



CONSUMER COUNCIL OF FIJI

**A Submission on
Policy to Limit or Control the Marketing of
Unhealthy Foods to Children**

**to the Minister for Health
Dr Neil Sharma**

April 2011

1.0 Introduction

The Consumer Council of Fiji (Council) is an independent statutory body established under the Consumer Council of Fiji Act -1976 (Cap 235) and is the statutory representative of consumers in Fiji. The Council's role is that of a watchdog to create a fair and just delivery of goods and services. It represents and protects the rights and interests of consumers and in particular disadvantaged groups, (such as the poor, low-income earners, rural dwellers, children, women and people with disabilities) by identifying and articulating policy issues that are important to consumers. First and foremost the Council is an advocacy organisation, conducting rigorous research and analysing policy on key consumer issues. The Council's insight into consumers' needs is a powerful tool for influencing decision-makers to bring about change.

2.0 Consumer Council Focus Areas: Food Security

The Council recognizes that *food security* refers to the availability, accessibility and affordability of safe and healthy food, which is a basic right of all citizens. Non-communicable diseases (NCDs) were amongst the top ten causes of mortality in Fiji in 2007-2008.¹ Forty per cent of Pacific people suffer from NCDs² and the prevalence of diabetes mellitus in Fiji in 25-64 year-olds is 16%³, one of the highest rates in the Pacific. The Council, Ministry of Health (MoH) and other stakeholders attribute these alarming figures to cultural and/or dietary changes, with an increase in consumption of high-density and high-fat foods and a decrease in fruit, vegetables and carbohydrates. This dietary shift has been nurtured by marketing and advertising of unhealthy foods (fast foods; carbonated drinks) and associated lifestyles (eating out rather than at home). These unhealthy dietary preferences often develop early during childhood and shape adults' diets and therefore health profiles. The MoH has noted that an estimated 80% of diabetes and cardiovascular diseases could be prevented through healthy diet, regular physical activity and avoidance of tobacco use.⁴

In its 2010-2013 Strategic Plan, the Council recognises the *child consumer* as a core focus area.⁵ For the purpose of this submission the terms *child-consumers*, *child* and *children* are construed to mean persons 18 years of age and under. The Council noted that in the contemporary marketplace, businesses are increasingly targeting children as key customers. The advertising and marketing strategies of businesses and corporations have now become more *child-focused*. For example, children figure prominently as principal subjects in the Flour Mills of Fiji's (FMF) media advertisements of its Chow Noodles brand. FMF's use of children and child-focussed marketing of instant noodles is not an uncommon strategy amongst food companies and restaurants around the world. Such strategies are followed

¹ Fiji Island Bureau of Statistics, Key Statistics 2010, 2.18 Top Ten Causes of Mortality, 2007/2008.

² Fiji NCD STEPs survey Report 2002

³ Cited in Ministry of Health, Non-Communicable Diseases Prevention and Control, National Strategic Plan 2010-2014, MoH, p.24

⁴ Ministry of Health, Non-Communicable Diseases Prevention and Control, National Strategic Plan 2010-2014, p11.

⁵ Part 7.5 The Child Consumer, Consumer Council of Fiji Strategic Plan 2010-2013.

because food companies recognise that children are known to influence their parents' purchasing habits⁶ and that the media has a stronger impact on children rather than on adults. This argument is supported by evidence that food companies and fast food outlets have focussed a lot of their marketing attention on children and adolescents. University of the South Pacific researcher Jayantha S Wimalasiri noted that the "phenomenal growth of the youth market and its implications for marketing strategy has been the subject of investigation in recent times".⁷ The marketing of food to children has increasingly come under the scrutiny of governments, non-governmental organisations, health agencies, nutritionists and researchers. The world's leading food and beverage companies spend a considerable amount of money on marketing foods to children and adolescents; major US-based food companies constituted the top television advertisers in programs or time segments where 30% or more of the audience was between the ages of 2 and 17.⁹ The United States Federal Trade Commission reported that fast food restaurants spent more than \$660 million each year marketing their products to children and adolescents.⁸ In the U.S, McDonald's and Burger King increased their volume of TV advertising from 2007 to 2009. The same study confirmed that preschoolers viewed 21% more ads for McDonalds and 9% more for Burger King, and children viewed 26% more ads for McDonalds and 10% more for Burger King.⁹ It should be noted that many of these US-based food companies have franchises and products in Fiji (e.g. McDonalds, KFC, Pepsi and Coca Cola), so this evidence has high relevance for the health of Fiji children.

