

# Response ID ANON-T6XQ-W4PA-F

Submitted to Public Consultation: Feasibility study on options to limit unhealthy food marketing to children  
Submitted on 2024-03-15 23:54:24

## Introduction

1 What is your name?

Name:  
Melinda Edmunds

2 What is your email address?

Email:  
national@healthpromotion.org.au

3a What is your organisation?

Organisation:  
Australian Health Promotion Association

3b Is your response being provided on behalf of your organisation?

Yes

3c Which sector do you represent?

Public health

If you chose 'Other', please briefly state the sector you represent. :

3d Do you want this submission to be treated as confidential?

No

Please specify which components of your submission you wish to remain confidential.:

## Policy objective and approach

4a) Which is the most appropriate policy objective?

To reduce the amount of unhealthy food marketing that children are exposed to and the persuasive content of marketing messages (power) (short-term objective, within 1-2 years) AND to improve children's dietary intakes (medium-term objective, within 3-4 years).

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

4b) Which policy approach has the greatest chance of achieving the policy objective(s)?

A mandatory legislative approach with policy development, monitoring and enforcement led by the Australian Government.

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

5 Which age definition is most appropriate?

Children are defined as less than 18 years of age.

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

6a) Which food classification approach has the greatest chance of achieving the policy objective(s)?

A government-led food classification system aligned with national dietary guidance that restricts marketing of unhealthy food products AND food brands that are associated with unhealthy products.

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

6b) Which specific food classification system do you prefer?

Other

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

## Marketing mediums and settings

7 Which option for restricting TV food advertising has the greatest chance of achieving the policy objective(s)?

Restrict unhealthy food advertising on all broadcast media between 5:30am and 11:00pm (all TV services and platforms, radio, cinema, podcasts and music streaming services).

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

For media industry: please provide available data to update estimates of children's TV viewing patterns and peak viewing times. :

Upload TV viewing data here if available:

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8 Which option for restricting online food marketing has the greatest chance of achieving the policy objective(s)?

Restrict all marketing for unhealthy foods through online media. This includes all marketing that has been 'paid' for (monetary and non-monetary) and 'non-paid' marketing where a company has acted to promote an unhealthy food (e.g. through sharing user content or encouraging user generated content with the intention of promoting an unhealthy food or brand).

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

9 Which option for restricting outdoor food advertising has the greatest chance of achieving the policy objective(s)?

Restrict unhealthy food advertising on all outdoor media.

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

10 Do you support restricting marketing on food packaging?

Yes

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

11 Do you support restricting food sponsorship of sports, arts and cultural events?

Yes

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

12 Which option for restricting retail marketing has the greatest chance of achieving the policy objective(s)?

Restrict placement-based and price-based promotion of unhealthy foods within food retail outlets.

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

13 Do you support restricting unhealthy food marketing 'directed' to children, in addition to policy options 5.1-5.6?

Yes

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

## Priority for action

14 Which media and settings do you see as the top priority for action? Please rank in order from 1 (highest priority) to 7 (lowest priority).

Priority for action - Broadcast media (TV, radio, cinema, podcasts, streaming services):

2

Priority for action - Online:

1

Priority for action - Outdoor:

5

Priority for action - Food packaging:

7

Priority for action - Sponsorships:

3

Priority for action - Retail:

4

Priority for action - Marketing 'directed' to children:

6

Please provide evidence/rationale for your selection. This may include: i. costs and benefits; ii. barriers and enablers; iii. impact on priority populations; and iv. monitoring and evaluation. Include references where possible.:

A comprehensive approach addressing all elements is needed to ensure effective action to protect children from exposure to unhealthy food marketing.

15 Is there any other information you would like to share to inform this consultation process?

Please provide evidence/rationale for your response. This may include consideration of costs, benefits, barriers, enablers, monitoring and evaluation. Include references where possible. :

The Australian Health Promotion Association supports the submission provided by the Food for Health Alliance. In addition, the Association supports policy options that address the determinants of health in order to build health equity. Ongoing development of policy and regulation should be evidence informed and developed in consultation with key health promotion and public health stakeholders and consumer organisations. Policies should have formalised ongoing monitoring, evaluation and reporting embedded which is a transparent process.

A comprehensive and multi-faceted approach to addressing unhealthy food marketing to children is needed. Any policy and regulation should be part of a range of actions to protect children from unhealthy food marketing and be guided by key existing strategies such as the National Preventive Health Strategy and the National Obesity Strategy.

Please upload any references or supporting information as required.:

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