

Countering commercial interests: building advocacy campaigns to protect children from food marketing

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Key points

- Cancer Council NSW uses strategic research, media advocacy and a community-organising model to influence policy solutions
- Obesity Policy Coalition uses strategic research, media advocacy and communications with key influencers to maintain political interest in protecting children from unhealthy food marketing
- Sustained efforts by civil society and clear campaign planning is needed to counter commercial influences on policy

Abstract

Objectives: To describe the strategies used by Cancer Council NSW (CCNSW) and Obesity Policy Coalition (OPC) to influence government policy on food marketing to children.

Type of programs: Comprehensive advocacy campaigns.

Methods: We present the components of an advocacy campaign run by OPC and another campaign run by CCNSW to protect children from unhealthy food marketing. We look at the successes and challenges of the campaigns and discuss future directions.

Results: CCNSW has focused on a community-organising and mobilisation model, while OPC has invested in building relationships with key stakeholders such as decision makers. Both organisations have ensured that protecting children from unhealthy food marketing is highlighted through media advocacy and stakeholder engagement. The issue has remained a public health priority despite limited policy windows.

Lessons learnt: Creating a climate for change and facilitating policy action to protect children from unhealthy food marketing can be achieved with: 1) presentation of a clear, united public-health solution; 2) using earned (or unpaid) media to gain public attention; and 3) sustained community and political engagement.

Background

There is robust evidence that food marketing affects children's food choices¹ and that reducing the exposure of children and adolescents to the marketing of unhealthy foods is an essential part of a comprehensive package to address childhood obesity.²

Established in 2008, the Australian Government's National Preventative Health Taskforce was tasked with developing a strategy to address the burden of chronic disease caused by obesity, tobacco and alcohol. The final report in 2009, *Australia: the healthiest country by 2020*, presented a series of recommendations to address obesity including phasing out marketing of unhealthy foods on television before 9pm, phasing out premium offers, toys, competitions and the use of promotional characters in unhealthy food marketing, and adopting criteria for determining energy-dense, nutrient-poor (EDNP) food and drinks.³ That same year, the Australian Food and Grocery Council introduced the Responsible Children's Marketing Initiative, and later that year the fast food industry introduced the Quick Service Restaurant Industry Initiative. Both initiatives were updated with minimal content changes in 2014.^{4,5} The Federal Government undertook to monitor the impact of the industry initiatives to determine their effectiveness in reducing children's exposure to advertising of EDNP foods and beverages.⁶

A decade on, much has been published on the failure of the food and advertising industry initiatives to protect children from exposure to EDNP food advertising⁷, but there has been little government commitment to address the issue. As well as individual global companies lobbying against government-led policy, there are many umbrella organisations representing those with vested interests in an advertising market that has minimal constraints. Some of those representative bodies include the Australian Association of National Advertisers (representing the advertising industry), Free TV Australia (representing commercial free-to-air television licensees), the Australian Food and Grocery Council (a member organisation for the food and grocery supply industry), and specific food or media representative bodies such as the Australian Beverages Council and the Outdoor Media Association. Private sector actions include undermining policy debate by disputing the evidence or using emotive framing, adopting self-regulations to pre-empt government-led policy, and direct lobbying.^{8,9}

Cancer Council NSW (CCNSW) is a large cancer charity working across every aspect of the cancer continuum, including cancer prevention. Given that obesity is linked to an increased risk of many cancers, preventing weight gain in the population is a key priority, and protecting children from food marketing a priority policy recommendation. Since 2005, CCNSW has been researching, publishing and advocating on food marketing to children. CCNSW has a strong track record in effective policy and advocacy activities. Grassroots activation

through an advocacy community of more than 40 000 volunteers, the CanAct community, has been a critical element of campaigns in influencing decision makers in relation to cancer prevention and treatment issues.

