

PRESS RELEASE BY THE COMMITTEE ON GUIDELINES FOR FOOD ADVERTISING TO CHILDREN

Food and Media Industries to Comply with Guidelines for Food Advertising to Children from 1 January 2015

New guidelines aimed at reducing children's exposure to advertising of food and beverages high in fat, sugar and salt will take effect from 1 January 2015.

The guidelines will be incorporated into the Singapore Code of Advertising Practice (SCAP), and administered by Advertising Standards Authority of Singapore (ASAS), an advisory council under the Consumers Association of Singapore (CASE), for industry self-regulation.

The comprehensive guidelines were developed by a public-private partnership consortium comprising stakeholders from MOH, HPB, ASAS, a Council of the Consumer Association of Singapore (CASE), Singapore Manufacturing Federation (SMF), Food Industry Asia (FIA) as well as representatives from media and advertising industries.

The aims of the Committee on Guidelines for Food Advertising to Children were to develop the guidelines and put in place a framework to govern food advertising targeted at children 12 years or younger across all media in Singapore.

Together, the Committee worked with all stakeholders to put in place an implementable framework to shift the balance of advertising towards food and beverage products that are healthier in nutrient composition.

Advertisers and Food Manufacturers can refer to the Common Nutrition Criteria for determining which food and beverage products can be advertised to children. Advertisers and Food Manufacturers will also have a three-month grace period until end December 2014 to adapt and ease into the requirements. This was announced by Associate Professor Muhammad Faishal Ibrahim, Parliamentary Secretary, Ministry of Health, today.

More information on the committee is at [Annex A](#).

ASAS Advisory on Children's Code for Advertising Food and Beverage Products

The guidelines require all food and beverage products promoted in marketing communications targeted at children aged 12 and below to meet the Common Nutrition Criteria. The guidelines will apply to all media platforms.

Food and beverage marketing communications primarily targeted at children in all media will be assessed using the following criteria:

- (a) **Placement** – i.e. whether the key target audience of the medium is children. For example, a TV channel that only broadcasts children's programmes or a TV channel that broadcasts children's programmes in specific time belts.
- (b) **Advertising content** – i.e. whether advertising tools and techniques used are designed to appeal specifically to children. Examples would include the use of licensed characters or toys; use of interactive games or contests; and overall creative execution such as the use of language and visuals that are directed primarily at children.

The following are not included within the scope of the guidelines:

- a) The product itself, including the packaging
- b) Ordinary display in store / at point of sale
- c) Sponsorship, where this only entails the use of the sponsor's name and / or trademark
- d) Use of brand equity characters

More information on the guidelines is at **Annex B**.

A set of interpretative guidelines has also been developed to help the industry comply with the food advertising guidelines for the different media platforms. The "Children's Code for Food and Beverage Products Marketing Communications: Interpretative Guidelines" is available at: http://asas.org.sg/Portals/0/Images/ASAS/news/Children_Code/Interpretative_Guidelines.pdf.

Common Nutrition Criteria

The Common Nutrition Criteria is a framework to help food manufacturers determine which food and beverage products can be advertised to children. The Criteria applies to both packaged food and food services. As part of the development process, the Committee worked to ensure that the nutrition criteria developed are scientifically grounded, relevant to the local context and clear and transparent to foster ease of implementation and monitoring. More information is in **Annex C**.

The "Common Nutrition Criteria White Paper" is available on the ASAS website at http://asas.org.sg/Portals/0/Images/ASAS/news/Children_Code/Common_Nutrition_Criteria_White_Paper.pdf.

Implementation and Monitoring

Any advertiser wishing to promote food and beverage products in marketing communications that are directed primarily at children aged 12 years and below will need to complete the Nutrition Criteria Compliance Certificate and provide the media owner with the completed certificate. For any food or beverage marketing communication not accompanied by a duly completed Nutrition Criteria Compliance Certificate, media owners should assume that the product does not meet the Common Nutrition Criteria and therefore ensure that the marketing communication is not placed in media targeted primarily at children.