3.0 Objectives

To protect child-consumers in Fiji, the Council has pledged to address the following:

- Protect children from being used in advertising and marketing of products;
- Protect children from marketing and promotion of unhealthy foods in school canteens, sporting events and via other media;
- Lobby the Fiji Government to adopt the WHO International Code on Marketing of Food to Children; and
- Lobby the Fiji Government to develop and establish a policy relating to advertising standards in Fiji.
 - Advocate for a new standalone policy and legislation to cover marketing of unhealthy foods to children of all ages.
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The Council's pledge to protect child-consumers is a preamble of this submission. The submission seeks to support the Ministry of Health's intention to limit or control the marketing of unhealthy foods (and associated lifestyles) to children. The submission generally supports any initiatives or actions taken to develop and establish measures to reduce or ban the marketing of unhealthy food (junk food) and drink to children.

⁶ Wimalasiri J. S (2004) A cross-national study on children's purchasing behavior and parental response in *Journal of Consumer Marketing*, Volume 21 (4). pp. 274-284.

⁷ Wimalasiri J.S (2004) p.274

⁸ Federal Trade Commission [FTC] (2008). Marketing Food to Children and Adolescents. A Review of Industry Expenditures, Activities, and Self-Regulation. Cited in Yale Rudd Centre (2010) *Fast Food FACTS: Evaluating Fast Food Nutrition and Marketing to Youth*, Rudd Centre for Food Policy and Obesity.

⁹ Yale Rudd Centre (2010) *Fast Food FACTS: Evaluating Fast Food Nutrition and Marketing to Youth*, Rudd Centre for Food Policy and Obesity, p ix.

4.0 Current Nutrition Policies for Children

National nutrition policies or initiatives to address the nutritional needs of children in Fiji are focussed primarily in the formal school or education setting.

4.1 National and Nutrition Policy for Schools National Food and Nutrition Policy for Schools

Current initiatives to address behavioural changes amongst children and adolescents are restricted to education, advocacy and awareness activities by the Ministries of Education and Health, National Food & Nutrition Centre (NFNC), Consumer Council of Fiji, community groups and other stakeholders. There are no effective national policies to address the marketing of unhealthy foods and beverages (unhealthy food) to children, with the exception of the regulation on marketing controls on foods for infants and young children (See Part 4.3). The only national policy to reduce children's access to unhealthy foods is the form of the 2009 *National Food & Nutrition Policy for Schools* which provides guidelines regarding the sale and provision of food in boarding schools and school canteens. The policy also focuses on the school curriculum whereby "All levels of education in schools (early childhood through to secondary schools) must include nutrition in their curriculum. All schools must have some elements of nutrition education in their subjects."¹⁰

4.2 School Canteen Guidelines

The *School Canteen Guidelines* (NFNC 2005) provides guidelines for school canteens relating to food preparation, as well as suggestions nutritional meals and snacks and displays of healthy and nutritious foods. The guidelines also discourage the sale of junk foods/snacks by creating awareness of health through participation in health education, talks, discussions and in various health events.¹¹ There is however no mention of limiting or banning the sale or promotion of junk foods in canteens.

4.3 Marketing Controls on Foods for Infants and Young Children

Policies on child nutrition are currently confined to the formal school system except for the *Marketing Controls (Foods for Infants and Young Children) Regulations 2010*. However, this is not a standalone regulation, but a subsidiary legislation under the Food Safety Act 2003 which comes under the jurisdiction of the Central Board of Health/Food Unit. This regulation is aligned with the 1981 *WHO/UNICEF International Code of Marketing of Breastmilk Substitutes* (WHO/UNICEF Code) which Fiji is part of. This Code governs the way in which breast-milk substitutes should be marketed. These regulations established by the Ministry of Health are contributing to the provision of safe and adequate nutrition for infants and young children in Fiji by the protection and promotion of breastfeeding, and the appropriate use of

¹⁰ Part 2.3.4 *National Food and Nutrition Policy for Schools*

¹¹ NFNC, 2008 *School Canteen Guidelines*, Part 5 'Selling Products in Canteens'

breast milk substitutes, other commercially produced baby foods, feeding bottles and teats (designated products) when these are necessary. The regulations will “...regulate the marketing practices of baby food companies so that breastfeeding has a chance to thrive in Fiji, and empower women to make informed decisions on infant and young child feeding free from commercial pressures.”¹² The regulations render illegal activities which promote commercial baby foods and related products. The Council supports the *Marketing Controls (Foods for Infants and Young Children) Regulations 2010*. This regulation only targets parents and relates to the purchase of infant foods. So the Council advocates for a new standalone policy and legislation to cover marketing of unhealthy foods to children of all ages.