Obesity Policy Coalition (OPC) is a small organisation, supported by Victorian nongovernment organisations, Cancer Council Victoria, Diabetes Victoria, the Global Obesity Centre at Deakin University, and VicHealth. OPC advocates to influence change through policy and regulation to improve diets and help prevent obesity, particularly in children. OPC regularly works with other not-for-profit organisations such as consumer advocacy group CHOICE and online network Parents Voice to extend the reach of advocacy campaigns.

CCNSW and OPC work collaboratively on government submissions and strategic planning such as advising other state Cancer Councils on local campaigns. They also collaborate on cancer prevention policy issues as members of Cancer Council Australia's Nutrition and Physical Activity Committee. Both organisations are also active members of issue-specific coalitions, for example an informal public health working group on the Health Star Rating system.

An advocacy framework based on demand-side strategies

In order to influence policy change, advocacy campaigns need a range of strategies.^{10,11} The campaigning models described in this paper most closely align with Kingdon's multiple streams theory in which policy change depends on three streams: problem (the framing of the issue); policy (the solutions); and politics (the political climate).^{11,12} In this theory, when at least two of these streams come together, a 'policy window' opens to provide an opportunity for change.¹¹ A policy window might be in the form of an inquiry or a consultation whereby a government asks for input into a public health problem and solution, or where a decision maker champions the solution. Using this and other frameworks from political science, Huang et al. suggest efforts need to be made to mobilise the community to complement conversations between public health professionals and political leaders on obesity prevention policies.¹¹ Huang et al. label these community-based strategies as 'demand-side' or 'bottom-up' strategies, where public pressure influences policy action and there is increased popular demand for policy.

The four demand-side strategies to influence political will described by Huang et al. are: 1) refinement and streamlining of consumer information, and identification of the appropriate frame/s; 2) media advocacy; 3) citizen protest and engagement; and 4) building partnerships to create a receptive political environment.¹¹ This paper discusses the campaigning models used by CCNSW and OPC to influence government action to protect children from EDNP food marketing, as they relate to the four strategies described by Huang et al.¹¹

Framing the issue

Framing the issue is important to counter efforts to undermine policy from vested interests which commonly use 'nanny state' and parental responsibility frames.⁸ The term nanny state has been used to emotively describe a world where government tells people how to live their lives. This framing undermines efforts to gain community support for regulations to support behaviour change and can be countered by framing about the benefits of such safeguards to the public's health, safety and quality of life.¹³ Nanny-state framing has been shown to be too simplistic for the community and more complex arguments around costs and equity have been suggested as framing for civil society to use when talking about government policy solutions.¹⁴

In the food policy setting, 'experts' are sometimes pitched against each other by drawing on conflicts about the definition of 'healthy food'.^{15,16} Recently, the Council of Australian Governments (COAG) agreed on criteria that could be used to determine what foods can, or cannot, be marketed to children, filling a gap in details required for policy making.¹⁷ This provides simple, but nonbinding, guidance on nutrition criteria to ensure children are protected from unhealthy food marketing in a range of settings. Although these guidelines need to be placed in actual policies and enforced, they provide an opportunity for civil society to show support for COAG to take action on this issue and advocate for further policy development.

A shared discourse from civil society is important for campaigning⁸ and the public health community has been unified regarding the solution to the problem.¹⁸ The NOURISHING framework provides examples of policy from around the world to use as best practice examples of policy solutions.¹⁹

There is consistently strong community support (more than 70%) for policies to protect children from EDNP marketing.^{20,21} However, there is limited understanding of what is needed to get the community to take action on this issue. CCNSW's strategic research using focus groups and a survey to inform messaging suggests that parents and others in the NSW community believe children are vulnerable and require protection from marketing techniques.²² It also shows that parents are seen as gatekeepers to raising healthy children, so framing controls on marketing as supporting parents' efforts to provide healthy food for their children is consistent with public perceptions on the role of parents in promoting children's health.²² This information feeds directly into framing of media advocacy and campaigns discussed later.

