recommendations
- 2006 FCC Task Force unable to reach consensus on nutrition standards and media marketing by 2008
- In 2009, Congress directed 4 federal agencies (i.e., CDC, FDA, FTC, USDA) to form Interagency Working Group (IWG) on Marketing to Children, establish nutrition standards for marketing, and submit report to Congress by July 15, 2010
- Tentative draft standards released (Dec 2009); delays in posting for public input; deadline not met
Marketing Practice Standards

Opportunities and Actions to Advance Progress

• Expand and promote healthier products through IMC
• Collaborate with public-sector stakeholders (i.e., IWG) to strengthen and support CFBAI beyond traditional advertising to “new media” and school-based marketing, and expand pledges to cover adolescents
• Use licensed characters only for healthy food and beverage product promotion
  – All brand-equity and third-party licensed characters should meet DGA 2010 and federal IWG nutrition standards
• Cooperate with FTC, CBBB, CARU and CFBAI to evaluate and enforce the expanded guidelines
Media and Entertainment Companies

Evaluation Results

- Media
  - Steady increase in media coverage of obesity (2005-2011) but specific content and accuracy of media stories unknown
  - Health-care journalists concerned about influence of public relations and advertising on news content and consumers’ perceptions of media stories

(Schwitzer G. The State of Health Journalism in the U.S., Kaiser Family Foundation, 2009)
Media and Entertainment Companies

Evaluation Results

- **Entertainment Companies**
  - Limited progress achieved to direct extensive power to promote healthy foods and beverages to children and adolescents
  - Only 25% entertainment companies have clear policy on food marketing to children; existing policies addressed third-party licensed characters but were weaker for products marketed through print, broadcast and digital media and product placement
  - Only Sesame Workshop and Walt Disney Company limited child-directed marketing to specific nutrition standards
  - Nickelodeon and Cartoon Network selectively applied or lacked nutrition standards
  - No company currently participates in CFBAI or HWCF
Media and Entertainment Companies

Opportunities and Actions to Advance Progress

• Join and support industry self-regulatory programs
• Use licensed characters only for healthy product promotion
  - Brand-equity and third-party licensed characters should be promoted when products meet the DGA 2010 and federal IWG nutrition standards (supported by White House Task Force on Childhood Obesity)
  - Companies restrict use of characters on product packaging and in-store marketing when products do not meet nutrition standards
• Encourage partnerships to promote a healthful diet
• Support evaluations of collective efforts
Parents, Caregivers and Families

Evaluation Results

• No progress made by government to partner with the private sector to create a long-term, multi-faceted and financially sustainable social marketing campaign, especially targeting parents with young children.

• No social marketing or health education campaigns met criteria to be scaled-up nationally and funded through a reliable and sustainable public-private mechanism for maximum effectiveness.

• Few campaigns evaluated for long-term behavioral changes.

• Strategies to reduce marketing of unhealthy products through counteradvertising media messages are likely to complement health-promotion messages.
Parents, Caregivers and Families

*Opportunities and Actions to Advance Progress*

- Fund national social marketing and IMC campaign to support healthy eating and active lifestyles, and a counteradvertising media campaign to discourage unhealthy eating and sedentary lifestyles
  - HHS, in partnership with public-private initiatives could designate funds from HWCF ($25 million), PHA ($40 million) and ARRA’s National Prevention and Media Initiative ($40 million) to develop, implement and evaluate a dietary behavioral change campaign
- **Use insights from existing campaigns and market research**
  - *We Can!, Let’s Move!, More Matters, VERB, truth, Coalition for Healthy Children, empowerME and private-sector consumer behavior research*
- **Support evaluations of all campaigns to promote a healthful diet**
Schools Evaluation Results

• Some progress achieved to promote healthful diets through nutrition standards in school environment
  - 11 states (2005) vs 20 states (2010) implemented stricter standards than USDA
  - 20 states (2005) vs 29 states (2010) limited access to competitive foods
  - 23 states and DC supported farm-to-school programs in 2010
• AHG, AFHK and USDA’s Team Nutrition provided TA to districts and local schools implement model SWP; some high-achieving schools received national recognition
• NGA, PTA and ABA improved school environment
• Healthy, Hunger-Free Kids Act of 2010 (CNRA) passed by Congress and signed into law by President Obama in Dec 2010
Schools
Evaluation Results

• Evaluations of school nutrition standards and competitive foods showed incremental changes, fragmented and inefficient implementation to reach schools nationwide

• Children in higher grades tend to have more permissive environments with more unhealthy competitive foods

• SWP evaluations found in-school marketing and use of foods for classroom celebrations and fundraisers made less progress than other SWP components

• Barriers to effective SWP implementation
  – Competing priorities
  – Limited time
  – Teachers perceive need to use food for fundraising
Schools