5.0 Food Advertising Impact on Children’s Eating Habits

The media is one agent that impacts on children’s current and future behaviours. Apart from parents, peers, teachers, schools and other important actors/agents in a child’s life, social scientists generally agree that the media is a key agent in the development of children’s values and behaviours. Worldwide the media has developed to become a powerful source of government, educational and commercial information. In Fiji, the media has become not only a principal source of social and public information, but a leading conveyor of commercial and product information. Media outlets in the country have become reliant on the advertising dollar rather than circulation or audience numbers to be sustainable. Up until 1986, Fiji radio was state-run under the Fiji Broadcasting Commission and there were only two commercial newspapers, therefore commercial advertising was limited. However more commercial advertising began to enter the scene after the opening of commercial radio stations in 1986.¹³ With the advent of free-to-air television in 1994 and the recent increase in billboard advertising, Fiji citizens are being exposed to an increasing number of advertisements and other commercial information. Studies overseas have demonstrated the strong link between young children’s exposure to TV advertising and their food preferences. A psychological study reported that “exposure to the food adverts increased the child’s attempts to influence the parent’s purchases, particularly towards choosing the food items which have been advertised.”¹⁴ An earlier Canadian survey concluded that children’s beverage and snack food choices were significantly affected by exposure to televised food messages over a two-week period.¹⁵ Consumers International found that, in 2009, major food companies like KFC, McDonalds spread their marketing strategies to the internet, taking advantage of the phenomenal rise in internet use by youths and young children.¹⁶ In Fiji, the recent study commissioned by the Pacific Research Centre for the Prevention of Obesity and Non-

¹² Cabinet Release 2/2/10 ‘Cabinet approves promulgation of the marketing controls’, Ministry of Information [www.fiji.gov.fj/index.php?option=com_content&view=article&id=968:2210-cabinet-approves-promulgation-of-the-marketing-controls-&catid=49:cabinet-releases&Itemid=166 Accessed 20/11/2010]

¹³ Fiji’s first commercially-run radio station, FM96 began broadcasting on 5th July 1985. See www.cfl.com.fj/history.php

¹⁴ Halford CG Jason, et al, ‘Effect of television advertisement for foods on food consumption in children’ in *Appetite* 42 (2004), Elsevier.

¹⁵ Gorn J Gerald, Goldberg E Marvin ‘Behavioural Evidence of the Effects of Televised Food Messages on Children’ in *The Journal of Consumer Research*, Vol.9, No.2, September 1982, pp.200-205, The University of Chicago Press.

¹⁶ CI (2009) *New Media, Same Old Tricks*, Consumers International, London

http://www.consumersinternational.org/media/540298/new_media_same_old_tricks.pdf

Communicable Diseases (C-POND) found that children and adolescents in Fiji are “heavily exposed to ‘junk food’ advertisements and promotions”.¹⁷ The study, which surveyed 88 primary and 103 secondary school students, found that respondents took notice of junk food advertisements and reported that “they were affected by them in terms of their food preferences and nutrition knowledge”. The C-POND survey found children and adolescents “heavily exposed” to unhealthy food advertisements especially on television and the participants in the study had “high recall of advertisements”. A 2007 *Island Business* health report ‘Noodles War: Who are the casualties?’ critiqued an advertisement on Nestle’s Maggi noodles that had been promoted heavily on Fiji television.¹⁵ This advertisement showed a boy and his partner queuing to enter what looked like a nightclub. The commercial says “this isn’t a nightclub, but kids can apply to join the ‘kids club’ where they can win kids’ stuff, like fancy watches, wallets, MPs and the latest sunglasses.” Children who wanted membership needed to purchase Maggi Noodles. Currently, the most frequent televised food advertisement in Fiji features children marketing instant noodles which have become a popular snack amongst children.

