

Helse- og omsorgsdepartementet høring forslag til ny regulering av markedsføring rettet mot barn og unge av usunn mat og drikke.

Response from IASO

About IASO

The International Association for the Study of Obesity (IASO) is a not-for-profit organisation linking over 50 regional and national associations with over 10,000 professional members in scientific, medical and research organisations. It is an umbrella organisation for 53 national obesity associations, representing 56 countries, along with a policy analysis body, the International Obesity TaskForce (IOTF). The headquarters are in London, UK.

IASO is officially recognised as a non-governmental organisation by the WHO. Our mission statement is "To improve global health by promoting the understanding of obesity and weight-related diseases through scientific research and dialogue, whilst encouraging the development of effective policies for their prevention and management."

For further information see www.iaso.org and www.iotf.org

Comments on the proposed Regulations

IASO welcomes the opportunity to contribute to this consultation exercise on the proposed regulations to restrict the marketing of foods and beverages to children.

1. We support the proposed objectives and encourage the Government of Norway to implement all the proposals in full. These proposals represent a comprehensive approach to the protection of children from inducements to consume unhealthy products. The proposed regulations are consistent with the recommendations of the World Health Organization and demonstrate Norway's continuing support for the World Health Organization's processes developing and following these recommendations. Norway has provided a strong lead to the rest of the world in this respect, and the proposed regulations will provide a 'good practice' model for other member states' actions.
2. We support the age limit of 18 years in the regulations. This protects all children, consistent with the UN Convention on the Rights of the Child. It avoids the false debate about children's awareness of the intention of advertising at younger ages and focusses correctly on the effects of exposure. We suggest that a higher age limit might be considered for the actors in advertisements (e.g. include a regulation that advertisements must not include actors under age 25y).

3. We support the wide range of media being included in the proposed regulations.

We anticipate that children will be increasingly exposed to digital communications and social media and less to the traditional media, and this needs to be included in the proposed regulations.

4. We support the wide range of foods included in the proposed regulations.

However, we urge the Government of Norway to consider changing the criteria for **breakfast cereals**. In our comparison of the Norwegian proposals with other government-approved proposals, we find that the Norwegian proposals allow relatively high levels of sugar in products which can be advertised. We suggest that a level of **15 grams sugar per 100 grams of dry cereal** is reasonable, and this is the level accepted by cereal manufacturers in the Forum for Responsible Food Marketing Communication to Children (www.kodeksforfoedevarereklamer.dk) which has been operating successfully in Denmark since 2008. Our comparison of the different nutrient profiling models is attached below.

We support the proposals to ban the advertising to children of foods containing **artificial sweeteners** along with the other foods proposed. Foods with artificial sweeteners usually use similar brand names, images and logos to sugar-sweetened varieties, and the advertising of one product in the range causes a halo effect which effectively promotes all the products in the brand range. In addition, the use of artificial sweeteners should be subjected to precautionary principles on the grounds that we do not know enough about their effects on dietary and metabolic behaviour in growing children, or enough about their effects on appetite and energy balance in general (1).

We look forward with enthusiasm to the development of the proposed regulations.

Yours sincerely

A handwritten signature in black ink, appearing to read "Tim Lobstein".

Dr Tim Lobstein
Director of Policy and Programmes

1. Conclusions of an expert meeting: "Low-Calorie Sweeteners, Appetite and Weight Control: What the Science Tells Us," held April 7–8, 2011, Washington, DC. See <http://jn.nutrition.org/content/142/6/1170S.long>

Table 3 (below) gives examples of foods attractive to children rated according to the manufacturer's own nutritional criteria, compared with their rating under several government-approved categorisation systems: the UK Ofcom regulations for TV marketing to children,¹ the Nordic Keyhole scheme for defining healthier food products,² the proposed US Inter-Agency Working Group scheme for voluntary restrictions on marketing to children,³ the Danish industry Forum Code (RFMC) and Norway's 2012 proposals for marketing restrictions.⁴ The food listed were either (i) promoted during children's television in a 2006 survey, or (ii) considered child-attractive and sold in supermarkets in spring 2012.