ASAS will undertake the monitoring of compliance to the guidelines at two levels:

- Complaint handling - all media covered by the guidelines
- Ex post facto compliance monitoring – Monitoring of television, print, internet and outdoors advertising will be based on periodic spot checks of samples of media communications in these areas. These media constitute more than 90 per cent of the food and beverage industry's advertising expenditure.

An annual ASAS compliance report will be compiled, starting end 2015.

ASAS will conduct workshops in November 2014 to provide training for key stakeholders such as brand owners, media owners, media compliance officers, creative and media agencies. The objective of the workshops is to ensure maximum compliance by building common understanding and ensuring consistent implementation of the Guidelines.

The Committee on Guidelines for Food Advertising to Children will continue to meet on a six-monthly basis for the next two years (2015-2016) to review the situation post-implementation.

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The Committee on the Guidelines for Food Advertising to Children

The childhood obesity rate in Singapore has been stable over the last three years. The obesity rate among Primary, Secondary and Junior College students was 12% in 2013¹. However, overweight and obesity remain key problems for adults due to a sedentary lifestyle, excessive caloric intake and the large portion-size of food servings. Obesity increases the risks for diabetes, hypertension and heart disease. Prevention of childhood obesity is important, because overweight and obese children are likely to stay obese into adulthood. It is therefore important to create awareness of healthy living to prevent childhood obesity from continuing into adult obesity.

Studies have shown that advertising influences children's food preferences, purchase requests and consumption patterns.² Dietary habits of children are often formed well before the age of five and are very hard to change once children turn 11³. In view of the evidence, the World Health Organisation (WHO) has called for restrictions on the advertising of food and beverages that are high in fat, sugar or salt to children⁴.

In October 2012, Minister for Health announced the intention to restrict advertisements that make unhealthy food and drinks appealing to children as part of Singapore's battle against obesity.

The Ministry of Health (MOH) and Health Promotion Board (HPB) conducted a public consultation exercise from 26 November to 28 December 2012 to seek the views of the public relating to food advertising restrictions for children. A total of 215 responses were received, with 50 per cent of respondents being parents or caregivers. More than 90 per cent of the respondents supported the introduction of restrictions to protect children from advertisements on food and beverages that are high in fat, sugar and salt.

In 2013, the Committee on Guidelines for Food Advertising to Children – public-private partnership comprising stakeholders from MOH, HPB, Advertising Standards Authority of Singapore (ASAS) (a Council of the Consumer Association of Singapore (CASE)), Singapore Manufacturing Federation (SMF), Food Industry Asia (FIA) as well as representatives from media and advertising industries was established. This committee's aims were to develop the guidelines and put in place a framework to govern food advertising targeted at children 12 years or younger across all media in Singapore. The composition of the Committee is as follows:

¹ Data from the Ministry of Education (MOE)

² Hastings, G, Stead, M., McDermott, L., Forsyth, A., MacKintosh, A.M., Rayner, M., Godfrey, C., Caraher, M. and Angus K. (2003) *Review of research on the effects of food promotion to children. Report to the Food Standards Agency*. Glasgow, University of Strathclyde, Centre for Social Marketing.

Hastings, G., McDermott, L., Angus, K., Stead, M. and Thomson S. (2006) *The extent, nature and effects of food promotion to children: A review of the evidence. Technical Paper prepared for the World Health Organisation*. World Health Organisation, Geneva.

Cairns, G., Angus, K. and Hastings, G. (2009) *The extent, nature and effects of food promotion to children: A review of the evidence to December 2008. Paper prepared for the World Health Organisation*. World Health Organisation, Geneva.

Institute of Medicine. (2006) *Food marketing to children and youth: Threat or opportunity?* Institute of Medicine of the National Academies, Washington DC.

Livingstone, S. (2006) New research on advertising foods to children – An updated review of the literature.

http://eprints.lse.ac.uk/21758/1/Television_advertising_of_food_and_drink_products_to_children.pdf

³ Skinner, J.D., Carruth, B.R., Wendy, B., Ziegler, P.J. (2002) Children's food preferences: a longitudinal analysis. *Journal of the American Dietetic Association*, 102, 1638-47.