Opportunities and Actions to Advance Progress

- Adopt and promote national nutrition standards that align with the CNRA 2010
  - USDA, CDC and state Departments of Education develop standards for school districts and local schools
- Use available guidelines, tools and TA to create healthy school environments
- Require mandatory reporting of comprehensive SWP implementation
- Engage parents to reduce school marketing of unhealthy food and beverage marketing
- Evaluate 2006 school snack food agreement
- Support evaluations of collective efforts to promote a healthful diet
Government Evaluation Results

- Limited progress achieved to use full range of public policy tools to promote a healthful diet for children and adolescents.
- Promising funds for F&V promotion through Food, Conservation and Energy Act of 2008, ARRA, and $400 million through Healthy Food Financing Initiative.
- Untapped opportunities at state and local levels to use legal ordinances to support healthy mobile markets and attract farmers’ markets and farm stands to encourage F&V availability, promotion and consumption.
Government Evaluation Results

- No evidence that federal government used tax incentives or performance awards to incentivize industry to promote healthful diet
- Federal spending on F&V across USDA, CDC and NIH (FY2000-2008) found only 2.8% combined budgets devoted to F&V promotion activities; large research and program gaps (Rosenfeld, 2010)
- USDA not yet demonstrated leadership to test new strategies to promote healthier, appealing meals; *Chefs Move to School* program launched in May 2010
- Independent evaluations showed limitations to voluntary industry self-regulation of marketing to children and adolescents
- Delay for IWG nutrition standards release and report to Congress
- Congress has not empowered FTC, FCC and FDA to regulate industry marketing practices promoting unhealthy food & beverage products
Government

Opportunities and Actions to Advance Progress

- Use industry incentives to encourage all sectors and stakeholders to promote a healthful diet
- Adopt policy strategies (i.e., taxes, subsidies) and mobilize state resources (i.e., attorneys general) to reduce unhealthy marketing
- Support USDA’s efforts to improve school meals and ensure resources are available
- Federal IWG release mandatory nutrition standards for marketing to children and adolescents
- FTC, FCC, FDA work with CBBB to enforce measures for non-participating and non-compliant companies relevant to industry self-regulation
- Focus on policies that protect children and adolescents from unhealthy marketing practices
Research Capacity

Evaluation Results

• Limited progress achieved to substantially direct sustained, multidisciplinary work and resources to understand how marketing influences food and beverage choices of young people

• No evidence of progress to develop a means for commercial marketing data to be made available, as a publicly accessible resource, to understand the dynamics that influence diets and health to inform a social marketing campaign promoting a healthful diet

• Congress appropriated funds for FTC to undertake 2 reports (2008 and 2011)

• Omnibus Act of 2009 supported federal IWG study; July 2010 deadline not met
Research Capacity

Evaluation Results

- RWJF remains largest supporter of research on food and beverage marketing to children and adolescents through five national programs and projects
  - Healthy Eating Research
  - Rudd Center
  - Bridging the Gap
  - NPLAN
  - AACORN

- **2009**: National Collaborative on Childhood Obesity Research (NCCOR) Network (i.e., CDC, NIH, USDA and RWJF) formed
  - Unclear how NCCOR funds will be used to support food marketing and obesity prevention research
Research Capacity

Opportunities and Actions to Advance Progress

• Federal IWG complete congressionally requested study and submit within reasonable time frame
• NCCOR encourage inter-agency collaboration to develop a strategic research agenda on marketing to children and adolescents, especially IMC, new media, and target marketing of racially and ethnically diverse groups
• Apply research findings to national social marketing, counteradvertising and IMC campaigns
Monitor and Report on Progress for All Actions

Evaluation Results

• No progress made by HHS Secretary to designate a responsible agency, with adequate and appropriate resources, to formally monitor and report regularly on progress of various entities and activities in IOM food marketing report

• Sept 2008: U.S. Senate hearing held and IOM food marketing committee chair provided informal update noting that no progress was made toward this recommendation

• Dec 2010: HP 2020 released
  - Objectives to reduce competitive school foods, enhance state food retail incentives, and increase access to diet supporting DGA 2010
  - No objectives included to reduce young people’s exposure to unhealthy food and beverage products promotion
  - Objectives included to reduce young people’s exposure to tobacco products promotion
Monitor and Report on Progress for All Actions

*Opportunities and Actions to Advance Progress*

- HHS Secretary designate a responsible agency to report on progress
- Institutionalize monitoring of progress in future public health policy documents
Conclusions

• Diverse private- and public-sector stakeholders have untapped opportunities to advance progress toward the IOM food marketing report recommendations by creating healthy food and eating environments that support a healthful diet for young people

• Industry
  – Use IMC approaches, substantially strengthen self-regulatory programs, support truthful and non-misleading product labeling and health claims, engage in public-private partnerships, and fund independent evaluations of collective efforts

• Schools and educational leaders
  – Develop simple and clear national nutrition standards; use available guidelines, tools and technical assistance provided by resource groups; require mandatory reporting of comprehensive SWP; effectively engage parents; evaluate initiatives

• Government
  – Use many policy tools (i.e., incentives and disincentives, education, legislation, regulation and legal actions)