

# Policy brief: Healthy food and drink advertising on Western Australian Government property

## KEY MESSAGES.

- Supporting Western Australians to eat well is a priority for the Western Australian (WA) Government to achieve its vision for all Western Australians to experience the best possible health, wellbeing, and quality of life.
- The marketing of unhealthy food and drinks is pervasive, powerful and having a detrimental impact on diet quality. This is undermining families' efforts to eat well, as well as undermining the government's own health promoting campaigns and programs.
- Creating standards for the types of food and drinks that are appropriate for advertising on WA Government owned and managed property is a strong and effective lever the government can take to improve population diets and halt the rise in adults and children living with overweight and obesity.
- International evaluations and WA modelling show government policies to restrict unhealthy food and drink marketing from its own property is cost-effective, negligible to government revenue, delivers improved diet quality, positive health outcomes and significant cost-savings to the health system.

## Poor diets and living with overweight and obesity are major public health issues in WA

- Living with overweight or obesity and poor diets are the greatest risk factors for death and disease in Australia second only to tobacco use<sup>1</sup>.
- Illness from overweight and obesity cost WA hospitals \$338.7 million in 2016, and it is estimated that this will rise by 80 per cent to \$610.1 million in 2026 if increases in overweight and obesity continue<sup>2</sup>.
- Prevention is a key pillar to a sustainable health system. The Final Report of the WA Sustainable Health Review recommends a strong commitment to address major public health issues with an ambitious goal to halt the rise in obesity by July 2024, and to have the greatest percentage of the population with a healthy weight of all Australian States and Territories by 2029<sup>3</sup>.

## Children and families are bombarded with advertising for unhealthy food and drinks

- There is strong evidence that the unhealthy food and drink marketing children are exposed to alters their food preferences, choice, purchases, and intake with a detrimental impact on diet quality<sup>4</sup>.
- The current food environment with pervasive marketing and availability of unhealthy food and drinks is the greatest driver of overweight and obesity<sup>5</sup>.
- Children deserve the right to go about their lives without being targeted by the processed food and advertising industry<sup>5</sup>. Instead, every part of their lives including catching a bus to school and participating in sport means exposure to unhealthy food and drink marketing.
- A 2020 audit conducted within 500m of Perth schools found 74 per cent of outdoor food advertising was for unhealthy food, with alcohol, fast food and sugary drinks the three most frequently advertised products<sup>6</sup>.
- This study also found food advertisements within 250m of schools were more frequent and were more likely to be for unhealthy food and alcoholic drinks in disadvantaged areas<sup>6</sup>.
- Perth secondary schools have an average of three unhealthy food outlets within 400m<sup>7</sup>.

## Government property is being used to advertise unhealthy food and drinks

- Outdoor advertising is highly visible, can't be avoided or turned off and predominantly on government property, with 60 per cent of all outdoor assets in Australia on government property<sup>8</sup>.

- A Perth audit of school buses and train stations for one hour on the first day back at school in 2020 found that 35 per cent of all advertisements were food related. Of these, 77 per cent were for unhealthy food and drinks<sup>9</sup>.
- The extent of unhealthy food and drink advertising on government property is replicated on local government infrastructure including bus stops<sup>6</sup>. A strong policy at the state government level will provide legitimacy and precedent for WA local governments to take action.

## **Removing unhealthy food and drink advertising from government property is recognised as an effective and evidence-based policy, supported by community**

- Removing unhealthy food and drink promotions from state government-assets has been prioritised in the National Obesity Strategy 2022-2032<sup>10</sup>, the WA Health Promotion Strategic Framework 2022-2026<sup>11</sup>, the Final Report of the Sustainable Health Review 2019<sup>3</sup>, the WA Food Policy Index Report Card 2023<sup>12</sup> and the World Health Organization's Set of Recommendations on the Marketing of Foods and Non-Alcoholic beverages to Children<sup>13</sup>.
- The marketing of unhealthy food and drinks is pervasive, powerful and having a detrimental impact on diet quality. This is undermining families' efforts to eat well as well as undermining the government's own health promoting campaigns and programs.
- In WA, the Public Transport Authority phased out alcohol advertising from trains, buses and related infrastructure commencing June 2018, reflecting the ability to remove products not appropriate to advertise on WA Government public infrastructure.
- There is strong public support with 71 per cent of Western Australians agreeing that unhealthy food and drink advertising should be banned from public transport and state government owned property such as billboards and posters<sup>14</sup>.
- Table 1 provides examples of government policies to address advertising on public infrastructure.

## **Economic modelling has predicted a WA policy will have significant monetary and health benefits**

- A cost-benefit analysis undertaken to model the WA Government implementing a policy to restrict unhealthy food and drink advertising on WA Government property demonstrates significant value for money in primary and all sensitivity analyses<sup>8</sup>.
- The health gains are associated with a total monetary benefit of \$2 billion over a 30-year time horizon, with healthcare cost savings making up \$166 million<sup>8</sup>.
- The net present value (NPV) of the policy is \$1.9 billion and a benefit-cost ratio (BCR) of 59 which presents excellent value for money, indicating for every \$1 invested, a there will be a \$59 return.
- This modelling was based on a policy implemented by Transport for London (TfL) to remove unhealthy food and drink advertising across its network in 2019.
- Evaluations have shown the TfL policy to be effective and subsequent modelling expects 4.8 per cent fewer individuals with obesity, reduced incidence of cardiovascular disease and diabetes and a £218 million saving to National Health System and social care costs. Greater benefits are expected in the most socioeconomically deprived groups, thus the policy likely to reduce health inequalities in London<sup>15</sup>.
- While the London transport network may not seem comparable to the Perth context, adjustments were made to allow for these differences in the modelling.
- TfL's advertising revenue has reported no decline because of the policy<sup>15</sup>.
- This CBA and the TfL experience counters the arguments made by the advertising industry. Claims of substantial government and industry revenue and profit loss are not supported by our analyses.