6.0 Marketing of Unhealthy Foods to School Children – Role of School Canteens

6.1 Role of school canteens

While school canteens play an important role in providing food and beverages within the school environment, they can also be a source of unhealthy foods. The OPIC Fiji Country Report 2004-2009 found that while 89% of adolescent students consumed lunch brought from home, 30% of students consumed soft drinks in schools.¹⁸ Canteens have been targeted by nutritionists, health workers, and the Ministries of Education and Health in order to improve the healthiness of food and beverages sold in schools. Despite the existence of the *National Food & Nutrition Policy for Schools* and *School Canteen Guidelines* (2005), school canteens continue to sell unhealthy foods and snacks.

The canteen guidelines do not appear to have stemmed the trend of junk food sales and marketing in school canteens since they were introduced in 2005. Consumer Council of Fiji marked World Consumer Rights Day on March 15th 2009 with the theme ‘Say No to Junk Food: Making Parents Responsible in Fiji’ which, apart from other initiatives, involved highlighting the role of school canteens in the marketing and sale of unhealthy foods. The Council produced a DVD to mark the occasion and to publicise what was happening in a sample of school canteens in the Central/Eastern Division. The Council found that many of the canteens sampled were selling unhealthy foods. Additionally some schools even sold unhealthy snacks that did not comply with labelling regulations.¹⁹ In a brief survey, the Council found that there were often two types of canteens operating in schools – one run by the Parents and Teachers Association (PTA) and the other run by either the school

¹⁷ Hope Silvia (2010) ‘Junk Food’ Advertising to Children and Adolescents in Fiji’, C-POND/Fiji National University

¹⁸ Fiji School of Medicine & Deakin University (2010) Pacific Obesity Prevention in Communities Project Fiji Country Report.

¹⁹ Kumar, P. (2008) Junk Food Generation: Marketing of Unhealthy Food to Children. Consumer Council of Fiji. Viewed 1st April, 2010. Available at:http://consumersfiji.org/index.php?option=com_content&task=view&id=42&Itemid=2Consumer

management or a contracted caterer (non-PTA). The PTA-managed canteens were found to provide healthier lunches, snacks and drinks compared to the non-PTA canteens. This reflects some level of parental and teacher responsibility over foods sold to school children. The survey also found that some canteens were selling unhealthy foods that had been directly marketed to them by suppliers. This was evident in the case of carbonated fizzy drinks. A common practice amongst school canteens is to prominently display sweets and other unhealthy snacks in the canteen and to encourage/attract purchases. The majority of schools sold carbonated drinks, while only a few sold freshly mixed fruit juices as an option.



Junk food marketed and sold in school canteens in 2009. **Left:** Primary school kids wait to be served. Bottles of sweets being displayed prominently on the canteen counter. **Right:** Note the special "SCHOOL PRICE" displayed on Coca Cola products. Such displays and placement of junk food and posters influence children when they go to the canteen.

School canteens no doubt play a crucial role in not only selling junk foods, but marketing these through strategic placement of posters and of unhealthy foods to entice students. An appropriate measure would be to restrict such displays by substituting the unhealthy foods and marketing material with healthy foods and posters that both promote good nutrition and are displayed in an attractive and enticing manner.

6.2 Compliance with the 2009 National Food and Nutrition Policy for Schools

The Council conducted an exploratory survey of four prominent schools in the Suva area to gauge the level of conformity to the Food & Nutrition Policy for Schools²⁰ four months after the launch of the policy and at the beginning of the new academic year. The survey also made observations outside one school where food vendors normally sold their products to students. The team found that unhealthy or junk foods were still being displayed prominently in school canteens and sold to students. There were also instances where food was prepared and sold in unhygienic conditions (e.g., being left exposed). One of the apparent weaknesses of the National Food and Nutrition Policy for Schools is the lack of appropriate enforcement in the guidelines provided by the Ministry of Education. The policy is simply a guideline which schools are encouraged to follow in order to create an enabling environment for healthy food choices. The following appear to be the weaknesses in the 2009 policy:

²⁰ This brief survey was included in Council's regular market surveillance work on January 28, 2010.