Identifying how the industry initiatives for responsible marketing are performing and drawing attention to their failures over time has also been a key strategy. For example, both CCNSW and OPC use the Ad Standards formal complaint process linked to the food industry initiatives to identify advertising that targets children. OPC has strategically explored existing as well as emerging

digital advertising platforms to determine the coverage of self-regulation and deficits, such as vague definitions in the initiatives. Focusing on the solutions is important and, as such, the OPC has developed a model of how regulation could comprehensively address marketing of unhealthy food to children, including definitions and coverage of all media platforms. The model also outlines actions that would be amenable to national interventions, compared with state/territory jurisdictions.^{18,23}

Media advocacy

Both organisations use earned media (unpaid media coverage generated by organisations), to amplify the discussion. Media articles report on strategic food advertising research in peer-reviewed publications to highlight the unhealthy food marketing environment. In 2015, CCNSW replicated previous research to show that there had been no change in the rate of unhealthy food advertising on television since previous studies in 2011.⁷ The updated study prompted discussion of the issue in the media.

Over the past decade, OPC has released several strategic reports that frame the issue and communicate solutions, thereby positioning itself as an expert that can provide media comment in this area.^{18,23,24} The reports have been used to generate media interest, engage stakeholders, including bureaucrats and politicians, as well as to influence the broader debate.

OPC has collaborated with a range of partners, including Cancer Council Victoria, to research issues, including use of toys with children's fast food meal deals, influence of cartoon characters promotions on packaging, sponsorship by EDNP food and drinks in televised high-profile sport events, and the influence of counter marketing. Along with strategic research on public opinion around support for a range of policy options, these studies have been released to coincide with key policy decisions or broader community discussion.²⁵

Citizen protest and engagement

Changes to public health policy require persistent, long-term campaigning. In 2007, leading up to the release of a discussion paper to inform the draft Children's Television Standards 2008, Cancer Council joined with a coalition of organisations to lead a grassroots campaign, *Pull the plug*, to lobby for changes to the marketing of junk food to children. In just 7 months, 20 561 postcards were signed by supporters and delivered to the organisation leading the review, the Australian Communications and Media Authority, and the Communications Minister.²⁶ Despite these efforts, and that over half of the formal submissions received were from public health organisations, the changes to the Children's Television Standards did not reflect those submissions.

In 2010, CCNSW set up the Junkbusters website to provide parents with the information and tools to complain about junk food advertisements and react to the food industry initiatives. Junkbusters has generated a following and had some success with complaints being upheld and changes to advertisements over time, and CCNSW has mobilised parents over specific issues. However, there has been no policy window or opportunity to build community concern about the issue in general. In 2017, CCNSW launched *Our kids, our call*, a campaign targeted at parents and focused on messages that put parents back in charge of helping their children develop healthy habits. These initiatives aim to build a base of supporters who are engaged with the issue and are ready to take action when a policy window or other opportunity is available.

CCNSW identified the 2019 New South Wales (NSW) election as an opportunity to feature a food marketing policy 'ask' (a request to government to remove unhealthy food marketing from state-owned property) within its CanAct community state election campaign.²⁷ At the centre of the CCNSW community-organising model are about 100 volunteers who visit their local NSW Member of Parliament (MP) or local candidate as an ambassador for CCNSW messages, including advocacy asks.²⁷ This sets up a two-way communication platform and assists with intelligence gathering. These volunteer visits provide evidence-based information on healthy eating and obesity prevention, and conveys the food marketing policy ask to MPs throughout NSW. In the lead up to the election, the CanAct community held 17 forums around the state to highlight this and other priorities to candidates. In addition, the campaign was covered in more than 200 media articles, volunteers and staff held 230 individual meetings with candidates or sitting MPs (covering 85% of electorates) and more than 16 000 postcards were collected in support of the priorities.