⁴ World Health Organisation. (2010) Set of recommendations on the marketing of foods and non-alcoholic beverages to children. World Health Organisation, Geneva.

NAME	POSITION	ORGANISATION
Chairperson		
Assoc Prof Tan Sze Wee 陈世伟副教授	Chairperson Deputy Executive Director, Biomedical Research Council CASE Central Committee Member	Advertising Standards Authority of Singapore Agency for Science and Technology and Research
Co-chairperson		
Dr Derrick Heng 王睦贵医生	Group Director, Public Health Group 公共卫生总司长	Ministry of Health
Members		
Ms Lily Tay 郑莉莉	Executive Director, 理事长 Singapore Advertisers Association	Advertising Standards Authority of Singapore
Mr Vincent Hoe 何文森	Honorary Secretary, Association of Accredited Advertising Agents Singapore	Advertising Standards Authority of Singapore
Professor Ang Peng Hwa 汪炳华教授	Wee Kim Wee School of Communication & Information, Nanyang Technological University	Advertising Standards Authority of Singapore
Ms How Siew Tang 侯秀冬	Director, Inspection Department, Quarantine & Inspection Group	Agri-Food & Veterinary Authority of Singapore 新加坡农粮兽医局
Mr Seah Seng Choon 谢成春	Executive Director 理事长	Consumers Association of Singapore 新加坡消费者协会
Dr Annie Ling 林美娟	Director, Adult Health Division	Health Promotion Board
Dr K Vijaya	Director, Youth Health Division	Health Promotion Board
Mr Goi Choon Kiat 魏俊杰	Deputy Director, Content Policy, Policy Division 副司长(内容政策), 政策司	Media Development Authority
Ms Mary Yoo 姚玛丽	Vice President, TV Ad & Copy Administration, Commercial Operations 广告与文案行政副总裁	Mediacorp Pte Ltd
Mr Sunny Koh 许乃洪	Deputy President, Designate 候任署理会长	Singapore Manufacturing Federation 新加坡制造商总会
Mr Tan Ooi Boon 陈伟文	Head of Print Classified	Singapore Press Holdings Ltd (President, Association of Media Owners of Singapore)
Ms Christine Rio 吴秀竇	Team Head Copy Vetting, Customer Service, Marketing 文稿审批组长, 客户服务部, 市场集团	Singapore Press Holdings Ltd 新加坡报业控股有限公司
Ms Neo Mui Lee 梁梅莉 (alternate to Ms How Siew Tang)	Senior Executive Manager, Regulatory Programmes, Department Regulatory Administration Group	Agri-Food & Veterinary Authority of Singapore 新加坡农粮兽医局
Ms Bev Postma	Executive Director	Food Industry Asia
Mr Will Gilroy	Director of Communications	World Federation of Advertisers

ASAS Advisory on Children's Code for Advertising Food and Beverage Products

Preamble

The Ministry of Health (MOH) convened the Taskforce for Obesity in 2008 to review international best practices and develop key strategies to prevent and control obesity in Singapore. The review was completed in 2009 and one key recommendation was to strengthen local food marketing standards for children. This recommendation is in line with the resolution passed by the World Health Organization (WHO) in 2010, which urged Member States to introduce controls on the marketing of foods and beverages to children in view of the growing scientific evidence that advertising influences children's food preferences, purchase requests and consumption patterns.

The Advertising Standards Authority of Singapore (ASAS), which is an advisory council under the Consumers Association of Singapore (CASE), is working with the Ministry of Health (MOH), Health Promotion Board (HPB), Singapore Manufacturing Federation (SMF) and Food Industry Asia (FIA) to put in place a long-term framework for advertising of food and beverage products to children.

ASAS, having consulted the MOH, HPB, SMF and FIA, now draws up the following advisory to ensure that:

- a. marketing communications for food and beverage products should support the food and nutrition policies of the Government;
- b. marketing communications for food and beverage products do not encourage over-consumption of any food or beverage product and should support balanced diets and healthy lifestyles among children; and
- c. advertisers and marketers develop and maintain a sense of social responsibility in advertising and marketing food and beverage products in Singapore.