- While the Nutrition Policy for Schools encourages nutritious foods and drinks in school premises, it does not specifically ban or limit the sale and marketing of unhealthy food and drinks.
- The current policy is confined to the school premises. It does not cover the immediate vicinity of the school premises such as bus stops, footpaths etc, where street vendors often sell unhealthy snacks. It would be better if the Ministry of Education worked with municipal councils or local authorities in extending the so-called enabling environment to the immediate vicinity of the schools, namely public footpaths, bus stops, shops and other public areas around the school boundaries.
- The policy does not make any linkages with current food safety laws such as the Food Safety Act 2003 and Food Safety Regulations 2010. Although the Nutrition Policy for Schools was established in 2009, it is pre-dated by the Food Safety Act which has some very important provisions, including food safety, labelling and food preparation.
- The policy does not have any provisions for checks or audits on schools to gauge compliance.
- There are no specific references to the role of the Ministry of Education in terms of enforcing the guidelines or providing a system of penalties for non-compliant schools and rewards for schools who comply. Penalties could be applied to schools for not adhering to the guidelines and rewards should be provided to those schools that make an effort to expand healthy food choices and remove unhealthy foods from canteens.



Pictures taken at schools on January 28, 2010. Despite the National Food & Nutrition Policy for Schools that promoted and encouraged healthy food choices, junk food were still being sold and marketed to children in school canteens.

6.3 Marketing of Unhealthy Foods Outside the School

It is important to note that children are more exposed to marketing of unhealthy food outside the school than within the school premises. When children travel between school and home, there is less teacher and parental control. On non-school days, marketing of food and advertisements in many forms exposed the children to unhealthy foods. As discussed in Section 5.0, advertising of unhealthy foods affects children's purchasing decisions and eating habits. Children are just as vulnerable to unhealthy food marketing outside school as within the school compound. Advertising of unhealthy food is not limited to television; a total of 56 street advertisements for 'junk food' were found along a 1.4 kilometre central areas in Suva

(Victoria Parade and Scott Street). These advertisements consisted of 12 sponsored store signs, 33 posters, 5 billboards and 6 “sponsored other”. Lunch is the only one of the three meals consumed at school during school days, while breakfast and dinner are usually served at the home (except for boarding schools). Outside the school the burden of teaching and practising healthy nutrition falls on parents and guardians. It is important therefore not to overlook the fact that a large proportion of marketing, sales and consumption of unhealthy foods occurs outside the school environment. The school system and the nutrition policy, weak as it may currently be on addressing junk foods, provides at least some measure of moderation as compared to outside the school.

6.3.1 Fast Food Marketing and

Children in Fiji are now more exposed to junk foods and unhealthy eating habits with the introduction of international fast foods chains (e.g. McDonalds (3 branches); KFC (2); Chicken Express; Wishbone). Even conventional restaurants are mimicking the kinds of foods marketed and sold by these companies, providing food items such as deep-fried chips, fish and chicken as special menus for children. The marketing and sale of fast food has been a key target area for health workers and nutritionists globally and in Fiji, all of whom agree that ready accessibility to fast food impacts negatively on public health. The fast food companies are global in nature and spend millions of dollars to promote their products, particularly to children.

Fast food companies’ global advertising spend in 2007²¹

Fast food company	Estimated advertising spend
McDonald’s	\$1740 million
Yum brands ²²	\$1238 million
Burger King Holdings	\$356 million

6.3.2 Consumers International 2009 survey on fast food outlets

The Consumer Council of Fiji in 2009 participated in a Consumers International (CI) survey of the international fast food chains.²³ The survey covered McDonald’s, Burger King and KFC in 14 countries. The Fiji Council surveyed McDonald’s and KFC, who provided information on calories, fat, sugar and salt.

The 14-country survey found that fast food outlets were still marketing meals with high levels of fat, sugar and salt to children. Also, it was found that children’s meals were still found to contain more than 50% of a child’s Guideline Daily Amount²⁴ (GDA) of fat, sugar and salt,

²¹ Adapted from CI 2009 report, *Fried and Test: An examination of the marketing of fast food to children*.

²² Yum brands is the parent company for KFC, Pizza Hut, Tacco Bell and other outlets. The advertising spend is the parent company’s advertising budget.