CCNSW's community survey found that people who understood the link between obesity and cancer were more supportive of food policy interventions.²⁰ Therefore by increasing discussion and understanding of the issue and building a community that owns the solution – as is happening with the CanAct community – CCNSW can limit public backlash when there is political interest and discussion about policy change.

Building partnerships to create a receptive political environment

One of the barriers to progress on obesity in Australia is the perception that there is a lack of clear and consistent messaging from obesity prevention advocates.²⁸ To address this, the OPC, together with the Global Obesity Centre, developed a consensus platform of eight key actions that it advocated the Federal Government should take.²⁹ One was to restrict unhealthy food marketing to children on television before 9:30 pm. The actions are supported by around 40 public health, community,

medical and academic groups, as the most critical and feasible components of an obesity prevention strategy. It set a strong foundation in the lead up to the 2019 Federal election and provided an opportunity to engage with a range of stakeholders, including media and government health advisers, contributing to the inclusion of obesity prevention policies in one major party's health agenda.³⁰ The Labor Party's platform included "a comprehensive review of the regulatory framework for food and drink advertising and marketing to children". This would have provided a policy window that has been lacking over the past decade had the Party won the election.

The OPC also partners with other groups such as Parents' Voice and CHOICE on issues around marketing to children to provide an amplified voice and add a community perspective.

Discussion and conclusion

Since 2009, there have been some subtle changes in advertising to children and, although it is unknown if the efforts described here contributed to this, they demonstrate positive developments. In 2019, monitoring of food advertising on television by CCNSW and OPC shows advertisements typically feature a parent (illustrating advertising to the main grocery shopper rather than to children) or some physical activity (positive health messaging to counter unhealthy food) or only the healthier fast food option, out of the many less healthy meal deals available to children. These changes allow unhealthy food advertising, while ensuring the advertisements comply with the ineffective self-regulatory initiatives.^{7,23} Both organisations strongly believe this is not good enough, but it is a change since 2009. However, advertising has also become more sophisticated, integrated and targeted, particularly in relation to digital media, making it difficult to monitor.

Although there has been no opportunity for policy influence through consultation processes and limited appetite within governments for regulation, there has been an increase in political interest. Having the issue on the COAG Health Ministers' agenda has been important in the development of actions to reduce marketing and availability of ENDP foods in sport and recreation, schools and public health settings. Some jurisdictions have taken action on food marketing in areas where they have influence. For example, the Australian Capital Territory Government has introduced restrictions on unhealthy food advertising on public buses³¹ and the Queensland Government has banned unhealthy food promotions at government-owned sites.³²

Political will remains a challenge and, with a conservative Federal Government elected in 2019, we need to build on efforts described here and strengthen coalitions to maintain campaigning in the current political environment. Future campaigning can focus on broader opportunities such as the recommendations of the 2018 Senate Select Committee into the Obesity Epidemic in

Australia³³ and the Federal Government announcement in August 2019 of the development of a long-term National Preventive Health Strategy.³⁴

Civil society organisations are well placed to mobilise the media and public opinion in support of policies.³⁵ CCNSW and OPC use the four strategies outlined by Huang et al. to create demand for policy action on food marketing to children. These strategies map to those described in the six key activities identified by Lyn et al³⁶ and by Cullerton et al.¹⁰ The Cullerton conceptual model for influencing government nutrition policy lists enablers that are included in our campaign models: develop a clear, unified solution; reframe issues appealing to values and beliefs; amplify the frame; increase public will; and invest in relationships strategically.¹⁰ Our models do not include either a policy entrepreneur or policy champion, as described in the Cullerton model, but key staff of OPC and CCNSW could be considered policy entrepreneurs.

Continued campaigning as described here aims to prime the community, allow their voices to be heard, create a climate for change and facilitate political will for policy reform.

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Competing interests

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Author contributions

WLW and JM contributed to the concept planning, drafting and final writing of the manuscript.

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