This Advisory must be read in conjunction with the Singapore Code of Advertising Practice (SCAP) and applicable legislation.

1. Principles

- 1.1 Special care should be taken in marketing communications of food and beverage products addressed to children or young people. The way in which children perceive and react to advertisements depends on their age, experience and the context in which the message is delivered. Marketing communications that are acceptable for young teenagers will not necessarily be acceptable for young children. The ASAS will take these factors into account when assessing the suitability of advertisements.
- 1.2 Marketing communications to children should be designed and delivered in a manner to be understood by those children. Marketing communications shall not be misleading or deceptive in relation to any nutritional or health claims, shall not be ambiguous or provide a misleading sense of urgency, nor feature practices such as price minimisation inappropriate to the age of the intended audience.
- 1.3 Explicit guidelines and interpretation shall be provided by ASAS on a case-by-case basis. In interpreting the Advisory, emphasis will be placed on compliance with both the principles and the spirit of the Advisory. The guidelines provide examples, which are by no means exhaustive, of how the principles are to be interpreted and applied.

- 1.4 In adjudicating on complaints, the ASAS will consider:
- (a) The extent to which the medium employed has a primary appeal for children, i.e. the extent to which children are the expressed target group for the medium employed; and
 - (b) The extent to which the advertising tools and techniques used are designed to appeal primarily to children.
- 1.5 In adjudicating on complaints, the ASAS is vested with discretion to ensure a commonsense outcome. It should be emphasised that a product with a special appeal for children can never in itself be regarded as marketing.

2. Definitions

2.1 For the purpose of this Code:

- (a) a “child” is a person 12 years old or younger.
- (b) “food and beverage products” means any food and beverage products advertised in Singapore, including advertising of meals or individual menu items by restaurant owners and other food service providers.
- (c) “Common Nutrition Criteria” is the common nutrition profile for food and beverage products that is endorsed by the HPB and will be adopted by all companies for food and beverage marketing communications targeted primarily at children – with effect from January 2015. (Until 31 Dec 2014, Company Specific Criteria will be adopted by individual companies as a guide.)
- (d) “marketing communications” include advertising as well as other means, such as promotions, sponsorships and direct marketing, and should be interpreted broadly to mean any communications produced directly by or on behalf of marketers intended primarily to promote products or to influence consumer behaviour. However, the following are not included in the scope of this Advisory:
 - (i) The product itself, including its packaging,
 - (ii) Ordinary display in store/ at point of sale, and
 - (iii) Sponsorship, where this only entails the use of the sponsor’s name and / or trademark.
- (e) “food and beverage marketing communications primarily addressed to children” are marketing communications which as set out in Section 1.4 of this Code, having regard to their placement, as well to the theme, visuals and language used, are targeted primarily at children.
- (f) a “premium” is anything offered, other than the product itself, without additional cost or at a reduced price, and is conditional upon the purchase of the advertiser's regular product or service.
- (g) “child-dedicated television” includes programmes on channels on both free-to-air and subscription television that specifically target children.

- (h) “child-dedicated publications” includes all print media that specifically target children.

3. Guidelines

3.1 All food and beverage products promoted in marketing communications that are primarily addressed to children in any media must meet the common nutrition criteria endorsed by the HPB.

3.2 Diet and Lifestyle

Marketing communications for food and beverage products primarily addressed to children shall be responsible in the manner in which the food and beverage products are portrayed:

- (a) They should not encourage or promote unhealthy eating or drinking habits.
- (b) They should not actively encourage children to eat excessively throughout the day or to replace main meals with confectionery or snack foods.
- (c) They should not undermine the role of parents or caregivers in guiding dietary and lifestyle choices.
- (d) They should feature quantities of food or portion sizes that are responsible and relevant to the scene depicted. They should not suggest that a portion intended for more than one child is to be consumed by a single individual, or that an adult’s portion may be consumed by a small child.