²³ Consumers International (2009) *Fried and Test: An examination of the marketing of fast food to children*, CI, London. Report is part of ‘Junk Food Generation’ – the Consumers International campaign to stop the marketing of unhealthy food to children www.junkfoodgeneration.org

²⁴ GDAs are international guidelines for health adults and children about the approximate amount of calories, fat saturated fat, carbohydrate and salt required for a healthy diet.

despite reformulation of their products to reduce levels of fat, sugar and salt and offering of 'healthier' alternatives in some outlets several fast food. The survey found that marketing by fast food companies targeted two age groups; children aged 10 years and under, and teenagers.

The fast food chains' marketing of children's meals in Fiji included free toys, cartoons and birthday party services that could appeal to children under the age of 12 years. All of the chains included high sugar carbonated drinks in the children's meals that they marketed to children, despite the fact that Coca Cola and Pepsi have policies that prohibit the use of children under the age of 12 when marketing their products. Coca Cola and Pepsi products are normally sold as part of a meal at McDonalds and KFC restaurants respectively, and they are also sold as separate items in other fast food outlets. The Fiji survey found McDonalds to be involved heavily in marketing their meals to children. Apart from special kids' packaging and free toys, the fast-food outlet has special catering services for children's birthdays. One McDonald's outlet has a special birthday room and a large play centre for children. Parents appear to find the birthday services at McDonald's more convenient and less laborious than a traditional home birthday party. Marketing targeted at teenage children often promoted items from the adult menu that in many cases contain higher levels of fat, sugar and salt than the children's options. While the National Food & Nutrition Policy for Schools has been legislated, the luring impact of unhealthy food advertising *outside* the school system is a matter of concern for the Consumer Council, as well as the Government of Fiji which aims to support health for all citizens.



Left: A Happy meal ... The Fiji survey found that McDonald's and KFC focussed much of their marketing on children.
Bottom: The kids' play area at McDonald's restaurant at Laucala Bay.



6.4 The use of Children when Advertising Unhealthy Foods in Fiji

Consumers in Fiji have been beset by a surge in television advertisements and the recent phenomena of billboard advertising. Many advertisements on food feature children and most/all of the foods marketed are unhealthy. For example, FMF Chow Noodles has become a favourite amongst children. The yellow colourful packaging is attractive and the product has the appearance of a snack. Children feature prominently either as principal subjects or extras in television commercials on food. Some of the prominent commercials featuring children are: FMF Chow Noodles, Kremo biscuits, and Maggi Noodles.



Picture from a TV commercial on a cream biscuit featuring a young boy. The boy is shown loading up his father's shopping trolley with the biscuit and the father is surprised at the amount of biscuits piled up in the trolley when he reaches the checkout counter. In this part of the commercial, the boy is munching the biscuits as if he is hungry and in the background are shelves of cream biscuits.

6.5 Street Vendors

Street vendors also play an important role in nurturing bad eating habits amongst school children. These vendors often sit near the school gates, targeting children as they arrive for and leave school. Some vendors operate in bus stops, on footpaths or places where school children normally converge. The vendors cater for children's fondness for sweets, salty snacks and fizzy drinks, as well as affordability; prices of sweets and snacks are quite affordable for many children ranging from 5 to 50 cents. The OPIC baseline survey showed that over 50% of secondary school students surveyed were spending \$1-\$4 on snack food each day, and that 25% of students bought after-school snacks from shops every day.²⁵ Street vendors often operate without proper facilities and the foods that they sell are often exposed to flies, dust and fumes from passing vehicles. Apart from the nutrition issue, children are at high risk of consuming contaminated foods purchased from street vendors. The Council has often raised the issue of street vendors failing to comply with the Food Safety Regulations and municipal by-laws. However, these vendors are also an important part of the local economy; vendors are mostly women and this activity is often their only source of income. Bringing the vendors into the mainstream through licensing and requiring them to sell healthy snacks and fruits could be a policy option that sustains this important income source while providing children with healthy options.



Left: School children crowd around a vendor after school (2009). **Right:** A street vendor with her products waits for children on the footpath next to a prominent school (2010)

²⁵ Fiji School of Medicine & Deakin University (2010) Pacific Obesity Prevention in Communities Project Fiji Country Report.