# RECOMMENDATIONS.

## 1. The WA Government implement a policy to that restricts the advertising of unhealthy food and drinks on its owned and managed property.

## 2. A government led, regulatory approach is taken.

- » In Australia there are no Government regulations to protect children from exposure to unhealthy food and drink marketing on any medium.
- » The current industry, self-regulatory pledge regarding the advertising of food and drinks on outdoor media does not protect children from unhealthy food and drink marketing exposure.
- » Consistently, self-regulatory pledges and voluntary government-led regulation are found ineffective<sup>5</sup> and do not reduce exposure to unhealthy food and drink marketing.
- » Voluntary industry commitments rely on community complaints for actioning breaches long after marketing exposure, have no consequence for breaches and risks unfair market advantage when companies choose not to comply.

## 3. All publicly-owned assets should be in-scope.

- » It is not sufficient to focus policy action on marketing that is determined to be 'directed to children'.
- » This may appear as arbitrary distances from a school sight line, examples of 'children orientated' venues or descriptions of images and advertising copy that 'appeal' to children.
- » Children are exposed to **ALL** advertisements in public spaces, whether directed to them or not.

## 4. An evidenced based guide is used to classify unhealthy food and drinks.

- » The COAG Health Council National Interim Guide to reduce children's exposure to unhealthy food and drink promotion was developed by government to specifically outline what food and drinks are unhealthy and not suitable for advertising in Government settings<sup>16</sup>.
- » This guide has been proved as simple to use, aligned with Australian Dietary Guidelines and best performing compared to other independently developed criteria<sup>17</sup>.

## 5. Master branding

- » The COAG guide stipulates that master branding should not be the predominant feature of any advertisement and can only be used in combination with the image of a healthy food or drink.
- » It is important that master branding is carefully considered in advertising restrictions. The brands of major fast-food, confectionary and sugary drinks are well-known corporate images and often used in absence of any food or drink images (for example, sport sponsorship)<sup>16</sup>.
- » There is a real risk to policy effectiveness if master brands are acceptable, as this will allow advertising such as directional signage, delivery options, generic price promotions and promotional apps and competitions.

**Table 1: Example of government policies that have restricted unhealthy food and drink advertising on publicly-owned assets**

Jurisdiction	Policy objective/scope	Food classification system	Advertising content and mediums
<b>London (2019)</b>	<p>The <i>TfL (Transport for London) advertising policy</i> was revised in 2019 to update standards for approval of advertisements. Under this revision, the promotion (directly or indirectly) of food or non-alcoholic drink which is high in fat, salt and/or sugar (HFSS) cannot be advertised on services run or regulated by TfL<sup>18</sup>.</p> <p>The policy is integrated with the London Food Strategy.</p>	<p>Public Health England's Nutrient Profiling Model used to classify high fat, sugar and/or salt (HFSS) products<sup>19</sup>.</p> <p><b>Exemptions:</b> If an advertiser can show that the product does not contribute to HFSS diets; incidental features that do not promote a HFSS product.</p> <p>Brands can be included if the advertisement promotes healthy products as the basis of the advertisement (e.g sugar free drink)<sup>19</sup>.</p>	<p><b>Content:</b> Graphics and text promoting HFSS foods and drinks (visual content, in-text references, brands, incidental placement).</p> <p><b>Mediums:</b> Includes London Underground, rail, buses, overground, light railway, roads (e.g. roundabouts and bus stops owned by TfL).</p>
<b>Australian Capital Territory (2016)</b>	<p>Part of the ACTION bus services advertising policy, which includes restrictions on the promotion of unhealthy food on Government-run bus services and light rail to ensure that the promotion of products is appropriate for the broader population and aligns with the values of the community and Government objectives<sup>20</sup>. Stated alignment with the Towards Zero Growth: Healthy Weight Action Plan.</p>	<p>Unhealthy food and drinks as defined by the Australian Dietary Guidelines and associated Australian Guide to Healthy Eating.</p>	<p><b>Mediums:</b> Government-run buses and light rail.</p>
<b>Amsterdam (2018)</b>	<p>To ban billboard advertisements for unhealthy products targeted at children and teenagers (up to 18 years of age) in any of Amsterdam's 58 metro stations as part of their Healthy Weight Program<sup>20</sup>.</p>	<p>National nutrition guidelines (Wheel of 5) from the Netherlands Nutrition Centre.</p>	<p><b>Mediums:</b> Billboards at metro stations (n=58).</p>
<b>Brazil (2016)</b>	<p>Part of a broader Ordinance (No 1.274) on healthy food procurement to address overweight, obesity and non-communicable diseases and based on the right to adequate food. Included in the Ordinance is the prohibition of advertisements and sales promotions of ultra-processed food products on the premises of the Ministry of Health and its entities<sup>20</sup>.</p>	<p>Ultra-processed products defined by the Pan American Health Organization's Nutrient Profiling Model: food mainly produced from the processing of unprocessed food, containing <math>\geq 1\text{mg}</math> of sodium per 1kcal, <math>\geq 10\%</math> of total energy from free sugars, <math>\geq 30\%</math> of total energy from total fat, <math>\geq 10\%</math> of total energy from saturated fat and <math>\geq 1\%</math> of total energy from trans fat<sup>20</sup>.</p>	<p><b>Mediums:</b> Ministry of Health premises and entities.</p>

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