Table 3: Product comparisons of criteria allowing marketing

No.	Company and product	Company criteria	UK Ofcom criteria	Keyhole criteria	IWG	Forum of RFMC	Norwegian proposals
	Ferrero						
1	Kinder Hippo	Yes ⁵	No	No	No	No	No
2	Kinder Surprise	Yes ⁵	No	No	No	No	No
	Intersnacks						
3	Pom-Bear snack	Yes	No	No	No	No	No
	General Mills⁶						
4	Yoplait Filous Frubes	Yes	Yes	No	No	No	No
5	Petit Filous Fromage Frais big pots	Yes	Yes	No	No	No	No
6	Wildlife Big Pots Fromage Frais	Yes	Yes	No	No	No	No

¹ UK Office of Communications (Ofcom) 2007. See http://stakeholders.ofcom.org.uk/consultations/foodads_new/statement/ and see <http://collections.europarchive.org/tna/20100927130941/http://food.gov.uk/healthiereating/advertisingtochildren/nutlab/nutprofmod>

² Developed by the Swedish National Food Administration to define healthier food products, and now used in Sweden, Norway and Denmark. See <http://www.slv.se/en-gb/Group1/Food-and-Nutrition/Keyhole-symbol/> and see <http://www.norden.org/en/news-and-events/news/first-anniversary-nordic-consumers-want-more-keyhole-food>

³ Federal Trades Commission (2011) Interagency Working Group Seeks Input on Proposed Voluntary Principles for Marketing Food to Children. See <http://www.ftc.gov/opa/2011/04/foodmarket.shtm>

⁴ See <http://www.regjeringen.no/en/dep/hod/documents/hoeringer/hoeringsdok/2012/horing---forslag-til-ny-regulering-av-ma/horingsnotat.html?id=684711>

⁵ Based on Fererro's nutrition criteria for energy content.

⁶ Yoplait in Europe is distributed by Yoplait France, a subsidiary of General Mills.

No.	Company and product	Company criteria	UK Ofcom criteria	Keyhole criteria	IWG	Forum of RFMC	Norwegian proposals
7	Thomas & Friends Fromage Frais	Yes	Yes	No	No	No	No
	Kellogg's						
8	Cocopops Moons and Stars	Yes	No	No	Yes	No	No
9	Cocorocks	Yes	No	No	No	No	No
10	Cocopops	Yes	No	No	No	No	No
11	Fruit 'n' Fibre cereals	Yes	No	No	No	No	No
12	Frosties Cereal and Milk Bars	Yes	No	No	No	No	No
13	Kellogg's Mini Max	Yes	Yes	No	Yes	No	Yes
14	Rice Krispies Squares Chewy Marshmallow	Yes	No	No	No	No	No
15	Fruit Winders	Yes	No	No	No	No	Yes
16	Crunchy Nut	Yes	No	No	No	No	No
17	Squares (Rice Krispies Crazy Choc)	Yes	No	No	No	No	No
	Kraft Foods						
18	Dairylea Light spread	Yes	No	No	Yes	No	Yes
19	Kool-Aid	Yes	No	No	No	No	No
	Nestlé						
20	Nestle Coco Shreddies	Yes	No	No	No	No	No
21	Curiously Cinnamon	Yes	No	No	No	No	No
22	Golden Nuggets	Yes	No	No	No	No	No
23	Munch Bunch Squashums	Yes	Yes	No	No	No	No
24	Munch Bunch Drinky	Yes	No	No	No	No	No
25	Milky Bar small bars	Yes	No	No	No	No	No
26	Milky Bar Buttons	Yes	No	No	No	No	No
27	Mini Smarties	Yes	No	No	No	No	No
28	Milky Bar Buttons minis	Yes	No	No	No	No	No

No.	Company and product	Company criteria	UK Ofcom criteria	Keyhole criteria	IWG	Forum of RFMC	Norwegian proposals
29	Smarties Mini Cupcakes	Yes	No	No	No	No	No
30	Rowntrees Fruit Pastilles Lollies	Yes	No	No	No	No	No
	Unilever						
31	Wall's Milk Time Squeezy Tube	Yes	No	No	No	No	No
32	Funny Finger	Yes	No	No	No	No	No
33	X-Pop	Yes	No	No	No	No	No
34	Wall's Twister / Mini Twister	Yes	No	No	No	No	No