7.0 Impact of Unhealthy Foods on Children's Health

Surveys by the Ministry of Health and National Food & Nutrition Centre (NFNC) have consistently shown that the number of obese or overweight children continues to grow. A 2004 NFNC survey found that 14.5% of all children were categorised as obese. The number of overweight children under the age of 18 years had tripled compared to a similar survey in 1993. Furthermore, overweight and obesity rates continue to increase rapidly in Fiji and the trend for children is worrying.²⁶ The high consumption of high-energy unhealthy food and drinks is a major contributor to overweight and obesity. The OPIC study demonstrated that secondary students in Suva had \$1-\$4 to spend each day and that 25% students purchased food on the way to school or on their way home.

8.0 Conclusions

The high consumption of high-energy unhealthy food and drinks is a major contributor to overweight and obesity. There is sound evidence that marketing of unhealthy foods to children influences their food choices and contributes to unhealthy weight gain and unhealthy dietary patterns that continue into adulthood. As part of a comprehensive approach to slow the epidemic of overweight and obesity in children that could potentially lead to NCDs later in life, the Consumer Council of Fiji urges the Ministry of Health and other authorities to take urgent action by enacting a policy that reduces the exposure of children to unhealthy food advertising. The Council recommends that the policy should either limit or ban the marketing of unhealthy food to children. While efforts have been made to address, but not monitor, unhealthy foods in the school environment (e.g. canteens), this is ineffective because there are no provisions for monitoring compliance. There is a considerable gap in policies to prevent marketing and sale of unhealthy foods to children outside the school system. The high exposure of children and adolescents to sales and marketing of unhealthy foods outside the school and in the media shows the need for policy intervention. It is important that action is taken now as the high prevalence of obesity and overweight in the current generation of children will add to the high prevalence of non-communicable diseases (NCDs) that were once a problem for adults and are already starting to occur in childhood. Non-communicable diseases will increase unless the high consumption of unhealthy foods is effectively limited by national strategies. The cost of public and private health care will undoubtedly increase with the rise in the prevalence of NCDs in the coming years if we do not stop the growth of a junk food generation. Fiji is yet to create standards and regulations to control the marketing of unhealthy food to children. The Council supports Consumers International's (CI) recommendations that an international code on the marketing of food to children be implemented by national governments. The CI recommendations target the marketing of nutrient-poor foods that are high in fat, sugar and salt to children up to 16 years old. A failure to act will continue to compromise the rights and health of children and will also result in increasing serious health impacts which will have a ripple effect through our families, communities and workforce.

²⁶ Utter, J et al, (2008) *Lifestyle and Obesity in South Pacific: Baseline results from the Pacific Obesity Prevention in Communities Project in NZ, Fiji, Tonga and Australia*, University of Auckland, Auckland.

9.0 Recommendations

On the basis of the discussions and evidence presented here, the Council recommends the following for consideration by the Ministry of Health. The Council understands that these recommendations would be subjected to a consultative process with all stakeholders.

- The Ministry of Health introduce new regulations under the Food Safety Act that would control or limit the marketing of unhealthy foods and drinks to children and youths under the age of 18 years of age.
- The National Food and Nutrition Policy for Schools (2009) be strengthened further by the Ministry of Education, especially in its enforcement, monitoring and feedback. Schools be required to comply with the policy just as they abide by other mainstream policies and rules set by the Ministry of Education.
- The National Food and Nutrition Policy should include alignment to the Food Safety Regulations 2009. Specifically school canteens should abide by the regulations. Aspects of food safety under the regulations should be incorporated into the nutrition subjects or curriculum.
- Fiji adopts advertising standards that protect children from being used or targeted in the marketing of food products or any other protects that are harmful to their long-term health.
- The Ministry of Health together with other relevant agencies push for a review of media laws such as the Media Development Decree to include provisions for the banning or limiting of the advertising of unhealthy foods to children.
- The Ministry of Health (or relevant authority) to consider Consumers International's recommendations that: promotion of unhealthy food be banned in schools; no inclusion of free gifts, toys or collectables which appeal to children to promote unhealthy foods; and ban the use of celebrities, cartoon characters, competitions or free gifts to market unhealthy foods
- Street vendors be properly licensed and be made accountable under the Food Safety Regulations. Street vendors be properly educated on the need to provide healthy food choices rather than sell or market junk foods to school children.
- Control or establish limits on sale, marketing and promotion of unhealthy food extend to the vicinity of school premises. The "vicinity" should be defined as the immediate area surrounding the school and the specific distance should be well defined.
- Control or establish a limit on sale, marketing and promotion of unhealthy food extends to school-organised events outside the school premises.

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