3.3 Pressure to Purchase

Marketing communications for food and beverage products primarily addressed to children must be prepared with a due sense of responsibility:

- (a) They should not imply that children are likely to be ridiculed, inferior to others, less popular, disloyal or have let someone down if they or their family do not use the advertised product.
- (b) They should not urge children to buy the food or beverage product, or persuade others to buy the products for them, via “high pressure” and “hard sell” techniques. Words or the tone adopted in the advertisement should not cajole, pressure or bully children or their parents into buying the food or beverage product.
- (c) They should not encourage children to make a nuisance of themselves to parents, caregivers or others.
- (d) They should not feature prices with words such as “only” or “just”, which implies a level of affordability that may not be true.

3.4 Promotional Offers

Marketing communications of food and beverage products addressed primarily to children and that feature promotional offers must be prepared with a due sense of responsibility:

- (a) They should not create an undue sense of urgency in children or encourage the purchase of excessive quantities for irresponsible consumption.
- (b) They should ensure that the product is significantly featured and should not encourage children to eat or drink a product only to take advantage of a promotional offer. The product should be offered on its merits, and the offer should serve only as an added incentive.
- (c) Premiums
 - (i) Marketing communications for collection-based promotions or premiums must not urge children or their parents to buy excessive quantities of the product. They should not directly encourage children only to collect the premiums, or unduly emphasise the number of items to be collected. The closing dates for premiums should enable the whole set to be collected without having to buy excessive or irresponsible quantities of the product within a short timeframe. Children should not be urged to buy the product in a hurry.
 - (ii) Marketing communications for premiums should not give children a false impression about the nature or content of the product.
 - (iii) Marketing communications for premiums should not give children a false impression that the premium, and not the product, is the item being advertised.
 - (iv) Marketing communications for premiums must clearly state the terms and conditions, as well as limitations.
 - (v) Marketing communications for premiums should not encourage children to consume the product in excess in a bid to obtain the premium.

3.5 Popular Personalities

- (a) “Brand equity characters” are characters that have been created by the advertiser and have no separate identity outside their associated product or brand. For the purpose of this Advisory, such brand equity characters are not included in the definition of Popular Personalities.
- (b) Marketing communications for food or beverage products primarily addressed to children must be prepared with a due sense of responsibility:
 - (i) They must not use popular personalities or celebrities (live or animated) primarily popular among children in advertisements and marketing communications to promote or endorse the product, or premium, in such a manner as to extol the virtue of the advertised product or undermine a healthy diet.
 - (ii) They must not suggest that consumption of the product would enable children to resemble an admired figure or role-model. They must also not suggest that the non-consumption of the product would imply that the children are not being loyal to the figure or role-model they admire.
 - (iii) Popular personalities or celebrities (live or animated) well known to children may present factual and relevant statements about nutrition and health.

- (iv) Popular personalities or celebrities (live or animated) that are primarily popular among children should not be used to endorse food and beverage products that do not meet the Common Nutrition Criteria endorsed by HPB.

The Common Nutrition Criteria

The Common Nutrition Criteria adopt a category-based approach, with thresholds established for key nutrients for the different categories. The Criteria cover 10 defined categories of products. For each category, the Common Nutrition Criteria are based on a set of “nutrients to limit” and “components to encourage” (nutrients and food groups).

The “nutrients to limit” – sodium, saturated fat and total sugars; as well as energy limit – are chosen as consumption in excess of recommendations is generally not encouraged. As for the “components to encourage”, the choice was made on a category basis, that is pinpointing those positive components most relevant in each category (e.g. fibre and wholegrain in cereal-based products, etc.).

In order to be eligible for advertising to children aged 12 years and below, a product will need to meet the criteria for both “nutrients to limit” and “components to encourage” – i.e. a product will need to be below the thresholds for “nutrients to limit” and under the calorie limit for its category. It also needs to contain the required quantity of “components to encourage” under that category.

Product Categories Under the Common Nutrition Criteria

S/N	Category
1.	Vegetable oils, butter and spreadable fats & emulsion-based sauces
2.	Fruits, vegetables and seeds and their products except oil
3.	Meat based products
4.	Fishery products
5.	Dairy products
6.	Cereal based products
7.	Soups, composite dishes, main courses and filled sandwiches
8.	Meals
9.	Edible ices
10.	Beverages